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# **CRIME AND CORRUPTION COMMISSION**

#### TRANSCRIPT OF INVESTIGATIVE HEARING

#### 10 **CONDUCTED AT LEVEL 2, NORTH TOWER, 515 ST PAULS TERRACE, FORTITUDE VALLEY WITH RESPECT TO**

File No: CO-16-1664

#### **HEARING NO: 17/0001**

#### DAY 5 - WEDNESDAY 26 APRIL 2017 (DURATION: 46MINS)

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#### LEGEND

- PO Presiding Officer ALAN MACSPORRAN QC
- CA Counsel Assisting GLEN RICE QC
- HRO Hearing Room Orderly ISABELLA PATTON
  - W Witness FELICITY STEVENSON
  - LR Legal Representative B T COHEN of Bartley Cohen

	PO	Mr RICE.
	CA	Commissioner, there are four witnesses scheduled for today's hearing. We are in a position to commence.
10	РО	Thank you.
10	CA	I call Ms Felicity STEVENSON.
	LR	Commissioner, my name is COHEN, initials B T, of Bartley Cohen. I appear for Ms STEVENSON.
	РО	Thank you.
		Ms STEVENSON, do you have any objection to taking an oath?
20	W	No.
	PO	Thank you.
	HRO	Please stand. Take the Bible in your right hand and repeat after me. The evidence.
	W	The evidence.
30	HRO	Which I shall give.
50	W	Which I shall give.
	HRO	In these proceedings.
	W	In these proceedings.
	HRO	Shall be the truth.
40	w	Shall be the truth.
40	HRO	The whole truth.
	W	The whole truth.
	HRO	And nothing but the truth.
	W	And nothing but the truth.
50	HRO	So help me God.
50	W	So help me God.
	HRO	Thank you. Please be seated.
	CA	Is your name Felicity STEVENSON?

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	W	Yes.
	CA	Ms STEVENSON, are you currently employed as an electorate officer in the office of Mr Stuart ROBERT MP?
	W	Yes.
	CA	You are appearing today, I think, in response to an attendance notice?
10	W	Yes.
	CA	Can I show you this, firstly. Is that a copy of the attendance notice you received?
	W	Yes, sir.
	CA	I tender that.
20	РО	Exhibit 73.
20	CA	Ms STEVENSON, you contested Division 5 in the 2016 Gold Coast Council elections; correct?
	W	Yes.
	CA	Unsuccessfully?
	W	Correct.
30	CA	At that time, that is to say before the election, you had been employed as an electorate officer in Mr ROBERT's office?
	W	Yes.
	CA	You know a colleague, I think, by the name of Kristyn BOULTON?
	W	Yes.
40	CA	She was also working at that office prior to the election?
40	W	Yes, correct.
	ĊA	And she also ran for office?
	W	Yes.
	CA	In her case, successfully?
50	W	Yes.
50	CA	Did she announce that she was a candidate before you, or what was the sequence?
	W	Yes, she did.
	CA	Do you remember about what time you decided to run for Division 5 and

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announced your candidacy?

- W Yes, it was mid-January.
- CA Did you make some kind of announcement, public announcement, of your candidacy?
- W I announced it well, my first announcement, I guess, was I started a Facebook page.
- CA What prompted you to run, Ms STEVENSON?
  - W The former councillor was retiring the seat, or the division. There was no councillor sitting and I thought there would be good opportunity. It was something I had been interested in previously.
  - CA For how long had you been working in Mr ROBERT's office?
- W I will be coming up to 10 years this year.
  - CA You started, I think, in, what, about 2007?
    - W Correct.

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- CA Upon his election?
- W I originally worked for the previous member as well, David JULL, and when Stuart was elected, I spoke to him and he subsequently employed me.
- CA Could you say what role or roles you had in the time you were working for him?
  - W I initially started as his PA and did some work then as his media advisor and more recently the electorate officer, so I worked with the constituents.
- CA There was another lady who joined his office, I think, by the name of Helen LEWIS?
- 40 W Yes.
  - CA Was that about 2010?
  - W Correct.
  - CA Did she take up a function as Mr ROBERT's personal assistant?
- W Yes. 50
  - CA Does that, then, mark the timeframe at which your role changed?
    - W Yes.
      - CA So after 2010, what was your role?

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- W That's when I went and did some media advising I was his media advisor.
- CA You mentioned also, I think, you had a role as electorate officer. Is that something different?
- W I had always done that role as well, but I made that was more my sole role as of 2015.
- 10 CA After the election campaign, did you return to your employ in Mr ROBERT's office?
  - W Yes.
  - CA Did you cease work at his office sometime after announcing your candidacy?
  - W I took leave.
- 20 CA From about when, do you recall?
  - W It was the week after Australia Day, only I had some personal things that week of Australia Day, so I do remember it was the week after. I went and worked - I was working up until the end of the Australia Day week.
  - CA We may not need to go to it, but there is an application for leave form available?
- W Yes. 30
  - CA It suggests that you were taking leave from 1 February 2016. Does that sound correct?
    - W That would fit, yes.
    - CA You applied for leave until the election day, which, I think, was the 19th of March. At the time you became a candidate, you were a member of the Liberal National Party?
- 40 W I had previously been a member, yes.
  - CA Well, over what period were you a member?
    - W It was on and off over several years, maybe five or six years out of ten.
    - CA Were you a member at the time you became a candidate?
    - W No.
- 50 CA How recently had you been a member?
  - W My membership, I think, had lapsed in the December previous, 2015.
  - CA Did you campaign as an independent candidate?
  - W Yes.

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- CA In what way? First of all, if we ask about printed material. Did you have printed material for distribution?
- W Yes, I did.
- CA How to Vote Cards?
- W Yes.
  - CA What other forms of printed material?
    - W I had a brochure. I had a magnet. There was a direct-mail letter that went out. And - I'm just trying to think what I handed out when I was walking around. A "Sorry I missed you" card, so that if I doorknocked and someone wasn't home, I would leave that in their mailbox. And a notepad.
- CA In any of that material, did you promote yourself as an independent 20 candidate using the word "independent"?
  - W I don't believe the word "independent" was actually written, no.
  - CA Did you describe yourself in that fashion when you were interfacing with electors in the course of the campaign?
  - W The question I generally would be asked was, "Do you belong to a political party?", and I said no.
- 30 CA Did you promote yourself as independent in any other way?
  - W I don't think so. That was really the context in which it only ever came up.
  - CA Did electors ask you about your former employment-

W No.

- CA -at a member of parliament's electorate office?
  - No. If people asked me what I did, I gave you know, told them what I did. In some cases, I told them where I worked. In some cases, I didn't. It depended on how interactive the conversation was or how intense.
  - CA Your approach was responsive to questions, by the sound of it?
  - W Yes.

W

- CA As opposed, perhaps, to making it public that you had come from a liberal member's electorate office and had been a party member?
  - W Yes, but that wasn't the reason that I didn't say that.
    - CA Did you think it relevant for electors to know something about your past employment, given that it was aligned to a political party and that you had been a member?

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W	No, not-

- CA Did you feel any need to make that publicly known rather than being responsive to questions on such subjects?
- W I didn't necessarily feel it was relevant. My boss was going through some difficult times at that time, and I suppose I felt that that may hinder my campaign, actually, more than help it.
- CA I see. Did you have a discussion with Mr ROBERT about financial support for your campaign?
  - W Yes.

10

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- CA Do you recall when that was?
- W Initially I had a discussion in my office. He sat in my office when I told him that I had wanted to contest, and he had said that he would assist by 20 getting some dollars and cents together.
  - CA You mentioned it was in your office.
  - W Yes.
  - CA And you've agreed, I think, that you took leave from the 1st of February 2016. So you were still at work-
  - W Yes.
  - CA -when you had this conversation?
  - W Mmm-hmm.
  - CA I think you also said you announced your candidacy in mid-January?
  - W Correct.
- CA So it was within that timeframe?
  - W Yes. It was that week, that Australia Day week, so the week before I took leave.
    - CA There may be some suggestion it was actually on the day that you signed your leave form, which I think was the 28th. Would that be correct?
  - W I honestly can't recall.
- CA It was in the week of the Australia Day holiday, was it?
  - W Yes.
    - CA And you recall it having taken place in your office?
    - W That conversation, yes, took place in my office.

- CA Was anyone else present?
- W No.

10

- CA Did you raise the subject with him or did he initiate it, can you recall?
- W I don't recall, but I it was in my office, so I would think that he came in to my office. So we probably sat down and had just a general chit-chat, and that was probably just part of the course of the conversation.
- CA Do you recall what the chit-chat was? I just want to exhaust your memory.
  - W No, that's fine. I think it was more like I said, it was more just he supported what I wanted to do. I think my biggest concern was that he would be down two staff. That's half an electorate office. So my biggest concern was making sure that the constituency would be looked after while I was away.
- 20 CA Well, what was the proposal that he made to you?
  - W He had no problem with me taking leave.
  - CA Okay. But so far as finance is concerned?
  - W That was the extent of the conversation, was that he would just help raise some dollars and cents for my campaign.
- CA Any mention of how that would take place?
  - W No.
    - CA Or what the source of the money would be?
      - W No.
    - CA Or amounts at that point?
  - W (Witness shakes head).
- 40 CA Or any reason why he would do that? Did he volunteer any reason for going about-
  - No.
  - CA -getting money for your campaign?
  - W No.

w

- 50 CA How lengthy was the conversation?
  - W Oh, maybe five minutes. Not very long.
    - CA Did you have any conversation with him on that same subject at a later time?

	W	I can't - I can't recall another conversation.	
	CA	You think that was it?	
10	W	I would think there would have been more, but I can't recall what other conversations were.	
	CA	Did you have any discussion with Kristyn BOULTON about Mr ROBERT funding her campaign?	
10	W	No.	
	CA	Did you know that he was doing so in the same fashion as yours?	
	W	Yes.	
	CA	How did you know that?	
20	W	I don't know. It would have come up at some point, but I don't know when.	
	CA	Could she have been present for that conversation in your office?	
	W	Not for that conversation. That one, no, she was not.	
	CA	Do you recall any other conversation involving Mr ROBERT, Ms BOULTON and yourself on this subject?	
30	W	I can't recall it, no.	
30	CA	At any subsequent time, was there mention by Mr ROBERT of what amount was being raised?	
	W	I don't recall that conversation, no.	
	CA	Was there any discussion at any subsequent time about the amount of any instalments that you might receive?	
40	W	No.	
40	CA	Do you have a recollection of having any subsequent conversation with Mr ROBERT after the one that took place in your office?	
	W	No.	
	CA	Do you think there may have been or not?	
	W	I think there would have been, yes.	
50	CA	But you can't recall any occasion?	
	W	No.	
	CA	Or what may have been said?	
	W	Correct.	

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	CA	Or who was present?	
	W	Correct.	
10	CA	Did you expect, at the time that you announced your candidacy, that there would be a need for campaign funding?	
	W	Well, campaigns have to be funded, so there would have needed to be funds to run any campaign, yes.	
	CA	And you accepted that that was something that was in prospect for you, that you needed to raise money?	
	W	Correct.	
	CA	How did you plan to do that?	
20	W	I planned to ask everyone I knew who I thought may support me.	
20	CA	Solicit donations?	
	W	Correct.	
	CA	Did you do any fundraising as such apart from soliciting for donations?	
	W	No.	
30	CA	What, in the end, did your campaign cost?	
30	W	It was around \$38,000, \$40,000.	
	CA	I think you may have said in your interview with investigators it was about \$48,000?	
	W	Yes.	
	CA	Does that sound right?	
40	W	It does.	
	CA	Did you become aware, after you left Mr ROBERT's office and commenced campaigning, that some money was being deposited to your account?	
	W	Yes.	
50	CA	You actually needed money, didn't you, so that you could actually get your campaign under way?	
50	W	Yes.	
	CA	Get material printed, and so forth?	
	W	(Witness nods).	

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- CA Did you become aware from your bank account that money was being deposited?
- W Yes.
- CA Perhaps we should go to that. Can I show you this extract of bank statement. Is that a copy of the account which you maintained for the purpose of your campaign?
- 10 W Yes.
  - CA Into which money was paid by way of donations?
    - W Yes.
  - CA There is some handwriting on it. Is that your handwriting?
  - W It is.
- 20 CA To indicate the significance of particular entries that might otherwise not be self-evident?
  - W Yes.
  - CA I tender that bank statement.
  - PO Exhibit 74.
- CA I just want to ask you about a few of the entries.
  - W Sure.
    - CA If we look at, I think, the second page, the date is 22nd of January. An entry is noted on 22nd January, "Cash Deposit Branch Nerang" and you've written "Open Account Own Funds Used".
  - W Yes.

No.

- CA Is this an account that you had previously?
- W
  - CA Is it one that you opened, then, for the purpose of conducting your campaign?
  - W Yes.
  - CA Were you aware that you needed to have a dedicated bank account?
- 50 W I knew I needed a bank account, yes.
  - CA And is that the reason why you opened this one on the 22nd of January or thereabouts?
    - W Yes, yes.

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	CA	We see an entry on the 2nd of February?		
	W	Yes.		
	CA	By way of a cheque deposit. That was also a donation by cheque of \$1,000; correct?		
	W	Yes, correct.		
10	CA	From someone who was supporting you?		
	W	Yes. My grandmother.		
	CA	I beg your pardon?		
	W	My grandmother.		
20	CA	You perhaps asked her, amongst others that you described, would she donate?		
20	W	Yes.		
	CA	And she did so?		
	W	She did.		
30	CA	We see, then, the next entry is the 3rd of February, being \$10,000. You accept that that was the first of what proved to be \$30,000 in total received that Mr ROBERT facilitated?		
30	W	Yes, it was - yes.		
	CA	There were in fact three instalments, weren't there?		
	W	Yes.		
	CA	The one on the 3rd of February is for \$10,000. There's another one on the 9th of February for \$15,000; correct?		
40	W	Mmm.		
	CA	And there is another one on the 8th of March for another \$5,000? That's on the front page.		
	W	Yes.		
	CA	They are the three donations that Mr ROBERT facilitated?		
50	W	Yes.		
50	CA	When did you see this bank statement?		
	W	I think when I-		
	CA	When did you first see it?		

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	W	First saw it, I think when I - probably when I went to do my disclosure.	
	CA	Were you receiving bank statements from your bank either electronically or in hard copy?	
W		No, because I think if you look at the timeframe from the 22nd of January, I don't - well, one, I don't know if - I don't think they sent them out in hard copy at all. I think they were things that you could download.	
10	CA	Do you recall seeing this bank statement during the course of the campaign, concluding on the 19th of March-	
	W	Yes.	
	CA	-when the election was held?	
	W	Not - not like this, no.	
20	CA	No? Well, when you say "not like this", did you see it in any form?	
20	W	Electronic form, as in you get a summary, when you internet bank, a very brief synopsis.	
	CA	I see. Well, the account shows that you received the first money on the 3rd of February.	
	W	Mmm-hmm.	
20	CA	And, in the next few days, commenced to spend money-	
30	W	Yes.	
	CA	-on a variety of materials for your campaign purposes?	
	W	Yes.	
	СА	Which you wouldn't have otherwise been able to buy without that \$10,000 deposit; correct?	
40	W	Correct.	
	CA	So were you watching to see that money come in so that you could commence to spend it?	
	W	I honestly can't recall, but it would make sense.	
	CA	It would make sense, wouldn't it?	
50	W	It would make sense, yes.	
50	CA	Because otherwise you can't afford it?	
	W	Correct.	

CA Do you recall, then, since we've discussed that, going to your electronic facility to log on to your bank account; did you see a donation in that

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		form?
	W	No.
	CA	What did you see?
	W	I just saw the balance of the account.
10	CA	Was there no inscription next to the balance as to the source of it?
10	W	When the internet banking - the NetBank app that I use just shows the account number and the amount, the account balance.
	CA	When you saw that amount, did you associate that with Mr ROBERT?
	W	Yes.
20	CA	Because there probably couldn't have been any other source of that kind of money?
20	W	That's right.
	CA	Would that be right?
	W	That's right.
	CA	As we've discussed, that then enabled you to get under way and make some purchases of printed material for campaign purposes?
30	W	Yes.
	CA	What about the entry on the 9th, did you access your electronic account to observe that there was another \$15,000 credit to it on that occasion?
	W	I most likely would have.
40	СА	As for the credit entry on the 3rd of March, do you recall what information was included in your electronic banking when you noticed that entry on the 9th of February?
40	W	Sorry, can you say that again?
	CA	What information was there displayed electronically pertaining to the credit entry of the 9th of March?
	W	I don't - look, I don't remember going into the entry, so I don't remember reading an inscription.
50	CA	Okay. But you looked up your account, didn't you?
50	W	Yes, yes.
	CA	I am just asking you, as I did for the entry on the 3rd of March, what you saw.
	W	Oh, I'm sorry. Yes. February, yes-

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	CA	February.
	W	The dates you were - sorry, it threw me.
	CA	I gave you the wrong date, did I? I'm sorry to mislead you.
	W	That's why I was confused.
10	CA	Sorry.
	W	That's okay.
	CA	We're talking about the entries on the 3rd and the 9th of February. Okay?
	W	Sure.
	CA	I'm just asking you what was displayed?
20	W	Yes, I think it was just the account balance. When you open up the app, like I said, it just has the names of the accounts and the balance of those accounts.
	CA	Well, seeing that, by then, there was \$25,000, did that prompt you at all to query Mr ROBERT as to the source of this money?
	W	No.
20	CA	Not at all?
30	W	No.
	CA	You can't recall whether you had any conversations with him about these deposits?
40	W	I only - well, I only know - I know that I only spoke to Stuart once or twice during the whole campaign, and once was by - I sent him a message wishing him well. Like I said, he was going through some tough times publicly, so I sent him an SMS to wish him all the best.
40	CA	Yes.
	W	And he called me on the 18th of March to wish me the best for the 19th.
	CA	Are they the only communications that you can recall-
	W	Correct.
50	CA	-with Mr ROBERT during the campaign period?
50	W	Yes.
	CA	Just for completeness, I'll ask you about the entry on the 8th of March. It shows another credit to your account of \$5,000. Did you observe that by accessing your electronic account facility?

	W	Yes.	
	CA	Did you notice the credit entry?	
	W	I think I would have known there was money in there, yes, would have seen the balance, because I was still - up until that point, I still had bills, so I would have been going in and paying bills.	
10	CA	As with the previous credits, I'll ask you what was displayed, if anything, about the source of the money that was credited?	
	W	Yes, the account balance is shown.	
	CA	And that's all?	
	W	Yes.	
	CA	No indication of the source of this \$5,000?	
20	W	No.	
	CA	Did you associate it, as you had the previous ones, with Mr ROBERT?	
	W	Yes.	
	CA	Did I understand you correctly that you didn't see a hard copy or even an electronic full copy of your account statement showing this information which is printed on it until after the election; is that correct?	
30	W	Yes, correct.	
	CA	Do you know of Fadden Forum?	
	W	Yes.	
	CA	What is it?	
40	W	It's a body used to - well, it's the body that's used to raise money for the Liberal National Party.	
40	CA	You refer to it as a body.	
	W	Mmm-hmm.	
	CA	Do you know what it consists of, how it's structured, or whether it has a structure?	
	W	No, no. I thought it was its own entity.	
50	CA	Of what kind?	
	W	I'm not - I don't know.	
	CA	You never asked?	
	W	No.	

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	CA	You had, I think you said, worked as Mr ROBERT's personal assistant until, what, 2010?
	W	Yes.
10	CA	When Ms LEWIS took over?
	W	Yes.
10	CA	When did this fundraising body commence?
	W	As the Fadden Forum?
	CA	Yes.
	W	I think it was 2008.
20	CA	How did it operate, so far as you knew in your capacity as personal assistant for Mr ROBERT, between 2008 and 2010?
	W	It was - you paid a membership to join and that entitled you to invitations to special events, cocktail parties, lunches.
	CA	Do you recall what the memberships, or membership, or membership fees were?
20	W	There were three levels, I believe. One was three hundred, one was fifteen and I think the other one was seven and a half thousand.
30	CA	For what timeframe?
	W	One year.
	CA	And what kind of functions were held?
	W	Lunches. Cocktail parties. Breakfasts. Roundtables.
40	СА	Did you have a role, in your capacity as PA, of assisting to organise any of those functions?
	W	It wasn't my role as PA, but it was more a general - if things needed to be done, I would do them.
	CA	Sending out invitations, for example?
	W	Correct, yes.
50	CA	Collecting membership?
30	W	Actually, I'm not sure that I - I don't know if I sent invitations. It was a long time ago. I think that invitations came from Stuart.
	CA	By what means, some printed form or by email - how?
	W	There were printed - it depended on the event. Most were email.

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- CA Did you issue emails of that kind?
- W I honestly don't know.
- CA Were you involved in communicating with members?
- W Yes.
- 10 CA For what purpose?
  - W I probably would ask them if they were attending events if they had been invited.
  - CA To do with their attendance at functions?
  - W Yes.
- CA Communicate by phone?
  - W Probably.
    - CA And email, perhaps?
    - W Probably.
    - CA I may have asked you: were you an organiser of any of these functions?
- WI would ring the venue and ask to book a room and pick a menu. That's30basically there wasn't much organising.
  - CA Was there any dedicated Fadden Forum stationery, like a letterhead or-
    - W There may have been back then. Like I said, it was a long time ago. There was an invitation card. That was the only stationery that I can think of, and a membership form.
  - CA Well, this was with a view to raising funds; correct?

40	W	Yes.
	CA	For what?

- W For the Fadden Forum.
- CA As you understand it?
- W Yes, for the Fadden Forum.
- 50 CA To be applied to what?
  - W It would be yes, it was for the Liberal Party.
  - CA Well, when you say money was being raised for the Liberal Party-
  - W Yes.

EVIDENCE GIVEN BY FELICITY STEVENSON

	CA	-do you mean to say by means of this, call it a network, Fadden Forum would then raise money to be applied to the Liberal Party?
10	W	Correct.
	CA	You understood that?
	W	Yes.
	CA	From early in the piece, when it started after 2008?
	W	Yes, correct.
	CA	Now, we've noted that Helen LEWIS took over the personal assistant function in 2010?
	W	Mmm-hmm.
20	CA	Did that affect your level of involvement in the operation of the Fadden Forum fundraising?
	W	Yes.
	CA	In what way?
	W	It no longer existed for me. I had no input.
30	CA	Did you cease to have any role with respect to its fundraising activities?
50	W	Correct.
	CA	Were you aware of its continued existence just by virtue of talk within the office?
	W	Yes, yes.
	CA	Were you aware that it continued-
40	W	Yes.
	CA	-in operation as a fundraising mechanism?
	W	Yes.
	CA	Up to, and taking in, the 2016 council elections?
50	W	Yes, but my understanding was that it - I thought it was a different entity than what it was back then. It was a much bigger forum than it was. It was quite small.
	CA	It grew?
	W	Yes.
	CA	It grew a lot?

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	W	I presume so. I didn't have the involvement any more, but from what I could gather, yes, it has.
10	CA	Can I ask you again what you understood to have been the source of the three payments totalling \$30,000 that went into your bank account?
	W	Yes, I didn't know at the time, but the Fadden Forum was, yes, where I understood it to come from.
	CA	From what you've told us, Mr ROBERT hadn't said anything about Fadden Forum. I asked you about that a couple of times; correct?
	W	Correct.
	CA	And the only point of reference is the conversation that you had in your office, before you left, during the Australia Day week?
20	W	Mmm-hmm.
20	CA	In your recollection of that conversation, you didn't recall that he had mentioned Fadden Forum?
	W	No.
	CA	Only that he would raise some dollars and cents?
	W	Yes.
30	CA	And he didn't say anything to you in the course of the election campaign-
	W	Correct.
	CA	-to indicate that there was a Fadden Forum source?
	W	Correct.
	CA	And you didn't have your bank statement to look at, as we can see now-
40	W	That's right.
	CA	-to see the actual source of the money?
	W	That's right.
50	CA	After the election, having received donations, one of your responsibilities as a candidate was to make a disclosure return; correct?
	W	Yes.
	CA	Can I show you this?
	W	Of course.
	CA	Is that the disclosure return that you signed on the 20th of May 2016? The date is on the last page.

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	W	Yes.
10	CA	I tender that disclosure return.
	РО	Exhibit 75.
	CA	It identifies, doesn't it - this is on the second page - that you received total gifts of \$32,595 from five - well, the figure 5 appears. It is actually five donations in total; correct?
	W	Yes.
	CA	And the donations are listed on the next page?
	W	Yes.
	CA	You have mentioned Mrs COLBURT. She is your grandmother?
20	W	Yes.
	CA	We see there the dates of the three entries that we discussed from your bank statement?
	W	Yes.
	CA	And you've included on the disclosure return the words "Fadden Forum"?
20	W	Yes.
30	CA	It indicates, doesn't it, that by the time you came to complete this return, you had some information about the source of the money going into your bank account?
	W	Yes.
	CA	What was the source of your information that caused you to fill out the form that way?
40	W	I asked Stuart for some advice.
50	CA	Was this after the election?
	W	Yes.
	CA	Now, this return was signed by you on 20 May.
	W	Yes.
	CA	Can you relate your request to Mr ROBERT for advice about how to fill out the form to the date on which you signed it?
	W	I'm sure I would have asked him what it was that I needed to put down-
	CA	Yes. Sorry to interrupt you. I'm asking you if you recall when in relation to the date-

	W	When.
	CA	-that you signed it that you had this conversation?
10	W	It would have been - it would have been quite-
	CA	Close?
	W	Yes, to this date, yes.
	CA	All right. Being sometime in May by this stage, had you seen your bank statement to notice the form in which the credit entries appeared?
	W	I can't recall if I had seen them, no.
	CA	Perhaps you would tell us, then, what was the advice that you sought from Mr ROBERT about completing this form?
20	W	Where the donations were from and how I would list them on my disclosure.
	CA	That was previously unknown to you, from what you've said; correct?
	W	Correct.
	CA	And is that the reason you approached him about it?
30	W	Yes.
30	CA	Because you had to fill out this form?
	W	Correct.
	CA	And identify the donors?
	W	That's right.
40	СА	That's what caused you to speak to him?
40	W	Yes. That's what the disclosure asked for.
	ĊA	And what did he tell you?
	W	That it was the Fadden Forum, and I confirmed with him that these details were the ones that should be put on the form.
50	CA	There is an address shown, being a postal address?
	W	Yes.
	CA	Did you ask for that or did you know it?
	W	I didn't - I think I had it written somewhere, so I probably asked whether that was the correct address.

- CA Mr ROBERT told you, did he, what you should put on the form?
- W I think he verified that this was what should be put on the form.
- CA What was it you asked him? Did you ask him about the source of the money or did you ask him what should go on the return, can you remember?
- W I asked him what I needed to put on the return for the donations.
  - CA And he told you "Fadden Forum"?
    - W Yes.
    - CA You knew, obviously, what that meant?
    - W Yes.
- CA Because we've discussed your connection with it in the course of your employment?
  - W Yes. Like I said, though, I understood that it was different to what it was between 2008 and 2010. I thought as it had grown and was a different beast, so to speak, that it would be - it was something different. I didn't know it was the same.
  - CA As a candidate, did you receive from the Electoral Commission any information or guide as to the completion of this kind of a return?
- 30 W There was a handbook that was issued at the time of nomination.
  - CA Do you recall amongst that being a guide for disclosure return purposes?
    - W I presume that was in the book.
  - CA Did you pause to consider whether just putting down "Fadden Forum" was a suitable and adequate disclosure of the source of the money?
- W I'd never filled one of these in before and I'd never seen one, so I took 40 advice from someone I thought knew better than I did.
  - CA That's Mr ROBERT, is it?
    - W Yes.
  - CA So were you reliant on what he told you-
  - W Yes.
- 50 CA -as to how you should fill out the form?
  - W Correct.
  - CA And you put down what he said?
  - W Yes.

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- CA When did you notice on your bank statement that the credit entries were styled as being sourced from LNP?
- W I don't know. I can't recall.
- CA Do you recall whether you noticed that before the discussion you had with Mr ROBERT about completing your disclosure return?
- 10 W I can't recall.
  - CA When you saw your bank statement with the credit entries shown as "LNP donation" or, in the case of the 8th of March, "LNP Fadden donation", did that surprise you?
  - W It would have, I would think.
- CA That doesn't jog your memory as to when you may have seen this relevant to completion of your disclosure return?
  - W No. I don't recall the timeline.
    - CA You put in an amended return, didn't you, in February this year?
    - W Yes.
    - CA Can I show you that?
- W Of course.
  - CA Is that an amended return signed by you on the 17th of February? You will see the date is on the last page.
    - W Yes.
    - CA Okay. I tender that amended return.
  - PO Exhibit 76.
- 40 CA You, I think, have noted on the first page that the purpose of the amendment was to amend the name of the donor?
  - W Yes.
  - CA And you've omitted "Fadden Forum" and inserted details of "Liberal National Party" against the three entries; correct?
  - W Correct.
- 50 CA What prompted you to do that?
  - W I sought legal advice, and the advice was that the return needed to be amended.
    - CA And that's what you did?

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- W Yes.
- CA What would you say to any suggestion that you were told before the money commenced to be paid that it would be derived from the Fadden Forum?
- W Sorry?
- CA What would you say to any suggestion that you were told before 10 the money commenced to be paid that it would come from the Fadden Forum? Is that your recollection or not?
  - W The recollection yes, I didn't know it came from the Liberal is that what you're asking? I'm not sure.
  - CA You told us earlier, and I asked you several times, whether you were told anything about the source of the money during the campaign, and you told me that you hadn't?
- 20 W Correct.
  - CA That Mr ROBERT had said only that he would raise some dollars for you?
  - W Yes.
  - CA I'm just asking you to comment on any suggestion that might be made that Mr ROBERT had told you that the money was coming from Fadden Forum?
- 30 W I don't recall the conversations I had with him, so I don't know if I can answer.
  - CA Have you given your best recollection today to the questions that I've asked you?
  - W Yes, I have.

Yes.

- CA Thank you. Just to change the subject, you know of a business SHAC Communications?
- 40 W
  - CA Did you make use of that business for the purpose of your campaign?
  - W Yes.
  - CA In what way?
- W They helped with the organising of my printing and communications, artwork for the campaign.
  - CA How did you come to use that business for that purpose?
  - W Simone's well known on the coast in political circles for having quite a good nous for campaigns. I've worked with her before, so or I've seen her work, so it seemed quite natural.

	CA	Was her name suggested to you or did you know of it?
	W	I knew of it, but I can't remember how we came to engage each other.
	CA	Were you aware in the course of the campaign that other candidates were also using her services?
10	W	Yes.
10	CA	Was that by any form of arrangement as between you?
	W	No, no.
	CA	Were you party to any arrangement to use that business-
	W	No.
20	CA	-along with other candidates?
20	W	No.
	CA	Did you have any strategy with any other candidate to form a group of candidates for the purpose of the election?
	W	No.
	CA	Did you promote anyone else's election in the course of the campaign?
30	W	No - oh, at a booth, at the pre-poll, yes, if someone asked me if I knew a candidate, I would put their name forward.
	CA	As a worthy candidate?
	W	Yes. If I knew them, yes, if it was someone I knew.
	CA	In what context would that occur, can you give us an example?
40	W	Just if they were - they couldn't find a How to Vote Card for a candidate, I might say Glenn TOZER in Division 9.
	CA	Or Kristyn BOULTON?
	W	Or Kristyn BOULTON or - yes.
	CA	Do you recall the cost of the services from SHAC Communications?
	W	Around \$5,000 plus GST.
50	CA	Did you have volunteers assisting you at polling booths on election day?
	W	Yes.
	CA	How did you garner, how did you obtain, the volunteers that you needed?
	W	A lot of phone calls, messages, requests, yes. I would - family and

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CA And any LNP sources?

	W	Yes, yes. Kristyn had sent me a - she had done the booth rosters for Stuart's previous election. She had those booth rosters and she sent them to me and told me that - she knew I was having trouble getting volunteers and suggested that I ring through some of the people on those lists.
10	CA	They would be volunteers specifically aware of supporting Mr ROBERT as a Liberal National Party candidate; correct?
	W	Correct.
	CA	And did you access some of those - did you contact some of those?
	W	Yes.
20	CA	And get assistance from some of those people?
20	W	I don't think any of them came out to west of the highway, no. No, I don't believe that they - mmm.
	CA	Well, can I ask you this: did you use your own resources?
	W	Yes.
	CA	Or did you access party resources to obtain volunteers?
30	W	It was my own resources, in the end.
	CA	That's the evidence, Commissioner.
	PO	Thanks, Mr RICE.
		Mr COHEN, do you have any commissions?
	LR	No, thank you, Commissioner. Might I be excused?
40	РО	Yes. Thank you.
		Thank you, Ms STEVENSON. You are excused.
	W	Thank you, Mr Chairman.

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