

Form 59
Rule 29.02(1)

Affidavit

No. NSD103 of 2023

Federal Court of Australia
District Registry: New South Wales
Division: General

BRUCE LEHRMANN

Applicant

NETWORK TEN PTY LIMITED (ACN 052 515 250) and another
Respondents

Affidavit of: **Nicole Juliana Hamer**
Address: [REDACTED]
Occupation: External communications manager
Date: 27 September 2023

I Nicole Juliana Hamer of [REDACTED] external communications manager, affirm:

1. The matters set out in this affidavit are based on my own knowledge, except where I have stated or qualified otherwise. Where I have set out my recollection of conversations in this affidavit I have included the effect of the words spoken as I recall them.

Background

2. Between October or November 2018 and April 2021, I worked for Senator Linda Reynolds as her media advisor.
3. From when I started in the role until March 2019, Senator Reynolds was the Assistant Minister for Home Affairs. I was based in her electorate office in Perth and would travel to Canberra for sitting weeks.

Filed on behalf of (name & role of party) First Respondent, being Network Ten Pty Limited
Prepared by (name of person/lawyer) Marlia Saunders
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[Version 3 form approved 02/05/2019]

4. I would also accompany Senator Reynolds when she travelled to other parts of Australia.

Relationship with Bruce Lehrmann

5. Bruce Lehrmann worked in Senator Reynolds' office as a policy advisor when I started there. He was based in Canberra. I did not know him too well. I worked with him when I required policy advice, but I had very little to do with him outside of work. I thought he was kind of lazy as I had observed that he tried to get other people to do his work for him, and I had experienced some issues with him bossing me around and trying to get me to do his work for him then presenting it as his own work. I recall that on at least one occasion when Mr Lehrmann had to pull together a brief for speaking remarks for Senator Reynolds he came to me because I was the comms person in the office and asked me to write the speech. I wrote the speech and Mr Lehrmann put it in the brief and passed it off as his own work.
6. Mr Lehrmann kept alcohol on his desk when he was based in the Assistant Minister for Home Affairs' office in Canberra. I saw it on his desk while I was in Canberra. I assumed that it was alcohol that had been gifted to him through his engagement with stakeholders as Senator Reynolds' policy advisor.

Resignation of Steven Ciobo

7. On or about 1 March 2019, the then Minister for Defence Industry, Steven Ciobo, announced that he would not be contesting the next Federal election and that he would be resigning.
8. I found out about Mr Ciobo's resignation through media announcements. When such an event occurs, the former Minister's staff effectively cease to be employed, they go into what is known as 'deferment' and have to reapply for roles.

[REDACTED]

9. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



Senator Reynolds' office

43. Because I was only in Canberra for sitting weeks, I did not spend time in Senator Reynolds' Canberra office when both Mr Lehrmann and Ms Higgins were working there.
44. Later in March 2019 or in early April 2019, I became aware that Mr Lehrmann no longer worked for Senator Reynolds because of a security breach. I recall that I became aware within days of Mr Lehrmann finishing up in Senator Reynolds' office.
45. This did not really surprise me as I thought that he did not have an appropriate attitude towards secure documents in that he was a bit blasé about how he treated them, when there were very strict requirements about how secure documents had to be handled. For example, I had walked past his desk and seen secure files not locked away before. When we travelled together, I had observed that he had not handled them correctly and carried around the secure carry bag without zipping it up.

2019 Federal Election

46. I worked in Senator Reynolds' Perth electorate office in the lead up to the 2019 Federal election on 18 May 2019.
47. Ms Higgins came over to Perth to work on the election campaign during the lead up period. I do not recall when exactly, but the Canberra staff came over to Perth approximately 3 to 4 weeks before the election.
48. I observed that Ms Higgins took quite a few days off sick while she was in Perth.
49. When I asked others about this, I was told that she was unwell. I do not now recall who told me.
50. I noticed that Ms Higgins would sometimes go down to the river for lunch and be gone for over an hour. I found this unusual as we were very busy in the lead up to the election so it was odd that she was allowed to eat her lunch out of the office for over an hour.



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Affirmed by the deponent
at East Perth
in Western Australia
on 27 September 2023
Before me:

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Signature of deponent



Signature of witness

Jess Chapman
Solicitor
Level 29, Central Park Tower, 152-158 St Georges Terrace, Perth WA 6000
An Australian Legal Practitioner within the meaning of the Legal Profession Uniform Law

