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File Title: BRUCE LEHRMANN v NETWORK TEN PTY LIMITED ACN 052 515 250

& ANOR

Registry: NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA



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Important Information

This Notice has been inserted as the first page of the document which has been accepted for electronic filing. It is now taken to be part of that document for the purposes of the proceeding in the Court and contains important information for all parties to that proceeding. It must be included in the document served on each of those parties.

The date of the filing of the document is determined pursuant to the Court's Rules.



Form 59 Rule 29.02(1)

Affidavit

No. NSD 103 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:

Marlia Ruth Saunders

Address:

Level 14, 60 Martin Place, Sydney NSW 2000

Occupation:

Lawyer

Date:

10 March 2023

Contents

Document number	Details	Paragraph	Page
	Affidavit of Marlia Ruth Saunders in response to the Applicant's application for an extension of time under s 56A of the <i>Limitation Act 1969</i> (NSW) affirmed 10 March 2023	1-18	1-5
1	Annexure "MRS-1", being the article published by news.com.au on 6 August 2021 entitled "Alleged Brittany Higgins attacker denies the allegations"	7 24	6-13
2	Annexure "MRS-2", being the video recording of the Applicant's record of interview conducted on 19 April 2021 and subsequently tendered in evidence at the Applicant's criminal trial (Exhibit S)	8	14-15
3	Annexure "MRS-3", being the transcript of the Applicant's record of interview conducted on 19 April 2021 and subsequently marked for identification at the Applicant's	9	16- 114

Filed on behalf of (name & role of party) Prepared by (name of person/lawyer)		k role of party)	First Respondent being Network Ten Pty Limited
		on/lawyer)	Marlia Saunders, Partner
Law fir	m (if applicable)	Thomson Gee	r Lawyers
Tel	02 8248 5836		Fax
Email	msaunders@tg	law.com.au	
	ss for service e state and postcode)		Geer Lawyers, Level 14, 60 Martin Place, Sydney NSW 2000

Ref MSA:5263490 Legal/81585339_3 [Version 3 form approved 02/05/2019]

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Document number	Details	Paragraph	Page
	criminal trial (MFI-15)		
4	Annexure "MRS-4", being the map drawn by the Applicant during his record of interview conducted on 19 April 2021 and subsequently tendered in evidence at the Applicant's criminal trial (Exhibit T)	10	115- 116
5	Annexure "MRS-5", being the Applicant's bank records provided to the Australian Federal Police during his record of interview conducted 19 April 2021 and subsequently tendered in evidence at the Applicant's criminal trial (Exhibit U)	11	117- 119
6	Annexure "MRS-6", being documents produced under subpoena by British American Tobacco Australia	12	120- 136
7	Annexure "MRS-7", being documents produced under subpoena by Northern Sydney Local Health District	13	137- 203
8	Annexure "MRS-8", being a subpoena issued to Korn Tlais Defence Lawyers	14	204- 211
9	Annexure " MRS-9 ", being a letter to the Court from Korn Tlais Defence Lawyers	15	212- 213
10	Annexure " MRS-10 ", being a Notice to Produce issued to the Applicant by the First Respondent	16	214- 217
11	Annexure "MRS-11", being documents produced by the Applicant under the Notice to Produce	18(a)	218- 225
12	Annexure "MRS-12", being documents produced by the Applicant under the Notice to Produce	18(b)	226- 241

I Marlia Ruth Saunders, Lawyer, affirm:

- 1. I am a Partner of law firm Thomson Geer, solicitors for the First Respondent.
- 2. I am authorised to make this affidavit on the First Respondent's behalf.
- 3. In prayer 1 of his originating application filed on 7 February 2023, the Applicant seeks "[t]hat the limitation period for bringing this action be extended to 7 February 2023 pursuant to s 56A *Limitation Act 1969* (NSW)" (the **Application**).
- 4. I make this affidavit is made in opposition to the Application.
- I make affidavit from my own knowledge, except where I have stated otherwise. Where I
 depose to matters on information given to me, I believe that information to be true and
 correct.

Record of interview given by the Applicant on 19 April 2021

6. On 19 April 2021, the Applicant gave a formal record of interview (**ROI**) with the Australian Federal Police (**AFP**). This ROI was recorded and later transcribed.

want Or

Legal/81585339_3

Statements made on behalf of the Applicant

7. On or about 6 August 2021, comments attributed to the Applicant's legal representative were reported in an article published on the website www.news.com.au. Annexed to this affidavit and marked "MRS-1" is a copy of that article.

Criminal Trial

- 8. Between 4 and 27 October 2022, the Applicant was tried in the ACT Supreme Court on the charge of having sexual intercourse with Brittany Higgins without her consent (**Criminal Trial**). I have read large parts of the transcript of the Criminal Trial and have seen the list of exhibits tendered or documents marked for identification in the Criminal Trial. Based of my reading of the transcript and my knowledge of the exhibit list, I am aware that the recording of the ROI was played to the jury on 10 October 2022 and was tendered as Exhibit S in the Criminal Trial. A copy of Exhibit S is exhibited to this affidavit and marked "**MRS-2**".
- 9. I am also aware that the transcript of the ROI was provided to the jury in the Criminal Trial on or around 12 October 2022 and was marked MFI-15. Annexed to this affidavit and marked "MRS-3" is a copy of MFI-15.
- 10. I am aware that during his ROI the Applicant drew a diagram or map of Senator Linda Reynolds' office suite. This map was tendered as Exhibit T in the Criminal Trial. Annexed to this affidavit and marked "MRS-4" is a copy of Exhibit T.
- 11. I am aware that during his ROI, the Applicant provided the AFP with bank statements for his two accounts recording expenditure from around the night of 22 March 2019. These bank statements were tendered as Exhibit U at the Criminal Trial. Annexed to this affidavit and marked "MRS-5" is a copy of Exhibit U.

British American Tobacco Australia Limited (BATA) subpoena material

- 12. In response to a subpoena issued on 3 March 2023, BATA produced material to the Court, including:
 - (a) an email Joshua Fett and BATA sent to the Applicant on 25 May 2021, with attachments;
 - (b) an email the Applicant sent to Joshua Fett on 26 May 2021; and
 - (c) an email the Applicant sent to a BATA employee on 4 June 2021 attaching:
 - (i) a letter from the Applicant's treating General Practitioner dated 27 May 2021; and
 - (ii) a letter from the Applicant's psychologist dated 1 June 2021.

Wayang Oz

Annexed to this affidavit and marked "MRS-6" are copies of these emails and attachments.

Northern Sydney Local Health District (NSLHD) subpoena material

13. In response to the subpoena issued on 3 March 2023, NSLHD produced material to the Court which consisted of two sets of medical records, the first comprising 7 pages and the second comprising 48 pages. Annexed to this affidavit and marked "MRS-7" are copies of the medical records produced by NSLHD.

Korn Tlais subpoena material

- 14. On 3 March 2023, a subpoena was issued to the law firm Korn Tlais Defence Lawyers, which sought production of the following categories of documents. Annexed to this affidavit and marked "MRS-8" is a copy of the subpoena.
- 15. On 8 March 2023, Korn Tlais Defence Lawyers produced to the Court a letter which stated that it had no documents to produce in response to the subpoena. Annexed to this affidavit and marked "MRS-9" is a copy of the letter from Korn Tlais Defence Lawyers to the Court.

Notice to produce

- 16. On 3 March 2023, the First Respondent served a Notice to Produce on the Applicant.

 Annexed to this affidavit and marked "MRS-10" is a copy of the Notice to Produce.
- 17. At the time of affirming this affidavit, the Applicant had produced no documents in response to categories 4, 5, 7 and 8 of the Notice to Produce.
- 18. On 9 March 2023, the Applicant produced:
 - (a) an extract of messages from the Applicant's phone in response to category 6 of the Notice to Produce. Annexed to this affidavit and marked "MRS-11" is a copy of the extract of messages; and
 - (b) a transcript of a second ROI with the AFP on 19 April 2021. Annexed to this affidavit and marked "MRS-12" is a copy of the transcript.

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Affirmed by the deponent

at Sydney

in New South Wales

on 10 March 2023

Before me:

Signature of Marlia Ruth Saunders

Stgnature of Roy Leigh

Thomson Geer

Level 14, 60 Martin Place

Sydney NSW 2000

An Australian Legal Practitioner within the meaning of the Legal Profession Uniform Law

No. NSD 103 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

CERTIFICATE IDENTIFYING ANNEXURE

This is the annexure marked "MRS-1" now produced and shown to Marlia Ruth Saunders at the time of affirming her affidavit on 10 March 2023:

Signature of Roy Leigh

Thomson Geer

Level 14, 60 Martin Place

Sydney NSW 2000

An Australian Legal Practitioner within the meaning of the Legal Profession Uniform Law

"MRS-1"

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Hi, Antonia

National > NSW & ACT > Courts & Law

Alleged Brittany Higgins attacker denies the allegations

A 26-year-old Queensland man accused of sexually assaulting Brittany Higgins has released a statement through his lawyer.

Samantha Maiden

🌌 @samanthamaiden 🕒 2 min read August 6, 2021 - 11:32PM



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10/03/2023, 10:03

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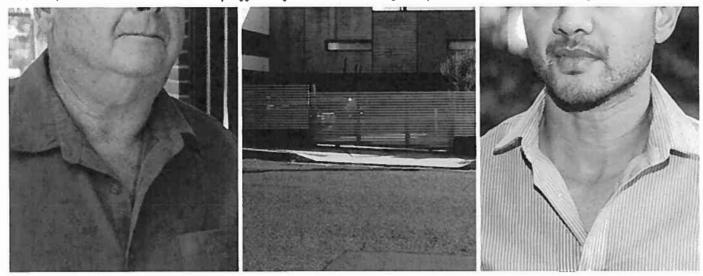
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https://www.news.com.au/national/nsw-act/courts-law/huge-development-in-brittany-higgins-case/news-story/df5f6f61a98805cb719943789059381f 2/7



Guy 'towered over' neighbour with brick: court

The former Liberal staffer accused of sexually assaulting Brittany Higgins has declared he is an innocent man and will fight the charge.

Lawyers acting for the Queensland man have told news.com.au that he has told police that he never had sex with Ms Higgins after they both returned to the office after midnight in March, 2019.

In a statement, the man's lawyer John Korn said that he would unequivocally reject the allegation that there had been sexual intercourse.

"My client absolutely and unequivocally denies that any form of sexual activity took place at all," Mr Korn said.

"He will defend the charge."

Police have confirmed they intend to charge the man with sexual intercourse without consent after a sixmonth investigation into former Liberal staffer Brittany Higgins' allegations.

The Australian Federal Police served a summons on the man at 2pm today.

The maximum penalty for the offence under ACT law is 12 years jail. He will face court in the ACT next month.

"Police will allege the man had sexual intercourse with a woman without consent at Parliament House on Saturday, 23 March 2019," a statement from the Australian Federal Police said.

"Officers today served the man's legal representative with a summons to appear before the ACT Magistrates Court on September 16, 2021.

Brittany Higgins alleged attacker denies allegations | news.com.au — Australia's leading news site

"The man will face one charge of sexual intercourse without consent. The maximum penalty for this offence is 12 years imprisonment."



Brittany Higgins pictured with Heidi Yates, the Victims of Crime Commissioner for the ACT, before a meeting with Prime Minister Scott Morrison. Picture: NCA NewsWire / Damian Shaw

News.com.au broke the story on February 15, 2021 that Brittany Higgins alleged she had attended Parliament House with the man in 2019.

She was later found by security guards in Defence Industry Minister Linda Reynolds' ministerial office at 4am in the morning.

Ms Higgins has given news.com.au legal consent to identify her as the alleged victim in the matter.

Police will allege incident occurred in the early hours of March 23, 2019, after Friday night drinks in Canberra. It was just weeks before Prime Minister Scott Morrison called the election on April 10, 2019.

In her interview with news.com.au, Ms Higgins made explosive allegations concerning the Morrison government's handling of the incident.



https://www.news.com.au/national/nsw-act/courts-law/huge-development-in-brittany-higgins-case/news-story/df5f6f61a98805cb719943789059381f





She subsequently agreed to a financial settlement that Ms Higgins donated to a Canberra based sexual assault counselling service.



Brittany Higgins pictured with Prime Minister Scott Morrison during her time working for the Liberal Party.

In June, the Australian Federal Police received advice from the Director of Public Prosecutions on whether or not there was a reasonable prospect of conviction.

ACT DPP Shane Drumgold SC confirmed last month he had examined the partial brief of evidence and finalised his advice to the AFP.

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No. NSD 103 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

CERTIFICATE IDENTIFYING EXHIBIT

This is the exhibit marked "MRS-2" now produced and shown to Marlia Ruth Saunders at the time of affirming her affidavit on 10 March 2023:

Signature of Roy Leigh

Thomson Geer

Level 14, 60 Martin Place

Sydney NSW 2000

An Australian Legal Practitioner within the meaning of the Legal Profession Uniform Law

"MRS-2"

Exhibit MRS-2 to be provided electronically by USB

No. NSD 103 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

CERTIFICATE IDENTIFYING ANNEXURE

This is the annexure marked "MRS-3" now produced and shown to Marlia Ruth Saunders at the time of affirming her affidavit on 10 March 2023:

Signature of Roy Leigh

Thomson Geer

Level 14, 60 Martin Place

Sydney NSW 2000

An Australian Legal Practitioner within the meaning of the Legal Profession Uniform Law

"MRS-3"



AFP RECORD OF CONVERSATION

Phone (02) 6131 3000

RECORD OF CONVERSATION BETWEEN DETECTIVE INSPECTOR MARCUS BOORMAN AND BRUCE EMERY LEHRMANN REGARDING A SEARCH WARRANT CONDUCTED AT AFP SYDNEY HEADQUARTERS, GOULBURN STREET, SYDNEY, NEW SOUTH WALES ON MONEY, NINETEEN APRIL, TWO THOUSAND AND TWENTY-ONE

PERSONS PRESENT:

DETECTIVE INSPECTOR MARCUS BOORMAN

SENIOR CONSTABLE EMMA FRIZZELL ACTING SERGEANT JAMES BROWN

BRUCE EMERY LEHRMANN

TIME COMMENCED:

THREE ELEVEN PM

BOORMAN:

Q1. All right. This is a record of conversation for the execution of a 3E Crimes Act search warrant of a person in relation to your telephone. Now, it's being recorded on Monday the nineteenth of April, two thousand and twenty-one, inside – inside the AFP Sydney Headquarters in Goulburn Street in Sydney. Persons present is myself, Detective Inspector Marcus BOORMAN and Bruce – now how do I pronounce your surname again?

A LEHRMANN.

Q2. LEHRMANN.

A Yeah.

Q3. Of currently residing at forty-nine Kara View Court in Rangeville, but has a Sydney residence of two O four/four Karrabee Avenue, Huntleys Cove. Is that correct?

A Correct, yeah.

All right. Now, also present are two other colleagues of mine. Can you introduce yourself for the purpose of the tape?

FRIZZELL: Senior Constable Emma FRIZZELL, badge one two eight nine six.

BROWN: Acting Sergeant James BROWN, AFP two one double eight three.

BOORMAN:

Q4. All right. When I refer to the time in relation to the recording, I'll refer to my watch and at the moment it is about – what eleven minutes past three in the afternoon pm. Is that correct, Bruce?

A Yep, yep, yep.

- Q5. All right. Can you state your full name please?
- A Bruce Emery LEHRMANN.
- Q6. And Bruce are you known by any other names or anything like that?

 A No. no.
- Q7. All right. Now, I have a now, just before you attended at the headquarters here in company with your legal representative, Mr John KORN. Would that be correct?
- A Correct.
- Q8. All right. And, um, you know, I spoke to you just briefly down there and Mr KORN and we discussed in relation to we would like to analyse and and look at your phone. And, um, and I informed Mr KORN that we will be doing it under warrant, a section 3E warrant. So, I have a warrant for you, which is Search Warrant for a Person, it's in relation to your phone.
- A Mm-hmm.
- Q9. All right. Now, you can have a read of that. It authorises myself and other police present, obviously to conduct a personal search and get the phone, but we don't need to do that because you've got your phone right in front of you. Is that is that right?
- A That's right.
- Q10. All right. So, I'll give you a copy of the warrant to read. So, for the purpose of the tape, Bruce, can you just read the just the first few paragraphs out aloud to me?
- A Ah, just starting here?
- Q11. Yeah, yeah, that'll do.
- Oh, yeah. Yep. "Marcus BOORMAN, a constable within the meaning of the Crimes Act nineteen fourteen, who is the executing officer in relation to this warrant. And to any other constable whose name may be written on this warrant in accordance with section 3(C)(1) of the Crimes Act nineteen fourteen, in which event that constable shall be the executing officer in relation to this warrant. Whereas I, J ."
 Who's that?
- Q12. That's the registrar at the court, that's that's all right, that's all I need.
- A Oh, oh, sorry.
- Q13. You can read the rest to yourself, but it's just for the benefit of the recording to show that you are reading it.
- A' Yep. Oh, got you. Yep. Sorry. Yep. Okay. Ah, so, it will cover social media as well?
- Q14. Yeah, your data on your phone.
- A That's yeah, and that's good. Okay. Because I haven't been able I've got evidence of making the reports to Twitter, but you might be able to get some of these out.

Q15. Yep.

A Okay. Oh, okay, maybe not. It's only in relation to that I'm

assuming.

Q16. Yeah, in relation to the second condition.

A Brilliant, yeah.

FRIZZELL: And then - - -

BOORMAN:

Q17. And then all the - - -

A Oh, sorry.

FRIZZELL:

Q18. --- if you can finish reading ---

A I'm sorry, just keep reading, okay.

No, that's okay.

BOORMAN:

A

Q19. All the – all of the stuff around it. Read it and then if you have any questions.

A Oh, so, do you need to frisk me as well?

Q20. No, no, no, I don't need to do that because I can see your phone is – is right in front of you.

No, all right. You've got - oh, good, oh, right, sorry. Sorry.

Q21. That's okay.

A Do I get to keep this copy?

Q22. Yeah.

A Oh, good. Because that is the first time I'm seeing those times, so. All right, that's fine, thank you.

Q23. Now, do you have any questions in relation to that – that warrant at the moment, like without going into specifics?

A Not – not at the moment, no.

Q24. All right.

A No, but I haven't gone through it with – with my counsel, but if I do

Q25. Yeah, yeah, that's all right. All right. So, you've read the whole warrant?

A Yes.

Q26. Do you understand the warrant?

A Yes.

Q27. All right. Now, I'll now give you the copy of the Rights of the Occupier, it normally relates to – in relation where we're executing a search warrant at a premises.

A Mm-hmm.

Q28. But also in relation to they're – they're your rights, ah, in relation to the Rights of a Person Searched. So, you can have a copy of that.

A Mm-hmm.

Q29. Just a lot of legal definitions.

A Yeah. I have seen this before.

Q30. Have you?

A In the course of my work in Parliament.

Q31. Mm-hmm.

A Okay. That's all good.

Q32. Okay. Now, do you agree that I've provided you with a copy of the search warrant and the Rights of a Person Searched documentation?

A Yep.

Q33. All right. Bruce, now I'm going to ask you some questions in relation to this warrant, but before continuing, I must give you a caution and inform you of your rights. Okay. I must caution you that you do not have to say or do anything, but anything you say or do may be used in evidence. Do you understand that?

A Yes.

Q34. Can you tell me what that means to you, what I've just told you?

Ah, well, if the matter proceeds further that you can use this in a brief of evidence or not moving forward, yep.

Q35. Yeah. So, I'm just making it clear that, you know, anything you say

A Yes.

Q36. --- could be used as evidence.

A Yeah, yes.

Q37. At a future time in relation to this matter.

A Yes, ves.

Q38. Are you clear on that?

A Yes, yeah.

Q39. All right. Are you Aboriginal or Torres Strait Islander?

A No.

Q40. Are you an Australian citizen?

A Yes. I'm also a dual citizen.

Q41. A dual citizen. A Mm-hmm.

Q42. All right. What – what country are you a dual citizen of?

A The other nationality is the USA.

Q43. Sorry? A USA.

Q44. USA? A Yeah.

Q45. And you're an Australian citizen as well?

A swell, vep, vep.

Q46. All right. Do you want to communicate with your consular of the USA in relation to this matter?

A No.

Q47. I have to ask these questions.

A No, no, I have not been back since we returned, so, that's all good.

Q48. Because you may communicate or attempt to communicate with the consular office of your country.

A No.

Q49. Do you understand that?

Yeah, I do understand it, no, thank you.

Q50. All right. Now, you also may communicate or attempt to communicate with a friend or relative to inform that person of your whereabouts. Do you understand that?

A I do, yes.

Q51. So, does anyone know that you're here, family or anything like that?

Um, ah, my mum does and my counsel.

Q52. Yes.

A But I suppose upon taking my phone I'd like to get a couple of numbers of - - -

Q53. Absolutely, we can facilitate that.

A --- I've only got a very few amount of people that still talk to me of course, but yeah.

Q54. We – we will facilitate all that, I understand the, um, - the – ah, inconvenience. But it's part of the investigative procedure.

A Oh, no, I understand that. Yeah, I understand.

Q55. All right. And you may communicate with or attempt to communicate with a legal practitioner of your choice and/or attempt to arrange for a legal practitioner of your choice to be present. Do you understand that?

A Yes.

Q56. Now, do you wish to communicate with your legal practitioner at this point?

A No. But I can during breaks.

Q57. Absolutely. You can contact your legal practitioner at any time you feel like it.

A Yes, okay.

Q58. And just to be – just to clarify, that you attended at the Sydney Office here with your legal representative, Mr John KORN, just before. Is that right directly?

A I did, yep, yes, that's right.

Q59. You're over eighteen years of age?

lam.

Q60. Okay. Have you recently consumed any alcohol, medication or drugs?

A No.

Q61. Have you been interviewed by an investigating official or police officer in the last forty-eight hours?

A No.

Q62. At the completion of this interview, in relation to the execution of this warrant. A transcript will be made available to you as soon as practicable. Do you understand?

A Okay. Yes.

Q63. But we will have to get that transcribed.

A Yep, yep.

Q64. But we will get that to you as soon as practicable.

A Sure.

Q65. Now, obviously the allegation that – I'm investigating here at the moment. It's written in the warrant.

A Mm-hmm.

Q66. As you - as you can see.

A Mm-hmm.

FRIZZELL:

Q67. Turn it over. A Just there, yeah.

BOORMAN:

Q68. No worries, I'll just follow that in. And it's, um, the allegation is that between eleven forty-eight - - -

A One forty-eight.

Q69. One forty-eight am, thank you. And two thirty-three am on Saturday, the twenty-third of March, two thousand and nineteen, that you engaged in sexual intercourse with a Miss Brittany HIGGINS at the Australian Parliament House in the Australian Capital Territory without her consent contrary to section fifty-four of the Crimes Act. That's what this is all about, as I believe you're aware, that – that's why we've asked you to come here.

A Ah, oh, yes, yes.

Q70. Yeah, yeah.

A Oh, yep.

Q71. All right. I just wanted to be clear on that. So, right at this point in time, so that I can get my colleague here to start looking through your phone. I'm going to suspend the tape for the purposes of, you know, viewing your phone.

A Mm-hmm.

FRIZZELL:

Q72. I might just – before we do suspend, just have a look back at the warrant to the second condition and we had a discussion earlier about whether there would be anything relevant to the warrant on your mobile device.

A Mm-hmm.

Q73. Is there anything relevant to the warrant on your phone?

A Not – not to my knowledge.

BOORMAN:

Q74. Mm-hmm.

A I've – I've, of course, discussed, um, the media inquiries.

Q75. Mm-hmm.

A Um, because that's all I've ever had.

Q76. Mm-hmm.

A Um, with (coughs) um, you know, very few people, my mum included.

Q77. Mm-hmm.

A Um, ah, that's all I can think of in terms of emails, no. There would be emails between myself and my counsel.

Q78. Mm-hmm.

A Um, yeah, not to my knowledge.

FRIZZELL: Okay.

BOORMAN: All right.

FRIZZELL:

Q79. So, is there any say discussions, correspondence about the

allegation at all on your phone?

A Oh, there – there is, yes.

Q80. Okay.

A Yeah.

Q81. So, that would be relevant?

A Oh, sorry, okay, okay, yeah. Sorry, I didn't, yeah.

BOORMAN:

Q82. That's all right.

A Count it as directly, but yeah, they're just based on from when a journalist would enquire and then I would try and, you know, think back and recall and whatever.

Q83. So, is there communications on your phone with journalists?

A I haven't responded back, but there is them reaching out to me, yes.

Q84. Mm-hmm.

A I can probably name them off if you want them.

Q85. Mm-hmm.

A There was – there was – there hasn't been a flurry, they've just been consistently – there's been a consistent of one, um, that has - - -

Q86. But there's no communication between you and them backwards or forwards it's just been - - -

A No, no, no. No, oh, the only one I had a very brief phone call with Sean NICHOLLS, who did the Four Corners report.

Q87. Mm-hmm.

A That was a very short phone call because the number kept ringing me.

Q88. Mm-hmm.

A And it was – it was during a quiet period where I thought journalists would no longer contact me.

Q89. So, that was a voice conversation was it that you had with him? Yes, yes, yes.

All right. No, that's okay.

FRIZZELL:

Q90. What about do you have any – is there any correspondence, um, with Brittany HIGGINS herself?

A Not to my knowledge, nothing, no, not to my knowledge at all. Um, and I have thought about that and the only – the only correspondence I would have had with her ever, would have been in professional context – context briefly on my ministerial phone about work matters.

BOORMAN:

Q91. Mm-hmm, mm-hmm.

A But for a very brief period, I didn't work with her for very long, so.

Q92. So, we'll suspend the tape so that we can have a look at the phone. Bruce, is there – you know, for like emails or like passwords and everything like that, are you prepared to give those to us?

A Oh, yeah.

Q93. So, that we can access obviously, yeah.

A Yeah, yeah, absolutely. I can – what do you need, I suppose I can jot them down on the - - -

Q94. All right. I'll let you write it down on here.

A Ah, so, I've got, um, well, the phone is, um, nine five one four is the PIN code.

Q95. Mm-hmm.

A Um, ah, Hotmail email is just my personal which – ah, because that's through Outlook, so I think and don't diss me for my passwords, but this was back when I worked for George BRANDIS, I think it's attorneyninefive or attorneyoneonenine, no, yeah, nineteen ninety-five.

Q96. Mm-hmm.

A That or it could be cricketeighteen.

Q97. Mm-hmm.

A Um, and now what else do you want? Um, Facebook I suppose.

Q98. Yep.

A Um, I've suspended all of them because once all this started I - - -

Q99. Yep, yep.

A --- I - so, Facebook is probably also is my email address and then I think, but feel free to come back and ask me, like I don't ---

Yeah, I appreciate your co-operation.

BROWN:

Q100.

And what is your email?

Oh, um, bdotlehrmann at Hotmail. I do have a Gmail but that's – it's not used for anything, it's like where crap goes to. Like when I sign up to newsletters and things, so.

Okay.

BOORMAN:

Q101.

Mm-hmm.

Α

Um, now, Twitter I suspended my Twitter account way back in January when I was – this – whoever this was impersonating my account. So, I don't know what – how to get that, um, because I understand Twitter gets rid of it after thirty days or something, I'm not sure.

Yeah.

BROWN:

Q102.

That's all right.

Α

But I did have Twitter.

BOORMAN:

Q103.

Mm-hmm.

Α

Um, Instagram, ah, there won't be anything on Instagram but I'll give it to you anyway. Ah, I think it's lehrmannb and then password, I think it's cricketeighteen. What else did you need?

BROWN: Um, let me think.

FRIZZELL:

Q104.

Do you have any WhatsApp, Signal or anything like that? Oh, yes, I've got all of that. Um, um, so, signal – are they – but they're not pass – they're already like unlocked.

BROWN:

Q105.

Yep.

A So, feel free to go through them.

Q106.

Do you have any secure folders or anything like that? No, the only thing I've got in my files of what – like my bank accounts, which I've saved on there, which I'm going to give you anyway.

BOORMAN:

Q107. Sure. Yeah.

A You know, I've taken like screenshots of media of – over the course of it coming out, when I've – I've saved a media article or whatever.

Mm-hmm.

BROWN:

Q108. And what type of phone do you have?

A iPhone XS or something, yeah.

Q109. Okay. And how long have you had that for?

A Oh, two years, yeah.

Q110. Okay. You've had that phone at the time of the allegation?

A No.

Q111. Okav.

A No. That – no, this no. But I've had the number the whole time, so yeah.

BOORMAN:

Q112. When you changed phones - - -

A Mm-hmm.

Q113. --- did you mirror your other phone to that phone?

A Yeah, yeah, I have always, yeah.

Q114. Yeah.

A Because an iPhone, yeah, I just do that.

BROWN:

Q115. Oh, good

A All right. I'll give you that and that's the phone, so, I'll just put that there as well.

Q116. No problem. If I have any questions on finding anything, I'll popback in, but, um, that should do.

A Yeah, please, yeah. Sorry.

BOORMAN:

Q117. That's all right. Thank you. All right. So, do you agree the – I'll suspend the tape now for the purposes of obviously going through and having a look at your phone.

A Mm-hmm.

Q118. And that's for us to determine whether there's any evidentiary value from an investigation point of view. Do you understand?

A Mm-hmm. Yes, yep.

Q119. All right. Do you agree the time is now by my watch – is about three thirty pm?

A Yes. Mm-hmm.

All right. Interview suspended.

ROC SUSPENDED AT THREE THIRTY PM

ROC RESUMED AT SEVEN ZERO NINE PM

BOORMAN:

Q120. All right. This is a recommencement of taped record of conversation between Detective Inspector Marcus BOORMAN and Bruce LINDEMAN.

A LEHRMANN.

Q121. LEHRMANN.

A You did that once too.

Q122. I'll get it right once before. Bruce, do you agree the time is now nine minutes past seven pm in the evening, by my watch?

A Yep, yep.

Q123. All right. And the interview recommencement is obviously in the AFP Sydney Office, Goulburn Street in Sydney. And it's in relation to the execution of a 3E, section 3E Crimes Act search warrant for a Person on yourself, Bruce. And we've initially taken your phone.

A Mm-hmm.

Q124. All right. Now, I'll remind you that the caution I gave you before, this still applies. You do not have to say or do anything, but anything you say or do, may be used in evidence. Do you understand that?

A Yep.

Q125. All right. Now, we've, um, my colleague here has done a brief analysis of that and looked through your phone.

A Mm-hmm.

Q126. And I have also had a look. And basically I've viewed – viewed a number of images on the phone of handwritten notes relating to a Miss Brittany HIGGINS.

A Yep.

Q127. I have reasonable grounds to believe there is evidential material on the phone, being those – those photographs.

A Okay. Yep.

Q128. So, therefore I will be seizing the phone.

A Yep.

Q129. To conduct further analysis and examination under section 3F of the Crimes Act in accordance with this warrant. Do you understand that?

A Yep. I do.

All right. Basically now I've got a Property Seizure Record. Um, so the warrant is now complete, I've got the – I've got the – I've got the phone. Um, - - -

BROWN: So, I'll go through this part if you like?

BOORMAN: Yeah, I'll get James to do that while I sign the Property Seizure Record.

BROWN:

Q130. So, for the purpose of the audio, Acting Sergeant James BROWN, AFP two one double eight three. Every search warrant, there's certain roles that we are allocated.

A Mm-hmm.

Q131. In this case, um, I'm managing the property that has been seized and it's just one mobile phone.

A Mm-hmm.

Q132. Again, there's a little bit of a proforma that I will go through, but effectively do you agree that during the search warrant police have seized one item?

A Correct.

Q133. Being your mobile phone. For the audio, the phone is in front of us at the moment, it is bagged, taped and sealed. Do you agree?

A Yes

Q134. I'll go through what's called a Property Seizure Record, it's basically a receipt for the item that we're taking. You'll get a copy as well.

A Mm-hmm.

BROWN: Perfect.

Q135. So, for the audio, we've got Property Seizure Record number M four eight four five four one. Do you agree?

A Yep.

Q136. So, listed on here, we've got obviously the date, today's date.

A Mm-hmm.

Q137. Our location which is the AFP Office, a hundred and ten Goulburn Street, Sydney.

A Mm-hmm.

Q138. We've got your details up here. Can I just confirm the date of birth is correct, fourteenth of June, ninety-five?

A Yeah, yep.

Q139. And just one item listed, being item number zero zero one.

A Mm-hmm.

Q140. Being one Apple iPhone XS Max in a brown case.

A Yep.

Q141. Which was located on you earlier today. It was seized at seven ten pm by Detective Inspector BOORMAN. Do you agree that this is the only item listed on the Property Seizure Record?

A Correct, yep.

Q142. So, I've ruled off here just to solidify that fact and we can't add any other items.

A Yep, mm-hmm.

Q143. I've got the warrant holder details being Detective Inspector BOORMAN. My details acting as the Property Officer for today.

A Mm-hmm.

Q144. What I'll get you to do is to just fill out the owner section there for me.

A Right, yep.

Q145. One thing I neglected to mention, you can see over on this side of the Property Seizure Record a seal number, so, we've got one one four one zero seven zero and the seal on the bag one one four one zero seven zero. Do you agree that both of those numbers match?

A Yes. I do, yep.

Q146. Okay. As I said you get a copy of the Property Seizure Record, this green one here.

A Öh, okay.

BOORMAN: All right.

BROWN: That's all.

BOORMAN:

Q147. All right. Now, we'll just wind this up, Bruce. Detective Inspector Marcus BOORMAN. Have the answers you have provided during this conversation been made of your own free will?

A Yes.

Q148. Has any threat, promise, inducement been held out to you to provide

the answers you have given?

A No.

Q149. Before we complete is there anything else that you – further you

wish to say in relation to the phone?

A No.

Q150. All right. Do you have any complaints regarding the way the

execution of this Person search warrant was conducted?

A No.

Q151. Do you agree the time is now seven fifteen pm by my watch?

A I do, yep.

All right. Record of conversation complete.

ROC CONCLUDED AT SEVEN FIFTEEN PM

AFP RECORD OF INTERVIEW

Phone (02) 6131 3000

RECORD OF INTERVIEW BETWEEN MARCUS BOORMAN AND BRUCE LEHRMANN CONDUCTED AT AFP SYDNEY OFFICE, GOULBURN STREET, SYDNEY, NEW SOUTH WALES ON MONDAY, NINETEEN APRIL, TWO THOUSAND AND TWENTY-ONE

PERSONS PRESENT:

DETECTIVE INSPECTOR MARCUS BOORMAN

SENIOR CONSTABLE EMMA FRIZZELL

BRUCE LEHRMANN

TIME COMMENCED:

THREE THIRTY-SIX PM

BOORMAN:

Q1. This is a taped video and audio recorded interview between myself,
Detective Inspector Marcus BOORMAN and Mr Bruce LEHRMANN, is
that the correct pronunciation?

A Correct, yes.

Q2. Being conducted at AFP Sydney office, Goulburn Street in Sydney.

The time is now three thirty-six pm in the afternoon on the nineteenth of April, twenty twenty-one.

A Yes.

For the benefit of the recording I will get all persons present to state their name starting with yourself, Emma.

FRIZZELL: Senior Constable Emma FRIZZELL, badge one two eight nine six.

BOORMAN:

Q3. And yourself, Bruce?

A Ah, Bruce LEHRMANN, no badge number.

Q4. As I've just explained there, as I said before, the interview is audio and video recorded. And if a transcript is made of this record of interview, a copy of the transcript will be made available within seven days of it being made. Okay. So, when I receive it within a week, I'll make sure you get a copy as well.

A Thank you.

Q5. And at the completion of the interview you will be given a copy of the audio disk of the interview.

A Mm-hmm.

Q6. Do you understand that?

A Yes.

Q7. All right. Bruce, myself and Senior Constable Emma FRIZZELL want to speak to you today about a report to police made by a Miss Brittany HIGGINS. And the allegation being that you engaged in sexual intercourse, without consent, with her on the twenty-third of March, two thousand and nineteen at the Australian Parliament House. That's the allegation and the report.

A I know.

Q8. Do you understand that?

A I do.

Q9. All right.

A Ah, from the outset reject it, or is that right?

Q10. Yes, yeah, absolutely.

A Thank you.

Q11. But before we go into any conversations, I need to explain your rights and caution you in relation to it, all right.

A Okay.

Q12. Now I must caution you that you do not have to say or do anything, but anything you say or do may be used in evidence. Do you understand that?

A Yes.

Q13. Can you tell me, in your own words, the understanding of this caution?

A Everything I say, everything you said, the court proceedings as far as your investigation.

Q14. That's correct. And you also – you know you do not have to say or do anything unless you wish to do so. Do you understand that?

A Yes, yes, I do.

Q15. All right. Now the caution also applies to any questions that Senior Constable FRIZZELL may ask. So either questions that either of us ask, that caution applies. Do you understand that?

A Yep.

Q16. Now prior to this interview commencing we had a conversation downstairs in the foyer where your legal representative, Mr John KORN was present.

A Yes

Q17. And we explained – I explained the process.

A Yep.

Q18. And I told you that I would be giving you this full caution and rights. Yep.

Q19. In relation to it. Is that correct?

Α		Ye:	8.

- Q20. All right. So, you know, I will now explain your rights. You may communicate with or attempt to communicate with a friend or relative to inform that person of your whereabouts. Do you understand that?
- A Yes.
- Q21. Do you wish to communicate with a friend or relative at this time?

 A No.
- Q22. All right. You may communicate with or attempt to communicate with a legal practitioner of your choice and arrange or attempt to arrange for a legal practitioner of your choice to be present during the questioning. Do you understand that?
- A Yes.
- Q23. Now, do you wish to communicate with your legal practitioner at this time?
- A No.
- Q24. And is it correct that, again I'll just reiterate you attended here earlier with Mr John KORN, your legal representative?
- A That's that's right. I want to just make it clear at the moment, I'm just, you know, taking advice from him.
- Q25. Okay
- He hasn't been formally engaged in a sense because I haven't been, um, you know, it's just been a media report, so, you know.
- Q26. Right.
- A Um, but he is my counsel, so, you know, I haven't been taking formal advice from him per se.
- Q27. All right. But it was correct that he was here with you and we've had discussions downstairs and you're here of your own free will that's
- A Oh, yes, that's correct. Yep, yep. Yes, absolutely, yeah.
- Q28. And just while I'm on that, well, I'll finish the caution and we'll come back to that. Are you an Australian citizen?
- A Yes.
- Q29. Are you Aboriginal or a Torres Strait Islander?
- A No
- Q30. Are you known by any other names?
- A No.
- Q31. All right. How old are you, Bruce?

 Twenty-five, I'll be twenty-six in June.

Q32. And your place and date of birth?

A Ah, place of birth was College Station, Texas, USA. Fourteenth of June, nineteen ninety-five.

Q33. And are you known by any other names?

A No

Q34. So, your full name is Bruce - - -

A Emery LEHRMANN, right.

Q35. And your current residential address?

A It's two O four/four Karrabee Avenue, I'm currently residing with my mum at forty-nine Kara View Court, Rangeville, Queensland.

Q36. And your mobile phone number?

A Zero four two eight one six eight eight nine eight.

Q37. And your occupation or your current occupation, work details at the moment?

A Ah, Regulatory Affairs manager for the British American Tobacco.

Q38. Are you currently in a relationship or anything like that?

A 😕 No.

Q39. Do you own any vehicles?

A Yeah, yes.

Q40. What sort of car do you have?

A Volkswagen Golf, it works pretty good.

Q41. Good, a new car?

A Work helped me out with that, but it's my name, so yes, it's mine.

Q42. Do you speak any other languages?

A No.

Q43. And what is your first language?

A English.

Q44. So you understand English, that's a good thing. So, you're happy to proceed, you don't need an interpreter or anyone to assist you in relation to this interview?

A No.

Q45. All right. In relation to your education, what education do you have? A h, ah, I haven't, um, I'm not degree qualified per se.

Q46. Mm-hmm.

A Um, I have completed my Arts degree, I just haven't, um, graduated at this stage. I'm still, um, well, I'm undecided whether I want to finish my policy, it is under consideration, so.

Q47. Yes.

A I got a bit lazy working in politics, yeah.

Q48. Right. So, it's a policy degree that you've been doing is it?

A Yeah, Arts and Policy, a double degree.

Q49. And where were you doing that?

A ANU in Canberra.

Q50. Now, do you understand me when I speak to you?

A Oh, yes, yeah.

Q51. Okay. Now, if you don't understand any questions I ask, please say so, and I'll repeat it or I'll ask it in another way. At any time during the interview should you wish to exercise any of your rights, please let me know. Okay. And at any time during the interview, if you particularly want to reach out to Mr KORN, please let me know. And I want to just make it clear right now, Bruce, that you are not under arrest, all right, you are not under arrest and you're free to go at any time you like. This is an opportunity for you to obviously participate in a formal record of interview in relation to this allegation and provide your version of events. Do you understand that?

A I do, yep.

Q52. Okay. Now, have you consumed any alcohol, drugs or medication before coming here today?

A No, well, Panadol, that's it.

Q53. Yeah.

A Yeah, but no.

Q54. No, you know, illicit drugs or anything like that?

A No, no, no.

Q55. Any – any, you know, medications that would affect your ability to

remember or give frank answers or anything like that?

A No, no, no.

Q56. How are you feeling at this time?

A Well, I – you know, obviously nervous and distressed and I have been for many weeks now, so yeah.

Q57. Mm-hmm. But you feel all right to obviously have this conversation?

Yeah, absolutely. I've – I've wanted to and that's why I'm being more than happy to cooperate, um, yeah, I am.

Q58. All right. Now, this may take some time, because we've got a lot of ground to cover. Um, and if at any time you wish to have a break, let us know and we can suspend the interview. And again, if you don't understand a question that I ask, please – please let me know and I'll repeat it or reword it. All right. All right. It's fine that you're not

under arrest. Myself and Senior Constable FRIZZELL will be taking notes, we'll be writing down to obviously to jog our memory.

A Yep.

Q59. During the interview, I – I may show you some documents or something like that if it becomes relevant. And, of course, it is audio and video recorded, but verbal responses are quite important in relation to the – obviously for the benefit of the recording. During the interview I will be talking to you about a number of things.

A Mm-hmm.

Q60. But in particular the – the events or what you may have been doing on some time ago in two thousand and nineteen.

A Mm-hmm.

Q61. On the evening of Friday, the twenty-second of March, two thousand and nineteen leading into the early hours of Saturday, the twenty-third of March, two thousand and nineteen.

A Mm-hmm.

Q62. And I will also – I would like to ask you a number of questions and talk to you in relation to your employment at Parliament House. The workplace, the operations, how it functions, conduct, peoples' behaviour, that sort of thing.

A Yep.

Q63. And your obviously your knowledge or relationship, if any, with Miss Brittany HIGGINS. And also, as I said, the events of the Friday and the Saturday night, I believe it was.

A Mm-hmm.

Q64. And just based on what you talk to me about, I may have some further questions a bit later if I have further need. Do you understand that?

A Yes. I do, yep.

Q65. All right. So, you're happy to go on?

A Yes, yep.

Q66. So, I think we'll start the interview by you sort of giving me a response in relation to the allegation I read out to you before.

A Sure

Q67. And I'll repeat that if you like.

A Yep.

Q68. So, the whole purpose of this record of conversation, record of interview, is in response to a report made to police by a Miss Brittany HIGGINS that between one forty-eight am and two thirty-three am on Saturday, the twenty-third of March, two thousand and nineteen, you engaged in sexual intercourse with Brittany HIGGINS at the Australian Parliament House in the Australian Capital

Territory without her consent. And contrary to section fifty-four of the Crimes Act nineteen hundred. What can you tell me about that allegation?

A So, obviously I reject that allegation because it simply didn't happen.

Q69. Mm-hmm.

A My recollection of the evening in question, um, and I'll just explain, some time ago, and I have had – you know, looked, you know, just piece – piece together, like I got out of Parliament and moved on with my life.

Q70. Mm-hmm.

A Ah, but the – the event was set up as a, um, Department of Defence drinks at The Dock in Kingston.

Q71. Yes.

I can't – well, I don't understand, I can't remember whether Brittany invited me or the invite went to Austin WENKE, who works for, um, Peter DUTTON as a press secretary, I still believe he does. Um, however, um, we were invited nonetheless. And Austin and I went to the Kingston Hotel prior for – we often went, you know, not just him, others as well, we often went to the Kingo as we used to call it, and had a steak and a beer.

Q72. Yeah.

A Um, and then we – we indicated that, um, I can't – I can't recall which one of us, that indicated to Brittany that we'll pop down later to The Dock and join her and her Defence colleagues. It was our understanding that she'd been in the Defence portfolio for some time, she'd previously worked for Steve CIOBO.

Q73. Mm-hmm.

And being, at the time of coming to the portfolio, I was Linda REYNOLD's most senior staffer. So, we inherited a number of Steve CIOBO's staff. And, um, it was on that basis, from our understanding that – that, you know, Brittany was staying on and, um, you know, the Department of Defence were having some drinks down at The Dock and we went down to The Dock. I believe I only bought one – one or two rounds of drinks. I was, um, not intoxicated at all.

Q74. Mm-hmm.

A Um, we were there for a couple of hours I suppose. Um, but I'm not a hundred per cent on that, but we were there for a while at the event. I — I treated it as a — as a Parliamentary event that I often get invited to.

Q75. Yep.

Um, so, I was not carrying on or anything because I thought there's going to be colleagues there from the Department of Defence, there was certainly, um, individuals who I recognised as ADC's of various ministers. The Governor-General's ADC was also present. I remember meeting him. Um, so, and there was other officials from

the Intelligence community as well, so, I understand that I'm aware of my obligations, um, with those.

Q76. Mm-hmm.

A Um, so, and you know, it was actually a very good night. Um, Lauren, I can't remember her name, but there was a blonde girl that was quite close to Austin.

Q77. Mm-hmm.

A Lauren someone who identified herself as the head of media or head of comms for the Chief of Navy.

Q78. Mm-hmm.

A She seemed to be sort of running it. Um, and sort of took me around and introduced me to everybody.

Q79. Mm-hmm.

A Um, a blonde girl she was. And we then made a decision not – not necessarily in connection with them, you know, just Brittany, Austin and Lauren, it was certainly everybody that we were then finished at The Dock and they wanted – we all sort of said, "Well, let's keep – let us keep having a drink."

Q80. Mm-hmm.

A And we went to – I've – um, I have, I really enjoyed 88mph, it's a favourite of mine.

Q81. Mm-hmm.

A So, I value music and I said, "Well, you know, that's – let's go there."
Um, and that's where we proceeded. Um, and I was – still by that
point, by no way intoxicated, I was, um, you know, particularly in the
company that I was in at The Dock.

Q82. Mm-hmm.

A Um, and I was fully aware of what who I was there with.

Q83. Mm-hmm.

Um, and then we got to 88mph, it was my recollection that Lauren was still sort of leading the group. Um, and because I certainly don't recall buying lots of drinks at all, um, um, and I'm happy to provide my bank statements, it's – it's from that night.

Q84. I appreciate that.

A l actually only spent forty dollars at 88mph.

Q85. Mm-hmm.

So, you know, that would have been maybe perhaps one round. Um, so, um, I then indicated to the – I can't recall if it was to the group or not, but I believe we were sitting in one booth we normally do, um, when I've gone with other people. Um, that, um, I had to go back to Parliament House to get my keys to get back into my apartment where I was living with my girlfriend.

Q86. Mm-hmm.

A Um, and, um, Brittany also indicated that she had to attend Parliament for something, I didn't enquire as to what. I thought I was being a gentleman and I said, "Well, I'm ordering an Uber, I've got to go back there briefly, you know, you're happy to stay – you know, it's fine if you want share an Uber."

Q87. Mm-hmm.

A And she indicated she was happy to go back there. So, um, we both hopped in the Uber, it was after midnight, ah - - -

Q88. So, that was Brittany who needed to get back to - - - A
She had to get to Parliament House.

Q89. Oh, all right.

A So, yeah, correct. So, I – I made an indication that I was ready to go and I had to pop back to Parliament to get my keys and, um, she – she indicated as well as part of that discussion that she – she also had to pop by Parliament. And I said, "Well, you know, I'm already going there, if you wanted to share an Uber there and I've got to pop up." You see, I live very close to Parliament, a five minute walk. Um, (clears throat) and then we – the Uber took us to the ministerial entrance at the rear of Parliament House.

Q90. Mm-hmm.

A And we pushed the – we didn't have our passes on us, um, the reason why she didn't have her pass, I'm not sure, but I didn't have my pass, typically, typically the case because, not necessarily the pass, I think I probably just forgot about it. But specifically I didn't have my keys and belongings because I wasn't expecting a big night.

Q91. Okay.

A Um, so we went – typically it was just going to be over in the Barton/Kingston foreshore, I'll just pop back up if it's before ten o'clock or whatever to get my things and pop home.

Q92. Yep

A Um, because it was often the case that staff and ministers attended Parliament after hours all the time.

Q93. Mm-hmm.

A Um, and we've never had an issue. Um, and then, um, we – I buzzed the, um, the initial intercom at the car park.

Q94. Mm-hmm.

A Um, and indicated to security my name and what office I was from. I can't recall if I indicated I was with Brittany.

Q95. Mm-hmm.

A Um, they would have seen on the cameras.

Q96. Yeah.

They let us through the car park, so, I've seen you guys, I know you guys through PM's motorcades' there. And we go – and then we go through the next layer where the signing process happens. And my understanding is that, um, from then – the best I can recall is I've provided all the things I needed to positively ID. So, um, you know, my driver's licence, um, whatever – they needed photo ID typically, so I did that.

Q97. Yeah.

A They looked me up, signed in, signed the back of the, um, positive ID card.

Q98. Mm-hmm.

Ah, put my – put my wallet through and phone through the security, because the phones aren't good at that time. Um, and she was taking some time. I – I proceeded to head up, but then she was taking a while to, um, put her shoes back on or whatever. Um, certainly and by that stage, from my memory, I was not intoxicated to a degree whereby I was, um, you know, unable to sign in and do all those things. And certainly I'd got indication that she was intoxicated to a level of that extent either. I mean, she also did that herself.

Q99. Mm-hmm.

A Um, um, and she was taking a while with her shoes. And her belongings in the, um, the tray. And then the security guard, um, I think they called on the Foxtrot with the keys, um, and met us – took us up to the office on Level Two to the front doors. They had to obviously open them and disarm the fire - - -

Q100. Mm-hmm.

Um, I entered the office and turned left to my desk. Um, Brittany turned right into the minister's suite, which is opposite the chief of staff's suite. Um, I turned left obviously to my desk, um, and, um, I didn't see her again. So, I went to my desk, um, my brief case was there, I've got what I needed to for the weekend.

Q101. Mm-hmm.

I also, um, attended to some of the Question Time folders because through the course of that evening, the discussions that we were having with Defence officials, um, while it was on my mind, I, um, attended to some of the Question Time folders because we had a new minister heading into her, um, first Question Time, so I wanted to ensure that – that was part of my role was to look after her Parliamentary duties.

Q102. Yes.

A So, um, while it was still on my mind, um, and the discussions that we'd have, particularly about some of the industry, um, programs, particularly in the Air Force.

Q103. Mm-hmm.

A Um, I was moving those around.

Q104. Yep.

A Um, and then I ordered myself an Uber. Um, and I left the building through the – through the car park. The Uber indicated that it was here and I went – and I left the building. That's – that's how I recall that evening.

Q105. Okay. Sorry.

A No, no, that's fine.

Q106. I'm trying to write as fast as I can.

A Sorry, I can slow down if you like.

Q107. No, no, that's okay. So, look, we're just going to recap now, if there's any – anything I've missed that you know, but we will go into things later on.

A Yeah, yes, yep, sure.

Q108. So, basically you've said you were out at an event at The Dock.

A Yes, on the Kingston foreshore.

Q109. On the Kingston foreshore.

A Yes.

Q110. And the night in question we're talking about is what night did this

A Oh, Friday the twenty-second, yep.

Q111. Friday, the twenty-second?

A Of March, twenty nineteen.

Q112. Yep, yep. So, that's the night in question?

A Yep.

Q113. So, you said you were – you were out with Austin WENKE, you went to the Kingo Hotel beforehand.

A Yep.

Q114. You – you've indicated to Brittany that you would pop in or someone did, we'll go into that.

A Yeah, yes, yep.

Q115. You, at the time, you were a senior staff with Minister Linda REYNOLD's office.

A It was a Home Affairs role prior to going to the Defence portfolio, vep.

Q116. Okay. So, when you were at The Dock you bought one or two rounds of drinks, you recall?

A Yeah.

Q117. You were there for a couple of hours. There was the Governor-General's ADC you recall being there.

A He was there. Um, the ADC's of every minister who had an ADC was there, including our own. Captain Nikita someone.

Q118. Mm-hmm.

A Um, she was there. All in civvies, they were not in ---

Q119. Yeah, yeah. There was a lady, Lauren.

A Yeah, Lauren, I think her last name starts with "G," I have no –
because I was intending on leaving politics, I was not, um,
ingratiating myself too much with the attendants, just so the purpose
of it, you know, just call my minister before I left, so.

Q120. Yep. So, you were there you were having a few drinks, um, you kept having some drinks and there was a group – there was a discussion

A Yeah.

Q121. --- about going to Eighty-eight Miles Per Hour.

A Well I offered that as a location, was because there was a discussion to – to proceed on as The Dock, I believe, I believe the booking was ending or something to that effect, because there was something that prompted us to be leaving.

Q122. Okay. Then you – you've said you don't recall buying a lot of drinks whilst at The Dock. And then you went to Eighty-eight Miles Per Hour, you recall sitting in a booth at Eighty-eight Miles Per Hour.

A Yeah, that's – that's the best of my recollection, that's how the bar is set up, yeah.

Q123. And we'll go into who you were there with and all that sort of thing.

A Yes.

Q124. And then you – you say you had to go to Australian Parliament House to get your keys.

A Mm-hmm.

Q125. Brittany mentioned she needed to get back there to the Australian Parliament House, so an Uber was ordered.

A Mm-hmm.

Q126. And you returned – you went to Australian Parliament House with Brittany.

A Mm-hmm.

Q127. You didn't have your pass with you.

A No.

Q128. And as you said you weren't expecting a big night and it was often the case that staffers, ministers or – had entered Parliament House

after hours. When you got to Parliament House you buzzed the intercom at the car park, and you can't recall whether Brittany said anything or you mentioned Brittany, but you said they would have seen both of you on the camera.

A Yeah, and when we went to sign.

Q129. So, you went to the signing area, you provided ID. They obviously looked you up, you signed the back of the ID. Is that correct?

A Yep, the green card.

Q130. You went through but Brittany was taking a while.

A Yes.

Q131. And, at that stage, you – you stated that you weren't intoxicated – was to that a high level or how would you describe your intoxication level?

A Oh - - -

Q132. I just missed that.

A Oh, moderate. I was certainly able to – I was functioning.

Q133. Yeah.

A Yeah.

Q134. And you said neither was Brittany.

Yeah, not to my observations, yeah.

Q135. Yeah. The security guard escorted you to the office.

A Mm-hmm.

Q136. And I take it you were referring to is it Minister REYNOLD's office where you work?

A Yep, yep, yep, the suite, yep.

Q137. You were – you were let into the suite. You went to the office, you turned left to your desk. Brittany went right into the minister's suite.

A Mm-hmm.

Q138. You went to your desk, you - - -

Well, can I clarify. So, when I – she went right, I'm assuming she went to the minister's office. It's possible she went through the minister's office and then to the media. Where my desk is I can't see any other peoples' desks, so, once I'm there. You know, I don't want to say she went straight there, she could have gone to the media office and her desk.

Q139. Oh, okay, yeah.

A Like they were joined to the minister's office.

Q140. Yeah, we can go through things. What we might do is break sessions of things, then get down and clarify and go from there.

A Yeah, yeah.

Q141.	When you said you went to your desk, you mentioned your briefcase
	was that to get your briefcase?
Α	No, I don't – no, I don't believe I got my briefcase, I just got what I
	needed for the weekend because I was back on Monday morning

- Q142. Yeah, okay. And you worked on some Question Time folders.
- Q143. All right. And then, you know, what you needed to do you ordered an Uber and you left through the car park and that's how you recall the evening. Is that right.
- A Yep. That's correct.
- Q144. All right. Now, do you want to have a break or minute before we we start breaking things down or are you - -
- A I'm okay, if you want to keep going, yeah.
- Q145. All right. So, you said before you went to an event at The Dock. Can you explain how when you say, "an event at The Dock," how that came about, who organised or how you came to be there?

 A No, I can't recall. All I know is I didn't organise it, that's all I know, yeah.
- Q146. So, you definitely know you didn't organise it? Yeah, yeah, yeah.
- Q147. Can you tell me how you came to be there, how did you know about it?
- A I'm not I can't be sure.
- Q148. Mm-hmm.
- A But I'm I'm I think it was through Brittany, yeah.
- Q149. Right. A Yes.
- Q150. Now, and you say, "through through Brittany." Maybe to make it clearer, let's let's start with you work for Minister REYNOLD's at Australian Parliament House?
- A Yes.
- Q151. What what role did you did you perform in your employment at Australian Parliament House?
- A Ah, I was policy adviser, yes.
- Q152. And you said you were a senior adviser?

 No. But but when she was in Home when she was in the Home Affairs portfolio, as assistant minister, I was I was still adviser rank but I was her most senior staffer.
- Q153. Yes. Ah, senior staffer, right, okay.

A Yes, yes, yeah, yeah, sorry, I didn't - - -

Q154. No, that's all right. I just need to be clear because I'm not a political person with things in Parliament.

A Oh, okay, yeah, yeah.

Q155. So, you were a senior staffer.

A Yeah.

Q156. And what was Brittany's role?

Well, I'm not – I'm not sure, um, because I didn't know her very well, like much of the CIOBO office. So, when we moved to that portfolio, um, we inherited some staff who had chosen – they'd indicated they wanted to stay on as – as staffers.

Q157. Mm-hmm.

A Um, and, um, Brittany was one of the few that, um, was allowed to stay on. So, my understanding was that she was in a media advising role.

Q158. Yep.

Um, handling media – in connection with Lindy HAYMER who was – who was the existing media adviser.

Q159. So, how long have you worked with Minister REYNOLDS in that office?

A Ah – oh, in that office?

Q160. Yeah.

A Oh, two or three weeks.

Q161. Right. And how long have you been working for the minister all up?

A Ah, a year, I think, yeah, maybe.

Q162. And how long have you worked at Parliament House?

A Oh, six years, I suppose, soon after the twenty thirteen election, yeah.

Q163. Okay. Can you explain to me that – how the sort of minister's office and staffing is set up?

A Oh, you mean the ---

Q164. In Parliament House, yeah, yeah.

A Like the office, the total desks or?

Q165. Well, we'll go into the layout, but also like who works for Minister REYNOLDS. Like you say you're a senior staffer, the structure and the roles and - - -?

A Oh, okay. So, when she was the Assistant Home Affairs Minister, um, they get two personal staff allocated by the Prime Minister's Office. An adviser level and an assistant adviser. The adviser level is typically, um, the senior staffer who – I had, um, I was in – I was in

the WhatsApp group chat with all of the chiefs of staff, including John KNUKLE, the Prime Minister's Chief of Staff.

Q166. Mm-hmm.

A Um, I had – I had oversight of the staff who were hiring and firing.
Um, but I will say not when we moved into the Defence portfolio, only when we were in the Home Affairs portfolio, did I have that role.

Q167. Right, right.

A Um, everything from liaising with, you know, your commissioner at the AFP, ASIO, ah, handling Estimates processes. Um, because all those offices, um, things like that. So, that was my role, Parliamentary Policy as well. National Security, because I had the relevant security clearances to do with that.

Q168. Mm-hmm.

A Um, signing for the ASIO briefs and the Home Affairs briefs and I don't know, various other briefs that would come to the office.

Q169. And that was in the – when you were working in what portfolio was it?

A Assistant Home Affairs.

Q170. Assistant - - -

A Home Affairs. So, we had, ah, Counter – we had Counter Terrorism. I mean obviously we assisted DUTTON's office but we had specific areas. So, we had Emergency Management, some Counter Terror stuff, um, I honestly can't remember everything, but yeah.

Q171. Yeah, yeah. No, that's okay. And who was that under, what minister at that time?

A Linda REYNOLDS.

Q172. Linda REYNOLDS.

A Was the Assistant Home Affairs, yep.

Q173. Right.

A But Minister DUTTON was our senior minister, yeah.

Q174. Okay. So, and then Minister REYNOLDS, did she move portfolios?

So, Steve CIOBO, um, was part of that group of ministers.

Julie BISHOP, Christopher – Christopher PYNE, Steve CIOBO had indicated that they're not contesting the election and they were going to resign.

Q175. Yes. Mm-hmm.

A Um, the Prime Minister phoned Minister REYNOLDS, saying that she was – he was offering her the Minister for Defence Industry portfolio.

Q176. Right. Okay.

A With a caveat that should we win the election, she will become the Defence Minister.

Q177. Mm-hmm.

A Um, which happened.

Q178. Yep

Um, so, um, um, I've – soon after she received that phone call from the Prime Minister, you know, she let me know and her electorate staff, quietly know, that you know, let's get to Canberra where she's gets sworn in and it was so exciting.

Q179. Yeah, yep. Mm-hmm.

A Um, and, um, then we – so then what happens in the transition I suppose, is that we want to go too.

Q180. I'm just trying to work out the staffing in – in like with
Minister REYNOLDS's office. Like you say you were a senior staffer?

A Oh, yeah. So, then – then once - - -

Q181. How many other staff are in there?

A Oh, so, now there's just the four electorates, so every member, senator gets by standard, ah, four electorate staff, um, depending when you become a junior minister, like she was, you get an assistant adviser and then an adviser.

Q182. So, you say, "four electorate staff." Who – who were they?

A Michelle LEWIS was the sort of diary manager, a close confidant of Linda's.

Q183. Mm-hmm.

A Um, Linda CROOK was another one. I can't remember the other two.
And then often they have a budget where they can put the casual staff on as well. So, I don't recall if she had any casual staff. But they – they – they don't handle a lot of ministerial matters at all.
They sort of handle the electorate work as a senator.

Q184. Mm-hmm.

A Um, so, the assistant adviser and adviser would, you know, do the liaising with departments and policy and ministerial work.

Q185. So, the day work at the minister's office up in Parliament House, well, or that was prior to Minister REYNOLDS moving into that?

A No, they work up in that office. If they needed to – if they came over for a sitting week from Perth, they would, they had a desk. But, um, I – I was actually the only one, when she was assistant in Home Affairs, we had a smaller office, we weren't in the blue carpet wing, we were on the red Senate wing.

Q186. Mm-hmm.

A I was the only staffer based in Canberra.

Q187. Right. So, in two thousand and nineteen in the day in question we're talking about, I'm just trying to clarify and trying to get the picture.

Α Yep.

Q188. Who was working in that office with you?

Well. - - -

Q189. Leading up to like when - - -

- - - well, it was just me.

So, you - it was only you that worked for Minister REYNOLDS? Q190. Yeah. We're still talking about the role as Assistant Home Affairs Minister?

Q191. Yeah. And this is in the two thousand and nineteen, in March, two thousand and nineteen.

Before we moved to the - the new office in the ministerial wing, it was just me. Oh, sorry, we had a DLO, sorry, sorry. No, we had a DLO. Why that - why that didn't click for me is because the DLO is from the department, they're not officially on staff, they're just there to conduit between sending out submissions from the department,

Politics is very confusing isn't it? Q192.

Yeah, sorry.

No, that's fine, take your time. I'm just trying to get an Q193. understanding of who was working in Minister REYNOLDS's office at that time in March, two thousand and nineteen.

Yes, yeah, yes. Δ

Q194. So, you were saying it was just, you, yourself? Yeah, and the DLO's.

Q195. And who is the DLO, can you recall? Ah, we had a few, Victoria someone.

Q196.

Victoria, ah, I - I can't remember, I can't recall names, I'm sorry, veah, I - - -

Q197. No, that's okay, that's okay. So, there's yourself, there's the DLO, Victoria that work in the minister's office area in Parliament House? Mm-hmm, yep, yep.

Q198. When did and how did you get to know - know a Miss Brittany HIGGINS, when did she come in to work in that office?

Well, when we moved offices to the Defence Industry portfolio. So, I moved - we moved out of the Senate wing.

Q199.

Um, upon being promoted to Defence Industry Minister, we got a bigger suite. Cabinet – I don't think it was Cabinet rank at that time.

Q200. Mm-hmm.

A But anyway we've moved to the ministerial wing, ah, which affords us a bigger room, more staff.

Q201. Right. And so, the ministerial wing - - -

A Mm-hmm.

Q202. --- is the office that you went back to on the evening of the twenty --

A That's correct.

Q203. Right. So, at that time there was yourself working there?

A Yes.

Q204. Brittany HIGGINS worked in that office?

A Yes.

Q205. Anyone else? A Many, yep.

Q206. Many? A Many.

Q207. Can you tell me who that is?

Um, we had Fiona BROWN was the acting chief of staff, very new in the role, it was put to me by Linda that she was a close personal friend of the minister's.

Q208. Right. Yes.

A So, she was there. Um, we had Nikki HAYMER, who was – ah, she was based in Perth, but when we moved to Defence Industry, the minister made her come to Canberra quite often because it was a bigger role.

Q209. Yes, yes.

A Ah, we had – and I can't remember their names, but we inherited an older gentleman from Minister CIOBO's office as a policy adviser as well.

Q210. Mm-hmm.

A A younger gentleman who handled, um the F18 or F15 Air Force program. He was a policy adviser. Um, then we had – obviously, Brittany, I'm just going through the desks sort of around.

Q211. Yeah sure, yes.

A Um, and then we had the ADC, Nikita. We had a DLO from the Department of Defence.

Q212. Mm-hmm.

We had a black haired girl who was new, she – she had briefly joined me in Assistant Home Affairs, because we still had Emergency Management as well.

Q213. Yes.

A We'd been afforded a Home Affairs DLO.

Q214. Yes.

A So, that girl was there. Michelle LEWIS would often come over from Perth, she would sit in Fiona BROWN's office. Ben CARLSON, he was seconded up from the Department of Defence, he was in the media office which joined the minister's suite. I think that's to the best of my recollection.

Q215. So, how long had Miss HIGGINS been working in that office prior to the night of the – of the twenty-third, it was the twenty-third?

A Oh, a couple of weeks.

Q216. So, she'd only been there a couple of weeks?

A Yeah, I can't – I don't have those, I was no longer in charge of staff anymore, so, I didn't have those details, so. Um, but – but, you know, because we inherited the CIOBO staff, they all sort of – the ones that stayed were only there for a couple of weeks, so, when we set up the office and what the hell's this portfolio all about, so.

Yep. Right.

FRIZZELL:

Q217. It was fairly new for everyone?

And very much so. The only two, - the only two people that were still

- that stayed were myself and Jesse WATT, who was the assistant
advisor within that Home Affairs area.

BOORMAN:

Q218. Right. It's just that I'm trying to get a picture of who – who worked in that area.

A Yeah, yeah.

Q219. Because what I'm – I'm getting at there, in relation to who worked there, is where – where the layout of the office, where people sat, who interacted with who and those sort of things.

A Mm-hmm.

Q220. And can you draw me a sort of a bit of mud map in relation to whose desk was where and the layout of the office from the entry?

A Sure. So, suppose I'm going through an entry.

Q221. Yep.

A These are the, um, double doors what you say.

Q222. Mm-hmm.

A Um, so, you go in past – ah, reception is sort of here, you've got a hallway here. Chief of Staff's office is here, and I'll just put, "Chief of Staff."

Q223. Yeah.

A Reception.

Q224. Yep. Is that like a desk into the hallway?

A Yeah, this is just a desk. It's not – it's not obvious.

Q225. Yeah, yeah, yeah, yeah.

A Um, hallway behind reception. Chief of Staff and then the doors to the minister's office from here.

Q226. Right.

A And then there was a sort of large sort of square here, they've got flags in the hallway here.

Q227. Yep, Mm-hmm.

A The minister's office.

Q228. Yes.

A Windows out into the PM's courtyard. She had a door here.

Q229. Mm-hmm.

A This walks through to the media, or we use it as a media office.

Q230. Mm-hmm.

A Um, hallway, um, back around here. So, then we would have all desks along here, so these are all desks. So, we'd probably have one, two, three along here.

Q231. Yes.

A Then we had more media desks – there was a hallway through here, another row of desks here.

Q232. Yes

A Um, the secure room was somewhere over here, a secure room.

Q233. Mm-hmm

A DLO's were the next to the secure room. I'll put, "DLO." The kitchenette was sort of in here.

Q234. Mm-hmm.

A And then around the corner was the spare fridge, oh, an extra fridge. The exit door was just the back entrance and my desk was sort of wedged in behind. So, but I liked it, because it was a big space that I could put all my folders that I was working on.

Q235. Mm-hmm. Oh, right, so, your desk was in here was it?

A Yeah, but at the back, behind there was – there was a high divider that divided all of these desks.

Q236. Right.

A And I was in behind here. And that was – that was the corner of the room as well, so I had the wall, the fridge and then the exit.

Q237. Right. So, this is the front entry into the minister's sort of suite? Yep.

Q238. And that's the minister's office there. And that's the only other exit out of the place is it?

A That's right.

Q239. And your desk is sort of ---

A That's a pin code, which at the time I – I can't tell you it now, but I knew that's what it was.

Q240. Yeah, yeah, okay. All right. Thanks that's very helpful.

A Oh, I hope it is.

Yeah, that's very helpful.

FRIZZELL:

Q241. Do you mind just writing what the things were?

A Oh, yeah. "Front door, front door." So, in here, these – some may – we had – so, Brittany's desk was here somewhere I believe, so, I think it was here, I didn't pay too much attention because I was leaving Parliament. Um, and then we had a spare desk here, this is spare for like when we had – if we had electorate officer visit from Perth, they'd sit there. And another spare one here for the same reason, we'd have – we'd have a visiting – either a policy, defence. I believe most of those gentleman were seconded from the Department of Defence.

Q242. Okay.

A Because they had specialist policy knowledge, yeah.

BOORMAN:

Q243. Yeah. And so, you said you were leaving Parliament in a couple of weeks were you, you were leaving?

A Yeah, my – my, um, and I don't have any records of it, but my, um, my recollection is that a week or more prior to these alleged events.

Q244. Mm-hmm.

A Which in my view didn't happen at all of course.

Q245. Mm-hmm.

A We – ah, I had a discussion with Fiona BROWN, the chief of staff.

Q246. Mm-hmm.

A Um, because when a – when a new portfolio happens all the staff are fired essentially.

Q247. Yep.

A Then you know, the minister makes a determination whether to keep you on.

Q248. Mm-hmm.

A Now, I was offered to a position to stay on but I had indicated then to Fiona BROWN that I was actually looking at, um, jobs in Sydney, because my girlfriend was to taking a role in the New South Wales Parliament here.

Q249. Mm-hmm.

A And that's what I was doing. And I indicated to her that I would be leaving Parliament and, um, she came back to me the next day and said, um, that, um, she pulled aside in the hallway, I think near reception there.

Q250. Yep.

A And said, um, you know, the minister wanted to thank me for the service briefs and that we would be offering your position to someone else. And I thought fine, whatever.

Q251. Mm-hmm.

A You know, it'd be great – you know we had the nice ease of I'll stay on until you find someone and I'll help you, yeah, prepare the minister or whatever.

Q252. So, you were – you were, your intention was to leave in a couple of weeks?

A Yeah, a couple of weeks. We didn't – we didn't settle on the date, I just said, when you find that person, I'll do a handover with the person, I'll, um, I understood the gravity of my role in terms of, you know, um, if you can imagine politicians, fair enough to care enough about their public image, so, um, it was her first Question Time and she wanted to be fully prepared with answers to questions, so that's yeah.

Q253. All right. That's very helpful to me because that explains so, you know, who's in the office, who works there and the layout of that, so that just clarifies that for me. Sorry if that - - -

A No. no. that's okay, yep.

Q254. --- I think it was good to get an appreciation of that role you do there.

A Mm-hmm.

Q255. And if I just recap all of that. You've explained that there's a number – a number of staff that work there, who was there at the time and that Miss Brittany HIGGINS had only been there for a couple of weeks. Is that correct?

- A Yeah, yeah. No, all the CIOBO staff had only been there for a very short period of time, we didn't know them very well, and just heard of them, so when they were joining.
- Q256. That's all right. It just helps me clarify things with everyone there. So, if we go back to Friday, the twenty-second of March, two thousand and nineteen at The Dock.
- A Mm-hmm.
- Q257. And I'll go back to my original question that I asked is how how did you come to be there, and you said you cannot recall who organised it or anything like that.
- A Yeah, yeah, I can't recall. I was, um, with the ADC Nikita, you know, I was, um, I did work with her a little bit in the short period because she would obviously may travel with the minister.
- Q258. Mm-hmm.
- A Um, it might have been the case that she mentioned it. I I recall knowing that the Defence Department were putting on something.
- Q259. All right.
- A Yeah, I can't be sure on that, I'm not a hundred per cent.
- Q260. Yeah, no, that's okay. If you're not sure don't speculate. A Yeah, yeah.
- Q261. So, you said you went out with Austin is it to the Kingston Hotel that evening before going to The Dock?
- A Mm-hmm.
- Q262. What time was that can you recall?
- A Um, no, and I don't want to I don't want to speculate and just guess.
- Q263. Yeah, yeah, yeah.
- A Often after work we'd pop down six o'clock usually leave, have a beer and a steak.
- Q264. Right. Yep, yep.
- A I mean looking at what I spent, I only think I bought a beer, but we went there, so.
- Q265. Yeah. So, you're not sure what time you got to the Kingo? Yeah.
- Q266. Like you've just said then normally that it's six o'clock or you go to the steak and a beer?
- A Yeah, it's after we'd often leave, whoever was still at the building and, you know.

Q267. So, you just said you went there, you had a steak or a beer or whatever. Do you recall what time you would have left there or how did you – and, you know, get to The Dock?

A I walked.

Q268. Right.

A Ah. we walked because it was close.

Q269. Yep.

A Um, I don't recall the time though.

Q270. Right. So, you walked to The Dock from the Kingston Hotel.

A Mm-hmm.

Q271. Was there communication, that you can recall, between yourself or anyone else while you were at the Kingston Hotel before you got to The Dock?

A Between - - -

Q272. Did anyone – and I don't want to suggest things, but you know, was there a message from someone, "Oh, come back to The Dock, it's happening," or you know?

A Mm-hmm, possibly, oh - - -

Q273. If you can't recall, that's all right, I'm working here, you know.

--- and I can't recall I'm sorry. All I can say is on past events, the things about how it was – how invariably it happened was, you know, "We're at this event come and join us," you know. So, but on this particular night, I just can't remember.

Q274. Yeah, no, that's okay. So, you're saying past event, is it normal behaviour, like people that obviously work in Parliament House, people that work together they attend the events and all that sort of thing?

A Oh, yes, all the time.

Q275. Yep

A Yeah, all the time, particularly during sitting weeks.

Q276. Yep.

A Um, all the time, yep.

Q277. So, you walked from the Kingston Hotel down to The Dock with Austin is it?

A Yeah.

Q278. And Austin, what's Austin's surname?

A Ah, WENKE, WENKE.

Q279. WENKE?

A Yeah, W-E-N-K-E.

Q280. All right. And what does Austin do for instance?

A Ah, he's Minister DUTTON's media adviser. But at the time he was and I believe he still is now.

Q281. Okay. So, you arrived at The Dock and the The Dock we're referring to is – what sort of place is that, where's that?

A Just the foreshore bar on the Kingston Foreshore.

Q282. All right. In the ACT?

A Oh, yes, sorry, yeah, yeah.

Q283. Yes. All right. Who was there when you got there, can you recall? A Oh, lots of people.

Q284. Yes.

We had – well, when I say, "we," the event had the front tables, um, which is an outside area, when you enter the bar but they have front bit, it was, um, I don't know, I remember seeing Nikita, of course, because, um, I sort of – I knew her a little bit better than the others in the office at the time. Brittany was there.

Q285. Yep.

A I was introduced to Lauren, I don't want to speculate, but I think Brittany introduced us to Lauren as a friend of hers. Um, and then we were introduced to ADC and this minister, that minister, Governor-General and the roles they performed for their various bosses. I – I can't recall the type of like why the Department of Defence, like those officials, why they were there.

Q286. Okay. Is it common for Defence people to be at these events or?

A Well, my recollection was that it was – that was a Defence event.

Q287. Ah, right.

That there, because there was – well, when I arrived I assumed that it was such a more of a Department of Defence, like this is one of their shindigs.

Q288. Yep.

A We're the new minister in the portfolio and I sort of got it, I thought, okay, well, we're just being nice to them basically.

Q289. Yeah.

A But I would invite Minister REYNOLDS, whoever wanted to come.

Austin, Austin was a mate of mine, I was going to hanging out with him anyway. I can't recall but I probably just dragged him along and, you know.

Q290. Yep. Was there – was there anyone there that didn't fit into that sort of crowd that you didn't know?

A Mm-hmm, I mean I – like I want to say, you know, some of the Intel people that I met, but - - -

- Q291. Yeah. No, what I suppose, I'll rephrase that question because it is a public place in a bar, there's probably a lot of people you wouldn't know there. So, I'm not asking you for your recount of everyone that was there, everyone that was there.
- A Yeah, everyone, not off the top of my head, yeah.
- Q292. What I'm saying out of the you know, you've got the Department of Defence crowd, you've got the minister's office crowd.
- A Yeah.
- Q293. Was there anyone that was sort of mingling with people or engaging that wasn't with that sort of crowd, that you can recall?
- A Not that I can recall. Not that I recall. As you said it was a public bar, so, I don't I'm not some sort of weirdo that scans the whole, you know, area, I don't do that.
- Q294. Yeah. So, when when you got there, what did you do, what what was the event sort of there, as in what did you do, did you have a drink?
- A Oh, yeah. Yeah, I would have had a drink absolutely, um, and and mingled and spoke to everybody. Um, I certainly got introduced. I was often I can't remember who, but a lot of the ADC's were wanting to introduce themselves to myself and Austin.
- Q295. Mm-hmm. Why is that?
 A I don't know.
- Q296. Because you worked in the minister's office probably?

 Oh, yes, that that that to them was probably, yes, they had they had ministerial staff there and they were sort of like they were able to go and have a chat to them, yeah.
- Q297. Is that how it sort of works in the political world?

 Yeah, there's there's a there's a, um, there's a divide I suppose between public service and, you know, political ministerial staff, yeah.
- Q298. Now, when you when you arrived there was Miss Brittany HIGGINS there on your arrival?
- A So, on my recollection she was, yeah.
- Q299. But you're not a hundred per cent sure?

 A I'm not a hundred per cent sure.
- Q300. At any time at The Dock did you engage with Miss Brittany HIGGINS? A I would have, yes, yep, she was a colleague of mine, yeah, yeah.
- Q301. Okay. And I know it's taking you back, it's a couple of years now, but you could comment on the level of drinking that was going on at this event or who got - -
- A Nothing out of the ordinary, um, nothing out of the ordinary.

Q302. When you say, "ordinary," what sort of events are these when you say, "ordinary," when it comes to buying alcohol and consuming?

A Well, sure, okay. Well, um, um, often on a sitting week we had a social event at Parliament House, um, they would get quite rowdy.

Q303. Mm-hmm.

A And we'd often end up back invariably with your minister in the office drinking more. Um, because this was a – an outside event where there was clearly Department of Defence people and I was new to the portfolio, you know, I was – I treated it differently to what I would have with closer colleagues in an event in Parliament House.

Q304. Okay. I understand.

A Yeah.

Q305. So, how many drinks do you recall buying at The Dock or were you in a shout, what was going on there?

A I was probably in a shout, um, I – I only recall buying a couple of rounds. I – I can't – I can't be sure, I can't be sure, but I wasn't – yeah, I can't be sure, but yeah.

Q306. Was it a good evening?

A Very good, yep. I met – met a lot of good people, yeah.

Q307. Was there any instance there that you can recall that stand out?

A No, no. Oh, it was – it was a really good event for, um, you know, um, staff to get to know each other, understand our roles with the Department of Defence people who were there, particularly ADCs. I personally also didn't know very much about what ADCs did. So, I found it quite useful, yeah.

Q308. Is there anything else that you can tell me that you think would be helpful for me during this investigation of any activities at The Dock on that evening?

A Um, no. We were just standing out the front there, yeah. Yeah, I was obviously – you - you sort of phrased the question like that.

Q309. It's not – no, I'm not trying to trick you with a question. A Oh, okay.

Q310. I'm just asking is there anything you could - - -

A Oh, because I'm sort of thinking, I'm going, no, we were just all standing there. (laughs)

Q311. Yeah. So, it was just a normal sort of --- Yeah, a social event, yeah.

Q312. All right. What was everybody wearing can you recall, what were you wearing on that evening, do you recall?

A I wasn't in a suit, because it was a Friday, I don't tend to wear a suit on a Friday.

Q313. Yeah.

A I don't – I can't recall what – I'm assuming you guys know, but you know, I can't recall, no.

Q314. Yeah. All right. Do you recall what Miss HIGGINS was wearing on that evening?

A No, no. I – I don't but obviously there's been a lot of media on this, so, you know, there's that but from my perspective, I don't recall, yeah.

Okay. That's fine. Is there anything you want to ask in relation to The Dock at this point?

FRIZZELL:

Q315. Yeah, just a couple of questions. You said that you went there from work.

A Mm-hmm.

Q316. Can you tell me more about that?

A Well, we went from work to the Kingston Hotel and then onwards to The Dock, um, yeah, so, that's - - -

Q317. What did you take with you? Who did you go with leaving work?

A Austin.

Q318. Mm-hmm.

A Yeah.

Q319. And what did you take with you or what did you leave at work?

Um, well, I – well, I can't recall. If you're suggesting I had my briefcase? But I can't recall that. I mean I had to go back to Parliament to get my keys anyway, so, they weren't in my – yeah, so, yeah.

Q320. So, I guess, is – is that normal practice. Can you tell me more about that?

A Normal practice?

Q321. You've left your keys at work. So, you have said earlier when you were talking about your keys.

A Oh, yeah, yeah, it is.

Q322. So, sometimes you'd leave them there and then before ten o'clock you'd go back and pick them up?

A Yep. And that could because, you know, I would often just leave them on my desk, because, um, I wouldn't have a lot of things in my pockets or anything like that. My briefcase would be shoved under my desk somewhere, so, um, you know, it's – it was often that I've forgot things, forgot laptops, forgot whatever, yeah.

BOORMAN:

Q323. Mm-hmm. What about – sorry, like phones or anything like that, do

you carry your mobile phone?

A Oh, yeah, yeah, yeah.

Q324. Did you carry that with you all the time?

A All the time, yeah.

Q325. And the number of that mobile phone is or was?

A Oh, you're talking about my ministerial one?

Q326. No, your personal one.

A Oh, O four two eight one six eight nine.

Q327. And what sort of phone is that?

A 🌸 An iPhone.

Q328. Right. Do you carry any other phones with you?

A No.

Q329. Or would you have done?

A Oh, I would have, my ministerial one, yeah, which was also an iPhone, but I – I can't remember the number of that because it's - - - .

No, that's all right. Sorry, go on.

FRIZZELL:

Q330. No, that's all right. Now, you mentioned that you were probably in a shout, but you're not quite sure, but you're also presented some

bank records before.

A Yes

Q331. Do you have them for The Dock?

A I do for that night, yep.

Q332. Yep.

A But honestly, I'm sorry.

You can obviously - - -

BOORMAN:

Q333. Yeah, if it's going to refresh your memory, that's great.

A So, yeah, sorry.

FRIZZELL:

Q334. That's all right.

A So, I had two – two accounts in my name, um, or the two accounts that I have a card, a credit card. So, this is the more relevant one, um, like this is my spending account I believe.

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This is a true and accurate transcript of the record of interview between D/Inspector Booman and Mr Lehrmann.
The transcript was checked for accuracy by DLSC Madders on 05/05/2021

BOORMAN:

Q335. Mm-hmm.

A So, the twenty-second, um, so there was some Ubers on that day, which, um, my recollection I often took Ubers to work in the morning.

Q336. Right

A Um, so, then there's The Dock's, sixteen dollars.

Q337. Mm-hmm.

A There's the Kingston Hotel charge, um, it's twenty-four twenty.

Q338. Yep.

A Ah, and then there's the Eighty-eight Miles charge.

Q339. Mm-hmm.

A And then there's, ah, well, that's just for me getting groceries the next day.

Q340. Mm-hmm.

A Um, and then they're the two Ubers to Parliament. So to Parliament and then leaving.

Okay.

FRIZZELL:

Q341. All right. The first column is date?

Yes.

Q342. The second column is what expenses you've incurred?

A Yeah, the charge.

Q343. The charge for - okay.

A Now I've got these in PDF as well. I – I just – because I'm here in Sydney, I don't have my laptop with me. So – so this one here, I don't think any charge is relevant to the allegation, um, so there's just nine charges, when I go to Aussies to get my coffee, my lunch at the cafeteria. The subsequent charges the following Monday.

BOORMAN:

Q344. Yeah, these ones?

A They're the following Monday.

Q345. Oh, right. So, you're back to the Kingston Hotel on Monday?

A Yep, Monday night, yeah, yeah, yeah.

Right.

FRIZZELL:

Q346.

Do you - so, these Ubers ones?

Α

Mm-hmm.

Q347.

Do you still have the trip records?

Α

I do, um, they're obtainable, I haven't got them here.

BOORMAN:

Q348.

Mm-hmm.

But I've certainly got them, yeah. Well, I've got the - sorry, I'don't

have – well, I can go – I can go back, it's a bit of thing, but I've got – the only ones I have readily available is these ones relating to if I'm going from Eighty-eight Miles Per Hour to Parliament and then me if I

went to home. Yeah.

Mm-hmm.

FRIZZELL:

Q349.

Are we able to keep these?

Α

Oh, yes, they're for you, yeah.

BOORMAN:

Q350.

Do you want to sign them for us?

Α

Oh, yeah, sorry, yep. Do you need the date on them?

Yeah. You may as well date them.

FRIZZELL:

Q351.

Nineteenth of the fourth, write in here, twenty-one, the date.

Α

Yeah, the year.

BOORMAN:

Q352.

Thanks for that.

Α

That's okay.

FRIZZELL:

Q353.

And then from - so, you had mentioned earlier that you were leaving,

you'd had a discussion with Fiona.

A Oh, leaving, sorry, Parliament?

Q354.

Yeah, yeah.

Α

Not the bar, sorry.

Q355.

Yeah, sorry. Who knew about it?

Α

Well, I mean, who didn't know (laughs). Um, former staff here had left Steven ClOBO's office. Carly ABBOTT, for example, she was - I

was close to her. Um, I had discussions with her. Daniel WARD who was, um, the senior legal officer for the Prime Minister, I'm assuming he's been across all of this.

Q356. Mm-hmm.

Um, ah, Michelle LEWIS would have known. Um, I'm just trying to think who else – I'm just trying to think of confidants I have discussed it with. Paul O'SULLIVAN, who's a close confidant of mine, the former Director-General of ASIO. Um, so, these people, Taylor ROBERTSON, who was a – ended up being a reference for my jobs outside of Parliament and politics. Um, so these are people I've discussed – Alex, Alex my girlfriend, obviously because she was in a good job, so um.

Q357. What about the people in your office?

A Ah, who? Ah, Jesse WATT it would have been, would have been aware. Oh, not many, we were quite close. Um, um, I'm just trying to think who else, Michelle LEWIS, she was there she would have known. Fiona BROWN was – my interactions with Fiona, they were a formal sort of thing, because I didn't know her very well. And I think the DLO, I just can't remember her name, she had black hair, from Home Affairs, the DLO she would have known I was quite close to her. Yeah, that's – that's as much as I can recall.

Q358. What about Brittany?

A Um, possibly. Yeah, but I mean people talk, you know, I mean this – it got around certainly.

BOORMAN:

Q359. Yeah, I was just going to ask you that. Is – you know, if you know things in-confidence, there's a common within Parliamentary staffing, is there one person - - -

A Oh, yeah, because they would have been angling for my job there.

Q360. Right.

A Absolutely, so, particularly if they were genuine and they saw an opening, because my position as adviser might have been used for policy but it was up to the chief of staff and minister how they utilised it. So, it could have been – I mean you could be in – it's quite often that, um, people are employed as an adviser, but not for that amount of money, but just a receptionist.

Q361. Mm-hmm.

A So, and that – that's reasons for that, um, but that's – they can use that role for however they want.

Q362. Is it pretty ruthless you would say?

A Very, um, that's – that's the basis for me wanting to get out, um, was that I'd had a gut full. Probably soon after TURNBULL was ousted, I – my mind started to working out a transition out. And at that point I was with Bridget MCKENZIE and – and I mean, you know, I don't

want to use it as a therapy session but minister's treat their staff in a way that's not the same I've seen since leaving politics.

Q363. Mm-hmm

A It's very mentally scarring.

Q364. Mm-hmm.

A Um, Bridget MCKENZIE was one minister who was notorious for treating her staff poorly and me included on a very personal level.

Q365. Mm-hmm.

And – and I just formed a view that the culture of that place, I know there's been a lot of discussion about the treatment of women, but irrespective of that, I think that broadly the culture was horrendous. Um, I was not a member of a political party. I, of course, supported one side, but I was there to do my policy work, I was studying, but most of the time I was working as well. And – and I was there to, you know, receive advice from departments and put out good policy.

Q366. Mm-hmm.

A Not to sort of stuff around and use it for political – a lot of people would use it for party political, um, things, you know, so that part of it, I didn't like that and I – I'd just had enough, I'd done it long enough. I'd worked fourteen, fifteen hours days long enough and yeah.

Mm-hmm.

FRIZZELL:

Q367. What was the interaction like in your area, with the new group of people?

They were, um, tense, because you had – essentially had new staff, you had the old REYNOLDS staff, we were a small office joined in taking these other staff from CIOBO's office, and we didn't know anything about them.

Q368. Mm-hmm.

A Um, and Fiona BROWN, um, came on board as the minister's friend and acted as the chief of staff.

Q369. Mm-hmm.

A. Um, and she sort of – as was her right, started setting up the office, making decisions.

Q370. Yep.

Um, so, it was – it was – there was – it was tense, you know bringing two offices that didn't know each other together. Who's doing what, who's responsible for what in those initial few days, um, yeah. But we – we eventually got to a point where it was workable, don't – don't get me wrong, you know.

BOORMAN:

Any further questions about The Dock?

FRIZZELL:

No.

BOORMAN:

Q371. So, based on your bank statements you've shown that you were spending at The Dock on that evening was - - -

A Sixteen dollars.

Q372. --- sixteen dollars. And you stated that you believed you were in a shout or you can't recall, you can't be certain?

A I can't be certain. It's – it's common that I would have been, but – but at the same time I treated this event very differently to just – just a staff one going to the Kingo for a drink. And because I was – there was the public service, so, we operated a little bit differently, yeah.

Q373. And when you were at The Dock, just before you left, what do you believe your intoxication level was?

A Oh, moderate level. I suggested let's go to Eighty-eight Miles Per Hour. We got let into Eighty-eight Miles Per Hour as well. So, no, I was – I was okav.

Q374. Yeah. All right. So, can you tell me about how and how you ended up getting to Eighty-eight Miles Per Hour from The Dock, how did that – what eventuated there?

A Ah, well, it would – it would have been an Uber.

Q375. Yeah.

A Um, I don't – I don't have a record of doing that Uber.

Q376. Mm-hmm.

A So, but yeah, my recollection is that it would have been an Uber because there's not a lot of taxis around the Kingston Foreshore.

Q377. Yeah. What time of night was this?

A Probably when The Dock, The Dock closes – closes rather early, it would have been close – close to midnight. Like you sort of then head to the city if you want to keep going because all of those bars close, because there's residences there obviously, so.

Q378. Yeah. Okay. Can you – can you explain, who went to Eighty-eight, how did the arrangement, who made those arrangements and who was involved?

A I – I can't recall, all I remember is I suggested Eighty-eight, that was one of my favourite places.

Q379. Mm-hmm.

A Um, so, I can't recall – I don't believe it being a formal, ah, formal sort of set-up sort of thing, it was sort of an open – this is where we're going.

Q380. Mm-hmm.

A Um, who to join a sort of situation, yep.

Q381. Yeah. And who did join you?

Well, from my recollection it was Brittany, Austin, um, and Lauren, because he was – he was rather close to this Lauren girl.

Q382. So, just the four of you?

A To the best of my recollection, yeah.

Q383. Yeah. No, that's okay, only what you remember, yeah.

A Yeah. It was a long time ago (laughs).

Q384. So, let's recap there. You're saying that you left The Dock, you think you took an Uber but you've got no records of paying for that. And you went with Brittany, Austin and Lauren?

A Mm-hmm.

Q385. Right. Austin WENKE, Lauren, what's Lauren's surname?

A I – I just remember it starting with "G."

Q386. Right. Do you know – what did she look like?

A Mm-hmm, blonde. I'm friends with her on Facebook.

Q387. Ah - - -

A I don't talk to her, we're just friends, like we added out of each other, I just – yeah, post meeting each other, yeah. I'm sorry, I can't even recall her last name, sorry.

Q388. No, no, that's okay, that's okay. So, when you arrived at Eighty-eight, what happened then?

Well, we went in and had a boogie. I really like it there, so, it's good music, so. Um, um, I – my bank records – and you know, I – I don't – I wasn't intoxicated to a – I mean they have very good security on the door there, there's often a line that they're observing before you go in. Um, and, um, I didn't even think we were in rounds per se, because I don't recall going up to the bar often and then coming back with drinks.

Q389. Can you recall how many drinks you may have had at Eighty-eight? A Oh, no, no.

Q390. So, you said - - -

A They would have – they would been stronger drinks than what I was having, so, you know, I was having beers before, but we probably would have gone for something like vodka or something, yeah, yeah.

Q391. All right. So, that's beers before at The Dock, is that what you were drinking at The Dock?

A Yep, yep.

Q392. And at Eighty-eight?

A I – I can't be sure, but I know when I go there, there's not – you don't have a beer at an Eighties club.

Q393. Mm-hmm. What would you normally have?

A Well, some - they have vodka in plastic cups so you can sort of drink a bit quicker and get to the dance floor. (laughs)

Q394. Ah, right, right. Okay.

A Yeah. Because it's not – it's a very loud, on place where you can sort of sit and have a chat, it's loud.

Q395. Right, right. So, you – you've arrived at The Dock, you're there with Brittany, Austin and Lauren?

A At Eighty-eight.

Q396. At Eighty-eight, sorry, I apologise.

A No, it's all right.

Q397. At Eighty-eight, you believe that you said you think you left The Dock at closing time about midnight, so you can't be sure exactly what time we're talking about here?

A I can't be sure exactly, no. Yeah.

Q398. How long were there for?

Oh, a few – a few hours, it was lengthy, we were having – I was meeting – the problem the thing – well, it's not a problem, but the good thing was it would have ended on a meeting was a good thing. Um, so that was, you know, and having good discussions.

Q399. All right. So, was it just the four of you from The Dock that ended up there or other people as well?

A Oh, the best I can recall it was the four of us.

Q400. Right. Okay.

A Yeah.

Q401. And you said before you were there for a couple of hours. In that couple of hours what were you doing?

A Dancing, the four of us would have been dancing, yeah. We were at — you know, we would have got to know each other as I said beforehand.

Q402. Yep. What was – you know other peoples' level of intoxication at that time?

A Similar to me, I mean I didn't observe, um, people to be so drunk that, you know, the night was over, they couldn't function, they couldn't talk to each other.

Q403. Mm-hmm, Yep.

A Um, certainly when police or security did their walk throughs of the club, they didn't determine that. They were kicking other people out of course.

Q404. Mm-hmm. What was the mood between - - - A Very good.

Q405. --- yourself, Brittany, Lauren and Austin?

The group was joyous, happy, um, you know, excited to be coming into the new portfolio, even, um, um, yeah, and forming that link. I mean Lauren's sort of set herself up, set herself up, having been so tied into the Chief of Navy I suppose. It was someone who I think Brittany saw as, um, a helpful contact in terms of a media perspective, because that – as I understood it, Brittany was taking on media work, so, um, that was obviously a useful contact as well.

Q406. Mm-hmm. What – what time did you decide to leave, how did leaving come about, when was that?

A Oh, well after midnight. I can't – I can't give you a specific time but it was well after midnight. Because I often look at my clock and, you know, my watch and – and I would have done the same just like, okay. I've got to wrap it now.

Q407. Mm-hmm.

Felt my pockets and think, you know, what do I need to get, so.

Q408. Mm-hmm. So, you said you were dancing, I take it that you were having drinks but you can't recall how many. And Brittany was dancing and drinking also?

A Yeah, yeah, I don't - I don't recall her being on the dance floor though.

Q409. Right.

A I-I was always on the dance floor.

Q410. Yeah.

A Because I like that bar.

Q411. Yeah.

A Um, but look, you know, that's being here nor there, we were having a good time, we were all happy and – and I didn't observe any of us being, um, so, grossly intoxicated that we were not functioning or anything, so.

Q412. Mm-hmm. Yeah. You mentioned earlier that you said when you went to Eighty-eight you were in a booth, is that like a - - -

A Yeah, when – when you go in there's – it's not a round, but it's sort of more of a rectangle one. You invariably do share it with other members of the public, um, because you're just looking for table space, um, yeah.

Q413. Mm-hmm. So, you recall being in a booth or you don't?

A l can't be sure.

Q414. Okay.

A But I'm confident, I'm relatively confident we would have got a table somewhere, um, yeah.

Q415. Okay. And, you know, when it was time you decided to leave, you said that – you noticed it's time to go, you've had enough and all that sort of thing.

A Mm-hmm.

Q416. Was there any communication between anyone, did you communicate with anyone that you were leaving?

A Yeah, the – the people, yeah. It definitely would have been Austin.

Q417. Yeah.

A And I recall definitely telling Brittany.

Q418. Mm-hmm.

A Ah, and Lauren as well. I mean I – once we sort of entered, that that was the group, and I was leaving, I didn't want to just not just go.

Q419. Yeah, yeah.

A I sort of just gave them my attention that I was heading to Parliament and I had to go and get a few things, I'm heading home.

Q420. Did they stay there or did they all – did they leave as well?

Well, obviously Brittany came with me to the Parliament.

Q421. Yeah.

A Um, I – I don't remember. On subsequent days I've – I've – it was so long ago that I think Austin and Lauren ended up getting together.

Q422. Mm-hmm. A I – I believe.

Q423. Mm-hmm.

A Um, yeah, I think he made that known to me.

Q424. Mm-hmm. A Um, yeah.

Q425. So, you mentioned before that Brittany left with you.

A Mm-hmm.

Q426. And this is in your first account of events, Brittany left with you and you said, "you were going back to Parliament House." Is that correct?

A Mm-hmm.

Q427. What can you recall the conversation with Brittany in relation to this?

Well, not – well, but not word for word. And I don't – I don't recall it being one on one.

Q428. Right.

A Um, and her – she just then indicated that she also had to pop back there.

Q429. Right.

Um, and then I said, "Well, I'm getting Uber did you want to share an Uber?"

Q430. Mm-hmm.

A And that made sense, if that's what she was meant to do.

Q431. Yeah.

A And I – and then I indicated that once I've picked up, gone to Parliament, I'm probably going back home.

Q432. Mm-hmm. So, when you – when you left Eighty-eight, you left with Brittany?

A Mm-hmm.

Q433. Right. Can you describe Eighty-eight, you know, how you left it and

A Yep. Um, you come up the stairs out of – from the underground bar.

Q434. Mm-hmm.

A There's a – there's a cab rank, but you sort of stand there on the pavement waiting for the Ubers.

Q435. Yep.

Who came – you know, maybe do a Uey into Hobart Place and then back over the Commonwealth Bridge and then, yeah.

Q436. Yeah. So, you ordered the Uber. Is that correct? A Yep, yep.

Q437. All right. And that and you've got a record of that in your - - -?

A l'II be able to get that to you, yep.

Q438. Yeah, yeah. And you and Brittany got into the Uber and you proceeded to Parliament House?

A Yep. And was pushed together that where we were going, yeah.

Q439. Yeah. Right. Can you recall what time that was?

A Going and get in the Uber actually, or getting in - - -

Q440. Well, when you left – when you left Eighty-eight and went to Parliament House, roughly what time that was?

A We left Eighty-eight at about one – one thirty.

Q441. Mm-hmm.

A I mean it was between one fifteen and one forty-five that we would have left, you know, it was decided we were going. I ordered the Uber and then it go to Parliament about a quarter to two.

Q442. Mm-hmm.

A Um, and then, um, I ordered the Uber at about, from my desk in Parliament at about, oh, two twenty, two twenty-five and waited for the Uber. And it sort of arrived at about two thirty.

Q443. And what was your level of intoxication when you would have left Eighty-eight?

A Ah, again, moderate. I – I recall things clearly, I mean I don't – yeah, and I certainly recall fixing up the Question Time folders properly and Monday they were all fine. And, you know, um, I recall – and to enable me to do that, I recall conversations from earlier in the evening to do that.

Q444. Mm-hmm.

A So, I wasn't in a state that I was not able to function.

Q445. On a scale of one to ten?

A Probably a seven.

Q446. What about Brittany? A Probably the same.

Q447. Mm-hmm.

A And I – I had no reason, from observations, I had no reason to believe she was any more or any worse than that, any worse than everybody else.

Q448. Right. Yeah, so everybody was a similar sort of behaviour and - - - Unless she was – she – I mean I can't account for her and (indistinct) so, you know.

Yeah, yeah. All right. Have you got anything else about Eighty-eight?

FRIZZELL:

Q449. Yeah, I do. You said they went in and you had a boogie because you always like to go there.

Q450. Ah, who else had a dance with you?

A I can't remember. I – I don't think I – I'm assuming we all did.

Q451. Yeah.

A Yeah, I just don't remember.

Q452. And what were the interactions between all of you like, what do you recall?

A Oh, they would have been – they would have been close, not in a – not in a romantic or intimate way, but just because we'd known each other from the night, um, and went out in public, we don't know anybody else, um, so, that was yeah.

Q453. You said that Austin and Lauren were involved together?

Yeah, I – I recall him telling me that days after, that he did, um, yeah. They were quite close that night.

Q454. How – how close would you say?

Oh, at The Dock and stuff they were quite close, just sort of touching and things like that and yeah.

Q455. Can you tell more about that?

Well, just sort of with hands and, you know, her and him were – I think she was recently divorced, I think she sort of told us all her story about that. So, and they were quite close at Eighty-eight as well I recall, so yeah, just mainly touching. I – I didn't observe any kissing or anything at that point, so.

Q456. Was there anything like that anywhere?

A Um, I can't recall, yeah. I can't remember. They were close, they were very close, they were very close.

Q457. What about your interactions with Brittany?

A h, close, yeah, close. Um, I – because we were – we were sort in front of The Dock, the only ones sort of left, I – you know, we – we all took it upon ourselves to look after each other.

BOORMAN:

Q458. Mm-hmm

A So, that was that, that was the basis of that, yep.

Mm-hmm.

FRIZZELL:

Q459. So, Austin and Lauren were handy and close. Were you and Brittany were close?

Yeah, yeah, we would have – oh, not in a – I don't think I would have done anything, um, out of the ordinary from what I normally would do with other, um, girls who are friends when we go out. In terms of, you know, moving them away from a person that might be coming to dance with them or just, you know, watching out for them. Or opening a door or whatever for them. Um, you know, it was quite friendly. Yeah, like I can't recall exact movements, um, but you know by that stage we were all close, yeah.

Q460. You said in terms of your intoxication levels you described yourself as being moderately intoxicated.

A Mm-hmm.

Q461. And you rated that seven out of ten.

A Mm-hmm.

Q462. What would your one be, and what would your ten be?

A Well, one would be – one would be sober and ten would be, you know, in a cab straight home, um, you know, knock on the door and get my girlfriend down to open up the door. I – I think the fact that I was, um, holding conversations throughout the night very well, um, and able to understand the work that I needed to just get together, um, that – I mean that's sort of a hard question to sort of say, I mean, it's – it's also two years ago, so.

Q463. Sorry. You also mentioned that you ordered an Uber, we've spoken about Ubers a fair bit.

A Mm-hmm.

Q464. Can you tell me a little bit about how you go about ordering an Uber, how long it takes, what information you put into the order?

Oh, sure. So, um, I just go on the app and it provides my location. I confirm the location. Usually Eighty-eight is eight to ten Hobart Place, just out the front there. And then I put in my location. And order and it arrives. Um, and I follow it on the app and all of that sort of stuff and check the number plate before we get in and those sorts of things, yeah.

Q465. But when you order an Uber and I don't know how, I'm one of the few who don't know how, I wonder if you could tell me how.

A (Indistinct) (Laughing).

Q466. You have the input where you are going to?

A Yep, yep, yep, so that's all before you order it, yep.

Q467. All right. So, you go into app on your phone that therefore you are ringing up. Is that what it is?

Yeah, it picks up on – it uses the location services on your phone, you're given an approximate, but then you can amend that and just put in – I just confirm that it's, you know, eight to ten Hobart Place which is the car park out the front of Eighty-eight. Um, and then you put in your location.

Q468. Yep

It – it does help you with, ah, suggested location, so the ministerial entrance is one that Uber recognises, a lot of staff go there, and then you just – you put that and order an Uber.

Right. Okay.

BOORMAN:

Anything else?

FRIZZELL:

No, I'm right.

BOORMAN:

Q469. Are you happy to continue or do you want to have a break?

A No, no.

FRIZZELL:

Q470. We've been going for an hour and a half.

A Oh, God, okay.

What about bathroom break or?

BOORMAN:

Q471. Yeah, do you want to - - -

A I don't need to go, but I – yeah, I'm conscious of, you know, I'm not the only one in the room, so.

Do you want to keep going at the moment or do you need a break, have to have a break?

FRIZZELL:

Yeah, let's take a minute to have a break.

BOORMAN:

Q472. Yeah, absolutely.

A Yeah, yep.

Q473. All right. Bruce, do you agree the time is now – what's it there, seven past five in the evening.

A Yep, it is.

Q474. Right. Record of interview between Bruce LEHRMANN.

A LEHRMANN.

LEHRMANN and Detective Inspector Marcus BOORMAN is suspended.

FRIZZELL:

Yep.

ROI SUSPENDED AT FIVE ZERO SEVEN PM

ROI RESUMED AT FIVE FIFTEEN PM

BOORMAN:

Q475. Recommencement of a taped record of interview between Detective Inspector Marcus BOORMAN and Mr Bruce LEHRMANN conducted at the AFP, Sydney Office, Goulburn Street, Sydney, New South Wales.

A Yes.

Persons present are Senior Constable Emma FRIZZELL, can you state your name?

FRIZZELL:

Emma FRIZZELL, badge one two eight nine six.

BOORMAN:

Q476. And Mr Bruce LEHRMANN, can you just state your name again please?

A Bruce LEHRMANN.

Q477. All right. And Bruce, do you agree the time is now five fifteen pm?

A That's it.

Q478. All right. And I'll just remind you of your rights, you're not obliged to say or do anything, but anything you say or do may be recorded and given in evidence or will be recorded and used in evidence.

A Yep.

Q479. Do you understand those rights? So they still apply, yep. Yep, yep, so far, yep, yep.

Q480. All right. And we've just had a break and during that break we didn't discuss any – anything in relation to this incident. Is that correct?

A No, yep.

Q481. All right. Now where were we? All right. So, we've spoken about the job and we've spoken about Eighty-eight and now we're – I just want to clarify in relation to how yourself and Brittany ended up in the Uber to go to Parliament House. Can you explain – explain that again?

A Yeah, yeah. Yeah, so, I – so, I indicated to the group that – that I was heading off, um, and I needed to stop by Parliament. Brittany had indicated that she also needed to, um, and I offered her a lift because I was already going there.

Q482. Yep.

A Um, and she accepted and well, she said, that she needed to, I didn't – she didn't offer what for and I didn't ask what for.

Q483. Okav.

A Um, but I said, "I've got to go and get my keys." And we left it at that and I ordered an Uber.

Q484. All right. And it's common for people just to go back to Parliament House at all hours of the night is it?

A Yeah, absolutely, um, absolutely. Even when I indicated to Fiona BROWN when she was asking about the after-hours access.

Q485. Yes.

A It was incredibly common, um, yep.

Q486. So, and you say, "Incredibly common," is that for work or socialising purposes?

A Ah, well, in my case it was, ah, ah, the majority of the time for work.

Q487. Mm-hmm.

A Um, ah, or to quickly retrieve something.

Q488. Mm-hmm.

A But, ah, there were times when I've been back with my minister, for example, and the whole office, um, and – and had drinks in the office.

That happened all the time.

Q489. Right. So, there's alcohol kept at the office is there? Yeah.

Q490. What sort of alcohol?

A Oh, beers, spirits, um, not in Linda REYNOLDS's office there wasn't.

But that's – that's also because we were moving offices.

Q491. Right.

I would be surprised if a minister's office didn't have alcohol, yeah, yeah.

Q492. So, you ordered the Uber, you got into the Uber with Brittany and you travelled to Parliament House. Can you tell me what happened then?

A Well, then we got out of the Uber and walked down the – the path, the driveway to the intercom at the ministerial car park.

Q493. Yes

Um, I pushed that, um, indicated that who I was and wanted to access the suite.

Q494. Yep

A Um, or my desk, um, I needed to get my keys.

Q495. Mm-hmm.

A They buzzed us through.

Q496. Mm-hmm.

A Um, the car park to the main point, I think it's called Point – no Point One's at the front, but anyway, whatever Point is it there to the ministerial entrance. Um, they opened the doors, um, there was a couple of security guards there, I think. It's usually well-staffed at that particular entrance.

Q497. Yep, yep.

A Um, and we proceeded to sign in. So, I, um, I offered my ID because I didn't have my pass on me, that was – that was – that was also common during the day, security didn't make a fuss about that at all, that is often the case.

Q498. Mm-hmm.

A So, they positively ID'd me, looked me up, signed the back of the pass, signed the form. Um, went through the members enter, ah, waited for Brittany and I mean, oh, we would have been told to wait at the Foxtrot without the keys as well.

Q499. Mm-hmm.

A Um, so, that was all taking place. And went up the elevators, Level Two, yeah.

Q500. All right. So, what was your demeanour and Brittany's demeanour when you arrived at Parliament House initially?

A Well, I think professional, yeah. I don't recall it being anything else.

Q501. Mm-hmm.

A So, it was like, I was just sort of ensuring that she got to the office and whatever she meant to do at the very least and then – and then, you know, and then I was meaning to do what I needed and then I left, I didn't sort of - - -

Q502. Did you have any conversations on the way to Parliament House in the Uber in relation to why either of you were going to Parliament House?

A No. Oh, certainly why I was, yeah. I was quite upfront about it.

Q503. Mm-hmm. Yep.

A Um, but not about – then it – then it was – it was, ah, particularly The Dock, I was asking about – I know I was talking about Austin and Lauren, because they were close and I think she observed that too.

Q504. Mm-hmm. Yes.

A Um, that's all I can recall being the extent of the conversations, yeah.

Q505. Right. Did Brittany mention why she was going to Parliament House to you at any time?

A No. She – I mean, she – she was the media adviser, so, and there was a quite a bit going on, so, it – it didn't – it didn't shock, well, it shocked me at the time, the timing that she had to do that.

Q506. Mm-hmm.

A Because I was going to get keys, and so wh - - -

Q507. Yes.

A But I like, that's her business, obviously, I'm not a media adviser, so, it's – you know.

Q508. Yep.

Sometimes the minister might have asked her for something I don't know, but if that's not been the case, play – play on, a late request.

Q509. All right. Now, you say you got to the car park entrance, you pressed on the intercom?

A Mm-hmm.

Q510. All right. And you gained access, they let you through to the next step.

A Yep.

Q511. You've gone in first. Is that correct or how – how did you both proceed through the security and were there any issues?

A Well, well, there were no issues.

Q512. Mm-hmm.

A I mean it's a double-doors, we probably just like walked through.

Q513. Yeah, yep.

A Um, um, and it was a normal process, so, I haven't – I sometimes leave my pass and there was nothing out of the ordinary in terms of accessing the building, yeah, without your ID.

Q514. Yep. And you just followed that process?

A As I'd known it for the amount of years that I'd been there, yeah.

Q515. When you sign in, what do you sign, do you show your ID then?

Yeah, you sign, there's a book that you sign in.

Q516. Mm-hmm.

A Um, you know, you've forgotten your pass.

Q517. Yep

A And you sign the back of the green temporary pass.

Q518. Yes.

A Just to say it's yours.

Q519. Yes

A Um, yeah, everything – there was nothing unusual because – because I'd done it before and with – with other people.

Q520. So, you've gone back to Parliament House after hours with other people?

A Yeah, yeah.

Q521. For what purpose?

A To – often to drink.

Q522. Is that a common practice?

A Mm-hmm, mm-hmm.

Q523. After hours?

A Yep.

Q524. Early hours of the morning?

l've never – well, well, probably – I mean we're talking about a long time, so, but my answer is that, you know, it was common practice and – and, you know, more often with your minister.

Q525. Yes.

A So, often with a senior staffer, a group of you and, you know, you've had dinner and then we've got all the booze stuff at Parliament anyway.

Q526. Yeah. Was there any conversation between you and Brittany about going back and having more drinks?

A No, no. I didn't have any – well, we didn't have drinks in the office.

Q527. I was just going to ask you, that was my next question.

A Yeah, yeah, no.

Q528. You said it was a new minister's office, was there any alcohol in the minister's office that you were aware of at that time?

A No

Q529. Right. Okay. So, you've gone – you've gone through the security, you've gone through.

A Mm-hmm.

Q530. And I asked about your demeanour and Brittany's demeanour. How was Brittany behaving when she went through the security?

A Ah - - -

Q531. Were there any issues?

A No, no. She was wearing heels, there was an issue putting heels on as there always is with somebody taking them off and then, you know, security there waiting to take you up. So, but that wasn't out of the ordinary going out there with - - -

Q532. Was Brittany intoxicated at all?

A Well, yeah, we were all intoxicated, yeah.

Q533. At what level at this time, from one to ten?

A I'm – like probably the same as me.

Q534. Mm-hmm.

A We – we were – we were, you know, we were discussing Austin and Lauren being drunk and them hooking up and potentially hooking up.

Q535. Mm-hmm. Yeah.

A I mean we were not at an intoxicated level like they were.

Q536. Right.

A Because we were talking about them, um, talking about the new office and the people we'd met at the Defence thing.

Q537. Mm-hmm. Yep.

A Um, so, and – doing the signing process because doing that way is – requires focus. (laughs)

Q538. Is it a complex process?

A Not complex but it's, you know, it requires you to be aware of your surroundings, talking with security, um, you know.

Q539. If someone was to turn up at Parliament House at security and were ten out of ten intoxicated, do you think they would be let in?

A I would – I would – no way. And it was quite often the case that a member of your party going back after hours was too intoxicated, we did have times when they were sent away and the rest of us could go up, so.

Q540. Who sends them away?

A Usually a senior member of the team that night.

Q541. Okav.

A Yeah.

Q542. Yeah. Are you aware of any time of security turning anyone away or prohibiting entry?

A That night?

Q543. No, in your period, given six years at Parliament House?

Oh, oh, oh, oh, all the time, and not – not from personally seeing it, just by word of mouth, "We had a big night but, you know, these two guys they just weren't allowed in because, you know, security

wouldn't let them have too much to (indistinct)."

Q544. Right, right. So, you said, you went through the process, Brittany was having issues with her heels. Is that her shoes, is that right?

A Yeah, yep.

Q545. Why was that do you know?

A Well, because they had (indistinct) on them, so she (indistinct), yeah.

Q546. And they called someone. Is that right to get you, because you hadn't had your pass - called someone to escort you to the minister's suite. Is that right or?

A No, no, no, they do that as a matter of course after hours.

Q547. Right.

A So, after – I think after ten o'clock they – they lock all the fire – like they double bolt the front doors.

Q548. Okay. Yep.

A Yep. So, if there's a person in there, they have to unlock it, so, if there's a fire, you can still get out.

Q549. Mm-hmm.

So, they have to call the main person wandering the building that has all the keys.

Q550. Mm-hmm.

A Um, to come and escort and open up the whole suite.

Q551. So, how far is it from the security check point to the minister's suite, where your office is?

A Ah, well, up the main lift to Level Two, and then down the hallway to the left. So, you will immediately sort of – oh, yeah, immediately to the right and then down left, because we were on the Reps side.

Q552. Right. So, you know, I take it yourself and Brittany walked from the security check point with the – who – who escorted you?

A The person with all the keys, the security person.

Q553. Right. Are they Parliamentary security or some private? Yeah, yeah, yes, they're Parliamentary security, yep.

Q554. Right. Okay. So, you went and – when you were walking from that security point to the minister's office, were there any issues along the way. Can you tell me anything about that if there was?

A No. No, nothing, nothing out of the ordinary.

Q555. Were you walking in a straight line or were you staggering?

A I wasn't staggering.

Q556. Mm-hmm.

A Um, no, I was with the program.

Q557. Yeah. A Yep.

Q558. What about Brittany, how was Brittany, was she herself?

No observations that she was – no observations that she was any worse for wear, um, none, no.

Q559. So, is there anything – anything that comes to mind that would alarm you if someone was, you know, worse for wear or?

A What do you mean, if they were - - -

Q560. If they were bouncing off the walls or, you know.

A Oh, yeah, if she'd been falling over and things like that, I actually would have said, that's where you – where you need to go and get back in the Uber and go to your place, um - - -

Q561. Right. Yep. Did she ever fall over or anything like that during the evening that you're aware of?

A I never witnessed that, no.

Q562. Okay. So, you've gone up to the minister's office. What happened then?

A I've turned left at my desk.

Q563. Yep. Sorry, the entry, so you said the security people need to swipe you in.

A Yep. Yeah, they opened the, um, door.

Q564. Right. Yep.

A Um, and then that layout I showed you, the reception desk, um, I went, you know, down the hall to the right to my desk in the same corner.

Q565. Yep.

A Um, and Brittany went to the right. Um, I did think sort of think that it was unusual to be – because that's going to the right is the minister's office or the chief of staff's office.

Q566. Mm-hmm.

A Um, but like it's not my place to – you know, she was there to do something, so, um, and, um, but it's possible because they use - like, I mean it's possible she went through there, but it's unusual to go through the minister's – I mean I wouldn't dream of going into the minister's office at all, um - - -

Q567. Was there any conversation between you and Brittany when you were walking to the minister's office that you can recall?

A Ah, not that I can recall, no. Um, yeah, and then so I went to my desk, got what I had to do.

Q568. Mm-hmm.

I got what I needed and then, um, worked on the Question Time folders, very quickly. I wouldn't do policy work at that time of night, while I'd been drinking but while it was on my mind, I was certainly moving certain topics up the front, so then on Monday, it was – I knew – I knew what I had to do.

Q569. So, you say you were working on the Question – again, can you – can you recall what time you got to Parliament House?

A lt was about quarter – quarter to two or ten to two, yeah.

Q570. And how long were you there all up, do you think, how long did you stay there for?

A From entry and exit?

Q571. Mm-hmm

A Probably forty-five minutes.

Q572. Mm-hmm. You've just said, you've gone – after you've gone left you've gone to your desk and you were working on some portfolios, right.

A Mm-hmm.

Q573. Can you explain what a portfolio is, is it a computer record, is it a - a

A Oh, no, no, it's a Question Time brief, so, the big – the big folders of files we have probably four or five of them.

Q574. Right. Right.

A Um, we serve them because in the Senate we represented other ministers.

Q575. Mm-hmm.

A Um, but my primary focus was on the defence matters because it was the new portfolio that we'd not been in.

Q576. Mm-hmm.

A Um, so, I was, um, certainly moving a lot of the Industry, um, matters to the front that could have been controversial, um, the submarine program was certainly one of them which was a focus of mine.

Q577. Mm-hmm.

A Um, so, they were paper-based.

Q578. Right.

A Like you sort of tab them up, um, like they're massive, they're huge folders and you take them into the chamber for Question Time.

Q579. So, what were you doing with those? You said you went there after hours to – to do something, what did you actually do with those portfolios?

A Well, I just left them on the desk.

Q580. Yep. Yeah, yeah, sorry, I'll rephrase that. So, you said you went back there for the purposes of getting your keys?

A Yep.

Q581. And you said you performed some work on or activities with the portfolios. Is that correct?

A Yeah, that's correct, yep.

Q582. Right. When you did those activities, can you explain what you did, can you tell me more about that?

A Sure. So, a lot of it was, um, sticking tabs to certain topics that I recall from discussing with the guys at The Dock.

Q583. Right. Yep.

A Um, so, not on the actual briefs because they're – that's what you get from the department.

Q584. Mm-hmm.

A But we won't alter them, we put a tag on them with our notes.

Q585. Right. Yes.

And the DLO can change them, not necessarily, we can redo them ourselves, um, but it was better to do them through the department, so they can see the changes, so, then they wouldn't send up a brief that was the same, and they would very likely.

Q586. Yeah.

A Um, certainly moving certain topics further up the folder.

Q587. Mm-hmm.

A Um, so, the minister, when she's sitting at her desk, the things that we were talking about the – ah, we were theorising that the Labour Party might ask questions on the Question Time, I was just there, writing notes on the submarine issue and ensuring that the folder was in a way that the minister was happy, it was readily accessible to her. Because when you're asked a question in Question Time, you have a matter of seconds to find, you know, the relevant part, so.

Q588. Mm-hmm. All right. So, when you write these statements, do you write anything or you just put stickers on them or?

A Oh, no, I write and make notes and, you know, yeah, the things that jog my memory, so, yeah.

Q589. At any time did you utilise any electronic equipment whilst you were there during that period, that you can recall?

A It's possible that I logged into my Parliament House computer.

Q590. Mm-hmm.

A Ah, because, um, we typically – well, at Parliament House, so you've got all parties that – it's a rule within the Coalition that if you were doing political work, it's to be done on the APH network, because it can't be FOI'd.

Q591. Yes.

A Um, so, it was – because I was working on the Question Time folders, if I was making notes, political notes, um, for the minister, it would have been on that system, like. The other system had Defence Top Secret and had these Top Secret as well. But then they were useless devices anyway, like they didn't have anything on them, so, yeah.

Q592. So, if you were to – you say, it's possible that you'd logged on?

A Yeah, yeah.

Q593. To – but that would be to the Parliament House - - -

A House computer.

Q594. --- computer.

A Yeah.

Q595. Not Defence or – or the other one.

A No.

Q596. Or Home Affairs?

A Well, if I had a defence, the Defence Department had the Top Secret, then they had the central one which – the central one had the Parliament connected into it and the Home Affairs connected into it, so, I would have had to have logged into that first and then you press a switch and it switches into the other network.

Q597. Right. So, and you said you made notes on that system. Is that right?

A Yeah, yep, yeah.

Q598. So, when you're working on your portfolios, you say, you're tagging them and – but where do you make your notes, is it, "hand written"?

A Hand-written. More often than not, hand-written and that's – that's

the political reason for – you know, it's not recorded anywhere.

Q599. Right. Right. Okay.

A Um, because, you know, the comments we make, particularly about the submarine issue, were quite sensitive about it. Yeah.

Q600. Mm-hmm. Yep. Okay. So, are you a hundred per cent you did or you didn't access the electronic equipment or you don't or you can't recall?

A I – I can't recall, I can't recall.

Q601. Right.

A I know I was doing Question Time stuff then, I'm just thinking because I was doing that - - -

Q602. Yes.

A --- you know, but I do remember doing a lot of writing, so, it's also possible I didn't, because I was just writing notes on – while I was thinking of it.

Q603. Yeah. And what happens to those notes afterwards, like in days later or?

A Oh, the adviser notes and if the minister has written on them they're destroyed because, um, we – know, we don't trust that out of Parliament all views that - - -

Q604. Right.

A Yeah, yeah.

Q605. All right.

A So, they get put into the secure bin.

Q606. What else did you – did you do anything else, can you tell me what

else you did during - that you were there before leaving?

A Well, it was just all at my desk.

Q607. Right

Um, yeah, I never saw Brittany again, um, in the office, so.

Q608. Did you hear her or?

A No, no. I – no, and when she – when she went into – and when she turned right, I thought she was working on what she needed to work

on, so, I, um, yeah, I did what I had to do.

Q609. Mm-hmm.

A I never left my desk.

Q610. Mm-hmm.

A Or my own corner. Um, then when I – when I did.

Q611. Which way did you exit the suite?

A Well, from memory I exited out the back door.

Q612. Why?

A Because my desk up that end, yeah, yep.

Q613. And that's not uncommon?

A That's very common, it's very common for me to enter that way actually.

Q614. Right.

Um, because when you come up the elevator it's right there.

Q615. Right. Yeah. Right. During that period you were in there at your desk, were you drinking or anything like that?

A No. Well, I didn't have any alcohol hidden in the office.

Q616. Right.

A That I knew of.

Q617. Yeah.

A Yeah.

Q618. You don't know whether anyone else did?

A No

Q619. But you didn't consume any alcohol?

A No, I didn't, no, that's – yeah, that's – -

Q620. And how long do you think you were there for?

A Well, at my desk probably twenty minutes or so, yeah.

Q621. And then you say you left your desk and you exited out the door near

your desk, which is the back door?

A Yeah.

Q622. Okav.

A It's still an entrance, it's the staff entrance, yeah.

Q623. Did – and you said before that you – after entering, Brittany went

right.

A Mm-hmm.

Q624. And you went left?

A Mm-hmm.

Q625. And you were saying you didn't see her again?

A No

Q626. During the whole time you were in there.

A That's right.

Q627. And then you exited?

A Yep.

Q628. Did you tell Brittany you were leaving or – or met – was there any conversation in the minister's office while you were there between

the two of you?

A Well, in the minister's office.

Q629. I mean in the suite, in the - - -

A Oh, okay. Ah, well, no, because no, there wasn't I – I – we both – I went left, so, I've gone and I'll get what I need to do and she went to the right. I think all I said, was something like, "Oh, I'm getting what I need, what I need and I'll do what I need to do and I'll head off."

Q630. Can you recall what she said in return or any response?

A No, I don't.

Q631. Did she give you a response or anything?

A Possibly, but I was on my way to my desk. I mean I – you know, I was – my intent was to get what I needed, get out of my head what we were talking about in the drinks.

we were taiking about in the unit

Q632. Mm-hmm.

A And go.

Q633. Mm-hmm.

A Um, you know, I had no, um, there was nothing in my mind that said to me, that I need to be looking after her.

Q634. Right.

A Um, because she has – she signed in herself and we both did all that.

Q635. Yeah. Mm-hmm.

A And she indicated that she needed to do something as well, which were related to her work and I don't talk about people, going into other people's work business, so.

Q636. All right., When you – when you entered into the room did you have your phone with you?

A Oh, well, hang on – the office?

Q637. Yeah, yeah, the office?

A Yeah, yeah.

Q638. When you went to Parliament House, so you had your phone with you on the night?

A Yeah, yeah, well, I needed it, yeah.

Q639. Yeah, yeah. And when you went on the way into your office ---

A Yep

Q640. --- and whilst in the office did you receive any calls, did you make any calls or anything like that?

A Not to – no, not to my knowledge.

Q641. Okay. And you're allowed to have your personal phone on when you're in the office?

A Yeah, yeah.

Yeah. Have you got any questions at this point in relation to the office?

FRIZZELL:

Q642. Yes, I do. Now, you mentioned – and sorry just like before you mentioned that you didn't have a pass.

A Mm-hmm.

Q643. You had got in to ---

A Yeah, I didn't have my usual purple pass to get in.

Q644. Yeah. Why is that?

A Oh, I don't know why, I don't know, I don't know, it's the not the first time — it's not the first time from any staff actually, um, I don't know.

Q645. Do you recall where it was?

A Ah, in the office, um, yeah. So, I don't know why I took it off though. But see, yeah, I – I just don't remember that, I don't remember that, because my intention that afternoon was not to have a big night, so I – I acted normally, like I would be returning to Parliament, so, yeah.

BOORMAN:

Q646. Ah, right, yeah.

A Yeah.

FRIZZELL:

Q647. Now, you've mentioned a couple of times that one of the things that you were working on was a submarine issue. Is that right?

A Mm-hmm. Yes.

Q648. Yep. So, you were absolutely working on – you commented the submarine issue?

A Yeah, yeah, yes.

Q649. And it was a Question Time is that right?

A Yep, yeah, the Question Time folders, we have – we have four at the time.

Q650. Yep. So, was the submarine issue that you've mentioned working on, was that raised in Question Time do you know?

A Um, well, possibly – well, I don't know because I had left then before the next Question Time, so.

Q651. Yep. Who holds those documents?

Well, so, this is the thing with politics, so, the department produces the Question Time folders and when they get to the minister's office, um, they're edited by every adviser who has responsibility for each area. Um, and then I sort of then had that role as the manager collating it, setting up the folder, determining what issues are more important than others, yeah.

Q652. And then you mentioned before that if something needs to be edited, you'd give that to the DLO was it?

A Yeah, so, if it was a non- controversial item, they can just edit it. I don't recall doing anything in relation to those, because Minister REYNOLDS, um, likes to have what we call a pink slip, above the top of the department provided briefs. So, the pink slip is a politically made document, either typed or hand-written, um, whereby there was no mention to the department so, we were saving the department. So, um, quite often there were lots of them pink notes on top of the department notes in the folders.

Q653. In terms of signing in, did they go (indistinct) and sign, and you take your form out. Did you agree each have to sign yourselves there?

A Yeah, yeah. So, we – there's no form they take out, so, they, um, they just ask for an Item, something with your face on it.

Q654. Yep.

A You almost always give your driver's licence, they look you up on the computer, you sign a log book. Then they've given out a

temporary pass and then you get a green pass with a clip-on, and you sign the green pass and put it on.

Q655. Mm-hmm. Can you sign someone else in, like can you sign on someone else's pass?

A Well, only if they're a visitor, but if they're a pass-holder, they do it themselves.

Q656. All right. Do you recall having to do that though? Well, I just sign myself.

Q657. Yeah, what about Brittany?

Um, well, I don't recall that, but she – but she was a staffer as well, so they would have positively identified her, so. So, that wouldn't have been a, um, like she was an employee in Senator REYNOLDS's office, so she was entitled to access to the office.

Q658. What prompted you to leave the office?

A Well, that I was done with my work and I'd got my stuff and I'd not been drinking and I was getting tired and I was going home.

Q659. And just to confirm, I believe you said before that you ordered an Uber and then you got a notification that it was there and you left. Is that right?

A Yes, yeah. Well, no hang on. I – well, you get sort of updates with the Uber, so, you order it and it's been accepted, it's five minutes away, it's eight minutes away. And then if it's – I usually go down when it's like two minutes away, because you've got to sort of fap around the elevator to get down, yeah, yeah.

That's all.

BOORMAN:

Q660. So, you've done your work, so, you've left. You can't comment on what Brittany was doing, is that what you're saying because you didn't see her. You were telling me you didn't see her after you entered?

A I did not see her, no, I did not see her. I don't know what – no, I don't know what she was doing.

Q661. During your conversations prior to entering was there any conversation in relation to I'm going to be twenty minutes, I'm going to half an hour or – or anything like that, was there any agreements to leaving together or?

A No, there's no agreements to leaving together.

Q662. Right

A But I definitely indicated that I – you know, as we were discussing the night at The Dock, I – I did say, I'll get my keys and I'm just going to poke around the Question Time folders based on what we

discussed tonight, or some of the others had discussed tonight, yeah.

Q663. But she didn't say anything in return or you can't recall what she

A No, yeah, no, she didn't and she – no one could help her or anything, I didn't – like that was not required, she was going for her own thing.

Q664. All right. So, at any time when you went to the office were you intimate with Brittany HIGGINS at any time?

A I didn't see her after we went in.

Q665. No, I was just asking if - sort of about the - - -

A Oh, no, so, I wasn't and also because I didn't see her. (laughs)

Q666. Right. All right. So, you leave – you exit, you don't know what happened to Brittany, you get in your Uber, you go home. Is that what you're saying?

A Yep.

Q667. Okay. So, the next day what did you do?

A | can't be quite - - -

Q668. You can't remember.

A Haven't got those reasons, I don't know. Prepared and ironed my shirts for the next - - -

Q669. Did you have any communication with Brittany after that evening of the twenty-second of March or Saturday, the twenty-third of March?

A No, no, no, not to my knowledge. I can't recall, no, no, I'm confident I didn't because it was – as I said the start it was such an innocuous sort of night, like it wasn't – it was not for – for staff to be out drinking, it was not an unusual, this was not an unusual night or anything.

Q670. All right. Did you have any discussions with anyone after that evening about going back to the office and Brittany going back with you or anything like that?

A I can't remember doing so.

Q671. Have you had any communications with Miss Brittany HIGGINS since this event, this night in question, the twenty-second, twenty-third of March, two thousand and nineteen?

A No.

Q672. Would you have any reason to?

A And that goes for most of the staff in that office, yep.

Q673. Mm-hmm. Why – tell me more about that, why is that?

A Oh, well, I was leaving and, um, it was unfashionable to leave before an election as well, so, I was doing that.

Q674. At any time during the night of the twenty-second, twenty-third of March, two thousand and nineteen, did you engage in any intimate behaviour with Miss Brittany HIGGINS at all? You said you were

A Yeah, I can't – I just can't remember that, I know we were close but I just can't remember.

Q675. is it possible?

A Yeah, yeah, it's possible but, um, would I have – would I have acted beyond anything that was a bit flirtatious, absolutely not, because I was in a relationship, so.

Q676. And who were you in a relationship with?

A Alexandra HALL.

Q677. Right. A Yeah.

Q678. How long have you been in a relationship with Alexandra before this evening?

A Um, ah, probably four to five months. Like we were living, we were on the lease together.

Q679. Yeah

Well, we still had a – well, actually, that means – that means I wasn't actually working for Linda for as long, so, I moved from Bridget's – Bridget's on the - . Because Alex and I started going when we both worked for Bridget MCKENZIE.

Q680. Right

A Ah, which was, um, September of twenty eighteen I think.

Q681. Right.

A And then I moved to REYNOLDS's office, so it was probably six months I was actually so, I should correct that, I apologise, I just forgot about that.

Q682. No, that's okay.

A Ah, yeah, so that was – yeah, we moved in together in Canberra, yep. She moved into my apartment.

Q683. So, does she work up in Parliament House or? Well, yeah, you've said you worked together.

A We – we did work together but, um, um, before this event she had, um, accepted a job with Ava MARSHALL here in Sydney in the New South Wales Parliament with the minister.

Q684. Oh, right, right.

A Um, and – and because of that, that just – that sped up my leaving because I thought well, if she's going I'll – I'll actually see if I can get a job in Sydney, so. Let me try and find if I've got that here. Yeah,

yep. Yeah, that's what I've got here, I was looking at jobs in Canberra, um, in the, um, security side.

Q685. Mm-hmm.

A Ah, which I've got records of meetings on the twenty-second of March and I think the week after as well, I met with someone, but I just – I just need – I was going to talk to John in terms of what I could say about those meetings, that's all.

Q686. Yeah, yeah, that's okay. So, now, I've gone over the – and I've asked you questions in relation to the alcohol consumption and all that sort of thing. Can you – at any time during the evening did you buy Miss Brittany HIGGINS any drinks that you can recall?

A Not that I can specifically recall.

Q687. Right. Okay.

A No. As I sort of was mentioning earlier, it's possible we were in rounds and things like that.

Q688. Mm-hmm. A Um, yeah.

All right. Have you got any questions at this point before I-I just want to clarify some things?

FRIZZELL:

Q689. Ah, look, only one. You were just talking about your girlfriend at the time, Alexandra HALL.

A Mm-hmm.

Q690. So, you were living together. She'd just accepted a job in Sydney.

A Mm-hmm.

Q691. You had told Fiona, that you were not going to continue working there.

A Yeah. I already told Fiona I was leaving on the basis of Alex leaving.

I – I made that decision of my own accord.

Q692. Yeah. So, your girlfriend is set up to move to Sydney.

A Yep.

Q693. But you just said that you were – you were looking at some jobs in Canberra as well.

A Well, just because of my interest in national security.

Q694. Yeah.

A So, but I was not wedded to Canberra, I was not – we were going to Sydney, but, um, if – if it was possible for me to move into a national security role, then – then right.

Q695. Would that then end the relationship?

A Well, we discussed it and we were just going to long distance, that was fine because, you know, there was – at that point, you know, I was either going into the private sector or the public service, um, when I do that, I mean to some security role. Um, but that for whatever reason that didn't work out and I actually was progressing to these other corporate roles, particularly with Ogilvy, so that's why – that's what I'm saying for that reason.

Q696. What was your relationship like?

A At that point very good, at that point, yeah, yeah.

Q697. But not – so, you went out on Friday, the twenty-second, for afternoon drinks or the evening drinks. What did Alex know you were doing?

A There was just me – after work drinks. I might have even said to her, when I got there, communication like with her – it was common for me, but it was not just the general staffer drinks, it ended up being more of an event. I probably would have said to her, "Oh, it was a bit more of a Defence evening, you know." Um, yeah.

That's all for me.

BOORMAN:

Q698. Just in relation to drinking, do you drink much?

A Not regularly, no, only on like Friday and Saturday at the end of the week, yeah.

Q699. Can you tell me about how much you would drink on a Friday or Saturday or if you went to an event or something like that? And you mentioned before that you – you know, at certain events you realised who was there, you obviously wouldn't have as many as maybe, well, I'm assuming this is what you're getting at. Like if it was a more friendly sort of off work kind type of event, you'd conduct yourself differently?

A Yeah, it was just – it was just – well, I'd conduct, my – my behaviour is not different but – but – but - - -

Q700. Yeah, I've got what you're saying.

A Yeah, absolutely, I think it was more, um, just ministerial staff.

Q701. Yep.

A And the minister and just the staff and we were at the Kingo, you'd – you'd drink a bit more than if you were at an event.

Q702. Oh, yeah, no, I get it. Now, I just want to – is there anything else that you want to tell me at the moment or you want to discuss at the moment in relation to this allegation before I clarify a number of things?

A Ah, not – not at this point, no, that I can – not off the top of my head.

Q703. Yeah, that's okay. Yeah, we're going to go over that. Now, you said you were leaving in two weeks, but after this event, my – my information is that after the event on the twenty-second, twenty-third, you had a meeting with Miss Fiona BROWN.

A Yes, on the Monday, yep.

Q704. Right. How did that come about, can you tell me about that?

Yep. So, Fiona BROWN, um, called me in. I can't recall the exact time, it was probably mid-morning.

Q705. Mm-hmm.

A Um, she, um, called me into the minister's office.

Q706. Mm-hmm.

Um, unusual, she had her own office. Um, and she – all it was – all that I can recall from that meeting was that, um, she'd been informed by security that Brittany and I accessed the office after hours, constituting a security breach.

Q707. Right.

A And that, um, it was also against, um, the Ministerial Staffing Code of Conduct ruling.

Q708. Yes, yes.

What do I have to say on that. Um, and in a much more brief way and I just like have to you, I said, that I had to get my keys, um, and I was only in there for a short period of time. And I – and that's all that was ever discussed. It was a rather brief meeting.

Q709. Yes

Um, she told me not to bring any phones in. I was also not allowed to bring any notepad or pen.

Q710. Mm-hmm.

A Um, and she – she put that to me.

Q711. Mm-hmm.

Um, she indicated that, um, because I was already leaving, I think we
 I think from my recollection we actually agreed that that Friday of that week, would be my last day.

Q712. Okay.

A I – yeah, for whatever reason, she – well, for the security breach she said, "Look, because of this, it's quite serious." This is that meeting I indicated to her that, you know, this is – you know, this is the first time by meaning after-hours access, it's an issue, because staff do it all the time.

Q713. Right

A Including ministers.

Q714. Yes.

A Um, but she was my superior and that was – and I was leaving anyway, so, look again, but that's what I did, you're my superior, so.

Q715. Yeah.

A I copped it on the chin. And she said, "Um, it's probably best if you just pack up your things and go now."

Q716. Mm-hmm.

A Um, and I packed up my personal belongings, I didn't have a lot of stuff, it was just – you know, annual reports and things.

Q717. Yep.

A Um, and – and left. Um, I didn't talk to anyone in the office – ah, leaving, um, yeah.

Q718. And that was on the Monday or the Tuesday?

A Monday, the twenty-fifth, yeah.

Q719. Right.

A Well, that's how I recall it, it happened pretty quick.

Q720. Yeah, yeah. A Yeah, yeah.

Q721. And – and that was it, you were done then, you left?

A Yeah, well, yes, and that was – yeah, that's right and I left the building, I handed in my pass to security and that was it, yeah.

Q722. And since that did you – since that day did you – when you left, you went – you said you didn't talk to anyone at all? Did anyone - - -

A No, and not even about – like it was a security breach, like it was, you know, and I was leaving, um, and I didn't make much of it because I hadn't been formally terminated. So, because I was waiting for something to happen, which did happen eventually.

Q723. Mm-hmm.

A But that week I sort of just carried on. I was progressing in the job, so, certain jobs.

Q724. Mm-hmm. A Certain jobs.

Q725. Yeah.

So, you know, um, you know, you can actually go through my bank records, you know, I was – I was still catching up with mates and staffers and things like that before they were heading off for the election campaign started. Um, so that was fine, I wasn't – I was – I was more concerned at her terminology saying, "security breach," and things like that, because that was – as someone who's – was a Nazi about sort of security, and working in the space, and she sort of then saying, you know, "A security breach," I was quite concerned because I thought, well, I come back to Parliament and everyone –

and everyone does often. Um, and I was actually concerned that, you know, the AFP would be involved that week for the security breach, but I thought, crap, this is a - - -

- Q726. When you you had that meeting, what did you tell Fiona your reason was for going back there?
- A To for getting my keys.
- Q727. Mm-hmm.
- A Um, I think I indicated I did some work, I didn't specify what,
- Q728. Mm-hmm.
- A Um, that was a special period of time.
- Q729. You mentioned before earlier in the interview when, you know, ah, because of the the environment in Parliament House and the culture and people tend to find things out, it's it's ruthless.
- A Mm-hmm.
- Q730. Someone being let go, terminated or whatever, with that circulate very quickly amongst the staff?
- A I would have thought so, yeah. And I think the shocking part of all of this, is that, um, I proceeded with my life, attended events back at Parliament since leaving. I met with staff at the Prime Minister's office and I've met with officers and through my network I've heard nothing, so.
- Q731. So, you say, it's possible that people would have found out? Can you expand on that, can you tell me more about how that would occur?
- A Well, how that would that occur. I mean - -
- Q732. If you don't know, don't speculate.
- A No, I don't want to speculate, well, I'm not going to, yeah, yeah.
- Q733. All right. Have you got any questions in relation to that at this point? I just want to recap over a over a couple of things. I really appreciate you've obviously given me a version of events. Now, you said that you went back there so, when you went back to Parliament House, you had your phone with you?
- A Yeah.
- Q734. And you can't recall receiving any calls?

 A No, I can't recall, I can't remember that, no.
- Q735. Would it if I just show you something there, this is just trying to explain things to you. Is that we've got here, we've got the date.

 A Yeah.
- Q736. Two four, two sixteen seventeen. We've got some numbers here. Do you recognise this number?
- A Yeah, they look like my ministerial phone, yeah.

Q737. Is that your ministerial phone?

A Well, I only meant the last three digits, yeah, one one.

Q738. So who's? A Oh. then - - -

Q739. Do you know whose phone number this is?

A I – I don't know, I don't know.

FRIZZELL:

Q740. So, we've identified that to be Alexandra's mobile. Is that right?

A Oh, yes, that's why I recognised the last three digits.

BOORMAN:

Q741. Right. A Yeah.

Q742. Did you see there's a number of calls there on the twenty-third at two

seventeen, and I take these are like messages is it?

A Mm-hmm. Yeah. Oh, - - -

Q743. And you didn't answer.

A No. Well, probably because I had – I always have my phone on

Silent.

Q744. Right.

A Um, and I was like how my desk is set up, and my back's turned

away.

Q745. Right.

A At my desk, I certainly would have spoken to her leaving, so.

Q746. Yeah. So, it's possible that your phone was on Silent and you didn't

hear the calls?

A Yeah, I usually leave it on the end of my desk which is a U-shape and

where I – where I have the, um, folders, I would have had my back

turned to my phone to observe.

Q747. Yep. All right.

A So, that's not unusual, that's not unusual to me, that I don't - - -

Q748. Yeah. Is it – you know, do you answer your phone all the time or?

A Oh, yeah, I – I usually answer it but if I'm – like if I'm busy and

distracted and not looking at my phone.

Q749. Yeah, yeah.

A Like I have to have it with me, you know.

Q750. All right.

A Yeah.

FRIZZELL:

Q751. Why do you think she would have called you so many times if that's one who was calling?

A Well, probably was believing that I'd be home at – at you know midnight-ish, she would probably.

BOORMAN:

Q752. And you – you weren't home?

A Yeah, yeah. If that happened I'd do the same to her too, all the time, so.

Q753. Right. Right. I just needed to clarify that. Now, at all times you've said during this interview that your reason obviously for going back, was to get your keys and get some work done, as in from your meeting.

A Mm-hmm.

Q754. And you said that, to the best of your knowledge or your recollection that there was no alcohol or anything back there. Is that correct?

A Yeah, not – not to my knowledge, no.

Q755. Now, we spoke to officers, we're investigators, spoke to Fiona BROWN.

A Mm-hmm.

Q756. And in the conversation, now, I'm just going to read this to you and I offer you an opportunity to provide comment. "And it was and I – I – and I had asked him and I told him that I'd been advised that he and another person had arrived in the early hours of Saturday morning."

A Mm-hmm.

Q757. And in this context, Fiona's referring to that evening.

A Yep, yep.

Q758. And that so for security breaches that was recorded.

A Yep, yep.

Q759. And – and then and could you please explain?

A Yep.

Q760. "And he didn't agree that they were intoxicated, so you've said that.

A Yep.

Q761. Or he wasn't intoxicated. I should say, he didn't agree he was intoxicated. That's what she said. So, you've said that you weren't intoxicated.

A Yes, yeah, yep.

- Q762. "And and when I asked him who'd came came with him, he said, Brittany.' And I asked him why he attended the office? And she says, 'Which he told me was to drink whisky.' And which I challenged why would you do that?" And that's what she said, you told her.
- A Yeah, I didn't have any alcohol in my office.
- Q763. So, can you explain why Fiona would have said that to us or?

 Oh, no, I'm not I'm not too sure at all. And I would have had a recollection of that meeting, if she'd allowed me to have to take records of that meeting.
- Q764. Yeah, yeah. She said, "I asked him what he did whilst he was there, what part of the offices he accessed, because I was concerned about security. And he said, he just came in to have a drink to drink his whisky. He denied going in or accessing anything else during that time. And I said, 'Okay,' and I asked him how much he had and he said, 'About two glasses.'" Do you recall saying that to Fiona BROWN?
- A No, I never drank in the office, I never did that, so, because there's no alcohol, I didn't have any alcohol, so, to access.
- Q765. Okay. So, you can't offer me any explanation why Fiona BROWN would say that?
- A No, I'm sorry.
- Q766. That's okay, I'm just being open with you and I'm trying to work through this.
- A Yeah, and that's - -
- Q767. So, is what you're saying that you didn't have any alcohol in the office and that was not the reason for going back?
- A No, it was certainly not the reason for going back to the office.
- Q768. Mm-hmm.
- A I would have just (laughs) stayed, I don't know (Indistinct)
- Q769. All right. You said and do you recall that when you're at the Eighty-eight Miles An Hour, you went there, there was yourself, Lauren and Austin?
- A Mm-hmm.
- Q770. All right. And you went there and you had a boogie?

 A Mm-hmm.
- Q771. You know you were dancing, that you said there was booths that sometimes people sit in and sometimes you share them or whatever.

 A Mm-hmm.
- Q772. You said that you and Brittany were close when you were there?

 A Mm-hmm.

Q773. Now, I've spoken to or we've spoken to Lauren GAIN.

A Yeah, oh, yeah, that sounds familiar, yeah.

Q774. And she told us about The Dock and Defence members being there and about attending Eighty-eight.

A Mm-hmm.

Q775. And remembers seeing Miss HIGGINS and yourself sitting very close to each other. She saw them rubbing each other's legs, kissing pash Miss HIGGINS slipping over once. She left the venue with – with Austin, but she really can't recall how that was all arranged. So, basically what I'm saying is that Miss GAIN says that you were a little bit intimate with Miss HIGGINS or pashing or what - - -

A Yeah, I'm not - - -

Q776. Can you recall that?

A No. I can't recall it.

Q777. Okay.

A I mean, you know.

Q778. Can you offer me any explanation why she would say that?

A Well, I – I mean I accept that, um, um, we were all (Indistinct).

Q779. Yes

A Um, I just can't recall – recall that, um, but that would have been – I just don't recall that, I just don't recall it. I just can't remember, I'm sorry, it is – it is a long time ago.

Q780. Yeah, yeah, no, that's okay.

A I'm trying to remember.

Q781. I'm just being very transparent with what I've got and, you know, my investigation, but I'm trying to, you know, making sure of the whole situation.

A Yeah, no, I understand, yep.

Q782. Now, this is – if you just have a look at that, that's the Visitor's Pass register?

A Mm-hmm.

Q783. Yeah, it talks about some sort of – down that far.

A Oh, yes.

Q784. So, we've got twenty-third – dated the twenty-third of March, two thousand and nineteen. It's got here – sorry, can you – is that?

A That's my name, yeah.

Q785. Right. Is this the normal process that when you've gone through?

Yeah, you see, quite often, um, I'd often let security write that, so, if they're trying to quickly do this.

Q786. Right. Yep. Mm-hmm.

A Um, they would just write myself, because they've identified me as myself.

Q787. Yeah. Is that your writing though, Bruce?

A It looks - appears, yeah, it appears that I've written my name, yeah.
This is - this is certainly got it.

Q788. Yeah, that's it. And underneath that is obviously, I think, or what I can make out is - - -

A That's not – it doesn't look like mine.

Q789. No, that looks like Brittany HIGGINS.

A Yeah. This looks like security has done this.

Q790. Right. So, you can't – that's not – is that your handwriting or is it Security's?

A Yeah, that would be my handwriting.

Q791. Oh, so, the signature is - - -

A Yeah, yeah, yeah, so, they've asked us to put our names down, yeah.

And they must have looked us up themselves.

Q792. Yep, yep. And this is the register that you're referring to when you arrived at Parliament House and all that sort of thing?

A Correct, yeah, that's right, yes, yes, that's right.

Q793. Okay. Yep. All right. There's just a couple of other things, just to – . Now, in an interview with Miss Brittany HIGGINS.

A That you've done or?

Q794. Yes. That was conducted by police.

A Yep.

Q795. Yep. She alleges that she doesn't remember whether I went to the couch myself firmly. I remember I was being on the couch as he was raping me.

A Yeah.

Q796. Can you offer me any reason as to why Miss HIGGINS would be saying this?

A Oh, I have no idea why she would be stating this. It – it didn't happen because we went in different directions when – as I've said to you as we entered the office, so, yeah.

Q797. Yeah, yeah. She says, "I was stuck in the corner and I couldn't get him off. I was crying, he was on top of me." Words to that effect. "And I said, 'No,' at least half a dozen times." Have you got any comment about that?

A Well, I – well, well, I'm not going to comment because I didn't see her as I stated, so, like you know, I'm now - - -

Q798. Yep.

A --- I've certainly got a lot of views about it all coming out in the

media.

Q799. Yes, yes, yes.

A It's not relevant to give indistinct

Q800. Yes, I understand. Mr LEHRMANN, can you offer me any explanation

why Miss Brittany HIGGINS would make this statement to police?

A I have – I have no idea. I have suspicions around certain things that

happened to me in January.

Q801. Yep.

A That on reflection since this has come out, appear to have a

connection.

Q802. Mm-hmm.

A Um - - -

Q803. And what – what were those things that happened in January?

They were, ah, two emails from a domain name, not owned by me.

Q804. Mm-hmm.

A bruce dot lehrmann one at outlook dot com

Q805. Mm-hmm.

A I only have one of them but I have a record of the other one just on

the content of it.

Q806. Right.

A Um ---

Q807. Can you just explain that to us again, bruce?

A bruce dot lehrmann one at outlook dot com. So, they were in early

January. Um, ah, fifteenth of January was one of them.

Q808. So, you've received emails from this ---?

A That same address, yeah, which is not mine.

Q809. Through – through which - - -?

A My b dot lehrmann at Hotmail dot com, which is my personal - - -

Q810. b dot - - -

A lehrmann at hotmail.

Q811. Yeah. And this was in January this year?

A Correct.

FRIZZELL:

Q812. Who has access to your personal emails?

A Ah, well, if people who know me, like I knew a lot of people.

Q813. Is it publicly accessible like is it - - -

A Oh, not publicly accessible, no, I mean, you know, it might have been on things like my Twitter Bio, like so, prior to the fifteenth of January, receiving this email.

BOORMAN:

Q814. Mm-hmm.

A Um, I was sent a Friend Request on Twitter by David SHARAZ, who – I've only now subsequently found out that he is her partner.

Q815. Right.

A Through media reporting.

Q816. Mm-hmm.

Um, I've never really known him, oh, it's possible that I met him over the course of my career when he was a journalist.

Q817. Mm-hmm.

Um, but he sent me a Friend Request on Twitter. I got an In-box on Twitter that said, "Hi, Bruce, um, thanks for adding me. You may remember me from your days working with Linda REYNOLDS."

Q818. Mm-hmm.

A l've gone, oh, okay.

Q819. And that was in January?
A Yep. Yep, before the emails.

Q820. Mm-hmm.

A And I've gone, okay, yep, I probably did.

Q821. Right

A The next day I was going to reply to his message but he had blocked my account and I couldn't message him back.

Q822. Mm-hmm.

A Um, and then I have Twitter, um, support evidence that, um, there was a numerous attempts to impersonate my account.

Q823. During what period?

A Um, early – early January, so, just the first half of January.

Q824. Mm-hmm.

A Um, various accounts being created, "Bruce the rapist." "You're a rapist." Trying to follow me, tag me. Oh, I mean, I can get them from Twitter.

Q825. Yeah, yeah, yeah.

A Because obviously I – I didn't think much at the time.

Q826. Mm-hmm.

A Except I thought, oh, this is a hack job. So, I did the right thing, changed passwords, reported it.

Q827. Mm-hmm.

A The same thing, blocked that email address.

Q828. Mm-hmm.

A Um, so – so, that was with Twitter.

Q829. Mm-hmm.

A And then that's when I said, when I was handing my phone over, I got rid of Twitter because it was just this relentless, just impersonating, using my photo, my bio and then they would send out Tweets, they'd have no followers, but they'd Tweet at me.

Q830. Mm-hmm.

A Just with disgusting things.

Q831. Mm-hmm.

A And that's why I got rid of Twitter because I would report it and this person would then create another account.

Q832. Did you ever think of reporting it to police or?

A I didn't feel – I didn't think that my life was in danger and I thought it's a key-board warrior.

Q833. Yep.

A And I thought I was doing the right thing changing passwords and things and securing everything.

Q834. Mm-hmm.

A Um, um, so, I didn't think anything of it. I didn't – I certainly didn't make as I mention here.

Q835. Yep.

Till after the fifteenth of Feb, when I found out about all this, so.

Q836. And then you say you found all about this. Are you talking about the allegation?

A The sexual assault I meant, yeah, yeah.

Q837. On the fifteenth of February. How did you find out?

A At around about two o'clock, um, Rosie LEWIS from the Australian, emailed my, um, boss at BAT

Q838. Mm-hmm.

A And he called me in and, um, sat me down and said, you know, he'd got – he sent me the email that someone at BAT emails, which I don't access to anymore.

Q839. Yep.

A But to the effect that we've heard from government sources that Bruce is the alleged person.

Q840. Mm-hmm.

A That, you know, does he want to respond?

Q841. Mm-hmm.

A Um, of course I didn't and that's how I found out and on that day.

Q842. What did you think?

A Oh, I – I was ready to go.

Q843. Mm-hmm, mm-hmm.

A Yep.

FRIZZELL:

Q844. How come?

A l'd had it. Yep. So ---

BOORMAN:

Q845. It's all right.

A --- um, that week, I wound up everything and just kind of go. My single mum was going to be okay, she can get my super.

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Q846. Mm-hmm.

A Um, just – just journo's and just shit in the media.

Q847. Mm-hmm.

A Like just some of the articles and people just taking apart of years of me advising. Um, you know, I didn't get relentless phone calls from journalists but it was hurtful when I got them or my sister was getting them in the US. So, my family in the US, who I've never spoken to, have been contacted over Facebook.

Q848. Mm-hmm, mm-hmm.

Um, there's a lot of things, like Channel Nine, a person named Keith O'KEEFE, I understand has got footage of me, you know, trying for the first time, trying to access mental health because I'm – you know, I'm at my wits end because I – I know politics that when this – something like this happens and – and you're shut off from everyone, that you're – you're done.

Q849. Mm-hmm.

A Like from a – from a PR perspective. Like and I thought that there's – I can't, there's no – I can't get a job, nothing.

Q850. Mm-hmm.

A And so that's how – and I've – I've finally been able to – I've got support now.

Q851. Yep. Mm-hmm.

A But it was a very tough sort of fortnight I suppose.

Q852. Mm-hmm. Yep.

A Um, and who I could talk to and trust.

Q853. Mm-hmm.

A Because, you know, I was hearing at, you know, Channel Nine took the footage of me and whatever, so.

Q854. Mm-hmm. And you're getting that support now?

A Yeah, it's – yeah, I am.

Q855. Yeah

A I mean this – going through this process, like I was getting stronger.

Q856. Mm-hmm.

A Um, you know, and I think I mentioned to you like I'd — you know, I haven't – I hadn't spoken to my counsel in – in weeks.

Q857. Yeah, yeah, yeah, yeah.

A Because I just thought – and they kept saying, "Well, what do you want us to do?" Because nothing happened like, so.

Mm-hmm. Bruce, I'm going to - I'll be very blunt and I'll put it to you in relation to this allegation. You know, the allegation is that on the evening of the twenty-second, twenty – twenty-third.

FRIZZELL: Yep.

BOORMAN:

Q858. Of March, two thousand and nineteen. You had – you had sexual intercourse without consent with Brittany HIGGINS in Parliament House.

A Mm-hmm.

Q859. Is there any truth in that allegation? Did you, at any time have intimate sexual intercourse without consent with Brittany HIGGINS on that date?

A No, no.

Q860. Is there anything that you can offer me in relation to an explanation as to why Miss Brittany HIGGINS would make this allegation if it was not true? If you're saying it didn't happen, if you're saying you didn't do it, what reason would Miss Brittany HIGGINS have to make this allegation?

A I – I don't know but I suspect it goes beyond just me.

Q861. Mm-hmm. What do you mean by that?

A Well, I'm – I'm strongly of the view that there are political factors at play here.

Q862. Mm-hmm.

A I – I have been out of politics for a very long – a period of time.

Q863. Mm-hmm, mm-hmm.

A And I have – I have progressed into two other jobs where I was conducting government relations, going back to Parliament and meeting with ministers.

Q864. Mm-hmm.

A In the same building as her. Um, I don't - - -

Q865. Yeah, go on.

--- I just don't know, I don't know, I've got my suspicions, I just don't want to sit here and go theorizing everything because that's not the point of it, so.

Q866. Is there anything about the evening of the – you know, the twenty-second, twenty-third of March, two thousand and nineteen, that you – you haven't, you know that you haven't disclosed to me or discussed here tonight, that you can recall?

A Not - not that I can remember.

Q867. Mm-hmm.

It was a long time ago. Um, it was dealt with as a security breach and I was certainly concerned about AFP involvement in those couple of weeks after that.

Q868. Mm-hmm. Yep.
A Um, ah, so, that's - - -

Yep. Mm-hmm. Have you got anything else you want to discuss at the moment?

FRIZZELL:

No.

BOORMAN:

Q869. Bruce, you know, over the course of the next few weeks or so, I would like to – you know, there may be things I need to clarify and discuss with you again.

A Yeah, yeah.

Q870. Of course, we'll work out after the interview the best way of communicating that with you, whether it's through Mr KORN or yourself.

A Yeah.

But, you know, this is an opportunity and I appreciate you coming in to give your recollection of events. Um, we've got a lot of things that we need to work

through. And again, like I say, at this point in time, you're not under arrest, you are not being charged with anything. And we have further investigations to conduct. Okay.

FRIZZELL:

Q871. I might – sorry, have you had conversations with anyone about

what's been alleged?

A Yes.

Q872. In detail.

A Um, um, only – I think you met him, Lyndon up in Toowoomba.

BOORMAN:

Q873. Mm-hmm

A Yep. My mum – my mum, not in detail.

Q874. Mm-hmm.

A But Lyndon, yes.

FRIZZELL:

Q875. And what about after - - -

A And he's been a big support.

BOORMAN:

Q876. Yep.

A Yeah.

FRIZZELL:

Q877. For the night out on the twenty-second into the twenty-third of

March, did you talk about that night with anyone afterwards? Did

you talk about it with Alex, with Austin?

A Oh, I've – yeah, probably only to the extent that it was the Defence

drinks.

BOORMAN:

Q878. Mm-hmm.

A Um, and they – they were useful and I met who I needed to meet.

Mm-hmm.

FRIZZELL:

Q879. Yep. Who would you have spoken to about that?

A Oh, oh, yes, Alex. Um, oh, no, um, possibly Daniel WARD in the Prime Minister's office.

BOORMAN:

Q880. Mm-hmm.

A Um, ah, I was very close to him. Um, he was – like he – he was sort of helping me like, you know, if an opportunity there at Parliament the week before.

Q881. Yep.

A Um, ah, I just – like I can't remember people – like it's – those are sort of definite ones I would have discussed it with, at that time, about the – you know, the drinks and yeah.

Q882. All right. Is there anything further, at this point that you wish to tell me about this matter?

A No, um, no. It's – I think you can tell I've – yeah, my world has been rocked, so.

Q883. Mm-hmm. Have the questions you've answered here today been of your own free will?

A Yes.

Q884. Has there been any threat, any threat to make you answer any of my questions here today?

A No.

Q885. Has there been any inducement made to you to answer my questions today?

A I'm surprised youse have to ask that. (laughs)

Q886. Has there been any promise made to you to answer my questions here today?

A No.

Q887. All right. Well, Bruce, thanks for coming in and participating in this record of interview. Is there anything further you wish to say?

A No. I suppose, um, in terms of my movement, am I able to go back to

Toowoomba and - - - ?

Q888. Absolutely.

A Okay. All right. Well, I've got my psychologist up there and things, so. Oh, well, no, I haven't – when you say, have I been talking about the allegation specifically, like they – they – my psychologist knows, I don't talk in detail and that's obviously been on the advice of counsel.

Q889. Yeah, yeah. Yes.

A Because I'm aware that you could subpoen athem, so, yeah.

FRIZZELL:

Yeah.

BOORMAN:

Q890. Yes, yeah. Yep.

A The Twitter, do you want the records of me reporting the Twitter?

Q891. Yeah. Anything you can do that you believe may be able to assist us in our investigation that would be appreciated, um - - -

A Okay.

FRIZZELL:

Q892. I can give you my email.

A Okay, yeah.

BOORMAN:

Q893. Yeah. So, you know, what's – what's going to happen now. Like I said, we've got further inquiries of investigation to undertake. Let me be very clear, you're not under arrest. You can, you know, you're not restricted in any movement or anything like that.

A Okay.

Q894. And the investigation is on-going. As I said, there may be – you know, we may want to speak to you again to clarify things or if we have any questions. And we'll be in touch.

A Yeah, that's fine, yeah. I – I didn't try to avoid flying.

Q895. Yeah, that's fine.

A Um, because the media thing is - - -

Q896. Yeah, we can come to you, we can come to you, that's fine.

A Um, the only thing that you've skipped out, um, I don't – well, I don't know, that's probably the wrong way to put it. But a week after that meeting with Fiona, there was another round of discussions that I had with her.

Q897. Mm-hmm.

A Um, and a gentleman called Reg CHAMBERLIN. Um, but that was via telephone, um, where she just confirmed my version of events.

Q898. Mm-hmm.

A Um, and I think he now works in the Prime Minister's office, um, but he was working with the Special Minister of State and handling staff matters, so, they were finalising my – my particulars and obviously with the Department of Finance to – to leave.

Q899. Did they give you anything in writing, Bruce?

A They did.

Q900. Mm-hmm.

A Um, an email which I've – because I specifically asked at that point to do it in writing.

Q901. Mm-hmm.

A Um, because of the fact that, um, I wasn't allowed to do notes and things, so, I thought if they're going to be alleging a security breach

Q902. Was that common practice?

A Um, unfortunately, yes.

Q903. Mm-hmm.

Fiona BROWN, um, um, like I'm – she was just a bit difficult to work with.

Q904. Mm-hmm.

A And in terms of her ways of working in the office was unorthodox.

Q905. Mm-hmm. Right.

A I found.

Q906. Yes.

Um, in terms of being improper, um, but so, and when I said, like I wasn't allowed to bring phones or even a notebook in, I found that quite peculiar.

Q907. Mm-hmm.

A Um, but that second – that happened when I'd already left the building that phone call, yeah.

Q908. During your time at Parliament House, had you been – was there any incidents prior to this incident that you were spoken to about?

A No, no, not formally, no.

Q909. Mm-hmm. All right.

A No. no. Um, not – not – no, by a superior or by a minister.

Q910. Mm-hmm.

A In the ordinary course, ministers are shouting at me all the time, but, you know, "Bring me this or bring me that."

Q911. Mm-hmm, mm-hmm, yeah. All right. Is there anything else you want to tell me or bring up at this point?

A Ah, no, I – I apologise I didn't – I missed that.

Q912. No, that's fine, that's - thank you.

A I – I, um, ah, but that's – that's all. I mean my recollection of that was in similar with the first Fiona BROWN meeting, just confirming that meeting.

Q913. Yep.

A Reg didn't say much at all.

Q914. Mm-hmm.

A Um, yeah, and then I got my notice from the Department of Finance, so.

Q915. Yep.

A Which – which detailed, it just said the, "security breach," so.

Mm-hmm. All right. Any further questions at this point?

FRIZZELL: No.

BOORMAN:

Q916. All right. I've told you that the investigation is on-going. We may need to reach out to you again. You'll be given our contact details and everything like that. I'm waiting to speak to my colleague in relation to – to your telephone.

A Yeah.

Q917. All right. Do you agree the time is now six thirty-seven pm in the evening?

A Yep, yep.

All right. Thirty-seven. All right. Bruce, this record of interview - - -

ROI CONCLUDED AT SIX THIRTY-SEVEN PM

No. NSD 103 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

CERTIFICATE IDENTIFYING ANNEXURE

This is the annexure marked "MRS-4" now produced and shown to Marlia Ruth Saunders at the time of affirming her affidavit on 10 March 2023:

Signature of Roy Leigh

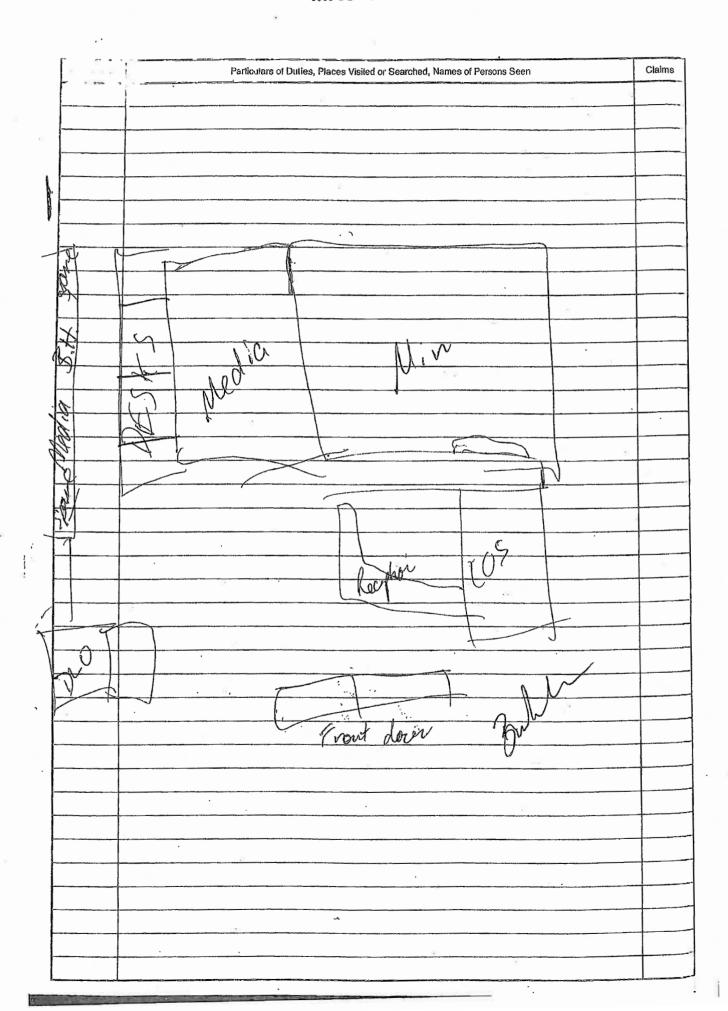
Thomson Geer

Level 14, 60 Martin Place

Sydney NSW 2000

An Australian Legal Practitioner within the meaning of the Legal Profession Uniform Law

"MRS-4"



No. NSD 103 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

CERTIFICATE IDENTIFYING ANNEXURE

This is the annexure marked "MRS-5" now produced and shown to Marlia Ruth Saunders at the time of affirming her affidavit on 10 March 2023:

Signature of Roy Leigh

Thomson Geer

Level 14, 60 Martin Place

Sydney NSW 2000

An Australian Legal Practitioner within the meaning of the Legal Profession Uniform Law

"MRS-5"

VAIL	VIID UEL EUEUGE HOUNEN	
210319	UBER *EATS HELP.UBER.COM AU	19.00
120325	74557029080041710873546	
220319	UBER *TRIP HELP.UBER.COM AU 74557029081051036425607	11.79
220319	UBER *TRIP HELP.UBER.COM AU 74557029081051210053563	12.76
220319	THE DOCK KINGSTON KINGSTON AU 74229859082911888941315	16.00
220319	KINGSTON HOTEL GRIFFITH AU 74564729084324944448661	24.20
230319	88 MPH Canberra AU 74249239082000005377040	40.00
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230319	UBER *TRIP HELP.UBER.COM AU 74557029084060218884801	12.47
230319	UBER *TRIP HELP.UBER.COM AU 74557029084060604894190	8.00
240319	Gewurzhaus - Canberra Canberra AU 74249239083000151956984	16.50
240319	AUSTRALIAN SPIRIT COMP ASPENDALE AU 74940529083806173752227	65.00
240319	SPORTSCRAFT CIVIC SQUARE AU 74564459084108812740034	307.97 Jaly 21
240319	SQ *QUARRY HILL WINES Lyneham AU 74375889083028551933830	35.00
240319	SQ *ALTINA DRINKS Lyneham AU 74375889083031043722837	60.00

18 Mar 2019

banking.westpac.com.au/secure/banking/overview/accountactivity?accountGlobalid=6F555028624D6350524E754F2867334777694747745A4D797248693837637546745257513755386 VouTube - Broadcas... Best Online Horse R... DEBIT CARD PURCHASE KINGSTON HOTEL GRIFFITH AUS -\$32.50 \$1,729.01 25 Mar 2019 DEBIT CARD PURCHASE KINGSTON HOTEL GRIFFITH AUS -\$24.20 \$1.761.51 25 Mar 2019 DEBIT CARD PURCHASE THE PEDLAR PTY LIMIT CAMPBELL -\$7.00 \$1,785,71 25 Mar 2019 AUS DEBIT CARD PURCHASE AUSSIE CPTL HLL GEN CAPITAL HILL -\$7.60 \$1,792,71 22 Mar 2019 AUS DEBIT CARD PURCHASE DEP PARL SERVICES CANBERRA AUS -\$7.50 \$1,800,31 22 Mar 2019 WITHDRAWAL MOBILE 1026825 TFR Westpac Life -\$1,000.00 \$1,807.81 21 Mar 2019 WITHDRAWAL MOBILE 1021606 TFR Altitude PI -\$1,383.83 \$2,807,81 21 Mar 2019 \$4,191,64 WITHDRAWAL-OSKO PAYMENT 1024089 Harcourts Prime -\$1,470,00 21 Mar 2019 Residential Trust 100126 DEBIT CARD PURCHASE OPTUS BILLING SERVICES \$5,661,64 21 Mar 2019 -\$110.47 MACQUARIE PA AUS DEBIT CARD PURCHASE DEP PARL SERVICES CANBERRA AUS \$5,772.11 21 Mar 2019 -\$7.50DEBIT CARD PURCHASE DEP PARL SERVICES CANBERRA AUS -\$4,10 \$5,779,61 21 Mar 2019 DEPOSIT-SALARY Department of Fi 8426899 \$3,247,60 \$5,783.71 21 Mar 2019 DEBIT CARD PURCHASE DEP PARL SERVICES CANBERRA AUS \$2,536.11 20 Mar 2019 -\$10.50 19 Mar 2019 DEBIT CARD PURCHASE DEP PARL SERVICES CANBERRA AUS \$2,546,61 -\$10.50 19 Mar 2019 DEBIT CARD PURCHASE DEP PARL SERVICES CANBERRA AUS -\$4,80 \$2,557.11 19 Mar 2019 DEPOSIT 2951383 HALLA, Rent \$750.00 \$2,561.91 18 Mar 2019 DEBIT CARD PURCHASE WOOLWORTHS 1419 CAND AIRPOAC -\$108.78 \$1,811,91 AUS

DEBIT CARD PURCHASE KINGSTON HOTEL GRIFFITH AUS

-\$44.20

\$1,920.69

No. NSD 103 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

CERTIFICATE IDENTIFYING ANNEXURE

This is the annexure marked "MRS-6" now produced and shown to Marlia Ruth Saunders at the time of affirming her affidavit on 10 March 2023:

Signature of Roy Leigh

Thomson Geer

Level 14, 60 Martin Place

Sydney NSW 2000

An Australian Legal Practitioner within the meaning of the Legal Profession Uniform Law

"MRS-6"

From:

Josh Fett

Sent:

Tuesday, 25 May 2021 5:01 PM

To:

b.lehrmann@hotmail.com

Subject:

Copy of letter posted today

Attachments:

Letter to Bruce Lehrmann.pdf; Bruce Lehrmann role profile.pdf

Hi Bruce,

I've tried getting hold of you via mobile a couple of times in the past week with no luck so have posted the attached letter and role profile to you today.

Hope to hear from you.

Regards

Josh Fett

Head of Corporate and Government Affairs m: +61 (0) 410276967 a: 166 William St, Woolloomooloo, NSW 2011, Australia www.bat.com





166 William Street Woolloomooloo 2011

> Locked Baa 6000 Potts Point 1335 NSW Australia

NSW Australia

25 May 2021

Bruce Lehrmann

204/4 Karrabee Avenue Huntley's Cove 2111

Cc: by email b.lehrmann@hotmail.com

Private and Confidential

Tel +61 2 9370 1500 Fax +61 2 9370 1188 www.bata.com.au

Dear Bruce.

Your Leave of Absence

We are writing to you about your absence from work.

We understand that you became unfit for duties on 15 February 2021 and have not returned to work since this date. We have attempted to contact you to discuss your current circumstances on several occasions over the past week to obtain an update on your condition, with no success.

Personal Leave

Even though the Company has not received any medical certificates from you since 15 February, it did make the decision to extend paid personal leave to you beyond your statutory minimum entitlement of 10 days per year of service. However, the Company does not believe that it is reasonable to continue to pay you such benefits beyond a period of absence exceeding three months. As such, we did wish to put you on notice that we will cease making these payments to you from 4 June 2021.

Request for Medical Information

As you have now been absent from work for a period exceeding three (3) months, the Company is at a point where it needs to consider your ongoing employment.

We do request that as a matter of urgency you provide us with a medical report from your treating practitioner which deals with the following questions:

- 1. Are you currently fit to perform the inherent requirements of your position without placing at you his health or safety or the health or safety of others? [We enclose your role profile].
- What is the extent of your unfitness and what restrictions apply to your ability to perform this 2. work? Are there any accommodations which the Company could make to enable you to return you to work safely?
- 3. If you are not currently fit to perform the duties of the position safely, when does your medical practitioner expect that you could return to work to perform the inherent requirements of your position safely?
- Are you fit to have a discussion with the Company regarding your employment, together with 4. a support person?

The Company will cover your costs of obtaining this report.

If you are not unfit for work, but have simply decided not to return to work, can you also please notify us as a matter of urgency.

We do request that you respond to our letter by 4 June 2021.

Yours sincerely,

Josh Fett

Head of Corporate and Government Affairs

British American Tobacco Australia Limited

ROLE PROFILE

Job Title:	Engagement Manager
Reports to:	Head of Corporate & Government Affairs
Function:	Legal and External Affairs (LEX)
Location:	Sydney, Head Office
Grade:	36

Purpose Statement

This role is responsible for campaign planning and implementation, engagement and corporate communications with the aim of achieving sensible regulation which balances both the business imperatives and corporate reputation of BAT.

The role supports the Head of Corporate & Government Affairs as follows:

- Ownership from development to execution of campaigns to drive the company's political and regulatory/public
 affairs strategies for both traditional tobacco products and new reduced risk products.
- Understanding stakeholders' needs and goals, how BAT's priorities fit with and advance those goals and how best to communicate with them for delivery of regulatory change.
- Communicating and engaging with external stakeholders to promote BAT's priorities including preparing briefs on key industry issues, preparing a schedule of meetings with key stakeholders.
- Monitoring and tracking legislation, regulatory development and the external environment, including proactively researching policies impacting BAT regulatory agenda.
- Overseeing the work of third parties that provide ongoing management of all traditional and digital media and public relations material and activities in relation to BAT business.
- To support other members of the wider LEX team, locally and in other markets.

Key Accountabilities

Operational/Technical/Professional Results

The role of the Engagement Manager is to support and drive the implementation of strategies for shaping and managing the regulatory environment, including:

- · Developing campaign plans;
- Policy analysis
- · Excellent writing skills for development of key advocacy material.
- Political and departmental engagement
- Manage strategic third-party relationships with think tanks and business associations etc. on matters of mutual interest
- Monitoring political, departmental and other environments and identify emerging issues
- Advising on and executing appropriate media activity as spokesperson for BAT Australia
- Advise internal and external stakeholders of the regulatory environment

Management Results

- To work with the Head of Corporate & Government Affairs on the development and management of regulatory, reputation and communication strategies including building and executing robust campaign plans
- Implement LEX specific projects and initiatives which support the delivery of both LEX and company strategic
 plans, aligned to local, Regional and Global company strategy and positions
- Ensure relevant internal stakeholders are promptly informed of potential and actual regulatory changes that may impact BAT's Australia business
- Provide assistance to the wider business including ensuring that BAT Australia activities do not pose a regulatory or reputation risk, providing LEX sign off and ongoing internal engagement and education on BAT Australia regulatory issues
- Engage with senior business leaders to gain commitment to a culture of open, honest, timely, two-way communication within the company
- Enlist the participation of business owners across the company in the development and/or delivery of communications activities.

Leadership Results

- Support the Head of Corporate & Government Affairs in providing industry leadership with external stakeholders on BAT Australia regulatory and policy issues
- To play an active role in relevant meetings and forums
- To work with senior managers on those aspects of the business which are influenced by the external
 environment ensuring LEX activities are aligned to business strategy and address key external issues
- Lead and contribute as an effective member to the LEX team and Australian business.

Relationship Results

- Develop and maintain strong relationships with political stakeholders and regulatory/government agencies
- To act as a key relationship manager internally and externally including but not limited to trade associations,
 retailers, general business community, community partners, suppliers, agencies, advisors
- Develop and maintain strong relationships within the LEX function in the Area, Region and Globe
- Maintain membership of relevant professional associations so as to raise the external profile within the LEX community.

Innovation Results

- Ensure that existing and ongoing activities are updated for relevance to the changing external environment
- Develop opportunities for innovation and continuous improvement to support delivery of strategy
- · Keep abreast of legal developments and advise the business of the impacts where appropriate.

Contextual Information

BRING YOUR DIFFERENCE

ROLE PROFILE PAGE 2 OF 6



i) Context

Role:

This role requires an individual with a deep knowledge of the Australia political and regulatory environment, strong relationship building skills, excellent communications and campaign skills and a good understanding of corporate reputation management.

Challenges:

- Complexity and lack of clarity of relevant regulation and impact on the business
- Achieving sensible regulation in a challenging and adversarial environment
- Complexity and number of issues and the need to communicate these simply to a variety of internal and external stakeholders
- Importance of good judgement, accuracy, timeliness and implications of statements made in external publications or engagement
- LEX deals with a high degree of change and uncertainty together with a long-time horizon
- Difficulty balancing internal and external expectations
- Delivery in an increasing hostile and regulated market.

Industry:

BAT operates within a highly regulated market place. And we are now entering the most dynamic period of change the industry has ever encountered. An unprecedented confluence of technology, societal change and public health awareness has created a unique opportunity: the opportunity to make a substantial leap forward in our long-held ambition to provide our consumers with potentially reduced-risk tobacco and nicotine choices.

ii) Functional Success Criteria

Success Criterion	Level	Description
Political & Regulatory Affairs	Being able to manage and implement a sensible regulatory strategy and approach that will support corporate goals	 Has a clear understanding of the AU parliamentary and regulatory system Displays a clear understanding of the motivations of groups and individuals Carefully manages the monitoring of activities, events, issues and commentary potentially affecting the regulatory environment Advises other functions on their activities Fully understands all BAT's key messages and positions, and uses this understanding to develop effective regulatory strategy Recognises business opportunities and threats presented by current and pending legislation, and makes appropriate recommendations With the Head of Corporate & Government Affairs, actively seeks to engage the government on behalf of BAT Australia Develops a close working relationship with the wider LEX team and other functions Is fully aware of how their actions may impact in the Area, Regionally and Globally on other areas of BAT Effectively participates in the presentations and submissions for legislative groups and advisors, and takes into account all stakeholder needs when developing proposals Understands the monetary and fiscal activities of government especially in relation to tobacco tax revenues Tries to ensure that sensible regulation is implemented

BRING YOUR DIFFERENCE

Strategy & Planning	The effective management of the LEX planning process	The LEX strategy and planning process is fully aligned with BAT Australia's planning cycle Integrates data from media analysis, LEX research tools and stakeholder dialogue to help formulate plans Works effectively to commission and manage LEX research/tools Able to analyse research data and make appropriate recommendations on stakeholder identification, prioritization and strategic approach and engage on same
Communications – External	Being able to manage and implement external communications strategies, processes and initiatives	Develops strategies to communicate the business values, activities and views externally Displays a sound understanding of the media Displays an advanced ability to write in a clear and concise manner Messages are consistent with global/regional/local positions and views Ability to manage communications in a crisis – prepare the media messages, manage communication to all relevant stakeholders in a professional and timely manner

iii) Other Knowledge, Skills & Experience

- Highly developed communication skills both written, oral and interpersonal, as well as an ability to influence, persuade and present to diverse audiences
- Strong engagement skills, highly developed negotiation, influencing and relationship building skills with an ability to work well with peers and senior management as well as external stakeholders
- High developed campaign planning, public relations and media skills
- Strong project management and organisation skills including ability to meet deadlines
- · Strong analytical, tactical and planning skills, with a creative approach to problem solving
- · Strong strategic and leadership skills
- Outgoing personality and ability to work well with diversity as well as above market peers, seniors and different cultures
- Excellent presentation skills and sound public speaking ability
- Sound ability in coaching and developing others.
- Business focus and general understanding of the environment including the sensitivities and complexities of the industry
- An ability to convert intangible ideas into a practical implementation reality
- Awareness of tobacco related social issues
- Leadership qualities an ability to lead by example, challenge and speak up with conviction even when this may be unpopular to ensure LEX is represented in the development of business plans and to provide clear direction on regulatory and reputational issues

iii) Other Knowledge, Skills & Experience Continued...

Qualifications and Experience:

- 7 or more years' experience in political, media and corporate affairs issues
- Deep political and public service relationships and an-depth understanding of government and regulatory affairs
- Experience dealing with stakeholders on controversial and complex issues

Desirable:

- Experience in a corporate environment
- A relevant tertiary qualification
- Understanding of corporate reputation and risk management
- Previous experience managing others

iv) Key Success Factors

- Regulations in relation to BAT AU products are balanced and workable and BAT is not competitively disadvantaged
- BAT retains an appropriate voice in regulatory and other matters through behaving and being seen as a responsible company
- Strong relationships with stakeholders.

v) Working Relationships

Internal:

- AU LEX, New Categories, TM&D, Planning & Insights, Finance
- LEX South Pacific
- LEX Region
- LEX Globe
- NZ business engagement and leadership, as applicable

External:

- Government officials
- Members of Parliament
- · Public health advocates
- Media
- Industry bodies and other industries
- External consultancies and agencies
- Trade and retail associations
- Retailers
- · General business community

BRING YOUR DIFFERENCE

ROLE PROFILE PAGE 5 OF 6

vi) Additional Comments

As Australia's largest tobacco company, we must ensure that we retain our leadership position through satisfying the expectations and needs of both our trade partners and consumers in a commercial and responsible manner and in line with all corporate principles and standards.

The external environment is one element in the sustainability of BATAU's business and the success of LEX strategies is a key component for BATAU's long term plans. BATAU faces considerable challenges to its business environment due to potential regulatory threats. The ability for the business to help shape the external environment has considerable impact on the commercial activities of BATAU.

This role will include frequent business travel and nights away from home, as required.

BRING YOUR DIFFERENCE

ROLE PROFILE PAGE 6 OF 6 From:

Bruce Lehrmann <b.lehrmann@hotmail.com>

Sent:

Wednesday, 26 May 2021 10:28 AM

To:

Josh Fett

Subject:

RE: Copy of letter posted today

* This is an EXTERNAL email * originated from outside BAT. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hey Josh,

Many thanks for your email. Apologies on my part for the difficulty in reaching me, I have been without my primary phone for a number of weeks now.

As you can imagine it continues to be an incredibly traumatic period of time for which I have received specialist medical care and continue to do so.

I would be more than happy to have a chat over the phone with you to go over more sensitive issues with my care as well as other matters as well, call any time. I did try and call you yesterday from the work mobile (0428 683 164) but you may not have recognised the number.

In the meantime I will collect the relevant letters from the medical team in response to this letter by the 4th June, not a problem at all.

I am confident of a resolution soon and look positively toward a hopeful return to work with BATA as soon as possible.

Hope you and the team are well.

Best, Bruce

From: Josh Fett

Sent: Tuesday, 25 May 2021 5:01 PM
To: b.lehrmann@hotmail.com
Subject: Copy of letter posted today

Hi Bruce,

I've tried getting hold of you via mobile a couple of times in the past week with no luck so have posted the attached letter and role profile to you today.

Hope to hear from you.

Regards

Josh Fett

Head of Corporate and Government Affairs m: +61 (0) 410276967 a: 166 William St, Woolloomooloo, NSW 2011, Australia www.bat.com



Confidentiality Notice: The information in this document and attachments is confidential and may also be legally privileged. It is intended only for the use of the named recipient. Internet communications are not secure and therefore British American Tobacco does not accept legal responsibility for the contents of this message. If you are not the intended recipient, please notify us immediately and then delete this document. Do not disclose the contents of this document to any other person, nor take any copies. Violation of this notice may be unlawful.

From:

Bruce Lehrmann <b.lehrmann@hotmail.com>

Sent:

Friday, 4 June 2021 10:06 AM

To:

Josh Fett

Subject:

PRIVATE & CONFIDENTIAL RE: Copy of letter posted today

Attachments:

James Neil Medical Centre GP letter re Bruce Lehrmann.pdf; Medical Report from

Mr James Brown re Bruce Lehrmann.pdf

* This is an EXTERNAL email * originated from outside BAT. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Josh,

Touching base in response to the letter you sent me on the 25th May.

Please see attached letters from my treating GP, Dr Ash Saleh and Psychologist, Mr James Brown with respect to my medical treatment over the past few months.

At this point we have not included letters from treating Doctors when I was at Royal North Shore Hospital as James makes mention of this in his letter, however if BATA does need a more historical letter this would require more time and are held guiet sensitively and confidentially as you would appreciate.

I did want to query one element of the letter that it discusses me being on personal leave. It was my understanding that BATA suspended me with full pay on the 15th February during the meeting we had with Jamie from HR in Susan's office as well as through a formal email sent to me later that afternoon.

I hope these letters are what you were after, happy to be as open and transparent with medical history and treatment as I possibly can be.

Happy to chat anytime as well, hope the team is well.

Best Regards, Bruce

From: Josh Fett

Sent: Tuesday, 25 May 2021 5:01 PM

To: b.lehrmann@hotmail.com

Subject: Copy of letter posted today

Hi Bruce,

I've tried getting hold of you via mobile a couple of times in the past week with no luck so have posted the attached letter and role profile to you today.

Hope to hear from you.

Regards

Josh Fett

Head of Corporate and Government Affairs m: +61 (0) 410276967 a: 166 William St, Woolloomooloo, NSW 2011, Australia

www.bat.com



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James Neil Medical Centre

Bernoth Centre 677-683 Ruthven St, Toowoomba Ph: 4632 4888 Shieldaig Medical Centre Range Shopping Centre

Range Shopping Centre 11 James St, Toowoomba Ph: 4638 0655

27/05/2021

To: Josh Fett, Head of Corporate and Government Affairs British American Tobacco Aus Ltd

RE: Mr Bruce Lehrmann, 14/06/1995

Mr Bruce Lehrmann is currently being treated for a condition that precludes him to return to normal function to the original workplace in Sydney but is capable of working in an alternate environment, including remotely. He is currently being treated through a psychologist under a mental health care plan with medications to assist with sleep and stress-related reflux disease.

Yours sincerely,

Dr ASHRAF SALEH

MBBS, MNutrSci, BMedSci, FRACGP, FARGP (Emerg Med) 296252LF

Dr ASHRAF SALEH

Rangeside Medical

11 James St, Toowoomba QLD 4350

Ph:(07) 4638 0655 F:(07) 4638 0755

Provider no.: 296252LF

Mr James Brown - Clinical and Consulting Psychologist

Phone: 0435768890 | Email: admin@jamesbrown.net.au | Fax: 617 3144 5614

James Brown Pty Ltd ABN: 42634270401

Patient

Name

Mr Bruce Lehrmann

Date of Birth

14-Jun-1995

Private and Confidential

Josh Fett

BAT Australia

166 William Street Wooloomooloo, NSW, 2011

01-Jun-2021

Dear Josh

RE: Treatment report for Mr Bruce Lehrmann (14-Jun-1995)

My patient, Mr Bruce Lehmann, has given me permission to write this letter in support of his return to work and to specifically address questions and concerns about his ongoing employment raised in your letter to him on the 25th of May 2021 requesting medical information.

Clinical Summary

Bruce presented to my practice for assistance on the 30th of March 2021, and we have thus far met on 8 occasions. Bruce was referred to see me for treatment by Dr. Ashraf Saleh. According to Bruce's account, on the 15th of February 2021, Bruce had a particularly distressing personal incident that had a significant effect on his mental health. Bruce subsequently admitted himself to Sydney North Shore Hospital for support and treatment. While there, Bruce's symptoms were stabilized, however, Bruce was at that point still unfit for work and chose to leave the hospital and return to his family home to seek support and further treatment to assist his recovery. Bruce reports that he has no previous mental health concerns, and it is my opinion that the distress he experienced was proportionate to the significant nature of the stressor that he was subjected to, and therefore his illness was reactionary to these circumstances and not an indication of any underlying psychopathology. Therefore, my prognosis for Bruce was optimistic and that with the right help he would make a full recovery. The main factor of concern is that while the stressor remained an ongoing uncertainty for Bruce, this might aggravate his symptoms and impede his recovery. During the last few months, Bruce has responded well to treatment, and his recovery has continued. The personal matters are still unresolved, but signs are that things are improving. In recent meetings, the topic of returning to work has been discussed favourably, and it is my opinion that this would actually be of benefit to Bruce's recovery. There were no work-related factors in his original illness in the first place, and Bruce feels a connection and identity with his career, which is a positive factor for him. Remaining off work for an extended period has been a source of concern to Bruce, and he expressed a desire to move forward in his life.

Recommendations

Having read the role profile, and my recent review of Bruce's current mental health, I am happy to support Bruce as being fit to return to work. Given the length of his absence, I would recommend that a gradual return to normal duties is most appropriate. This may take the form of starting on a reduced number of days and building up to full capacity over 4 weeks. Additionally, given that Bruce is not currently located in Syndey, he might be able to work remotely for a brief period until he is back to full capacity if that can be supported organisationally. This return to work may be best supported by a rehabilitation consultant or return-to-work coordinator, as is sometimes offered to employees of larger organizations with such resources in place, however, I feel confident that this can be managed by Bruce in consultation with his line manager, and supported by myself and his doctor.

Feel free to contact me on 0435768890 if you have any questions.

Yours sincerely,

Mr James Brown - Clinical and Consulting Psychologist

Phone: 0435768890 | Email: admin@jamesbrown.net.au | Fax: 617 3144 5614

James Brown Pty Ltd ABN: 42634270401

James Brown Clinical Psychologist

cc; Dr. Ashraf Saleh Mr Bruce Lehrmann

No. NSD 103 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

CERTIFICATE IDENTIFYING ANNEXURE

This is the annexure marked "MRS-7" now produced and shown to Marlia Ruth Saunders at the time of affirming her affidavit on 10 March 2023:

Signature of Roy Leigh

Thomson Geer

Level 14, 60 Martin Place

Sydney NSW 2000

An Australian Legal Practitioner within the meaning of the Legal Profession Uniform Law





6 March 2023

The Registrar
Federal Court of Australia
Level 17, Law Courts Building
Queens Square
184 Phillip Street
SYDNEY NSW 2000

Our Reference: 1961238

Re: Subpoena Documents

Case Name: Lehrmann v Network Ten & Another Case Number: NSD 103 of 2023

I refer to the above matter for which the Royal North Shore Hospital received a subpoena dated 3 March 2023 requiring the release of medical records for Bruce LEHRMANN.

Please find enclosed the medical records for the above patient.

These documents are true copies of the Royal North Shore Hospital business records.

Upon completion of their use we request that the records enclosed are destroyed via secure and confidential means and in doing so do not require their return.

Should you have further questions please do not hesitate to contact our office.

Regards

Catherine Ewin
Medico Legal Officer
Medico Legal Team | Health Information Services
Royal North Shore Hospital
Tel: (02)9462 9777

Northern Sydney Local Health District ABN 63 834 171 987

Royal North Shore Hospital Health Information Services Level 2, Building 29, Reserve Road, St Leonards NSW Australia 2065 Tel 02 9462 9777 Fax 02 9462 9055

NOTICE OF FILING AND HEARING

Filing and Hearing Details

Document Lodged:

Subpoena to Produce Documents - Form 43B - Rule 24.13(1)(b)

Court of Filing:

FEDERAL COURT OF AUSTRALIA (FCA)

Date of Lodgment:

3/03/2023 1:46:34 PM AEDT

Date Accepted for Filing:

3/03/2023 3:11:50 PM AEDT

File Number:

NSD103/2023

File Title:

BRUCE LEHRMANN v NETWORK TEN PTY LIMITED ACN 052 515 250

& ANOR

Registry:

NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA

Reason for Listing:

Return of Subpoena

Time and date for hearing:

08/03/2023, 9:30 AM

Place:

Virtual Recorder Forty-Six, Level 17, Law Courts Building 184 Phillip Street

Queens Square, Sydney

SHORT SERVICE GRANTED. LAST DAY FOR SERVICE IS COB 3 MARCH 2023.



Sia Lagor

Registrar

Important Information

This Notice has been inserted as the first page of the document which has been accepted for electronic filing. It is now taken to be part of that document for the purposes of the proceeding in the Court and contains important information for all parties to that proceeding. It must be included in the document served on each of those parties.

The date of the filing of the document is determined pursuant to the Court's Rules.

Form 43B Rule 24.13(1)(b)



Rage 140 of 241

Subpoena to produce documents

No. NSD 103 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

To: The Proper Officer, Northern Sydney Local Health District

Health Information Services PO Box 4007

Royal North Shore LPO, St Leonards NSW 2065

You are ordered to produce this subpoena or a copy of it and the documents or things specified in the Schedule of documents. See next page for details.

Failure to comply with this subpoena without lawful excuse is a contempt of court and may result in your arrest.

Please read Notes 1 to 13 at the end of this subpoena.

The last date for service of this subpoena is 3 March 2023, noting the time for production has been abridged by order of his Honour Justice Lee on 17 February 2023. (See Note 1)

Date:	
Signed by an officer acting with the of the District Registrar	authority

Issued at the request of the Respondents, whose address for service is: c/- Thomson Geer, Level 14, 60 Martin Place NSW 2000

Filed on behalf of (name & role of party) Prepared by (name of person/lawyer)			First Respondent being Network Ten Pty Limited Marlia Saunders, Partner	
Tel	02 8248 5836		Fax	
Email	msaunders@tgl	aw.com.au	1	
Address for service (include state and postcode)			Geer Lawyers, Level 14, 60 Martin Place, Sydney NSW 2000	
			Narrian 4 form approved 03/05/20101	



Email: msaunders@tglaw.com.au



Details of subpoena

You must comply with this subpoena:

- (a) by attending to produce this subpoena or a copy of it and the documents or things specified in the Schedule of documents below at the date, time and place specified for attendance and production; or
- (b) by delivering or sending this subpoena or a copy of it and the documents or things specified in the Schedule of documents below to a Registrar at the address below, or if there is more than one address below, at any one of those addresses, so that they are received not less than 2 clear business days before the date specified for attendance and production. (See Notes 5–9)

Date, time and place at which you must attend to produce the subpoena or a copy of it and documents or things, unless you receive a notice of a later date or time from the issuing party, in which case the later date or time is substituted:

Date: 8 March 2023

Time: 9:30am

Place: Federal Court of Australia, New South Wales District Registry

Address, or any address, to which the subpoena (or copy) and documents or things may be delivered or posted:

The Registrar
Federal Court of Australia
New South Wales District Registry
Level 17, Law Courts Building
184 Phillip St Queens Square, Sydney NSW 2000



Schedule of documents

The documents and things you must produce are as follows:

1. The original or one copy of all documents recording or referring to the admission of Mr Bruce Lehrmann (DOB 14 June 1995) at Royal North Shore Hospital in or about February 2021, including admission and discharge documents, medical notes, medical reports and referrals.



Notes

Last day for service

 You need not comply with the subpoena unless it is served on you on or before the date specified in the subpoena as the last date for service of the subpoena.

Informal service

 Even if this subpoena has not been served personally on you, you must, nevertheless, comply with its requirements, if you have, by the last date for service of the subpoena, actual knowledge of the subpoena and of its requirements.

Addressee a corporation

3. If the subpoena is addressed to a corporation, the corporation must comply with the subpoena by its appropriate or proper officer.

Conduct money

4. You need not comply with the subpoena in so far as it requires you to attend to give evidence unless conduct money sufficient to meet your reasonable expenses of attending as required by the subpoena is handed or tendered to you a reasonable time before the date your attendance is required.

Production of subpoena or copy of it and documents or things by delivery or post

- 5. If this subpoena requires production of the subpoena (or a copy of it) and a document or thing, instead of attending to produce the subpoena (or a copy of it) and the document or thing, you may comply with the subpoena by delivering or sending the subpoena (or a copy of it) and the document or thing to a Registrar:
 - (a) at the address specified in the subpoena for the purpose; or
 - (b) if more than one address is specified at any of those addresses; so that they are received not less than 2 clear business days before the date specified in the subpoena for attendance and production, or if you receive notice of a later date from the issuing party, before the later date or time.
- 6. If you object to a document or thing produced in response to this subpoena being inspected by a party to the proceeding or any other person, you must, at the time of production, notify a Registrar in writing of your objection and of the grounds of your objection.
- 7. Unless the Court otherwise orders, if you do not object to a document or thing produced by you in response to the subpoena being inspected by any party to the proceeding, a Registrar may permit the parties to the proceeding to inspect the document or thing.



Production of a number of documents or things

8. If you produce more than one document or thing, you must, if requested by a Registrar, produce a list of the documents or things produced.

Production of copy instead of original

- 9. You may, with the consent of the issuing party, produce a copy, instead of the original, of any document that the subpoena requires you to produce.
- 9A. The copy of a document may be:
 - (a) a photocopy; or
 - (b) in an electronic form in any of the following electronic formats:
 - .doc and .docx Microsoft Word documents
 - .pdf Adobe Acrobat documents
 - .xls and .xlsx Microsoft Excel spreadsheets
 - .jpg image files
 - .rtf rich text format
 - .gif graphics interchange format
 - .tif tagged image format

Applications in relation to subpoena

- 10. You have the right to apply to the Court:
 - (a) for an order setting aside the subpoena (or a part of it) or for relief in respect of the subpoena; and
 - (b) for an order with respect to your claim for privilege, public interest immunity or confidentiality in relation to any document or thing the subject of the subpoena.

Loss or expense of compliance

11. If you are not a party to the proceeding, you may apply to the Court for an order that the issuing party pay an amount (in addition to conduct money and any witness's expenses) in respect of the loss or expense, including legal costs, reasonably incurred in complying with the subpoena.

Contempt of court - arrest

- 12. Failure to comply with a subpoena without lawful excuse is a contempt of court and may be dealt with accordingly.
- 13. Note 12 is without prejudice to any power of the Court under any rules of the Court (including any rules of the Court providing for the arrest of an addressee who defaults in attendance in accordance with a subpoena) or otherwise, to enforce compliance with a subpoena.

Page 146 of 241

Schedule

No. NSD 103 of 2023

Federal Court of Australia

District Registry: New South Wales

Division: General

Respondents

Second Respondent:

Lisa Wilkinson

Date: 3 March 2023



ONEN MAINE MOS

LUS BUCHT WARD

COMPLETE ALL DETAILS OR WEEK PADIENT LABELTHERE

6 March 2023

The Registrar

Our Reference: 1961238

Sensitive Information

Re: Subpoenaed Documents

Case: Lehrmann v Network Ten Pty Ltd & Another
Case Number: NSD 103 of 2023

Please find enclosed the medical records from Royal North Shore Hospital for as requested in the Subpoena Schedule.

These records contain sensitive information. We therefore request that you review the enclosed documents for relevance to the proceedings.

NSW Health Policy Directive PD 2019_0001 Subpoenas defines sensitive information as 'prime criterion of sensitivity is whether the patient would consider the data sensitive. Examples of sensitive records include: sexual assault, drug and alcohol, HIV/AIDS, domestic violence, genetic information, transgender status, mental health and records of children considered to be at risk and records containing information on other persons. Records relating to people or patients who are not directly involved in the legal proceedings can also be classified as sensitive'.

These documents are true copies of the Royal North Shore Hospital business records. Upon completion of their use we request that the records enclosed are destroyed via secure and confidential means and in doing so do not require their return.

Catherine Ewin

Medico-Legal Officer | Medico Legal Team

Northern Sydney Local Health District ABN 63 834 171 987

Royal North Shore Hospital Health Information Services Level 2, Building 29, Reserve Road, St Leonards NSW Australia 2065 Tel 02 9462 9777 Fax 02 9462 9055



ROYAL NORTH SHORE HOSPITAL 1 Reserve Road ST LEONARDS NSW 2065

MEDICAL RECORDS

MRN: 1961238

Patient Name: Bruce LEHRMANN DOB: 14 June 1995 Age: 27 Sex: Male

INFORMATION HAS BEEN REDACTED

In accordance with accordance with section 12.3.1 Reasons for refusing access of the NSW Health Privacy Manual for Health Information Version 3 March 2015.

Where information has been redacted this has been clearly indicated in the medical record.

Disclaimer: These documents are true copies of the patient medical record as printed on the day, and have been produced in response to a request for clinical information under the Health Information and Records Privacy Act 2002. The responsibility of the integrity & confidentiality of those records as such has been passed on to the recipient.

PMRN: 196-12-38 MRN: 196-12-38

Patient Name: LEHRMANN, Bruce E

U 204 4 Karrabee Ave

HUNTLEYS COVE, NSW 2111

Ph:

DOB: 14/06/1995 Age: 27 years

Sex: Male



Lower North Shore Community Health

02 9926 7111

GP,Not Known

Visit Type: Community

Attending Doctor:

Admit Date:

17/02/2021

Dischg Date: 19/02/2021

Alerts and Problems

Problem Name: Situational crisis

Last Updated: 17/02/2021

Classification: Medical; Confirmation: Confirmed; Code: 1461181000168116 (SNOMED CT); Status Date: 17/02/2021

Allergies							
Substance	Updated Date/Time	Updated By	Allergy Type	Allergy Category	Severity	Reaction Symptom	Reaction Status
Dust	27/07/2019 03:34 AEST	Hawksford, Tory (RN)	Allergy	Environment	Mild	Grasses	Active
Grasses	27/07/2019 03:34 AEST	Hawksford, Tory (RN)	Allergy	Environment	Mild		Active

Care Plans

DOCUMENT NAME:

MH Care Plan

SERVICE DATE/TIME:

17/02/2021 14:38 AEDT

RESULT STATUS:

Modified

PERFORM INFORMATION:

McMahon, Adam (Psychologist) (18/02/2021 09:11 AEDT);

Van Bruinessen, Julia (Social Worker) (17/02/2021 14:53

SIGN INFORMATION:

McMahon, Adam (Psychologist) (18/02/2021 09:11 AEDT); Van Bruinessen, Julia (Social Worker) (17/02/2021 14:53

AEDT)

Addendum by McMahon, Adam (Psychologist) on 18 February 2021 9:11

Discussed in MDT with Dry Gray (consultant), Runa (acting TL), Dr. Pelin, Dr. Lam, Dr. Van Staden, Duncan (CNC), Julia - 18/02/21 AMPC to client (try NoK if no answer)

MH Care Plan

Patient: LEHRMANN, Mr Bruce E

MRN: 196-12-38

Age: 25 years Sex: Male DOB: 14/06/1995

Associated Diagnoses: None

Author: Van Bruinessen, Julia (Social Worker)

Plan of Care

Handover received from Janelle - RNSH PECC

Printed on: 03/03/2023 10:23 AEDT

Page 1 of 7

PMRN: 196-12-38 MRN: 196-12-38 **Lower North Shore Community Health**

02 9926 7111

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995

Age: 27 years

Sex: Male

Care Plans

25M self presented to RNSH ED with situational crisis

- presented overwhelmed and tearful in context of high profile work incident
- denies any wrongdoing
- states he and his family have been contacted by journalists following allegations of rape of a colleague in parliament
- there is nil evidence against him, nil charges have been laid and he has not been named in the media
- has legal council who advised him not to speak with anyone (including his mother)

has family hx of suicide although he denies suicidal thoughts

lives alone

in a relationship

Nil MH hx

has been accepted by Northside

PLAN: 17/2 PMPC to support, monitor and confirm admission plan to Northside

	Cli	nical Patient Informa	ation		
Procedure Service Setting MH Adult Outcome Me Units Reference Range			Measure Admission .	Phase of Care	
Recorded Date/Time		*			
17/02/2021 16:14 AEDT	Ambulatory	Adult Outcome Measure Admission		Acute	
Procedure 1 Behavioural Disturbance HoNOS Units Reference Range [1.9] Recorded Date/Time		2 Non-accidental self	-injury HoNOS		
17/02/2021 16:14 AEDT		0			
Procedure Units Reference Range Recorded Date/Time	3 Problem drinking or drug taking HoNOS [1.9]			roblems HoNOS 1.9]	
17/02/2021 16:14 AEDT		0		0	
Procedure Units Reference Range	•	or disability HoNOS		and delusions HoNOS	
Recorded Date/Time					
17/02/2021 16:14 AEDT		0		0	
Procedure Units Reference Range	7 Problems with o	depressed mood HoNOS	5		
Recorded Date/Time					
17/02/2021 16:14 AEDT		0			

Printed on: 03/03/2023 10:23 AEDT

Page 2 of 7

Lower North Shore Community Health

02 9926 7111

MRN: 196-12-38

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995

Age: 27 years

Sex: Male

Clinical Patient Information

Procedure Units	8 Other mental/behavioural problem HoNOS
Reference Range	[1.9]
Recorded Date/Time	
17/02/2021 16:14 AEDT	0

Procedure Units	9 Problems with relationships HoNOS	10 Problems daily living activity HoNOS
Reference Range	[1.9]	[1.9]
Recorded Date/Time		
17/02/2021 16:14 AEDT	0 = 0	. 0

Procedure Units	11 Problems with living conditions HoNOS
Reference Range	[1.9]
Recorded Date/Time	
17/02/2021 16:14 AEDT	0

Procedure Units	12 Occupation and activities HoNOS	HoNOS Behavioural Score
Reference Range	[1.9]	
Recorded Date/Time		
17/02/2021 16:14 AEDT	0	0

Procedure Units Reference Range	HoNOS Impairment Score	HoNOS Symptomatic Score	HoNOS Social Score
Recorded Date/Time			
17/02/2021 16:14 AEDT	0	0	0

Procedure	HoNOS Total Score
Units	
Reference Range	
Recorded Date/Time	
17/02/2021 16:14 AEDT	0

Diagnosis

Diagnosis: Situational crisis

Diagnosis Date: 19/02/2021 Status: Active

Classification: MH Community; Ranking: Primary; Code: 1461181000168116 (SNOMED CT)

Printed on: 03/03/2023 10:23 AEDT

Page 3 of 7

MRN: 196-12-38

Lower North Shore Community Health

02 9926 7111

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995

Age: 27 years

Sex: Male

Discharge Documents

DOCUMENT NAME:

SERVICE DATE/TIME:

RESULT STATUS: PERFORM INFORMATION: SIGN INFORMATION:

MH Discharge / Transfer Summary 19/02/2021 10:01 AEDT

Auth (Verified)

McMahon, Adam (Psychologist) (19/02/2021 10:03 AEDT) McMahon, Adam (Psychologist) (19/02/2021 10:03 AEDT)

MH Discharge / Transfer Summary Community

Patient: LEHRMANN, Mr Bruce E

MRN: 196-12-38

Age: 25 years Sex: Male DOB: 14/06/1995 Associated Diagnoses: Situational crisis Author: McMahon, Adam (Psychologist)

Visit Information

Patient Demographics

Facility:

Lower North Shore Community Health

Admission Date:

17/02/2021

Medical Service:

Mental Health

Consulting Clinician:

Attending Medical Officer:

AMO Provider No.:

Local Medical Officer:

GP, Not Known

1 MO Provider No :

LMO Address:

LMO Phone:

NO

LMO Fax:

Interpreter Required:

Language spoken at home: English

Indigenous Status: Neither Aboriginal/Torres Strait Is

Dear Colleague,

Thank you for reviewing Bruce LEHRMANN a 25 year old male to be discharged on 19/02/2021 from MH Acute RHC at Lower North Shore Community Health.

Bruce LEHRMANN presented to this facility with PECC referral.

Summary of Care

Bruce is a 25 y/o male that was referred to Ryde CMH for post-discharge follow-up after an overnight admission for suicidal ideation in the context of a situational crisis. Ryde CMH attempted to engage Bruce, but it was confirmed that he has now been admitted to the Northside Clinic for a planned 21-day MH admission. No further follow-up with CMH planned at this stage.

Health Status

Provisional Situational crisis: SNMCT 1461181000168116, Final, MH Community **Allergies and Adverse Reactions**

Allergic Reactions (Selected)

Mild

Dust- Grasses.

Grasses- No reactions were documented.

Discharge Information

Discharge Plan

- Discharge from Ryde CMH
- To be re-referred by Northside Clinic if clinically indicated post-discharge

Printed on: 03/03/2023 10:23 AEDT

Page 4 of 7

Lower North Shore Community Health

02 9926 7111

MRN: 196-12-38

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995

Age: 27 years

Male Sex:

Discharge Documents

Performed By

Adam McMahon (Psychologist); Mental Health Clinician V5

Progress Notes

DOCUMENT NAME:

SERVICE DATE/TIME:

RESULT STATUS:

PERFORM INFORMATION:

SIGN INFORMATION:

MH Community Care Zone 17/02/2021 14:53 AEDT

Auth (Verified)

Van Bruinessen, Julia (Social Worker) (17/02/2021 14:55

Van Bruinessen, Julia (Social Worker) (17/02/2021 14:55

AEDT)

MH Community Care Zone

Patient: LEHRMANN, Mr Bruce E

MRN: 196-12-38

Age: 25 years Sex: Male DOB: 14/06/1995

Associated Diagnoses: None

Author: Van Bruinessen, Julia (Social Worker)

Plan of Care Care Zone:

RED

Reason for being in current care zone category:

Not known to service

Situational crisis of high profile incident scrutinised in media

Planned interventions in regard to identified need:

Has been accepted to Northside

requires support and monitoring until admission

DOCUMENT NAME:

MH Progress Note

18/02/2021 13:16 AEDT SERVICE DATE/TIME:

RESULT STATUS:

SIGN INFORMATION:

Modified

PERFORM INFORMATION:

McMahon, Adam (Psychologist) (18/02/2021 14:17 AEDT);

McMahon, Adam (Psychologist) (18/02/2021 13:32 AEDT)

McMahon, Adam (Psychologist) (18/02/2021 14:17 AEDT);

McMahon, Adam (Psychologist) (18/02/2021 13:32 AEDT)

Addendum by McMahon, Adam (Psychologist) on 18 February 2021 14:17

Returned PC from Bruce at 14:15

Apologised for missing calls - stated he has been admitted to Northside Clinic and hasn't had his phone with him. Has a planned 21 day admission.

Will get in contact after if requiring further assitance.

Printed on: 03/03/2023 10:23 AEDT

Page 5 of 7

Lower North Shore Community Health

02 9926 7111

MRN: 196-12-38

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995

Age: 27 years

Sex: Male

Progress Notes PLAN - Discharge MH PC Patient: LEHRMANN, Mr Bruce E MRN: 196-12-38 Age: 25 years Sex: Male DOB: 14/06/1995 Associated Diagnoses: None Author: McMahon, Adam (Psychologist) **Progress Note** PC to Bruce at 13:15. Failed PC. Long ring left unattended - detailed voice message left. PC to mother - Lynden. No answer - left detailed voice message as well. PC to Northside Clinic (referral stated that family were seeking admission following RNSH PECC). Call transferred to clinic supervisor - John. Initially stated that he could confirm if client was registered with them or not. Eventually stated that he would have to call author back. - Await contact from client/NoK/Northside Clinic DOCUMENT NAME: MH Progress Note

SIGN INFORMATION: MH Missed PMPC Note

SERVICE DATE/TIME: **RESULT STATUS:**

PERFORM INFORMATION:

Patient: LEHRMANN, Mr Bruce E MRN: 196-12-38

Age: 25 years Sex: Male DOB: 14/06/1995

Associated Diagnoses: None

Printed on: 03/03/2023 10:23 AEDT Page 6 of 7

17/02/2021 20:22 AEDT

Perez, Adrian Alejandro (RN) (17/02/2021 20:25 AEDT)

Perez, Adrian Alejandro (RN) (17/02/2021 20:25 AEDT)

Auth (Verified)

Lower North Shore Community Health

02 9926 7111

MRN: 196-12-38

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995

Age: 27 years

Sex: Male

Progress Notes

Author: Perez, Adrian Alejandro (RN)

Progress Note

Interaction:

Author provided a Phone Call to Bruce 2x at approx. 19:30hrs with no answer

Purpose of Call: to monitor mental state and risk while providing support

Author provided Bruce with a detailed voice message stating authors name, position, service, purpose and contact number left for further discussion.

Author also sent a text message to Bruce with the above.

Plan:

- 1. Await contact from Bruce
- 2. If no response by this B shift than to discuss in AM MDT handover on 18/02/21
 - to please provide an AMPC on 18/02/21

Printed on: 03/03/2023 10:23 AEDT

Page 7 of 7

PMRN: 196-12-38 MRN: 196-12-38

Patient Name: LEHRMANN, Bruce E

U 204 4 Karrabee Ave

HUNTLEYS COVE, NSW 2111

Ph:

DOB: 14/06/1995 Age: 27 years

Attending Doctor: Drew, Kathryn (Senior MO)

GP.

GP.Not Known

Health Northern Sydney Local Health District

Royal North Shore Hospital

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

Visit Type: Inpatient

Admit Date:

Sex: Male

16/02/2021

Dischg Date: 17/02/2021

DOCUMENT NAME: SERVICE DATE/TIME:

RESULT STATUS:

PERFORM INFORMATION: SIGN INFORMATION:

16/02/2021 22:38 AEDT Auth (Verified)

MH Physical Appearance

Feng, Lena (RN) (16/02/2021 22:39 AEDT) Feng, Lena (RN) (16/02/2021 22:39 AEDT)

MH Physical Appearance

Patient: LEHRMANN, Mr Bruce E

MRN: 196-12-38

Age: 25 years Sex: Male DOB: 14/06/1995

Associated Diagnoses: None Author: Feng, Lena (RN)

Physical Examination

Body Build: Medium. Complexion: Fair.

Facial Hair: Yes short stubble beard.

Teeth: Primary. Condition: Good.

Hair.

Colour: Black. Length/ style: Short.

Eves:

Colour: Brown. Sight: Good. Aids: Glasses.

Hearing: Patient hearing is adequate.

Alerts and Problems

Problem Name: Situational crisis

Last Updated: 17/02/2021

Classification: Medical; Confirmation: Confirmed; Code: 1461181000168116 (SNOMED CT); Status Date: 17/02/2021

Allergies							
Substance	Updated Date/Time	Updated By	Allergy Type	Allergy Category	Severity	Reaction Symptom	Reaction Status
Dust	27/07/2019 03:34 AEST	Hawksford, Tory (RN)	Allergy	Environment	Mild ·	Grasses	Active
Grasses	27/07/2019 03:34 AEST	Hawksford, Tory (RN)	Allergy	Environment	Mild	=	Active

Printed on: 03/03/2023 10:25 AEDT

Page 1 of 48

MRN: 196-12-38

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995

Age: 27 years

7 vears

Sex: Male

Royal North Shore Hospital

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

Assessment Documents

DOCUMENT NAME: SERVICE DATE/TIME: RESULT STATUS:

PERFORM INFORMATION: SIGN INFORMATION:

ED Assessment 16/02/2021 19:14 AEDT Auth (Verified)

Lingathas, Sharanya (JMO) (16/02/2021 19:24 AEDT) Lingathas, Sharanya (JMO) (16/02/2021 21:29 AEDT)

ED Assessment

Patient: LEHRMANN, Mr Bruce E MRN: 196-12-38

Age: 25 years Sex: Male DOB: 14/06/1995

Associated Diagnoses: None
Author: Lingathas, Sharanya (JMO)

ED Assessment

Presenting Complaint:

Low mood

History of Presenting Complaint:

25M patient was teary and low mood, otherwise well

Last 24 hours feeling very overwhelmed regarding work incident and rumours / journalists

- Works as in corporate sector of government
- Previously worked in politics
- Has hired a lawyer who is supportive
- Did not disclose details of the incident

Symptoms

- Poor sleep for the past week
- Havent eaten for the last 48 hours
- Denies any thoughts of self harm or suicide
- Nil auditory or visual hallucinations

Past psych hx

- No history of anxiety or depression
- Previously had an abusive ex girlfriend, resulting in incident with hand injury in 2019

Current supports

- Reports mum will be coming down from Queensland tomorrow to support him
- Girlfriend and close friends are aware he has come to hospital today

РМНх

Hand operation 2019

Allergies

nil

Medications

nil

Family History

- Reports 3 suicides in the family due to financial stress

Printed on: 03/03/2023 10:25 AEDT

Page 2 of 48

MRN: 196-12-38

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995 A

Age: 27 years

Sex:

Male

Royal North Shore Hospital

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

Assessment Documents

Social History

Lives in Hunteley Cove Support girlfriend and multiple best friends in sydney Mum lives in Queensland also supportive

Non smoker Social drinker ~ 4-5 standards/weekend Occasional cocaine use

Plan

Mental health review

N Zhang ED JMO

Addit (Lingathas, PT)
ECG and bloods performed
Nil sig findings
Medically cleared, as per psych

DOCUMENT NAME: SERVICE DATE/TIME:

RESULT STATUS:

PERFORM INFORMATION:

SIGN INFORMATION:

MH Current Assessment 16/02/2021 20:59 AEDT

Auth (Verified)

Watt, Hilary (JMO) (16/02/2021 21:17 AEDT) Watt, Hilary (JMO) (16/02/2021 21:36 AEDT)

MH Current Assessment

Patient: LEHRMANN, Mr Bruce E

MRN: 196-12-38

Age: 25 years Sex; Male DOB: 14/06/1995

Associated Diagnoses: Mental health problem; Acute situational disturbance

Author: Watt, Hilary (JMO)

Assessment Details
Reason for Referral:

ED MH Assessment (Watt - registrar, Govero Maposa - CNC)

Presentation

25 yo man presenting voluntarily with suicidal ideation in the context of significant stress and public scrutiny. Nil previous MH history.

History of Presentation

Yesterday Bruce was contacted by multiple journalists in the morning regarding an alleged incident occurring in early 2019. It is alleged that he raped a fellow government staff member just prior to leaving his job in politics. Bruce denies any wrong-doing, and reports that night he did share an uber however there was no intercourse or any romantic relation. He had not heard any thing about this until yesterday - nil complaints flagged, nil charges, nil contact from victim. It has come as an enormous shock and he has been considering suicide. These thoughts

Printed on: 03/03/2023 10:25 AEDT

Page 3 of 48

PMRN: 196-12-38 **MRN:** 196-12-38

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995 Age

Age: 27 years

Sex: Male

Royal North Shore Hospital

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

Assessment Documents

acutely intensified when he was intoxicated (ETOH) last night after his friends left. He fears these thoughts, and denies considering any plans. He has told his mother and girlfriend of his suicidal ideation. At this stage the media have not released his name however he, and his family, have been contacted repeatedly by journalists. He has a lawyer who has advised him not to speak to anyone about it (including his mother). At present there are no official charges, only intense media scrutiny. As a consequence of this Bruce has been suspended from his job, which he had been enjoying and was expecting a promotion in.

Prior to the stress of yesterday Bruce reports no mood concerns, he had normal appetite, was sleeping generally at baseline (occasional trouble with initiation), enjoying life, and was performing well in his work. He had no evidence of psychosis or mania on review. Bruce reports worsening nightmares over the last two weeks and attributes this to increase financial stress. He is \$25,000 in credit card debt at present, and his suspension at work has intensified this stress. This debt was accrued moving from Canberra to Sydney and buying furniture, as well as partying after a break up with his ex.

Background

Bruce Lehrmann is a 25 year old gentleman who lives at home alone and is in a relationship with (0424 386 895). They have been dating for 3 months now. Until yesterday he was working for British America Tobacco in regulatory affairs (he reports high income). Bruce was born in Texas to an American father and Australian mother, his father died when he was aged 18 months in a farming accident. He moved with his mother back to Australia. He has one younger sister who now lives in the US. Bruce grew up in Moree, he reports an unremarkable childhood with nil developmental trauma (apart from father's death). In year 9 he had a serious lower back injury, requiring 2 surgeries, 6 weeks in rehab, and home schooling for the remainder of the year. He was bullied after this as he gained ++ weight, and he was on endone and oxycontin for an extended period. He attended private boys schools, and his family lived of money from his father's death. Bruce did well in year 12 and went to ANU to study Arts/Policy where he worked simultaneously in politics. He ascended through politics rapidly over 6 years. He was working as a policy advisor prior to leaving Canberra in 2019. Bruce describes trauma from an abusive relationship for 7 months over 2019, his girlfriend at the time often physical hit him, verbally abused him, and controlled him. He sustained a serious hand injury (laceration) in one incident during which she hit him with a smashed cup. At this point they broke up. Bruce worked in Sydney for Ogelbie in PR, was made redundant during Covid in April 2020, then was unemployed for a few months, he then gained employment with British America Tobacco.

D&A

ETOH - 6 drinks most Fridays and Saturdays, up to 10 SD last night Cocaine - occasional use socially Cannabis - denies regular use Denies all other drugs

Family History

3 cousins of his mother commit suicide, reportedly all secondary to financial stress Mother on antidepressants Nil other history

<u>Forensic</u>

Denies any current charges or previous police/court involvement ("I've never even had a speeding fine")

<u>MSE</u>

Printed on: 03/03/2023 10:25 AEDT

Page 4 of 48

PMRN: 196-12-38 MRN: 196-12-38

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995 Age: 27 years

Sex: Male Royal North Shore Hospital

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

Assessment Documents

A: overweight caucasian man with glasses casually dressed

B: teary, distressed at times, polite and engaged easily in review, no psychomotor agitation

S: goal directed and appropriate, normal in rate tone and volume

A/M: affect reactive and congruent with shocked/distressed state

TC/TF: not thought disordered, no delusions voiced, ongoing thoughts of suicide with nil intent or plan, thought content fixed on processing recent events, retelling story

P: not seen responding to unseen stimuli

C: alert, orientated

I: reasonable insight and judgement remains intact - help seeking

Risk Assessment

Acutely elevated risk of suicide given current public shaming and loss of job.

However is help-seeking and agreeable to receiving ongoing MH care, mitigating some risk.

Impression

Acute situational crisis

Plan - discussed with Dr Ralf IIchef (consultant psychiatrist)

- 1. Admit as voluntary patient to PECC unit for 48 hour admission
- 2. CL3 no leave until review by treating team
- 3. PRN temazepam 10mg for insomnia
- 4. Regular medications
- paracetamol
- Nexium
- 5. Both (partner) and (mother) have been informed of admission
- they intend to contact North Side Clinic in the morning to request bed

Formulation and Diagnosis

Diagnosis: Provisional Mental health problem: SNMCT 2474834012, Discharge, ED Nursing, Provisional Acute situational disturbance: SNMCT 295478016, Final, MH Inpatient.

Factors affecting assessment:

Is this person#s presentation highly changeable?: Yes.

Are the person#s circumstances and supports unstable?: No.

Has assessment included corroborative history from family, carers or others?: Yes.

Are there important aspects of history or assessment that require further clarification?: Yes.

DOCUMENT NAME:

Ontario Modified Stratify-Syd Scor.(SMR)

SERVICE DATE/TIME:

16/02/2021 22:36 AEDT

RESULT STATUS:

Auth (Verified)

PERFORM INFORMATION:

Feng, Lena (RN) (16/02/2021 22:36 AEDT)

SIGN INFORMATION:

Feng, Lena (RN) (16/02/2021 22:36 AEDT)

OMS Falls Risk Screen Entered On: 16/02/2021 22:37 Performed On: 16/02/2021 22:36 by Feng, Lena (RN)

Printed on: 03/03/2023 10:25 AEDT

Page 5 of 48

PMRN: 196-12-38 **MRN:** 196-12-38

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995

Age: 27 years

rs

Sex: Male

Royal North Shore Hospital

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

Assessment Documents

OMS Falls Risk Screen

OMS Falls Risk: Completed On: Admission OMS Falls Risk: Current Admission: No

Falls within 6 months: No OMS Falls Risk: HoF Score: 0

OMS Falls Risk: Mental Status - confused: No OMS Falls Risk: Mental Status - disorientated: No OMS Falls Risk: Mental Status - agitated: No OMS Falls Risk: Mental State Score: 0 OMS Falls Risk: Vision - eyeglasses: No OMS Falls Risk: Vision - blurred: No OMS Falls Risk: Vision - glaucoma: No OMS Falls Risk: Vision Score: 0

OMS Falls Risk: Vision Score: U

OMS Falls Risk: Transfer Score: Independent - use of aids to be independent is allowed. OMS Falls Risk: Mobility Score: Independent (but may use any aid e.g. walking stick)

OMS Falls Risk: Total TS + MS Score: 0
OMS Falls Risk: Total Form Score: 0

OMS Falls Risk: Is Total TS + MS between 3-6?: No

Supervision required for patient: No

Feng, Lena (RN) - 16/02/2021 22:36

Printed on: 03/03/2023 10:25 AEDT

Page 6 of 48

LEHRMANN, Bruce E 14/06/1995

	il.			Fi Roya	al North Sho	ry Psuch	MRN Emerg RNS As	<u> </u>
	NS	W	Health	G W			5-12-	38 <u>FEMAL</u>
	Fac	ility:		L E Bruc	BRMANN Se E	lie i ii	PRIHIED: 16FEB2	1 21:36
	SR		ELF REPORT MEASURES FOR ULTS AND OLDER PEOPLE K10 + LM - ENGLISH	HUNTL	B:14JUN 4 KARPABEE AVE EYS COVE 2111 16FEB21 MO 26411474551 ETE ALL DE	PH: 9426166 89	10	ex:M
		The fou i	tructions following ten questions ask ab r weeks. For each question, m cribes the amount of time you t	out how y	ou have	been fee	eling in t	ne last
				None of the time	A little of the time	Some of the time	Most of the time	All of the time
		1.	In the last four weeks, about how often did you feel tired out for no good reason?	0	0	Ø	0	0
NO WALLING		2 .	In the last four weeks, about how often did you feel nervous?	0	×	0	0	0
		3.	In the last four weeks, about how often did you feel so nervous that nothing could calm you down?	0	×	0	0	0
		4.	In the last four weeks, about how often did you feel hopeless?	0	×	ď	0	0
		5.	In the last four weeks, about how often did you feel restless or fidgety?	0	*	0	0	0
		6.	In the last four weeks, about how often did you feel so restless you could not sit still?	0	%	0	0	0
		7.	In the last four weeks, about how often did you feel depressed?	0	×	0	0	0
		8.	In the last four weeks, about how often did you feel that everything was an effort?	0	×	0	0	0
		9.	In the last four weeks, about how often did you feel so sad that nothing could cheer you up?	0	K.	0	0	0
		10.	In the last four weeks, about how often did you feel worthless?		ø_	0	0	0

NO WRITING

SR1 Self Report Measure	s for Adults - MH	- Auth (Verified) *
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* SR1 Self Report Mea	asures for Adults - M	H - Au	ith (Verified)	* 10 N		
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	Royal North S	hore			· C service	1
Health					FEMALE	-
y:	LEHRMANN					
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	ADM: 16FEB21 M/C: 26411474	MD:Ilc	her. Ralf (Se	enior MO) 424 Fin=EF	•	
KIU + LW - ENGLISH	COMPLETE AL	L DET	AILS OR AFFI	X PATIENT LA	BEL HERE	1
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x)	All of the time	0				0 8
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Please sign below and return it to the st	aff mæmber who as	ked v	ou to compl	ete it.		
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For Care Planning Purposes:		3	K10 score		8	<u>ω</u> ===
Staff comments:					—	ROG
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Staff name: Signature:		natio	n:	Date:		
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In the last four weeks, how many days were you TOTALLY UNABLE to work, study or manage your day to day activities because of these feelings?  12. [Aside from those days], in the last 4 weeks, HOW MANY DAYS were you able to work or study or manage your day to day activities, but had to CUT DOWN on what you did because of these feelings?  13. In the last 4 weeks, how many times have you seen a doctor or any other health professional about these feelings?  14. In the last 4 weeks, how often have physical health problems been the main cause of these feelings?  None of the time A little of the time Some of the time All of the time All of the time Thank you for completing this queets and the second of the se	Health  y:  SELF REPORT MEASURES FOR DULTS AND OLDER PEOPLE K10 + LM - ENGLISH  The next few questions are about how these feelings min the last four weeks.  You need not answer these questions if you answered all of the ten questions about your feelings.  11. 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In the last four weeks, how many days were you TOTALLY UNABLE to work, study or manage your day to day activities because of these feelings?  12. [Aside from those days], in the last 4 weeks, HOW MANY DAYS were you able to work or study or manage your day to day activities because of these feelings?  13. In the last 4 weeks, how many times have you seen a doctor or any other health professional about these feelings?  14. In the last 4 weeks, how often have physical health problems been the main cause of these feelings?  None of the time OA little o	Health  Y:  SELF REPORT MEASURES FOR DULTS AND OLDER PEOPLE K10 + LM - ENGLISH  The next few questions are about how these feelings may have affected you in the last four weeks. Pound and the ten questions about your feelings.  11. In the last four weeks, how many days were you TOTALLY UNABLE to work, study or manage your day to day activities, but had to CUT DOWN on what you did because of these feelings?  12. [Aside from those days], in the last 4 weeks, HOW MANY DAY'S were you able to work or study or manage your day to day activities, but had to CUT DOWN on what you did because of these feelings?  13. In the last 4 weeks, how many times have you seen a doctor or any other health professional about these feelings?  None of the time  A little of the time  Some of the time  All of the time  Thank you for completing this questionnaire.  Please sign below and return it to the staff member who asked you to complete it.  Consumer signature:  Date: 14 Jun 1995 Age: 25 Y Sex: M  1966-12-38   PEMALE  1967-12-38   PEMALE  1966-12-38   PEMALE  1966-12

Page 2 of 2

NO WRITING

Holes Punched as per AS2828.1: 2012

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# * SR1 Self Report Measures for Adults - MH - Auth (Verified) *

NSW Health Facility:	FAMILY NAME  GP Royal North Shore Psych Eme 196- Ph: LEHRMANN AI Bruce E  DOB: 14JUN1995 Age: 10 284 4 KARPAPEE AUE AURILLYS COUE 2111 PN: 8428168998	MRN  12-38  1188:1976821 21:25
SR1 SELF REPORT MEASURES FOR ADULTS AND OLDER PEOPLE K10 + LM - ENGLISH	DOB: 14JUN1995 Age:  U 284 4 KARRAPET AUE  LC HUBILEYS COVE 2111 PN: 8428168898  ADN: 16FER21 MO: 11chef, Ralf ( M/C: 26411474551 H/F: N18-4931	. 8

# Instructions

The following ten questions ask about how you have been feeling in the last four weeks. For each question, mark the circle under the option that best describes the amount of time you felt that way.

		None of the time	A little of the time	Some of the time	Most of the time	All of the time
1.	In the last four weeks, about how often did you feel tired out for no good reason?	0	100	0	0	0
2.	In the last four weeks, about how often did you feel nervous?	0	0	<b>*</b>	0	0
		-	283	15	980X 32	m
3.	In the last four weeks, about how often did you feel so nervous that nothing could calm you down?	0	0	ø	0 *	0
	1000 1000 000 000	6 30		*		s - a
4.	In the last four weeks, about how often did you feel hopeless?	0	0	<b>\$</b>	0	0
100	55 (F. 15) (F. 17 (65))	岀		• 20		6) 17 - 1 ⁽²⁾
5.	In the last four weeks, about how often did you feel restless or fidgety?	0	0	ø	0	0
			e r ••	es es ans	50.0	
6.	In the last four weeks, about how often did you feel so restless you could not sit still?	0	0	Ø.	0	0
7.	In the last four weeks, about how often did you feel depressed?	0	0	762	0	0
8.	In the last four weeks, about how often did you feel that everything was an effort?	0	0	92	0	0
9.	In the last four weeks, about how often did you feel so sad that nothing could cheer you up?	0	0	Þ	0	0
10.	In the last four weeks, about how often did you feel worthless?	0	0	ф	0	0

NO WRITING

Page 1 of 2

SMR060.934

* SR1 Self Report Me	asures for Adults - MH - Auth (Verified) *
Health  Illity:  R1 SELF REPORT MEASURES FOR ADULTS AND OLDER PEOPLE K10 + LM - ENGLISH	GIVI 196-12-38 MALE  D.O LEHRMANN  Bruce E  DOB: 14JUN1995 Age: 25Y Sex: M  LOC HIGHER HOP HIS ENGINEERS  LOC HIGHER HOP HIS ENGINEERS  COMPLETE ALL DETAILS OR AFFIX PATIENT LABEL HERE
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14. In the last 4 weeks, how often have problems been the main cause of	
Please sign below and return it to the st  Consumer signature:  Date: 722  For Care Planning Purposes:  Staff comments:	npleting this questionnaire.  aff member who asked you to complete it.  K10 score
Staff name: Signature:	Designation: Date:
2 of 2	NO WRITING

PMRN: 196-12-38 MRN: 196-12-38

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995

Age: 27 years Sex:

Male

Royal North Shore Hospital

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

#### **Assessment Documents**

DOCUMENT NAME: SERVICE DATE/TIME:

**RESULT STATUS:** 

PERFORM INFORMATION: SIGN INFORMATION:

Waterlow Assessment Form - Text

16/02/2021 22:36 AEDT

Auth (Verified)

Feng, Lena (RN) (16/02/2021 22:36 AEDT) Feng, Lena (RN) (16/02/2021 22:36 AEDT)

Waterlow Assessment Entered On: 16/02/2021 22:37 Performed On: 16/02/2021 22:36 by Feng, Lena (RN)

#### **Waterlow Assessment**

Update patient weight: Yes Patient Height: 172 cm Sex Waterlow: 1 - Male Age Waterlow: 1 = 14 - 49

Continence Waterlow: 0 - Complete/Catheterised Tissue Malnutrition Waterlow: 0 - Not Applicable

Neurological Deficit Waterlow: 0

Major Surgery or Trauma Waterlow: 0 - Not Applicable

Medication Waterlow: 0 - Not Applicable

Skin Type Visual Risk Areas Waterlow: 0 - Healthy

MST - Total Score: 3 (>HHI)

Has the patient lost weight without trying (and how much)?: Unsure if has lost weight

Eating Poorly Due to Decreased Appetite: Yes

Feng, Lena (RN) - 16/02/2021 22:36

# **Biochemistry**

# Elect, Urea, Creat

		Collected Date Collected Time	16/02/2021 18:55 AEDT
Procedure	Units	Reference Range	
Sodium	mmol/L	[135-145]	139
Potassium	mmol/L	[3.5-5.2]	3.9
Chloride	mmol/L	[95-110]	100
Bicarb.	mmol/L	[22-32]	23
Urea	mmol/L	[3.5-8.0]	2.8 L
Creatinine	umol/L	[60-110]	89
Anion Gap	mmol/L	[7-17]	20 H
Estimated GFR (CKDEPI)	mL/min/1.73m2	[>60]	>90

Printed on: 03/03/2023 10:25 AEDT

Page 11 of 48

MRN: 196-12-38

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995 Age: 27 years

Sex: Male

Royal North Shore Hospital

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

# **Biochemistry**

#### Liver Function

	Collected Date Collected Time	16/02/2021 18:55 AEDT
Units	Reference Range	
umol/L	[<20]	19
g/L	[60-80]	88 H
g/L	[31-47]	52 ^H
g/L	[22-42]	36
unit/L	[30-110]	71
unit/L	[5-50]	188 ^H
unit/L	[10-50]	82 H
unit/L	[10-35]	45 ^H
	umol/L g/L g/L g/L unit/L unit/L unit/L	Collected Time  Units Reference Range  umol/L [<20]  g/L [60-80]  g/L [31-47]  g/L [22-42]  unit/L [30-110]  unit/L [5-50]  unit/L [10-50]

# Ca, PO4, Mg

		Collected Date Collected Time	16/02/2021 18:55 AEDT
Procedure	Units	Reference Range	
Ca	mmol/L	[2.10-2.60]	2.53
Ca Corrected	mmol/L	[2.10-2.60]	2.31
PO4	mmol/L	[0.75-1.50]	0.79
Mg	mmol/L	[0.70-1.10]	0.96

# Glucose Level

		Collected Date	16/02/2021
		Collected Time	18:55 AEDT
Procedure	Units	Reference Range	
Glucose (Rand)	mmol/L	[3.5-7.8]	4.6

# Therapeutic Drugs

		Collected Date Collected Time	16/02/2021 18:55 AEDT
Procedure	Units	Reference Range	
<b>Drug Comment</b>			See Below T1

#### Textual Results

T1: 16

16/02/2021 18:55 AEDT (Drug Comment)

The lower limit of the paracetamol assay is 10 mg/L and may be associated with toxicity depending on the time of acute ingestion. Refer to the MJA Guidelines for the management of paracetamol poisoning in Australia and New Zealand and nomogram on page 18 for interpretation (note molar & mass units scales on opposite side of graph), available at https://www.aci.health.nsw.gov.au/networks/eci/clinical/clinical-resources /clinical-tools/toxicology/paracetamol

Printed on: 03/03/2023 10:25 AEDT

Page 12 of 48

MRN: 196-12-38

Patient Name: LEHRMANN, Bruce E

**DOB**: 14/06/1995 **Age**: 27 years

je: 27 years Sex:

Royal North Shore Hospital

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

Bio	oche	mi	str	У

# Thyroid Studies

		Collected Date	16/02/2021
		Collected Time	18:55 AEDT
Procedure	Units	Reference Range	
TSH	mIU/L	[0.40-3.50]	0.86
Free T4	pmol/L	[9.0-19.0]	15.2

# Protein Analysis

Collected Date 16/02/2021 Collected Time 18:55 AEDT

Male

Procedure C-Reactive Protein Units mg/L

nits Reference Range

2.6

Taylool

# Toxicology

		Collected Date	16/02/2021
		Collected Time	18:55 AEDT
Procedure	Units	Reference Range	
Alcohol	mmol/L		<2.2
Ethanol Level %	g/100mL		<0.01

[<5]

# Drug Screen

		Collected Date	16/02/2021
		Collected Time	18:55 AEDT
Procedure	Units	Reference Range	
Paracetamol Conc	mg/L		<10

# Charts

Printed on: 03/03/2023 10:25 AEDT

Page 13 of 48

LEHRMANN, Bruce E 14/06/1995

	* Mental H	lealth Nurs	ing Obs Char	Level	3 - Auth (Verified) *				
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MENTAL HEALTH NURSING	995 Age: 25Y 5	Sex: Marginary	.0000		HEALTH NURSING -	DOB: 14JUN19  : 211 - VARIANT OF A  - 211 -	95 Age: 25Y  ii sessissis  oner. Relf (Sentor  or NSG-48372424_	Sex:I	
OBSERVATION CHART LEVEL 3 COMPLETE ALL DETAIL	LS OR AFFIX PATIENT L	ABEL HERE	DBS	EKVA	TION CHART LEVEL 3	COMPLETE ALL DETAILS			
Minimum 30 Minute Observations Day and Night			122200 122200 122000 Date	Time	Behaviour/Affect/Remarks and MO Re (e.g. PRN, incidents, engagement & activity		Name Sign	Designation	
In addition to the completion of the nursing observation chart, nurses must record the modical record. This must include the level of observation the observation and engag the consumer's mental state. Level 3 observation is supported through two contempor with Nursing staff may increase the level of observation at any time based on assessment in medical review and NUM or Nurse in Charge notification as soon as possible. Responsible Medical Officer Review is recorded within the Nursing Observation Chart.	pement undertaken and or randous documented as ment or concern. This in	assessment of ssessments per crease must			outcome of same, respiration rate and acti	wity during sleep)			
consumer's medical record.	1 1	<del>,                                    </del>		10.000	200 C W/			_1	
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LEHRMANN, Bruce E 14/06/1995

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MRN: 196-12-38

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995 A

Age: 27 years

Male

Sex:

Royal North Shore Hospital

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

# **Clinical Patient Information**

Procedure Units Reference Range	Height cm	Temperature Oral DegC [35.5-38.5]	Temperature Tympanic DegC [35.5-38.5]	Peripheral Pulse Rate bpm [50-120]
Recorded Date/Time				
17/02/2021 08:41 AEDT	-	-	36.6	86
16/02/2021 22:36 AEDT	172	-		-
16/02/2021 21:50 AEDT	-		36.9	97
16/02/2021 20:13 AEDT	-	37.0	-	64
16/02/2021 18:04 AEDT	-	37.1	-	100

Procedure Units Reference Range	Peripheral Pulse Rate Regularity	Respiratory Rate brpm [10-25]	Systolic Blood Pressure mmHg [100-180]
Recorded Date/Time			
17/02/2021 08:41 AEDT	Regular	16	135
16/02/2021 21:50 AEDT	-	20	146
16/02/2021 20:13 AEDT	Regular	20	156
16/02/2021 18:04 AEDT	Regular	14	159

Procedure Units Reference Range Recorded Date/Time	Diastolic Blood Pressure mmHg	Mean Arterial Pressure mm/Hg
17/02/2021 08:41 AEDT	85	
16/02/2021 21:50 AEDT	86	<u>-</u>
16/02/2021 20:13 AEDT	60	-
16/02/2021 18:04 AEDT	90	113

Procedure Units Reference Range	Mean Arterial Pressure Cuff Calc mm/Hg	Oxygen Saturation % [95-100]	ED Approved Protocol
Recorded Date/Time		ü	
17/02/2021 08:41 AEDT	102	98	
16/02/2021 21:50 AEDT	106	96	- "
16/02/2021 20:13 AEDT	-	98	-
16/02/2021 18:49 AEDT	<u>-</u>	_	General Nurse Protocol
16/02/2021 18:04 AEDT	= <u>-</u> = =	99	14 = = <u> </u>

Procedure Units Reference Range	ED Approved Protocol Comment	ACVPU	ED Approved Protocol & Intervention
Recorded Date/Time			ist.
17/02/2021 08:41 AEDT		Alert	
16/02/2021 21:50 AEDT		Alert	
16/02/2021 18:49 AEDT	See Below T2	- 1	Other

Textual Results

T2: 16/02/2021 18:49 AEDT (ED Approved Protocol Comment)

**BLOODS** 

Printed on: 03/03/2023 10:25 AEDT

Page 16 of 48

MRN: 196-12-38 Patient Name: LEHRMANN, Bruce E

**DOB:** 14/06/1995

Age: 27 years

Sex: Male

# **Royal North Shore Hospital**

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

	Clinical F	Patient Informa	tion			
Procedure Units Reference Range	Oxygen Delivery	Room Air or Oxygen at Triage				
Recorded Date/Time						
17/02/2021 08:41 AEDT	Room Air (no device)		-			
16/02/2021 21:50 AEDT	Room Air (no device)		-			
16/02/2021 20:13 AEDT	Room Air (no device)		-			
6/02/2021 18:04 AEDT		Roo	m air			
	01: 7 1/2 10:14	347.1	0. 111.1		144	
Procedure Units Reference Range	Skin Type Visual Risk Are	eas Waterlow	Sex Waterlow	Age	Waterlow	
Recorded Date/Time						
16/02/2021 22:36 AEDT	0 - Healthy		1 - Male	1 :	= 14 - 49	
Procedure Units Reference Range	Continence Waterlow	Tissue	Tissue Malnutrition Waterle			
Recorded Date/Time						
6/02/2021 22:36 AEDT	0 - Complete/Catheterise	sed 0 - Not Applicable				
Procedure Units Reference Range	Neurological Deficit Wate	erlow Ma	w Major Surgery or Trauma Waterlo		terlow	3
Recorded Date/Time						
6/02/2021 22:36 AEDT	0		0 - Not Applicable			
Procedure Units Reference Range	Medication Waterlow	Eye Opening Response G		Best	Verbal Res	ponse GC
Recorded Date/Time						
16/02/2021 22:36 AEDT	0 - Not Applicable	<u>-</u>			-	
16/02/2021 18:04 AEDT	-	4 - Sponta	aneously		5 - Orier	nted
Procedure Units Reference Range	Best Motor Response GC		Glasgow Coma Score		Limb Respo	onse
Recorded Date/Time						
16/02/2021 18:04 AEDT	6 - Obeys commands		15	5 -	Normal pow	er
Procedure Units	R Arm Limb Response	L Leg Limb Re	2		Response	
Reference Range						
Recorded Date/Time						

Printed on: 03/03/2023 10:25 AEDT

16/02/2021 18:04 AEDT

Page 17 of 48

5 - Normal power

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5 - Normal power

5 - Normal power

MRN: 196-12-38

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995 A

Age: 27 years

Sex:

Royal North Shore Hospital

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

Clin	ical	Patier	at Ir	form	ation
CIII	ııcaı	rauei	11 11		Iauvii

Procedure Units	OMS Falls Risk:Total Form Score	OMS Falls Risk:Mental Status -di		
Reference Range	[7]			
Recorded Date/Time				
16/02/2021 22:36 AEDT	0	No		

Male

Procedure Units Reference Range	OMS Falls Risk:Mental Status -confused	OMS Falls Risk:Toileting
Recorded Date/Time		
16/02/2021 22:36 AEDT	No	No

Procedure Units	Sedation Score	MST -Total Score	Service Setting
Reference Range		[0-1]	
Recorded Date/Time			
17/02/2021 16:04 AEDT	-		Acute inpatient psychiatric care
16/02/2021 22:36 AEDT	-	31	
16/02/2021 22:34 AEDT	-	-	Acute inpatient psychiatric care
16/02/2021 21:50 AEDT	0 - Wide awake		<u> </u>

Procedure	MH Adult Outcome Measure Admission	MH Adult Outcome Measure Discharge
Units		
Reference Range		
Recorded Date/Time		
17/02/2021 16:04 AEDT		Adult Outcome Measure Discharge
16/02/2021 22:34 AEDT	Adult Outcome Measure Admission	-

Procedure Units	Phase of Care	1 Behavioural Disturbance HoNOS
Reference Range		[1.9]
Recorded Date/Time		
17/02/2021 16:04 AEDT	-	0
16/02/2021 22:34 AEDT	Acute	0

Procedure Units	2 Non-accidental self-injury HoNOS	3 Problem drinking or drug taking HoNOS
Reference Range	[1.9]	[1.9]
Recorded Date/Time		
17/02/2021 16:04 AEDT	1	1
16/02/2021 22:34 AEDT	1	0

Procedure Units	4 Cognitive problems HoNOS	5 Physical illness or disability HoNOS
Reference Range	[1.9]	[1.9]
Recorded Date/Time		
17/02/2021 16:04 AEDT	0	0
16/02/2021 22:34 AEDT	0	0

Printed on: 03/03/2023 10:25 AEDT

Page 18 of 48

MRN: 196-12-38

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995 Age: 27 years

ears Sex: Male

# **Royal North Shore Hospital**

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

# **Clinical Patient Information**

Procedure Units	6 Hallucinations and delusions HoNOS
Reference Range	[1.9]
Recorded Date/Time	
17/02/2021 16:04 AEDT	1
16/02/2021 22:34 AEDT	0
Procedure Units	7 Problems with depressed mood HoNOS
Reference Range	[1.9]
Recorded Date/Time	
17/02/2021 16:04 AEDT	2 ^H
16/02/2021 22:34 AEDT	2 ^H

Procedure Units	8 Other mental/behavioural problem HoNOS
Reference Range	[1.9]
Recorded Date/Time	
17/02/2021 16:04 AEDT	2 н
16/02/2021 22:34 AEDT	2 H

Procedure Units	8a Other problem description HoNOS	9 Problems with relationships HoNOS
Reference Range		[1.9]
Recorded Date/Time		
7/02/2021 16:04 AEDT	Anxiety	0
6/02/2021 22:34 AEDT	Anxiety	2 н

Procedure Units	10 Problems daily living activity HoNOS
Reference Range	[1.9]
Recorded Date/Time	
17/02/2021 16:04 AEDT	0
16/02/2021 22:34 AEDT	1

Procedure Units	11 Problems with living conditions HoNOS
Reference Range	[1.9]
Recorded Date/Time	
17/02/2021 16:04 AEDT	0
16/02/2021 22:34 AEDT	2 ^H

Procedure Units	12 Occupation and activities HoNOS	HoNOS Behavioural Score
Reference Range	[1.9]	
Recorded Date/Time		
17/02/2021 16:04 AEDT	0	2
16/02/2021 22:34 AEDT	2 ^H	1

Printed on: 03/03/2023 10:25 AEDT

Page 19 of 48

PMRN: 196-12-38

MRN: 196-12-38

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995 Age: 27 years

Recorded Date/Time

16/02/2021 22:34 AEDT

Sex:

Royal North Shore Hospital

1 Reserve Rd 02 9926 7111

2

St Leonards, NSW 2065 -

Procedure Units Reference Range	HoNOS Impairment Score		HoNOS Symptomatic Score		HoN	HoNOS Social Score	
Recorded Date/Time							
17/02/2021 16:04 AEDT	. 0			5			0
16/02/2021 22:34 AEDT	0		4			7	
Procedure Units Reference Range	HoNOS Total Score 1 Tire		ed for no reason 2 Nervousness		ness 3	3 Unable to calm	
Recorded Date/Time							
17/02/2021 16:04 AEDT	7		-		-		
16/02/2021 22:34 AEDT	8	8		3 2			2
Procedure Units Reference Range	4 Hopelessness	5 Restles	sness	6 Unabl	e to sit still	7 Depre	essed
Recorded Date/Time							
16/02/2021 22:34 AEDT	2	2			2	2	
Procedure Units Reference Range	8 Everything an e	ffort 9 S	Sad 1	0 Worthless	sness		

**Clinical Patient Information** 

Male

Procedure Units Reference Range	11 Days unable to undertake activities	12 Days able to undertake activities
Recorded Date/Time		
16/02/2021 22:34 AEDT	2	0
Procedure Units Reference Range	13 Times seeing health professional	14 Physical health as cause of problem
Recorded Date/Time		
16/02/2021 22:34 AEDT	0	2. A little of the time

Procedure	K10LM Total Score
Units	
Reference Range	[19.9]
Recorded Date/Time	
16/02/2021 22:34 AEDT	21 ^H

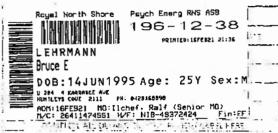
# Correspondence

Printed on: 03/03/2023 10:25 AEDT

Page 20 of 48

* Correspondence - NSLHD - Auth (Verified) *





Date: 17/02/2021

Admissions Officer Northside Clinic

Dear Sir/Madam,

Mr Bruce Lehrmann (DOB 14th June 1995) is seeking admission to your facility for treatment of his acute crisis.

We feel he would be appropriate for admission to your facility as soon as a bed were to become available.

If further information is required, please do not hesitate to contact us on 02 9463 2299.

Kind Regards,

Dr. Laura Conway Psychiatry Registrar to:

Dr Kathryn Drew Psychiatrist, Provider No 81457HH Royal North Shore Hospital

> Northern Sydney Local Health District ABN 63 834 171 987

* FAX Cover Sheet - Auth (Verified)



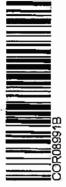
(02) 94333599

(02) 94333555

Wednesday, 17 February 2021

Bruce Lehrmann dob 14/06/1995

IF YOU WOULD LIKE THIS DOCUMENT TO BE SCANNED ONTO THE MEDICAL RECORD, PLEASE ATTACH PATIENT LABEL AFTER FAXING



#### TO FROM PECC Leanne COMPANY Northside Clinic St Leonards BRANCH **Psychiatric Emergency Care Centre** Level 2, ASB

FAX

TEL

Royal North Shore Hospital St Leonards, NSW, 2065 9463 2029 9463 2299 PAGES INCLUDING THIS PAGE

Please see attached referral for Bruce

Kind regards,

FAX

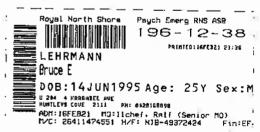
TEL

DATE

**SUBJECT** 

Anne RN





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PMRN: 196-12-38 MRN: 196-12-38

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995

Age: 27 years

Male Sex:

**Royal North Shore Hospital** 

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

# **Diagnosis**

Diagnosis: Acute situational disturbance

Diagnosis Date: 16/02/2021

Status: Active

Classification: MH Inpatient; Ranking: Primary; Code: 295478016 (SNOMED CT)

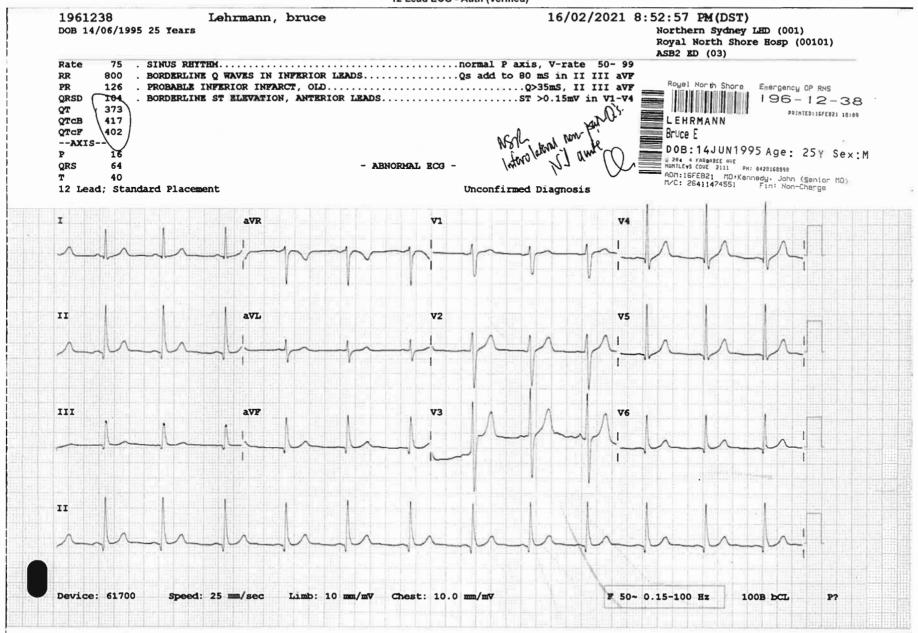
Diagnosis: Mental health problem

Diagnosis Date: 16/02/2021 Status: Active Classification: ED Nursing; Ranking: ; Code: 2474834012 (SNOMED CT)

# **Diagnostic Results**

Printed on: 03/03/2023 10:25 AEDT Page 23 of 48

#### * 12 Lead ECG - Auth (Verified) *



MRN: 196-12-38

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995 Age: 27 years

Male Sex.

**Royal North Shore Hospital** 

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

# **Discharge Documents**

DOCUMENT NAME: SERVICE DATE/TIME: MH Discharge / Transfer Summary

17/02/2021 15:54 AEDT

Auth (Verified)

**RESULT STATUS:** PERFORM INFORMATION:

SIGN INFORMATION:

Conway, Laura (JMO) (17/02/2021 15:59 AEDT) Conway, Laura (JMO) (17/02/2021 15:59 AEDT)

#### MH Discharge /Transfer Summary Inpatients

Patient: LEHRMANN, Mr Bruce E

MRN: 196-12-38

Age: 25 years Sex: Male DOB: 14/06/1995

Associated Diagnoses: Mental health problem; Acute situational disturbance

Author: Conway, Laura (JMO)

#### Visit Information

# **Patient Demographics**

Facility:

Royal North Shore Hospital

Admission Date:

16/02/2021

Medical Service:

Psychiatry

Consulting Clinician:

Attending Medical Officer:

Drew, Kathryn

AMO Provider No.:

081457HH

GP, No GP

Local Medical Officer: LMO Provider No.:

LMO Address:

LMO Phone:

LMO Fax:

Interpreter Required:

NO

Language spoken at home: English

Indigenous Status: Neither Aboriginal/Torres Strait Is

# Dear Colleague,

Thank you for reviewing Bruce LEHRMANN a 25 year old male to be discharged on 17/02/2021 from Psych Emerg RNS ASB at Royal North Shore Hospital. Bruce LEHRMANN presented to this facility with a situational crisis.

Bruce self-presented to RNS ED on the 16/02/2021 due to a deterioration in mental state with suicidal thoughts. This is on a background of Bruce being contacted by multiple journalists alleging that he was the perpetrator of a high profile sexual assault occurring at Parliament House in 2019.

Bruce was reviewed by a consultant psychiatrist on the 17/02/2021. His presentation appeared consistent with an acute situational crisis on the background of significant psychosocial stressors. Upon cross-sectional examination, he did not present with signs/symptoms consistent with a pervasive mood disorder or primary psychotic illness.

Bruce feels that he would benefit from a voluntary inpatient admission to Northside Clinic and has asked that we arrange a referral for him. Bruce may benefit from longitudinal follow-up with a clinical psychologist.

We also recommend the following:

# 1. Acute management:

- Discharge today
- Referral to Northside Clinic for a voluntary admission
- Contact numbers given for MHTAL 1800 011 511
- Safety plan discussed if mental health deteriorates to:
- Call '000'

Printed on: 03/03/2023 10:25 AEDT

Page 25 of 48

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995

Age: 27 years

Sex:

Male

Royal North Shore Hospital

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

# **Discharge Documents**

- Contact MHTAL
- Present to nearest ED

#### 2. Legal Status:

- Voluntary not detainable under the act
- 3. Medication Recommendations:
- No regular medications

#### 4. Investigation Recommendations:

- N/A

# 5. Drug and Alcohol:

- N/A

#### 6. Discharge Recommendations:

- Admission to Northside when bed available
- Discharge plan as per Northside

# Dr Laura Conway (Psychiatry Registrar)

Emergency/PECC Level 2, Acute Services Building Tel (02) 9463 2299

#### **Health Status**

# **Discharge Medications**

Pharmacy will dispense up to 7 days' supply of medication on discharge (where required). Additional supply may be provided to meet the clinical needs of the patient and at public holidays to allow continued medication access.

Medications dispensed are intended to be taken from the time of discharge or as otherwise labelled.

.Formulation / Clinical Impression

Provisional Mental health problem: SNMCT 2474834012, Discharge, ED Nursing Provisional Acute situational disturbance: SNMCT 295478016, Final, MH Inpatient Allergies and Adverse Reactions

Allergic Reactions (All)

Mild

Dust- Grasses.

Grasses- No reactions were documented.

**Discharge Information** Performed By

Dr. Laura Conway (JMO); Medical Officer

Printed on: 03/03/2023 10:25 AEDT

Page 26 of 48

Patient Name: LEHRMANN, Bruce E

**DOB:** 14/06/1995

Age: 27 years

Male Sex:

**Royal North Shore Hospital** 

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

#### **Discharge Documents**

DOCUMENT NAME: SERVICE DATE/TIME:

**RESULT STATUS:** PERFORM INFORMATION: SIGN INFORMATION:

MH Transfer of Care Checklist - Text

17/02/2021 16:19 AEDT

Auth (Verified)

Read.Anne (17/02/2021 16:19 AEDT) Read, Anne (17/02/2021 16:19 AEDT)

MH Transfer of Care Checklist Entered On: 17/02/2021 16:27 Performed On: 17/02/2021 16:19 by Read, Anne

#### Checklist

Transfer of care date: 17/02/2021 Completed by: Read, Anne Role in consumer care: Nurse Transfer of care to: Community

Unit/Service transferring to: Hand over to Julia Van Bruinbssen for F/U Phone call this evening

Transfer of care discussed with: Community Mental Health Team

Transfer comment: Patient waiting for conformation of NSC St Leonards bed

Verbal handover of transfer date and time: 17/02/2021 16:19

Handover provided by: Read, Anne

Handover provided to: : Julia Van Bruinbssen (JMO)

Details confirmed: Consumer home address, Consumer contact details

Valuables/Belongings Returned: Yes

Read. Anne - 17/02/2021 16:19

Read, Anne - 17/02/2021 16:19

#### Check items where appropriate

Consumer introduced to next unit/service/provider: Not Applicable Details of scheduled appointments provided: Not Applicable

Ward Clerk/admin notified of transfer of care: Yes

Transport arranged: Yes

MH Outcome Measures completed: Yes Your Experience Service (YES) provided: Yes

Carer Experience Survey (CES) provided(paper/online link): Not Applicable

MHTAL and emergency contact numbers: Yes

Medications supplied: Not Applicable Prescriptions supplied: Not Applicable

Patient Flow Manager Notified of Available Bed: Yes

Service/provider aware of any communication issues: Not Applicable

Service/provider aware of any mobility issues: Not Applicable Service/provider aware of any falls risk: Not Applicable Service/provider aware of any diet orders: Not Applicable

The following was discussed with the consumer: Discharge / Transfer Summary The following was discussed with the carer/s or family: Follow-up arrangements

Documents provided to consumer: MH Care Plan Documents provided to carer/s and family: MH Care Plan Documents provided to external service: MH Care Plan

Printed on: 03/03/2023 10:25 AEDT Page 27 of 48

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995

Age: 27 years

Sex: Male

**Royal North Shore Hospital** 

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

# **Discharge Documents**

Read, Anne - 17/02/2021 16:19

Patient Belongings/ Valuables Checklist

Belongings recorded: Arrival
Own Medications with Patient: No
Own X-Rays with patient: N/A
Pt Belongings, Clothing Cut: No
Pt Belongings, Glasses: Yes
Pt Belongings, Contact Lenses: No

Pt Belongings, Dentures: No Pt Belongings, Hearing Aids: No

Pt Belongings, Mobile Phone/Electronic Devices: Yes

Pt Belongings, Walking Aid: No Pt Valuables, Money: Yes Pt Valuables, Jewellery: No

Read, Anne - 17/02/2021 16:19

**Medication Location** 

Medication Location: Other: No medications to return

Read, Anne - 17/02/2021 16:19

**Glasses** 

Pt Belongings, Glasses on Arrival/During Stay/Departure: Transferred with patient

Read, Anne - 17/02/2021 16:19

**Mobile Phone/ Electronic Devices** 

Pt Belongings, Mobile/Electro Devices on Arrival/During Stay: Transferred with patient

Read, Anne - 17/02/2021 16:19

Money

Pt Valuables, Money on Arrival/During Stay/Departure: Transferred with patient

Read, Anne - 17/02/2021 16:19

Printed on: 03/03/2023 10:25 AEDT

Page 28 of 48

Patient Name: LEHRMANN, Bruce E

**DOB:** 14/06/1995

Age: 27 years

Male Sex:

**Royal North Shore Hospital** 

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

#### **ED Documents**

DOCUMENT NAME:

SERVICE DATE/TIME: **RESULT STATUS:** 

PERFORM INFORMATION: SIGN INFORMATION:

ED Approved Protocol Form- Text

16/02/2021 18:49 AEDT

Auth (Verified)

Boyle, Janet (EN) (16/02/2021 18:51 AEDT) Boyle, Janet (EN) (16/02/2021 18:51 AEDT)

ED Approved Protocol Entered On: 16/02/2021 18:51 Performed On: 16/02/2021 18:49 by Boyle, Janet (EN)

**ED Approved Protocol** 

ED Approved Protocol: General Nurse Protocol ED Approved Protocol & Intervention: Other ED Approved Protocol Comment: BLOODS

Boyle, Janet (EN) - 16/02/2021 18:51

DOCUMENT NAME:

SERVICE DATE/TIME:

**RESULT STATUS:** 

PERFORM INFORMATION: SIGN INFORMATION:

Triage Form - Text

16/02/2021 18:04 AEDT

Modified

Benardos, Michelle (RN) (16/02/2021 18:04 AEDT) Benardos, Michelle (RN) (16/02/2021 18:07 AEDT); Benardos, Michelle (RN) (16/02/2021 18:04 AEDT)

Triage Form RNS Entered On: 16/02/2021 18:07 Performed On: 16/02/2021 18:04 by Benardos, Michelle (RN)

Triage Presenting Information: PRESENTS WITH FIRST PRESENTATION OF MH PROBLEM WANTING TO SPEAK TO SOMEONE. STATES FEELS SUICIDAL ( DIDN'T ELABORATE) PMH-NIL. NKDA O/E-ALERT, FORTHCOMING. TEARFUL AT TRIAGE. DENIES SUICIDE INTENT. NIL SELF HARM CUTS. FEELS ANXIOUS Triage Information: **Arrive Dt&Tm this visit: 16-FEB-2021 18:04

**Total ED PRESENTS Last-week(0) month(0) year(0)

Benardos, Michelle (RN) - 16/02/2021 18:04 Benardos, Michelle (RN) - 16/02/2021 18:04

DCP GENERIC CODE

Triage Group: Emergency RNS

Benardos, Michelle (RN) - 16/02/2021 18:04

Triage Date/Time: 16/02/2021 18:04

{ [16/02/2021 18:04 ] previously charted by Benardos, Michelle (RN) at 16/02/2021 18:04 };

Triage Category: 4

Benardos, Michelle (RN) - 16/02/2021 18:07

{[3] previously charted by Benardos, Michelle (RN) at 16/02/2021 18:04 };

Printed on: 03/03/2023 10:25 AEDT

Page 29 of 48

MRN: 196-12-38

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995

Age: 27 years

Sex: Male

**Royal North Shore Hospital** 

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

#### **ED Documents**

Triage Specialty: MentalHealthPathway

Triage Visit Reason: MH - mental health problem

Type of Visit: Emergency Presentation

Mental Health ED Triage Screening Tool: Yes

Pregnancy, Birth or LaPregnancy, Birth or Lactation relevant at the Not applicable

Respiratory Rate: 14 brpm Oxygen Saturation: 99 %

Room Air or Oxygen at Triage: Room air

Peripheral Pulse Rate: 100 bpm

Peripheral Pulse Rate Regularity: Regular Systolic Blood Pressure: 159 mmHg Diastolic Blood Pressure: 90 mmHg Mean Arterial Pressure: 113 mm/Hg Temperature, Oral: 37.1 DegC

Is Novel coronavirus 2019 suspected: No

Benardos, Michelle (RN) - 16/02/2021 18:04

# **General Neurological Assessment**

GCS Eyes Open: 4 - Spontaneously GCS Best Verbal Response: 5 - Oriented

GCS Best Motor Response: 6 - Obeys commands

Glasgow Coma Score: 15

Limb Response, Right Arm: 5 - Normal power Limb Response, Left Arm: 5 - Normal power Limb Response, Right Leg: 5 - Normal power Limb Response, Left Leg: 5 - Normal power

Benardos, Michelle (RN) - 16/02/2021 18:04

**Image 5 -** Images currently included in the form version of this document have not been included in the text rendition version of the form.

#### **ED Triage Mental Health Screening Tool RNS**

Is the patient known to the NSLHD-MHS and presents in keeping with established Mental Health Diagnosis (not first presentation): No

Is this presentation consistent with symptoms and signs of the patient's previously diagnosed mental illness? : No Vital signs stable (white zone BTF) : Yes

No acute medical issues requiring urgent management in ED (including febrile illness, trauma, ingestion or drug side-effects): Yes

Patient is alert, orientated and coherent (i.e.: not confused): Yes

Not aggressive on this presentation: No concerns

Benardos, Michelle (RN) - 16/02/2021 18:04

DOCUMENT NAME:

SERVICE DATE/TIME:

RESULT STATUS:

PERFORM INFORMATION: SIGN INFORMATION:

ED Safe Transfer/Discharge List - Text

16/02/2021 21:47 AEDT

Auth (Verified)

Waters,Lana (RN) (16/02/2021 21:47 AEDT) Waters,Lana (RN) (16/02/2021 21:47 AEDT)

ED Safe Transfer / Discharge List Entered On: 16/02/2021 21:47 Performed On: 16/02/2021 21:47 by Waters, Lana (RN)

Printed on: 03/03/2023 10:25 AEDT

Page 30 of 48

MRN: 196-12-38

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995

Age: 27 years

are

Sex:

Male

Royal North Shore Hospital

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

#### **ED Documents**

# Admission Checklist 1_new

ID Band Colour: White

ID Band: Yes

Language Spoken: Language Spoken: English

Interpeter Required: No

Verbal Handover Given: PECC BY MH NURSE

Ward Allocated: Emergency RNS ASB

Person to Contact Details : Patient Contact Profile

Type Relationship Name

Contact 1

Mother

Address

Home Phone Mobile Phone Business Phone

Call Instruction

Risk Assessments Completed: Yes

Waters, Lana (RN) - 16/02/2021 21:47 (As Of: 16/02/2021 21:47:43 AEDT)

Allergies (Active)

Dust Estimated Onset Date: Unspecified; Reactions: Grasses;

Created By: Hawksford, Tory (RN); Reaction Status: Active; Category: Environment; Substance: Dust; Type: Allergy; Severity: Mild; Updated By: Hawksford, Tory (RN); Source:

Patient; Reviewed Date: 27/07/2019 16:39

Grasses Estimated Onset Date: Unspecified; Created By: Hawksford,

Tory (RN); Reaction Status: Active; Category: Environment;

Substance: Grasses; Type: Allergy; Severity: Mild; Updated By: Hawksford, Tory (RN); Source: Patient;

Reviewed Date: 27/07/2019 16:39

Admission Checklist 2_new

Medications Sent with Pt: No

Nil By Mouth: No

Clerical Admission Complete Comment: An Admit Paper Attended event has been commenced

Waters, Lana (RN) - 16/02/2021 21:47

**Registered Nurse Authorisation for Departure** 

Senior Nurse Auth ED to Ward: Waters, Lana (RN)

Observations within last hour: Yes Patient Between the Flags: Yes

Printed on: 03/03/2023 10:25 AEDT

Page 31 of 48

MRN: 196-12-38

Patient Name: LEHRMANN, Bruce E

**DOB:** 14/06/1995

Age: 27 years

Sex:

**Royal North Shore Hospital** 

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

#### **ED Documents**

Male

ACC documented: N/A

Frequency of obs documented: Yes

Safe for departure: Yes

Waters, Lana (RN) - 16/02/2021 21:47

**DOCUMENT NAME:** 

SERVICE DATE/TIME:

**RESULT STATUS:** 

PERFORM INFORMATION: SIGN INFORMATION:

ED Nursing Fast Track Assessment - Text

16/02/2021 20:13 AEDT

Auth (Verified)

Woodbury, Abbey (RN) (16/02/2021 20:13 AEDT) Woodbury, Abbey (RN) (16/02/2021 20:13 AEDT)

ED Nursing Fast Track Assessment Entered On: 16/02/2021 20:15 Performed On: 16/02/2021 20:13 by Woodbury, Abbey (RN)

# **ED Nursing Fast Track Assessment**

Assessment, Relevant History and Intevention: Pt presents low moods and suicidal ideation Nil Pmhx

Did not probe pt due to confidental nature of problem

However pt presents with increasing work stressors, leading to suicidal ideation

Has not had any issues with depression previously

Happy to be here

Wanting to speak to MH team

Plan: MH rv (done)

Aw plan

Woodbury, Abbey (RN) - 16/02/2021 20:13

#### **Nursing Arrival Checklist**

Caring Responsibility for Others: No Current Person to Contact details.: Yes

ID Band: Yes

ID Band colour: White

Could the patient be pregnant, lactating or given birth within the last 6 weeks?: Not applicable

Does Pt have any Advance Care Documents?: No

Woodbury, Abbey (RN) - 16/02/2021 20:13 (As Of: 16/02/2021 20:15:38 AEDT)

# **Vital Signs Previous & Current**

Triage Vital Signs: Latest Obs

Oxygen Saturation

99%

16 FEB 21 18:04

Respiratory Rate

14brpm

16 FEB 21 18:04

Peripheral Pulse Rate Peripheral Pulse Rate Regularity Regular

100bpm

16 FEB 21 18:04 16 FEB 21 18:04

BP

159mmHg / 90mmHg 16 FEB 21 18:04

Temperature Oral

37.1DegC

16 FEB 21 18:04

Glasgow Coma Score

15

16 FEB 21 18:04

Printed on: 03/03/2023 10:25 AEDT

Page 32 of 48

Patient Name: LEHRMANN, Bruce E

**DOB**: 14/06/1995

Age: 27 years

Male

Royal North Shore Hospital

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

#### **ED Documents**

Last Update by: Bernardos, Michelle E (Nurse - EEN/Registered V5), 16 FEB 21 18:04

Sex:

Respiratory Rate: 20 brpm Oxygen Saturation: 98 %

Oxygen Delivery: Room Air (no device)

Peripheral Pulse Rate: 64 bpm

Peripheral Pulse Rate Regularity: Regular Systolic Blood Pressure: 156 mmHg Diastolic Blood Pressure: 60 mmHg Temperature, Oral: 37.0 DegC

Woodbury, Abbey (RN) - 16/02/2021 20:13

# Haematology

#### Full Blood Count

		Collected Date Collected Time	16/02/2021 18:55 AEDT
Procedure	Units	Reference Range	
Full Blood Count Status			FINAL
White Cell Count	x10^9/L	[4.0-11.0]	12.0 ^H
Haemoglobin	g/L	[130-180]	157
Platelet Count	x10^9/L	[150-400]	352
Red Cell Count	x10^12/L	[4.50-6.50]	5.28
Hct	L/L	[0.380-0.520]	0.464
MCV	fl	[80-100]	88
Mean Cell Hb	pg	[27-32]	30
Mean Cell Hb Conc.	g/L	[310-360]	338
RDW	%	[<15.0]	12.9
MPV	fl	[7.2-11.1]	7.6

#### Differential

Procedure Units Reference Range	
Differential Status	AUTOMATED
Neutrophils x10^9/L [2.0-8.0]	7.9
Lymphocytes x10^9/L [1.0-4.0]	3.0
Monocytes x10^9/L [0.2-1.0]	1.0 ^H
Eosinophils x10^9/L [<0.5]	0.0
Basophils x10^9/L [<0.1]	0.1

Printed on: 03/03/2023 10:25 AEDT

Page 33 of 48

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995 Age: 27 years

e: 27 years Sex:

**Royal North Shore Hospital** 

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

#### **Medication Administration Record**

Male

## Medications Administered

Admin Date/Time: 16/02/2021 22:18 AEDT

Medication Name: temazepam Ingredients: tema10tab 10 mg Admin Details: (Auth) Oral

Action Details: Order: Watt, Hilary (JMO) 16/02/2021 21:22 AEDT; Perform: Curtin, John (RN) 16/02/2021 22:29 AEDT; Witness:

Feng, Lena (RN) 16/02/2021 22:29 AEDT; VERIFY: Curtin, John (RN) 16/02/2021 22:29 AEDT

# Medico-Legal

Printed on: 03/03/2023 10:25 AEDT

Page 34 of 48

Holes Punched as per AS2828.1: 2012 BINDING MARGIN - NO WRITING

•	
* Application for Volunta	nry Admission - Auth (Verified) *
Application for Volunta	
NEW	F. Royal North Shore Energency OP RNS 238
Health	G FEMALE PAINTED: LISTEREZ 1 28:00
Facility:	LEHRMANN Bruce E
	DOB:14JUN1995 Age: 25Y Sex:M-
PERSONAL APPLICATION FOR	U 264 4 KARRAIEE AVE HUNTLEYS COVE 2111 PH: 0472168898
VOLUNTARY ADMISSION TO A MENTAL HEALTH FACILITY	ADN:16FEB21
MENTAL BEALTH PACIENT	COMPLETE ALL DETAILS OR AFFIX PATIENT LABEL HERE
41	HEALTH ACT 2007 Section 5(1)
PERSONAL APPLICATION	N FOR VOLUNTARY ADMISSION TO
	L HEALTH FACILITY
212.116 16.16	AAAAAAA
I, DAUCE LEAR!	request admission to
, 10 -1 o	in day
KNSH GECE	, for treatment as a Voluntary Patient.
(Name of Mental Health Facility)	
Intending patient's signature:	which are
Date: 16,02,27	
VERIFICATION	freely and voluntarily, in my presence.
The above application was made applicable	freely and valuatority in my processes
The above application was made apparently	ifeery and voluntarily, in my presence.
Print name GOVERO	1DOOLL CXCC
Print name ( V V V )	
all a	Date 16,02,21
Signature	Date <u>/ 0   0 \                               </u>
	3
or, in the case of a person who needs the ass	sistance of an interpreter, -
5	
I have interpreted the content of this form to	the intending patient, who has signed above. The above
application was made apparently freely and	voluntarily, in my presence.
Interpreter:	LI Yes LI No
Print name	Designation
Signature	Date / /

NH606720 071215

LEHRMANN, Bruce E 14/06/1995

		* Nomination of I	Designated Carer(s	s) - Auth (Verified) *	
***	FAVILYNAME	MRK		politic 1	MRX
NGW	GAEV, NAME	DI MALE STEWALE	1	NSW Health	196-12-38 Grante
NSW   Health	DOB/			Facility:	LEHRMANN Brice E
Facility:	NOOKE 523		1 <u>—</u>	racinty.	Brice E
NOMINATION OF				NOMINATION OF	DOB: 14JUN1995 Age: 25Y Sex:
DESIGNATED CARER(S)	LCCATION			DESIGNATED CARER(S)	H/21 284114/4551 4/F: H/0 18372624 Finite
DEGIGNATED GARER(G)	COMPLETE ALL DETAILS OR AFFIX	X PAREKT LABEL HERE			COMPLETE ALL DETAILS OR AFFIX PATIENT LABEL HERE
Section 78 Notifications to designated	carers and principal care providers	of events affecting		MENTAL	HEALTH ACT 2007 Section 72
patients or detained persons				NOMINATION OF	DESIGNATED CARER(S)
steps to notify any designated car	mental health facility must take all re- rer and the principal care provider (if the	he principal care provider	: <b>=</b> 3		not a person with a guarcian appointed under the
s not a designated carer) of a pa- events occurs:	tient or person detained in the facility i	il any of the following		If you have a quardian, that person is your	r designated carer for the purposes of this Act. You
	nt from the facility without permission o	or fails to return at the end	5	cannot make another nomination of a des	ignated carer but you may, if you choose, nominate primation about your treatment in the mental health
<ul> <li>(b) it is proposed to transfer the panother mental health facility</li> </ul>	patient or person, or the patient or person of other facility,	son is transferred, to	!	Please tick -1 certify that 171 am (27 am )	not a person under the age of 18 years.
(c) the patient or person is discha-	arged from the mental health facility,			If you are over the age of 14 and under the	e age of 18, you can nominate someone other than
(d) the patient or person is re-cla	99		•	right to receive information about your free	However, if you do so, your parents will still have a atment
the patient or person is capab	Tribunal for an ECT inquiry under Part ole of giving informed consent to elect	ro convulsive therapy,	BNICHIG	* Parent includes any person having parel Young Persons (Care and Protection) Act	ntal responsibility as defined in the Children and 1998.
2000	med on the patient or person under Pa		. z - 🦠 🗟	You may nominate up to two designate	ed carers. If you choose not to nominate, the
(g) it is proposed to apoly to the soperation or special medical t	Secretary or the Tribunal for consent to reatment under Part 3.	o a surgical		service may identify your designated o	
(h) the patient or person has any			Besserve	☐ I choose not to nominate a designated of OR/	carer
(2) The authorised medical officer mi	usi give the notice as soon as practica	able after becoming aware	1 . 2	1 would like to nominate as my designate	ed carer/s:
that the event has occurred			ONILILAM ON . 2102 - 82528 - 2102 - 82528 - 8810 MAR	DESIGNATED CARER 1	DESIGNATED CARER 2
(3) In the case of a proposed transfe, arrangement is made, except in a	r, the notice must be given before the an emergency.	relevant order or	9 5NIQNB 430m4 F969 528: 2012	Title M(/'s Fam's name:	Tide: MT/55 Family name:
• · · · · · · · · · · · · · · · · · · ·	<b>--</b> -		GNIS Frien 2012 TINO	Given name:	DESIGNATED CARER 2 Tide: Miss Family name Glven name
					Towas Acciess
				X Same as patern She will be sydney how	12/ Seme as satient
				· Horre phone	Home phone:
				Mobile phone:	Mobile phone:
				Relationship Morthus	Home phane:  Mobile phone:  Relationship: Gag- Your New  Call instructions:
				Call instructions:	Call instructions
			SE S	You also have the right to nominate perso information and/or consulted about your tr	ns who are to be excluded from being provided with reatment.
			251	1 choose to exclude	(provide (v l engreyle)
			°	By signing this form, I understand my nom unless varied or revoked by me	inations will be valid for a period of twelve (12) months,
				Patients full name Bruck	Lehrmann  Date 16, 2, 21  FORMATION ON THE FOLLOWING PAGE.
			-3	Patients signature	Date 16, 2, 21
			7500	PLEASE SEE IMPORTANT IN	FORMATION ON THE FOLLOWING PAGE.
Pros. 4 ol 4	NO WRITING	10	, ,	NO.	O WRITING Page 1 of 4

# * Nomination of Designated Carer(s) - Auth (Verified) *

	AMILY NAME	MRN		addition in	FAMILY NAME	MRN
	EVEN KAME	☐ MALE ☐ FEMALE	-	VICIN	GIVEN NAVIE	C MALE   FEMALE
NSW Health	009IMO	L		NSW Health		
Facility:	DORESS		T	Facility:	AOORESS	
NOMINATION OF				NOMINATION	OF	
	OCATION	70				
DESIGNATED CARER(S)		TIENT LABEL HERE			COMPLETE ALL DETAILS OR AFI	TIX PATIENT LABEL HERE
IMPORTANT INFORMATION  Your nominations will not be accept considered incapable of making a your nomination would put you or a lifthere is no nomination of designate determined by reference to section  A nomination may be made or variable of the principal care provider is not treatment can be shared with your extracts from the Mental Health A section 71 Designated carer  (1) The "designated carer" of a patient is:  (a) the guardian of the patient, or  (b) the parent of a patient who is a clipton to the patient is over the age of 14 a person nominated by the patient nomination that is in force, or  (d) if the patient is not a patient reference in force as referred to (i) the spouse of the patient, the spouse is close and could will aw individual who is prime to the patient of	pted if, at the time they are made normination, or if it is considere any other person at risk of seric lated carer in effect, your design not of the Mental Health Act 20 ried or revoked at any time. It your designated carer, informat reprincipal care provider.  ACT 2007  ACT 2007  ACT 2007  Act and is not a person under guant as a designated carer under this Patred to in paragraph (a) or (b) or there in paragraph (c) if any, if the relationship between the oritinung, or larily responsible for providing support or substantially on a commercial basion the patient.  In a friend or relative of the patient whaten through frequent personal contains who does not provide support to the patent or a Torres Strait Islander includers on or a Torres Strait Islander includers.	de, you are do that accepting ous harm.  lated carer will be 007 (see below).  ation about your distinct referred ardianship, art under a late or care to the s), or compatient wholly es a person who is	OLISZOBINS  SHIDING MARGIN - NO WRITING  BINDING MARGIN - NO WRITING  SMR025170	information about the nomination.  (3) A person who is over exclude the person.  (4) A nomination, varial authorised medical treatment.  (5) A nomination remains revoked in writing or her functions understand the exception.  (6) An authorised medical revocation.  (7) An authorised medical give effect to a nomination or revocation.  (7) An authorised medical give effect to a nomination of revocation.  (8) An authorised medical give effect to a nomination of the first of series of the principal care in primarily responsible substantially on a company, for the purposite is the principal care (2) An authorised medical may, for the purposite is the principal care (3) The authorised medical person is the principal care (4) An authorised medical care requirement resistence of the officer or derection of the of	complete all Detalls orable  and designated carer  nate up to 2 persons to be the person's designated  nate persons who are excluded from being given in the person under this Act and may revoke or vary an er the age of 14 years and under the age of 18 year is parent by a nomination under subsection (2), tion or revocation is to be made in writing and may officer at a mental health facility or a director of co-  ns in force for the period prescribed by the regulation  cal officer or a director of community treatment is, ther this Act or the regulations, to give effect to a no inno of a nomination, if notified of the nomination, va- ical officer or a director of community treatment is in ination, or a variation or revocation of a nomination believes  or may put the patient or nominated person or any or us harm, or son who made the nomination, variation or revocati  I making the nomination, variation or revocation.  are providers  for formation of the purposes of this Act is to the for providing support or care to the person (other commercial basis)  cal officer at a mental health facility or a director of the provider of a person for the purposes of this Act or the in the provider of a person or the director of community treatment pal care provider of another person if the person is a about the other person under this Act cal officer or a director of community treatment pal care provider of another person if a person under cal officer or a director of community treatment pal care provider of another person if a person under cal officer or a director of community treatment is a lating to a principal care provider of a person under cal officer or a director of community treatment is a lating to a principal care provider of a person under cal officer or a director of community treatment is a lating to a principal care provider of a person under the person is a principal care provider of a person under	I carers for the purposes office or my such is may not be given to an immunity ons or until it is in carrying out his mination or a unation of a una

Patient Name: LEHRMANN, Bruce E

**DOB:** 14/06/1995

Age: 27 years Sex: Male Royal North Shore Hospital

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

#### Orders - Medications

#### Inpatient

Order: pantoprazole

Order Date/Time: 16/02/2021 21:22 AEDT Order Start Date/Time: 16/02/2021 21:22 AEDT

Order Status: Discontinued

End-state Date/Time: 17/02/2021 16:45 AEDT

Ordering Physician: Watt, Hilary (JMO)

Entered and Electronically Signed By: Watt, Hilary (JMO)

Order Details: 40 mg, Oral, Tab-EC, daily, PRN for indigestion/heartburn, Max dose/24 hrs: 40 mg, First Dose: 2/16/21 9:22:00 PM

End-state Reason:

End-state Reason:

End-state Reason:

AEDT, Emergency RNS ASB

Order Comment: Swallow whole. Do not crush or chew.

Order: paracetamol

Order Date/Time: 16/02/2021 21:22 AEDT Order Start Date/Time: 16/02/2021 21:22 AEDT

Order Status: Discontinued

End-state Date/Time: 17/02/2021 16:45 AEDT

Ordering Physician: Watt, Hilary (JMO)

Entered and Electronically Signed By: Watt, Hilary (JMO)

Order Details: 1,000 mg, Oral, Tablet, TDS, PRN for pain, Max dose/24 hrs: 3000mg, First Dose: 2/16/21 9:22:00 PM AEDT,

**Emergency RNS ASB** 

**Order Comment:** 

Order: temazepam

Order Date/Time: 16/02/2021 21:22 AEDT Order Start Date/Time: 16/02/2021 21:22 AEDT

Order Status: Discontinued

End-state Date/Time: 17/02/2021 16:45 AEDT

Ordering Physician: Watt, Hilary (JMO)

Entered and Electronically Signed By: Watt, Hilary (JMO)

Order Details: 10 mg, Oral, Tablet, daily (at bedtime), PRN for sleep, Max dose/24 hrs: 10 mg, First Dose: 2/16/21 9:22:00 PM

AEDT, Indication: insomnia, Emergency RNS ASB

**Order Comment:** 

# **Progress Notes**

DOCUMENT NAME:

SERVICE DATE/TIME:

**RESULT STATUS:** 

PERFORM INFORMATION:

SIGN INFORMATION:

**ED Nursing Progress Note** 16/02/2021 21:06 AEDT

Auth (Verified)

Woodbury, Abbey (RN) (16/02/2021 21:08 AEDT) Woodbury, Abbey (RN) (16/02/2021 21:08 AEDT)

# **ED Nursing Progress Note**

Patient: LEHRMANN, Mr Bruce E

MRN: 196-12-38

Age: 25 years Sex: Male DOB: 14/06/1995

Associated Diagnoses: None Author: Woodbury, Abbey (RN)

Printed on: 03/03/2023 10:25 AEDT

Page 38 of 48

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995

Age: 27 years

Male

Sex:

Royal North Shore Hospital

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

#### **Progress Notes**

**Progress Note** 

Pt sitting in chairs Seen by MH for admission under PECC ECG attended and signed by MO Bloods back - NAD

F) MO rv then medically cleared for PECC

DOCUMENT NAME:

SERVICE DATE/TIME:

**RESULT STATUS:** 

PERFORM INFORMATION:

SIGN INFORMATION:

MH Progress Note 17/02/2021 16:28 AEDT

Auth (Verified)

Read, Anne (17/02/2021 16:35 AEDT) Read, Anne (17/02/2021 16:35 AEDT)

**MH Progress Note** 

Patient: LEHRMANN, Mr Bruce E

MRN: 196-12-38

Age: 25 years Sex: Male DOB: 14/06/1995

Associated Diagnoses: None

Author: Read, Anne

**Progress Note** 

Phone call to North Side Clinic St Leonards.

No bed available at present time.

Author spoke to Leanne.

Referral,D/C Summary and MH Review faxed to 94333599.

Leanne will phone Bruce this evening about a bed.

Bruce D/C from PECC unit.

All belongings returned.

Discharge Care Plan with cards for Mental Health Line and Ryde CMHT.

Hand over has already been given to Julia at Ryde CMHT.

Message left for Julia to contact PECC to confirm Bruce's D/C from PECC.

Bruce D/C with his mother and partner in attendance

DOCUMENT NAME:

SERVICE DATE/TIME:

**RESULT STATUS:** 

PERFORM INFORMATION:

SIGN INFORMATION:

MH Progress Note

17/02/2021 15:48 AEDT

Auth (Verified)

Brown, Leah (RN) (17/02/2021 15:54 AEDT)

Brown, Leah (RN) (30/03/2021 12:25 AEDT)

**PECC Discharge Care Plan Content Unverified** 

Patient: LEHRMANN, Mr Bruce E

Age: 25 years Sex: Male DOB: 14/06/1995

Associated Diagnoses: None Author: Brown, Leah (RN)

**Progress Note** 

# NORTH SHORE RYDE MENTAL HEALTH SERVICE **PSYCHIATRIC EMERGENCY CARE CENTRE**

Printed on: 03/03/2023 10:25 AEDT

Page 39 of 48

Patient Name: LEHRMANN, Bruce E

**DOB:** 14/06/1995

Age: 27 years Sex:

Male

Royal North Shore Hospital

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

# **Progress Notes**

DISCHARGE CARE PLAN	
Date of Admission: 16/02/2021	Date of Discharge: 17/02/2021
Discharge Address: U 204 4 Karrabee Ave Huntleys Cove 2111	Contact Phone Number: 0428168898
Discharged From:	

PECC Royal North Shore Hospital - (02) 94632299

#### Crisis Plan:

Call the Mental Health Telephone Access Line (MHTAL) on 1800 011 511 In an emergency call 000 or present to the nearest Emergency Department

# **Local Community Mental Health Team (CMHT) Contact Numbers:**

Lower North Shore (LNS) - (02) 9462 9100

Ryde - (02) 9858 7777 Hornsby - (02) 9477 9520

Northern Beaches - (02) 9388 5366

# After-Hours support and other Community Teams may be accessed through MHTAL 1800 011 511

# Diagnosis/Non-Clinical Issues:

Situational crisis/Anxiety

#### **Outstanding Issues:**

North Side Clinic to phone Bruce this evening

#### Discharge Medication/s:

No changes to regular medications

Follow-Up Care:	Comments:
Community Mental Health Team	PECC will refer you to Ryde Team for follow-up contact within 7 days of discharge [delete if N/A]
Private Hospital	NSC St Leonards to phone this evening
Private Psychiatrist/Psychologist	n/a
GP	No GP
Other (Specify)	n/a

Completed by (name and designation): AR

Verified by Manager/Medical Officer (name and designation):lc

Copy given to patient:yes

Document Created By: Leah Brown, A/CNC

Printed on: 03/03/2023 10:25 AEDT

Page 40 of 48

MRN: 196-12-38

Patient Name: LEHRMANN, Bruce E

**DOB:** 14/06/1995

Age: 27 years

Sex: Male

MRN: 196-12-38

Royal North Shore Hospital

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

#### **Progress Notes**

Created Date: 30/03/2021

This note was left unsigned by the author. I have signed the note in the author's absence to provide a clear audit trail of all documentation, but I am unable to verify the accuracy of the information in this note.

DOCUMENT NAME: SERVICE DATE/TIME: **RESULT STATUS:** 

PERFORM INFORMATION: SIGN INFORMATION:

MH Progress Note 17/02/2021 13:35 AEDT Auth (Verified) Ellis, Janelle (EN) (17/02/2021 15:22 AEDT) Ellis, Janelle (EN) (17/02/2021 15:22 AEDT)

MH Level 3 Engagement / Shift Summary

Patient: LEHRMANN, Mr Bruce E

Age: 25 years Sex: Male DOB: 14/06/1995

Associated Diagnoses: None Author: Ellis, Janelle (EN)

**Progress Note** 

# **Acuity Level 3**

Engagement undertaken Introduced self to Bruce after handover from nightshift. He was polite but guarded at first then after building good rapport he was able to talk about his current mental state.

Current mental state 25yo overweight male, preferring to stay inside room, states is "not eating or drinking" although compliant with all other nursing intervention, help seeking and accepting of care.

General comments Bruce is overwhelmed, not thinking clearly and unsure of how his current situation will play out.

Appearance: Neatly groomed obese 25year old msle. Wearing thick glasses, dressed appropriately.

Behaviour: Keeping to himself, grateful and thankful for nursing care.

Speech: well spoken, able to verbalize feelings

Mood: low

Affect: thoughtful

Thought Form / Content: logical, denies hallucination

#### **Shift Summary:**

Polite and helpseeking 25year old male.

Believes that he is being targeted and likely to be accused and named in a high profile political scandal currently playing out in mainstream media.

Grateful for PECC admission.

Has close relationship with mother who has flown from Brisbane and will be staying with Bruce on discharge. Girlfriend is also currently visiting, she has taken today off work.

Has decided to apply for private admission to Northside at St Leonards.

Has also been referred to Ryde Community Mental Health Team, they are waiting confirmation of his discharge details.

Printed on: 03/03/2023 10:25 AEDT

Page 41 of 48

Patient Name: LEHRMANN, Bruce E

**DOB:** 14/06/1995 Age: 27 years

Sex: Male **Royal North Shore Hospital** 

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

# **Progress Notes**

We will contact Ryde to confirm discharge plan.

Waiting for referral to be faxed to Northside, he can then complete phone assessment and present at Northside St Leonards.

Mother and girlfriend are waiting with Bruce in lounge area.

DOCUMENT NAME: SERVICE DATE/TIME: **RESULT STATUS:** 

PERFORM INFORMATION:

SIGN INFORMATION: **PECC Consultant Psychiatrist Review**  MH Progress Note 17/02/2021 09:06 AEDT Auth (Verified)

Conway, Laura (JMO) (17/02/2021 09:06 AEDT) Conway, Laura (JMO) (17/02/2021 14:53 AEDT)

Patient: LEHRMANN, Mr Bruce E MRN: 196-12-38

Age: 25 years Sex: Male DOB: 14/06/1995

Associated Diagnoses: None Author: Conway, Laura (JMO)

**Progress Note** 

Seen with Dr. Kathryn Drew (Consultant psychiatrist), Janelle (RN) and Damien Deng (student doctor)

Legal Status - Voluntary

Direct handover from PECC NS with thanks. Previous notes revisited.

#### **BACKGROUND:**

Bruce is a 25 year old man, in a relationship, who lives alone and is employed in regulatory affairs for British America Tobacco (suspended from work this week). He has no past medical history or psychiatric history. He has had no previous psychiatric reviews, admissions or medications.

## *** As per admission note***:

Bruce was born in Texas to an American father and Australian mother, his father died when he was aged 18 months in a farming accident. He moved with his mother back to Australia. He has one younger sister who now lives in the US. Bruce grew up in Moree, he reports an unremarkable childhood with nil developmental trauma (apart from father's death). In year 9 he had a serious lower back injury, requiring 2 surgeries, 6 weeks in rehab, and home schooling for the remainder of the year. He was bullied after this as he gained ++ weight, and he was on endone and oxycontin for an extended period. He attended private boys schools, and his family lived of money from his father's death. Bruce did well in year 12 and went to ANU to study Arts/Policy where he worked simultaneously in politics. He ascended through politics rapidly over 6 years. He was working as a policy advisor prior to leaving Canberra in 2019. Bruce describes trauma from an abusive relationship for 7 months over 2019, his girlfriend at the time often physical hit him, verbally abused him, and controlled him. He sustained a serious hand injury (laceration) in one incident during which she hit him with a smashed cup. At this point they broke up. Bruce worked in Sydney for Ogilvie in PR, was made redundant during Covid in April 2020, then was unemployed for a few months, he then gained employment with British America Tobacco.

#### PRESENTATION:

Bruce self-presented to RNS ED due to a deterioration in mental state with suicidal thoughts. This is on a background of Bruce being contacted by multiple journalists alleging that he was the perpetrator of a high profile sexual assault occurring at Parliament House in 2019.

#### *** As per admission note***:

It is alleged that he raped a fellow government staff member just prior to leaving his job in politics. Bruce denies any wrong-doing, and reports that night he did share an uber however there was no intercourse or any romantic relation. He had not heard any thing about this until yesterday - nil complaints flagged, nil charges, nil contact from victim. It has come as an enormous shock and he has been considering suicide. These thoughts acutely intensified when he was intoxicated (ETOH) last night after his friends left. He fears these thoughts, and denies considering any plans. He has told his mother and girlfriend of his suicidal ideation. At this stage the media have not released his name however he, and his family, have been contacted repeatedly by journalists. He has a lawyer who has advised him not to speak to anyone about it (including his mother). At present there are no official charges, only intense media scrutiny. As a consequence of this Bruce has been suspended from his job, which he had been enjoying and was expecting a promotion in.

Printed on: 03/03/2023 10:25 AEDT Page 42 of 48

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995

Age: 27 years Sex: Male Royal North Shore Hospital

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

#### **Progress Notes**

#### REVIEW:

Bruce was reviewed in the PECC interview room at 10:55am. Introductions were made. Bruce presented as settled and cooperative with review. Discussed recent events. Bruce reported that on Monday afternoon, he was at work and was called into his bosses office. He boss advised him that a journalist had emailed his boss and advised that Bruce was the alleged perpetrator of a high-profile rape currently in the media. He was subsequently suspended with full pay and advised to obtain legal counsel which he did.

Subsequent to this, Bruce returned home and received numerous phone calls from journalists. He did not answer any of these calls, however the journalists then texted him. He denied having an influx of media but was obviously alarmed. Bruce reported that his Mum (who lives in has also been approached by a journalist who left their card on her front door. He denied that anyone has come to his house as yet, nor has Bruce had any contact from police/govt.

Bruce reported that he has never had to get a lawyer before or "access mental services" until yesterday. Prior to the events of yesterday, he reported that everything had been fine. However since Monday, he hasn't been able to sleep, eat or relax. Bruce became tearful and stated "I know what politics is like. They just drag your name through the mud. I can't see a way out of this."

He reported that yesterday he felt completely overwhelmed by the situation. He has told his mother, three best friends, his girlfriend and lawyer about the allegations, but aside from that no-one knows what is happening. He reported feeling lonely and not knowing who to trust. His Mum has flown from QLD to NSW today to support him.

Bruce reported that he worked with the victim in question for a few weeks but wasn't close to her stating "she was just a colleague". He has had not had any contact from anyone about a complaint and presumed that the federal police or dept of finance would have been in touch with him. Bruce doesn't know if he is the subject of the allegation but appeared appropriately concerned and remarked "I've worked there long enough to know its just how journalists work."

Before Monday, Bruce reported that things were fine. He denied having any issues with his moods, sleep, appetite or motivation.

Bruce reported that he left Canberra in March 2019 because he didn't like the shift in culture after PM left office. He reported that there was a lot of bullying, and he decided to leave. Bruce reported having some run-ins with PM when he presented some policy on the food system. Bruce felt he wasn't treated well and decided that his office was nasty. Prior to this he had been working in office as a health advisor. Worked there for 8-9 months.

Bruce reported that alleged victim came to work in his office in early-2019, when her boss had been promoted to He had a role in transitioning her into the department. Bruce reported that he is concerned that these allegations will ruin his life. He reported "I fit the profile, I resigned around the same time. We often went to drinks. We often went back to parliament after hours to get our stuff. We were ministerial staff, we were allowed to do that." Bruce reported that to his knowledge, he may have been there on the day in question.

After leaving his job in politics, Bruce relocated to Sydney (never lived here before) and got a job at Oglivie doing govt affairs for corporations (amex, amazon). The job involved him going to Canberra on multiple times, during which he was never approached about the alleged incident. He reported that in mid-2019 he broke up with his ex-partner, resulted in him presenting to RNS because she glassed his hand.

Bruce became tearful when discussing his plans for the future. He reported that he feels I ke he doesn't have any options. His lawyer has told him, that they can't do anything yet as no charges have been made. He's checked FB and people have blocked him which also caused him distress. He reported "I don't know where to go or who to turn to. I just want to go into a world where this isn't happening."

Bruce reported that his boss called him this morning and asked him to come into work tomorrow "for an internal review" however his lawyer has advised him not to engage in a meeting without him present. He understands that they have to manage their reputation but wants to be careful

Bruce is worried about finances as he has approx. \$20,000 credit card debt which he accumulated by purchasing consumer goods (furniture) and "boozy nights". Bruce reported that he has been a high income earner since leaving uni (always more than 6-figures). He reported "maybe I've been arrogant about it". He reported that he eats out on multiple nights in the week and when he goes out with friends "I usually end up shouting the whole thing". He doesn't know why he does this but acknowledges that it is unwise. He also reported using cocaine recreationally.

Discussed things that matter to him. Bruce reported that his girlfriend matters to him a lot. She works in digital advertising and has a history of BPAD. He doesn't want this issue to unsettle her mental state. He is worried about her because "it's the first time I feel good about a relationship." She has reportedly been "good at bringing me down a peg".

Bruce reported "I feel scared" and "embarrassed". He reported feeling guilty about the impact that this has had on his family as he is the only man in the house. He reported that since his Dad died, he has felt the need to be the provider and protector of his family. He expressed that he has never felt it was appropriate to show vulnerability because he is a man. Bruce denied ever having sought mental health support. He has never seen a

Printed on: 03/03/2023 10:25 AEDT Page 43 of 48

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995

Age: 27 years

?7 years Sex: Male

**Royal North Shore Hospital** 

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

#### **Progress Notes**

psychologist before however is aware that if he did want to see one, getting access/appointments is not always easy. Bruce reproted that he doesn't think he would have the capacity to take his life, however just has the thoughts.

He expressed "I feel like I just need a blanket for the next few weeks." Bruce expressed that he is considering obtaining a referral to Northside Clinic for a week or so, or going interstate (to his Mum's) or going on holiday.

Discussed things he can do to engage in self-care:

- "I don't know what makes me feel good. I'm always busy."
- Reports that being busy and having a purpose makes him feel good
- He loves being in an office and being with people

Bruce expressed concern that his support network might not have the capacity to "deal with him at the moment." He reported that part of coming to hospital is "to take the load of them". Team discussed that the essence of healthy relationships is to trust that your support network will be there in difficult times.

His Mum has suggested that he come back to QLD to be with him. He worries that she will be emotional and that will impact him.

No further issues discussed.

#### MSE:

Appearance: Overweight, Caucasian male with short dark hair, green eyes and 5 o'clock shadow. Casually dressed, purple polo shirt, brown shorts nike socks. Clear rimmed spectacles.

Behaviour: Polite, cooperative, sat comfortably in chair, good eye contact, occasionally tearful at appropriate moments, no abnormal movements.

Speech: Spontaneous, normal RRTV

Mood: "Stressed"

Affect: Anxious, normal range/reactivity

Thought form: Linear Thought Stream: Normal

Thought content: Future-focussed, does not want to kill himself, anxiety +++ regarding alleged rape, no delusional content elicited.

Perceptual disturbances: Denied, none observed

Cognition: Not formally assess, appeared alert and oriented to TPP

Insight: Reasonable Judgement: Poor

#### IMPRESSION:

Bruce's presentation appears consistent with an acute situational crisis on the background of significant psychosocial stressors. Upon cross-sectional examination, he did not present with signs/symptoms consistent with a pervasive mood disorder or primary psychotic illness. Bruce feels that he would benefit from a voluntary inpatient admission to Northside Clinic and has asked that we arrange a referral for him. Bruce may benefit from longitudinal follow-up with a clinical psychologist.

**DIAGNOSIS**: Situational crisis

#### PLAN:

Plan discussed with the following:

- Patient
- Patient's NOK
- Consultant psychiatrist
- Northside Clinic

#### 1. Acute management:

- Referral to Northside Clinic as a voluntary admission
- Transfer when bed available if not today, tomorrow
- Contact numbers given for MHTAL 1800 011 511
- Safety plan discussed if mental health deteriorates to:
  - Call '000'
  - Contact MHTAL
  - Present to nearest ED

Printed on: 03/03/2023 10:25 AEDT Page 44 of 48

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995 Age: 27 years Sex: Male Royal North Shore Hospital

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

#### **Progress Notes**

#### 2. Legal Status:

- Voluntary not detainable under the act
- 3. Medication Recommendations:
- No regular medications
- 4. Investigation Recommendations:
- 5. Drug and Alcohol:
- 6. Discharge Recommendations:
- Transfer to Northside
- Discharge plan as per Northside

#### Dr Laura Conway (Psychiatry Registrar)

Emergency/PECC Level 2, Acute Services Building Tel (02) 9463 2299

DOCUMENT NAME: SERVICE DATE/TIME: **RESULT STATUS:** 

PERFORM INFORMATION:

SIGN INFORMATION:

#### **Pecc Admission Note**

Patient: LEHRMANN, Mr Bruce E MRN: 196-12-38 Age: 25 years Sex: Male DOB: 14/06/1995

Associated Diagnoses: None Author: Feng, Lena (RN)

**Progress Note** 

#### **Admission to PECC Unit**

Admitted to the unit: 2135hrs Admitted from: RNS ED

Handover: Provided by CNC Govero

Acuity Level: 3

# Reason for admission

Presented to hospital voluntarily wanting someone to speak to. Experiencing low mood, feeling overwhelmed and suicidal in the context of significant stress and public scrutiny

# **MSE**

Printed on: 03/03/2023 10:25 AEDT

Page 45 of 48

SENSITIVE: HEALTH INFORMATION. This document has been classified according to the NSW Government Digital Information Security Policy version 2 & NSW Government Information Classification, Labelling and Handling Guidelines 2015. Any use if this document must comply with the policy and guidelines. This document is confidential and may contain legally privileged information. The copying of this document or any information it contains is prohibited. If you have received this document in error please notify us by phone on the number at the top of page.

MH Progress Note 16/02/2021 23:06 AEDT Auth (Verified)

Feng, Lena (RN) (16/02/2021 23:05 AEDT) Feng, Lena (RN) (16/02/2021 23:06 AEDT)

MRN: 196-12-38

Patient Name: LEHRMANN, Bruce E

**DOB:** 14/06/1995

Age: 27 years

Sex: Male

Royal North Shore Hospital

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

# **Progress Notes**

Appearance: Neat appearance, dressed in casual Khaki shorts and t-shirt

Behaviour: Shy demeanor, pleasant and cooperative

Affect: Reactive affect

Mood: "feeling overwhelmed" Speech: Speaking softly

Thought Form: Logical and coherent

Thought Content: Nil suicidality expressed but feeling overwhelmed and tired

Perception: Nil perceptual disturbance observed

Cognition: Not formally assessed but orientated to time, place and person

Insight and Judgement: Has reasonable insight and is understanding of circumstance and

cooperative with ward rules

# **Risk Assessment**

Suicide: Low Self harm: Low

Violence / Aggression: Low

Vulnerability: Low Absconding: Low

# **Shift Summary**

Bruce was oriented to unit and process.

Contraband searched on arrival.

Personal items and any contraband secured in patient's storage.

Nomination of Primary Carer form filled.

Voluntary Patient form signed.

K10LM completed.

Statement of Rights given.

Waterlow and Ontario done.

Diet ordered in eMR.

Bruce requested for temazepam to help with sleep, stated he had an overwhelming couple of days.

Looking forward to mum coming to visit tomorrow.

Vital signs BTF.

Had a sandwich and juice.

In bed at time of report.

# Plan

- Review tomorrow

Printed on: 03/03/2023 10:25 AEDT

Page 46 of 48

Patient Name: LEHRMANN, Bruce E

DOB: 14/06/1995

Age: 27 years

Male

Sex:

MRN: 196-12-38

#### Royal North Shore Hospital

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

## **Progress Notes**

DOCUMENT NAME: SERVICE DATE/TIME: **RESULT STATUS:** 

PERFORM INFORMATION: SIGN INFORMATION:

**MH Progress Note** 

Patient: LEHRMANN, Mr Bruce E

Age: 25 years Sex: Male DOB: 14/06/1995

Associated Diagnoses: None Author: Maposa, Govero (RN)

**Progress Note** 

Handed over to PECC staff Mx as per Dr Watt's entry

DOCUMENT NAME: SERVICE DATE/TIME: **RESULT STATUS:** 

PERFORM INFORMATION:

SIGN INFORMATION:

MH Progress Note 16/02/2021 21:24 AEDT Auth (Verified) Maposa, Govero (RN) (16/02/2021 21:24 AEDT) Maposa, Govero (RN) (16/02/2021 21:24 AEDT)

MH Progress Note 16/02/2021 21:04 AEDT

Modified

Watt, Hilary (JMO) (16/02/2021 21:07 AEDT)

Watt, Hilary (JMO) (16/02/2021 21:08 AEDT); Watt, Hilary

(JMO) (16/02/2021 21:07 AEDT)

#### MH Admit brief

Patient: LEHRMANN, Mr Bruce E MRN: 196-12-38

Age: 25 years Sex: Male DOB: 14/06/1995

Associated Diagnoses: None Author: Watt, Hilary (JMO)

**Progress Note** 

MH ED Review (Watt - registrar, Maposa - CNC)

25 yo man presenting with suicidal ideation in context of acute significant life stress - rape allegations + media scrutiny

Impression: acute situational crisis

Discussed with Dr IIchef who advised following:

- 1. Admit to PECC as voluntary patient under Dr Ralf Ilchef
- 2. CL3
- 3. No leave until review by treating team
- 4. PRN temazepam 10mg
- 5. Regular meds paracetamol, nexium charted
- 6. Patient is considering transfer to private MHU

Printed on: 03/03/2023 10:25 AEDT

Page 47 of 48

MRN: 196-12-38

Patient Name: LEHRMANN, Bruce E

**DOB**: 14/06/1995

Age: 27 years

oore 9

Sex: Male

**Royal North Shore Hospital** 

1 Reserve Rd 02 9926 7111

St Leonards, NSW 2065 -

#### **Progress Notes**

DOCUMENT NAME: SERVICE DATE/TIME: RESULT STATUS:

PERFORM INFORMATION: SIGN INFORMATION:

MH Shift Summary 17/02/2021 06:18 AEDT Auth (Verified) Curtin,John (RN) (17/02/2021 06:25 AEDT) Curtin,John (RN) (17/02/2021 06:25 AEDT)

#### **MH Shift Summary**

Patient: LEHRMANN, Mr Bruce E MRN: 196-12-38

Age: **25 years** Sex: **Male** DOB: **14/06/1995** Associated Diagnoses: **None** 

Associated Diagnoses: Non Author: Curtin, John (RN)

#### **Progress Note**

Patient retired to bed at around midnight. Remained asleep on all rounds. 10mg Temazepam as charted with good effect.

#### Plan

- remain on level 3 observations
- monitor all calls coming into the unit and under no circumstances give out patient details. Especially mindful of enquires from journalist seeking to confirm if he is here at RNSH
- no leave
- Consultant review for discharge today

Printed on: 03/03/2023 10:25 AEDT Page 48 of 48

No. NSD 103 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

# **CERTIFICATE IDENTIFYING ANNEXURE**

This is the annexure marked "MRS-8" now produced and shown to Marlia Ruth Saunders at the time of affirming her affidavit on 10 March 2023:

Signature of Roy Leigh

Thomson Geer

Level 14, 60 Martin Place

Sydney NSW 2000

An Australian Legal Practitioner within the meaning of the Legal Profession Uniform Law

# "MRS-8"

# NOTICE OF FILING AND HEARING

#### Filing and Hearing Details

Document Lodged:

Subpoena to Produce Documents - Form 43B - Rule 24.13(1)(b)

Court of Filing:

FEDERAL COURT OF AUSTRALIA (FCA)

Date of Lodgment:

3/03/2023 1:46:34 PM AEDT

Date Accepted for Filing:

3/03/2023 3:11:54 PM AEDT

File Number:

NSD103/2023

File Title:

BRUCE LEHRMANN v NETWORK TEN PTY LIMITED ACN 052 515 250

& ANOR

Registry:

NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA

Reason for Listing:

Return of Subpoena

Time and date for hearing:

08/03/2023, 9:30 AM

Place:

Virtual Recorder Forty-Six, Level 17, Law Courts Building 184 Phillip Street

Queens Square, Sydney

SHORT SERVICE GRANTED. LAST DAY FOR SERVICE IS COB 3 MARCH 2023.



Sia Lagor

Registrar

#### **Important Information**

This Notice has been inserted as the first page of the document which has been accepted for electronic filing. It is now taken to be part of that document for the purposes of the proceeding in the Court and contains important information for all parties to that proceeding. It must be included in the document served on each of those parties.

The date of the filing of the document is determined pursuant to the Court's Rules.

Form 43B Rule 24.13(1)(b)



# Subpoena to produce documents

No. NSD 103 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

To: Korn Tlais Defence Lawyers

Suite 1503/338 Pitt Street, Sydney NSW 2000

You are ordered to produce this subpoena or a copy of it and the documents or things specified in the Schedule of documents. See next page for details.

Failure to comply with this subpoena without lawful excuse is a contempt of court and may result in your arrest.

Please read Notes 1 to 13 at the end of this subpoena.

The last date for service of this subpoena is 3 March 2023, noting the time for production has been abridged by order of his Honour Justice Lee on 17 February 2023. (See Note 1)

Date:	39	
	28	
Signed by an office	er acting with the authority	
of the District Regi	istrar	

Issued at the request of the Respondents, whose address for service is: c/- Thomson Geer, Level 14, 60 Martin Place NSW 2000

Email: msaunders@tglaw.com.au

Filed on behalf of (name & role of party) Prepared by (name of person/lawyer)		First Respondent being Network Ten Pty Limited  Marlia Saunders, Partner		
Tel 02 8248 5836		Fax		
Email msaunders@tg	law.com.au			
Address for service T (include state and postcode)		Geer Lawyers, Level 14, 60 Martin Place, Sydney NSW 2000		
•	0	Norsian 4 form approved 02/05/2010		



# **Details of subpoena**

You must comply with this subpoena:

- (a) by attending to produce this subpoena or a copy of it and the documents or things specified in the Schedule of documents below at the date, time and place specified for attendance and production; or
- (b) by delivering or sending this subpoena or a copy of it and the documents or things specified in the Schedule of documents below to a Registrar at the address below, or if there is more than one address below, at any one of those addresses, so that they are received not less than 2 clear business days before the date specified for attendance and production. (See Notes 5–9)

Date, time and place at which you must attend to produce the subpoena or a copy of it and documents or things, unless you receive a notice of a later date or time from the issuing party, in which case the later date or time is substituted:

Date: 8 March 2023

Time: 9:30am

Place: Federal Court of Australia, New South Wales District Registry

Address, or any address, to which the subpoena (or copy) and documents or things may be delivered or posted:

The Registrar
Federal Court of Australia
New South Wales District Registry
Level 17, Law Courts Building
184 Phillip St Queens Square, Sydney NSW 2000



# Schedule of documents

The documents and things you must produce are as follows:

- 1. The original or one copy of any retainer by Mr Bruce Lehrmann of Korn Tlais Defence Lawyers in relation to the sexual assault allegations by Brittany Higgins.
- 2. The original or one copy of any document recording or referring to any communications between Mr Lehrmann and Korn Tlais Defence Lawyers and/or Warwick (Rick) Korn concerning defamation in relation to the sexual assault allegations by Brittany Higgins.



#### Notes

# Last day for service

 You need not comply with the subpoena unless it is served on you on or before the date specified in the subpoena as the last date for service of the subpoena.

## Informal service

2. Even if this subpoena has not been served personally on you, you must, nevertheless, comply with its requirements, if you have, by the last date for service of the subpoena, actual knowledge of the subpoena and of its requirements.

# Addressee a corporation

3. If the subpoena is addressed to a corporation, the corporation must comply with the subpoena by its appropriate or proper officer.

# **Conduct money**

4. You need not comply with the subpoena in so far as it requires you to attend to give evidence unless conduct money sufficient to meet your reasonable expenses of attending as required by the subpoena is handed or tendered to you a reasonable time before the date your attendance is required.

# Production of subpoena or copy of it and documents or things by delivery or post

- 5. If this subpoena requires production of the subpoena (or a copy of it) and a document or thing, instead of attending to produce the subpoena (or a copy of it) and the document or thing, you may comply with the subpoena by delivering or sending the subpoena (or a copy of it) and the document or thing to a Registrar:
  - (a) at the address specified in the subpoena for the purpose; or
  - (b) if more than one address is specified at any of those addresses; so that they are received not less than 2 clear business days before the date specified in the subpoena for attendance and production, or if you receive notice of a later date from the issuing party, before the later date or time.
- 6. If you object to a document or thing produced in response to this subpoena being inspected by a party to the proceeding or any other person, you must, at the time of production, notify a Registrar in writing of your objection and of the grounds of your objection.
- 7. Unless the Court otherwise orders, if you do not object to a document or thing produced by you in response to the subpoena being inspected by any party to the proceeding, a Registrar may permit the parties to the proceeding to inspect the document or thing.



# Production of a number of documents or things

8. If you produce more than one document or thing, you must, if requested by a Registrar, produce a list of the documents or things produced.

# Production of copy instead of original

- 9. You may, with the consent of the issuing party, produce a copy, instead of the original, of any document that the subpoena requires you to produce.
- 9A. The copy of a document may be:
  - (a) a photocopy; or
  - (b) in an electronic form in any of the following electronic formats:
    - .doc and .docx Microsoft Word documents
    - .pdf Adobe Acrobat documents
    - .xls and .xlsx Microsoft Excel spreadsheets
    - .jpg image files
    - .rtf rich text format
    - .gif graphics interchange format
    - .tif tagged image format

# Applications in relation to subpoena

- 10. You have the right to apply to the Court:
  - (a) for an order setting aside the subpoena (or a part of it) or for relief in respect of the subpoena; and
  - (b) for an order with respect to your claim for privilege, public interest immunity or confidentiality in relation to any document or thing the subject of the subpoena.

# Loss or expense of compliance

11. If you are not a party to the proceeding, you may apply to the Court for an order that the issuing party pay an amount (in addition to conduct money and any witness's expenses) in respect of the loss or expense, including legal costs, reasonably incurred in complying with the subpoena.

#### Contempt of court - arrest

- 12. Failure to comply with a subpoena without lawful excuse is a contempt of court and may be dealt with accordingly.
- 13. Note 12 is without prejudice to any power of the Court under any rules of the Court (including any rules of the Court providing for the arrest of an addressee who defaults in attendance in accordance with a subpoena) or otherwise, to enforce compliance with a subpoena.

# Page 211 of 241

# Schedule

No. NSD 103 of 2023

Federal Court of Australia

District Registry: New South Wales

Division: General

Respondents

Second Respondent:

Lisa Wilkinson

Date: 3 March 2023

No. NSD 103 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

# **CERTIFICATE IDENTIFYING ANNEXURE**

This is the annexure marked "MRS-9" now produced and shown to Marlia Ruth Saunders at the time of affirming her affidavit on 10 March 2023:

Signature of Roy Leigh

Thomson Geer

Level 14, 60 Martin Place

Sydney NSW 2000

An Australian Legal Practitioner within the meaning of the Legal Profession Uniform Law

# "MRS-9"



8 March 2023

To Federal Local Court of Australia

By email:

Dear Registrar

Re:

**Bruce Lehrmann v Network Ten Pty Limited Subpoena for Production** 

We refer to the Short Service Subpoena served on our office on 3 March 2023.

In relation to the schedule of the subpoena, our office can advise that there is nothing to produce in relation to items 1 & 2.

Should there be anything further we can do to assist the Court with the above, we may be contacted on 02 8041 4900.

Kind regards,

Zahra Haideri

Solicitor

No. NSD 103 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

# **CERTIFICATE IDENTIFYING ANNEXURE**

This is the annexure marked "MRS-10" now produced and shown to Marlia Ruth Saunders at the time of affirming her affidavit on 10 March 2023:

Signature of Roy Leigh

Thomson Geer

Level 14, 60 Martin Place

Sydney NSW 2000

An Australian Legal Practitioner within the meaning of the Legal Profession Uniform Law

Form 61 Rule 30.28(1)

# "MRS-10"

# **Notice to produce**

No. NSD 103 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

To the Applicant

The First Respondent requires you to produce the following documents or things to the Registrar at 9:30am on 8 March 2023:

- 1. The Applicant's diary for the period from 12 February 2021 to 12 December 2022.
- 2. The messages (received and sent by the Applicant) referred to in paragraph 10 of the Affidavit of Paul Victor Svilans sworn 1 March 2023 (**Svilans Affidavit**).
- 3. All documents in relation to the internal review referred to in paragraph 11 of the Svilans Affidavit.
- 4. Any document comprising the retainer by the Applicant of Korn Tlais Defence Lawyers in relation to the sexual assault allegations by Brittany Higgins.
- 5. All communications, including text messages, emails, WhatsApp messages and letters, between the Applicant and Korn Tlais Defence Lawyers and/or Warwick (Rick) Korn concerning defamation in relation to the sexual assault allegations by Brittany Higgins.
- 6. All documents comprising notes, audio recordings and other communications (including text messages, emails, WhatsApp messages, letters) recording any legal advice given to the Applicant by Rick Korn in relation to potential defamation proceedings.

Filed on behalf of (name & role of party) Prepared by (name of person/lawyer)		First Respondent being Network Ten Pty Limited
		Marlia Saunders, Partner
Law firm (if applicable) Thomson Geer		er Lawyers
Tel 02 8248 5836		Fax
Email msaunders@	tglaw.com.au	
Address for service Thomson G (include state and postcode)		Geer Lawyers, Level 14, 60 Martin Place, Sydney NSW 2000
Ref MSA COB 5263490		[Form approved 01/08/2011]
Legal/81584427_3		

- 7. Any notes and other documents referring to or recording the discussions between the Applicant and Rick Korn referred to in paragraph 22 of the Svilans Affidavit.
- 8. Any invoices issued by Korn Tlais Defence Lawyers which:
  - (a) relate to meetings, conversations or other work in relation to the provision of defamation advice; and/or
  - (b) relate to the discussions between the Applicant and Rick Korn referred to in paragraph 22 of the Svilans Affidavit.
- Any document comprising admission documentation, discharge documentation, medical reports and referrals in respect of the Applicant's admission to Royal North Shore Hospital as referred to in paragraph 17 of the Svilans Affidavit.
- 10. Any document comprising social media posts which identified the Applicant as the subject of the sexual assault allegations by Brittany Higgins as referred to in paragraph 18 of the Svilans Affidavit.
- 11. Any documents comprising communications or interviews between the Applicant and the Australian Federal Police about the sexual assault allegations by Brittany Higgins up to the date the Applicant was charged.
- 12. Any documents comprising the charge sheet and statement of facts filed in the ACT Magistrates Court in August 2021 in R v Lehrmann (No SCC 264 of 2021).
- 13. The brief of evidence in R v Lehrmann (No SCC 264 of 2021).
- 14. Any documents comprising the withdrawal of the charge against the Applicant in R v Lehrmann (No SCC 264 of 2021) and the Notice referred to in paragraph 41 of the Svilans Affidavit.

17. Any documents referring to any work undertaken by the Applicant since late 2021.

Date: 2 March 2023

Signed by

Lawyer for the First Respondent

# Note

If this notice specifies a date for production, and is served 5 days or more before that date, you must produce the documents or things described in the notice, without the need for a subpoena for production.

If you fail to produce the documents or things, the party serving the notice may lead secondary evidence of the contents or nature of the document or thing and you may be liable to pay any costs incurred because of the failure.

No. NSD 103 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

# **CERTIFICATE IDENTIFYING ANNEXURE**

This is the annexure marked "MRS-11" now produced and shown to Marlia Ruth Saunders at the time of affirming her affidavit on 10 March 2023:

Signature of Roy Leigh

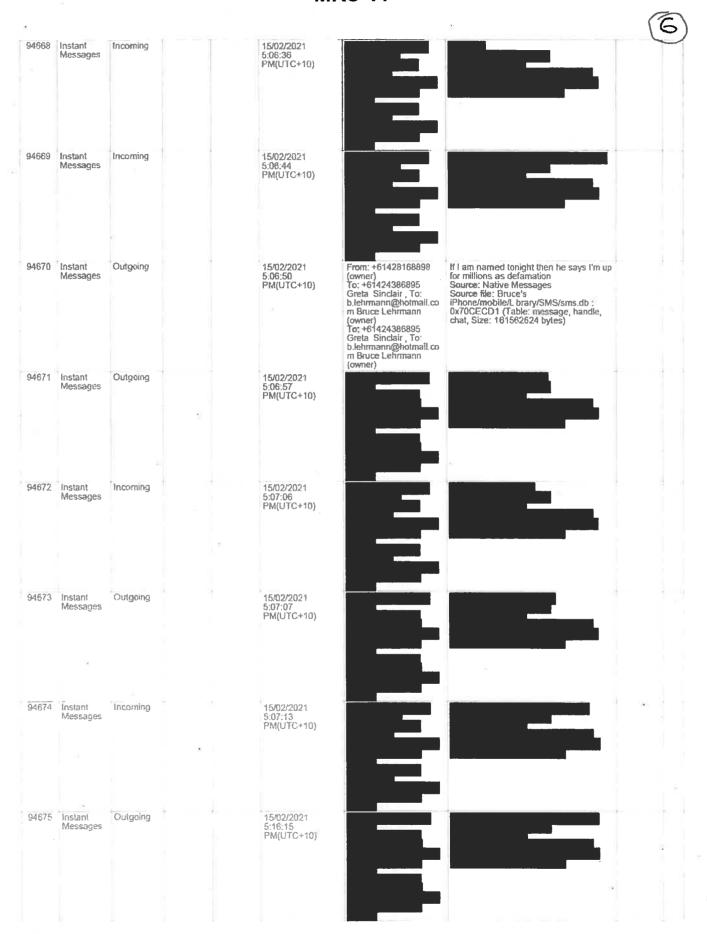
**Thomson Geer** 

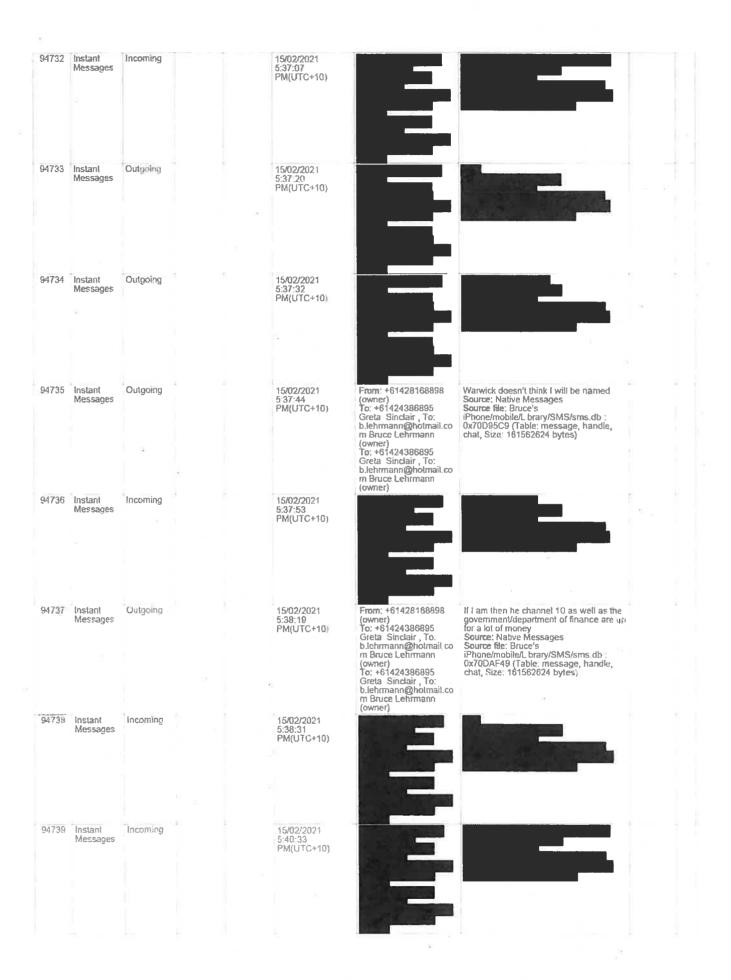
Level 14, 60 Martin Place

Sydney NSW 2000

An Australian Legal Practitioner within the meaning of the Legal Profession Uniform Law

# "MRS-11"





94813	Instant Messages	Outgoing		15/02/2021 7:55:18 PM(UTC+10)			
94814	Instant Messages	Incoming		15/02/2021 7:55:24 PM(UTC+16)	=		
94815	Instant Messages	Outgoing		15/02/2021 7:55:29 PM(UTC+10)			
34816	Instant Messages	Incoming	Y	15/02/2021 7:55:37 PM(UTC+10)			
i4817	Instant Messages	Outgoing		15/02/2021 7:55:49 PM(UTC+10)	From: +61428168898 (owner) To: +61424386895 Greta Sinclair , To: b.lehrmann@hotmail.co m Bruce Lehrmann (owner) To: +61424386895 Greta Sinclair , To:	Criminal he says is off the cards completely Source: Native Messages Source file: Bruce's iPhone/mobile/L brary/SMS/sms db 0x70E6340 (Table: message, handle, chat, Size: 161562624 bytes)	
4818	Instant Messoges	Outgoing		15/02/2021 7:56:02 PM(UTC+10)	b.lehrmann@hotmail.com Bruce Lehrmann (owner) From: +61428168898 (owner) To: +61424388895 Greta Sinclair, To: b.lehrmann@hotmail.com Bruce Lehrmann (owner) To: +61424386895 Greta Sinclair, To: b.lehrmann@hotmail.com Bruce Lehrmann (owner)	One it's false and second they have nothing Source: Native Messages Source file: Bruce's iPhone/mobile/L brary/SMS/sms db: 0x70E7F49 (Table: message, handle, chat Size: 161562824 bytes)	
4819	Instant Messages	Outgoing		15/02/2021 7-58.09 PM(UTC+10)	m Bruce Lehrmann (owner) From: +61428168898 (owner) To: +61424386895 Greta Sinclair, To: b.lehrmann@hotmail.co m Bruce Lehrmann (owner) To: +61424386895 Greta Sinclair, To: b.lehrmann@hotmail.co m Bruce Lehrmann	But we may heave vivil Source: Native Messages Source file: Bruce's iPhone/mobile/L, brary/SMS/sms.db. 0x70E7CA4 (Table: message, handle, chat, Size: 161562624 bytes)	
4820	Instant Messages	Outgoing	4	15/02/2021 7:56:14 PM(UTC+10)	(owner) From: +61428168898 (owner) To: +61424386895 Greta Sindair, To: b.lehrmann@hotmail.co m Bruce Lehrmann (owner) To: +61424386895 Greta Sindair, To: b.lehrmann@hotmail.co m Bruce Lehrmann (owner)	*have Source: Native Messages Source file: Bruce's iPhone/mobile/L brary/SMS/sms.db. 0x70E7A20 (Table: message, handle, chat, Size: 161562624 bytes)	

-							
94829	Instant Messages	Incoming			15/02/2021 7:58:47 PM(UTC+10)	E	
94830	Instant Messages	Outgoing			15/02/2021		
	Messages			×	7:59.06 PM(UTC+10)		
94831	Instant Messages	Outgoing	,		15/02/2021 7:59:16 PM(UTC+10)		
DAPTO	Instant	Outgoing			45,00,0004	From: +61428168898	But I want to know if someone calls me I
5+002	Messages	Oligonis			15/02/2021 7:59:34 PM(UTC+10)	(owner) To: +61424386895 Greta Sinclair, To: blehmann@hotmail.co m Bruce Lehrmann (owner) To: +61424386895 Greta Sinclair, To: blehmann@hotmail.co m Bruce Lehrmann (owner)	refer them to Rick Source: Native Messages Source file: Bruce's iPhone/mobile/L. brary/SMS/sms.db: 0x70EAF49 (Table: message, handle, chat, Size. 161562624 bytes)
94833	Activity Sensor Data				15/02/2021 10:00.00 AM [End time]		Source: Health Source file: Bruce's iPhone/mobile/L brary/Health/healthdb_s ecure.sqlite: 10x40E968 (Table: objects, samples, Size: 18513920 bytes)
94834	Activity Sensor Data				15/02/2021 10:00:00 AM [Start time]		Source: Health Source file: Bruce's iPhone/mobile/L brary/Health/healthdb_s ecure.sqfite: 10x40E8DC (Table: objects, samples, Size: 18513920 bytes)
94835	Instant Messages	Outgoing			15/02/2021 8:00:09 PM(UTC+10)	From: +61428168898 (owner) To: +61424386895 Greta Sinclair, To: b.lehrmann@hotmail.co m Bruce Lehrmann (owner) To: +61424386895 Greta Sinclair, To: b.lehrmann@hotmail.co m Bruce Lehrmann (owner)	And he said tonight I won't see the light of a courtroom this is that outrageous Source: Native Messages Source life: Bruce's iPhone/mobile/L brary/SMS/sms.db: 0x70EAC87 (Table: message, handle, chal, Size: 161562624 bytes)
94836	Instant Messages	Outgoing			15/02/2021 8:00:23 PM(UTC+10)		
94837	Instant Messages	Outgoing		(3)	15/02/2021 8:00:36 PM(UTC+10)		

<u> </u>						
94965	Instant Messages	Outgoing	15/02/2021 10:35:03 PM(UTC+10)	From		
94966	Instant Messages	Outgoing	15/02/2021 10:35:05 PM(UTC+10)			
94967	Instant Messages	Outgoing	15/02/2021 10.35:13 PM(UTC+10)			
94968	Instant Messages	* Incoming	15/02/2021 10:35:30 PM(UTC+10)			
94969	Instant Messages	Incoming	15/02/2021 10:36:08 PM(UTC+10)			
94970	Instant Messages	*Outgoing	15/02/2021 10:36:59 PM(UTC+10)			
94971	instant Messages	Outgaing	15/02/2021 10:37:08 PM(UTC+10)	b.lehrmann@hotrsail.co m Bruce Lehrmann (owner) To: +61438259671 Tahlia Work Mobile , To- b.lehrmann@hotmail.co m Bruce Lehrmann	I've got two lawyers now Source: Native Messages Source file: Bruce's iPhone/mobile/L brary/SMS/sms.db: 0x70FC4FE (Table: message, handle, chat, Size: 161562624 bytes)	
94972	Instant Messages	Outgoing	15/02/2021 10:37:14 PM(UTC+10)	(owner) From: +61428168898 (owner) To: +61438259671 Tahlia Work Mobile , To: b.lehrmann@hotmail.co m Bruce Lehrmann (owner) To: +61438259671 Tahlia Work Mobile , To: b.lehrmann@hotmail.co m Bruce Lehrmann (owner)	0x70FC27F (Table: message, handle, chat, Size: 161582624 bytes)	

94973	Instant Messages	Outgoing		15/02/2021 10:37:27 PM(UTC+10)	From: +61428168898 (owner) To: +61438259671	Who says it's joy his realm yet Source: Native Messages Source fie: Bruce's	
				, , , , , , , , , , , , , , , , , , , ,	Tahlia Work Mobile , To: b.lehrmann@hotmail.co m Bruce Lehrmann (owner) To: +61438259671 Tahlia Work Mobile , To:	iPhone/mobile/L brary/SMS/sms.db 0x70FDF49 (Table: message, handle, chal, Size: 161562624 bytes)	
×					b,lehrmann@hotmail.co m Bruce Lehrmann (owner)		
94974	Instant Messages	Outgoing		15/02/2021 10:37:47 PM(UTC+10)	From: +61428168898 (owner) To: +61438259671 Tahlia Work Mobile , To: blehmann@hotmail.co m Bruce Lehrmann (owner) To: +61438259671 Tahlia Work Mobile , To: b.lehrmann@hotmail.co m Bruce Lehrmann	And another who's says I'm up for a 'bit' of money Source: Native Messages Source file: Bruce's iPhone/mobile/L brary/SMS/sms.db: 0x70FDCBC (Table: message, handle, chat, Size: 161562624 bytes)	
94975	Instant Messages	Outgoing	V 3	15/02/2021 10:37:56 PM(UTC+10)	(owner) From: +61428168898 (owner) To: +61438259671 Tahlia Work Mobile, To: b.lehrmann@hotmail.co m Bruce Lehrmann (owner)	*not his Source: Native Messages Source file: Bruce's iPhone/mobile/L. brary/SMS/sms.db. 0x70FD9FC (Table: message, handle, chat, Size. 161562624 bytes)	
					To: +61438259671 Tahlia Work Mobile , To: b.lehrmann@hotmail.co m Bruce Lehrmann (owner)		
94976	Instant Messages	Outgoing		15/02/2021 10/38/34 PM(UTC+10)	(owner)		1
94977	Instant Messages	Outgoing		15/02/2021 10:38:40			1 .
( <b>)</b>				PM(UTC+10)			
25		ā					
94978	Instant Messages	Incoming	. 1	15/02/2021 10:38:40	From: +61438259671 Tahlia Work Mobile	Clear your name mate that's all that matters - you only have your name and	9
		*	2	PM(UTC+10)	To: +61428168898 (owner), To: b lehrmann@hotmail.co m Bruce Lehrmann (owner)	one name. Source: Native Messages Source file: Bruce's Phone/mobile/L brary/SMS/sms.db: 0x70FD797 (Table: message, handle,	
					To: +61428168898 (owner), To: b.lehrmann@hotinail.co m Bruce Lehrmann (owner)	chat, Size: 161562624 bytes)	
94979	Instant Messages	Outgoing		15/02/2021 10:40:17 PM(UTC+10)	From: +61428168898 (owner) To: +61438259671 Tahlia Work Mobile , To: b.lehmann@hotmail.co m Bruce Lehmann (owner) To: +61438259671 Tahlia Work Mobile , To: b.lehmann@hotmail.co m Bruce Lehmann	Yeah exactly Source: Native Messages Source file: Bruce's iPhone/mobile/L brary/SMS/sms.db . 0x70FD4D0 (Table: message, handle. chat, Size: 161562624 bytes)	
94980	Instant Messages	Outgoing		15/02/2021 10:40:36 PM(UTC+10)	(owner) From: +61428168898 (owner) To: +61438259671 Tahlia Work Mobile , To: b.lehrmann@hotmail com Bruce Lehrmann	He said I'm clear from criminal completely Source: Native Messages Source file: Bruce's I'Phone/mobile/L brary/SMS/sms.db . 0x70F026D (Table: message, handle,	
	×				(owner) To: +61438259671 - Tahlia Work Mobile , To: b lehrmann@hotmail.co m Bruce Lehrmann (owner)	chat, Size: 161562624 bytes)	

94981	Instant Messages	Incoming	15/02/2021 10:43:12 PM(UTC+10)		
94982	Instant Messages	Outgoing	15/02/2021 10:45:29 PM(UTG+10)		
94983	Instant Messages	Outgoing	15/02/2021 10:45:42 PM(UTC+10)	From: +61428168898 (cwner) To: +61438259671 Tahlia Work Mobile , To: b.lehrmann@hotrnail.co m Bruce Lehrmann (owner) To: +861438259671 Tahlia Work Mobile , To: b.lehrmann@hotmail.co m Bruce Lehrmann (owner)	l've got criminal and a defamation Source: Native Messages Source file: Bruce's iPhone/mobile/L brary/SMS/sms.db. 0x70FEA21 (Table: message, handle, chat, Size: 161562624 bytes)
94984	Instant Messages	Outgoing	15/02/2021 10:45:59 PM(UTC+10)	From: +61428168898 (owner) To: +61438259671 Tahlia Work Mobile , To: b.lehrmann@hotmail.co m Bruce Lehrmann (owner) To: +61438259671 Tahlia Work Mobile , To: b.lehrmann@hotmail.co m Bruce Lehrmann (owner)	Haven't spoken to anyone as you advised which was amazing Source: Native Messages Source file: Bruce's iPhone/mobile/L.brary/SMS/sms.db: 0x70FE78E (Table: message, handle, chat, Size: 161562624 bytes)
94985	Instant Messages	Outgoing	15/02/2021 10:46:11 PM(UTC+10)	From: +61428168898 (owner) To: +61438259871 Tahlia Work Mobile, To: b.lehrmann@hotmail.co m Bruce Lehrmann (owner) To: +61438259871 Tahlia Work Mobile, To: b.lehrmann@hotmail.co m Bruce Lehrmann	Anyone who does they go through my lawyers Source: Native Messages Source file: Bruce's iPhone/mobile/L brary/SMS/sms.db; 0x70FE4CC (Table: message, handle, chal, Size: 161582624 bytes)
94986	Instant Messages	Outgoing	15/02/2021 10:46:28 PM(UTC+10)	(owner) From: +61428168898 (owner) To: +61438259671 Tahlia Work Mobile , To: b.lehrmann@hotmail.co m Bruce Lehrmann (owner) To: +61438259671 Tahlia Work Mobile , To: b.lehrmann@hotmail.co m Bruce Lehrmann (owner)	Retained formerly Source: Native Messages Source file: Bruce's iPhone/mobile/L brary/SMS/sms.db 0x70FE22D (Table: message, handle, chat, Size: 161562624 bytes)
94987	Instant Messages	Incoming	15/02/2021 10:47:50 PM(UTC+10)	(owner) From: +61438259671 Tahlia Work Mobile To: +61428168698 (owner), To: b.lehrmann@hotmail.co m Bruce Lehrmann (owner) To: +61428168898 (owner), To: b.lehrmann@hotmail.co m Bruce Lehrmann (owner)	Bet your lawyer is thanking me now Source: Native Messages Source file: Bruce's iPhone/mobile/L brary/SMS/sms db: 0x70FFF3F (Table: message, handle, chat, Size: 161562624 bytes)
94988	Instant Messages	Outgoing	 15/02/2021 10:48.14 PM(UTC+10)	(owner) From: +61428168898 (owner) To: +61438259671 Tahlia Work Mobile , To: b.lehrmann@hotmail.co m Bruce Lehrmann (owner) To: +61438259671 Tahlia Work Mobile , To: b.lehrmann@hotmail.co m Bruce Lehrmann (owner)	You have know idea Source: Native Messages Source file: Bruce's iPhone/mobile/L. brary/SMS/sms.db 0x70FFCD8 (Table: message, handle, chat, Size: 161562624 bytes)

No. NSD 103 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

# **CERTIFICATE IDENTIFYING ANNEXURE**

This is the annexure marked "MRS-12" now produced and shown to Marlia Ruth Saunders at the time of affirming her affidavit on 10 March 2023:

Signature of Roy Leigh

**Thomson Geer** 

Level 14, 60 Martin Place

Sydney NSW 2000

An Australian Legal Practitioner within the meaning of the Legal Profession Uniform Law

# "MRS-12"



#### AFP RECORD OF CONVERSATION

Phone (02) 6131 3000

RECORD OF CONVERSATION BETWEEN DETECTIVE INSPECTOR MARCUS BOORMAN AND BRUCE EMERY LEHRMANN REGARDING A SEARCH WARRANT CONDUCTED AT AFP SYDNEY HEADQUARTERS, GOULBURN STREET, SYDNEY, NEW SOUTH WALES ON MONEY, NINETEEN APRIL, TWO THOUSAND AND TWENTY-ONE

PERSONS PRESENT:

**DETECTIVE INSPECTOR MARCUS BOORMAN** 

SENIOR CONSTABLE EMMA FRIZZELL ACTING SERGEANT JAMES BROWN

**BRUCE EMERY LEHRMANN** 

TIME COMMENCED:

THREE ELEVEN PM

#### **BOORMAN:**

Q1. All right. This is a record of conversation for the execution of a 3E Crimes Act search warrant of a person in relation to your telephone. Now, it's being recorded on Monday the nineteenth of April, two thousand and twenty-one, inside – inside the AFP Sydney Headquarters in Goulburn Street in Sydney. Persons present is myself, Detective Inspector Marcus BOORMAN and Bruce – now how do I pronounce your surname again?

A LEHRMANN.

Q2. LEHRMANN.

A Yeah.

Q3. Of currently residing at forty-nine Kara View Court in Rangeville, but has a Sydney residence of two O four/four Karrabee Avenue, Huntleys Cove. Is that correct?

A Correct, yeah.

All right. Now, also present are two other colleagues of mine. Can you introduce yourself for the purpose of the tape?

FRIZZELL: Senior Constable Emma FRIZZELL, badge one two eight nine six.

BROWN: Acting Sergeant James BROWN, AFP two one double eight three.

# BOORMAN:

Q4. All right. When I refer to the time in relation to the recording, I'll refer to my watch and at the moment it is about – what eleven minutes past three in the afternoon pm. Is that correct, Bruce?

A Yep, yep, yep.

- Q5. All right. Can you state your full name please?
- A Bruce Emery LEHRMANN.
- Q6. And Bruce are you known by any other names or anything like that? A No, no.
- Q7. All right. Now, I have a now, just before you attended at the headquarters here in company with your legal representative, Mr John KORN. Would that be correct?
- A Correct.
- Q8. All right. And, um, you know, I spoke to you just briefly down there and Mr KORN and we discussed in relation to we would like to analyse and and look at your phone. And, um, and I informed Mr KORN that we will be doing it under warrant, a section 3E warrant. So, I have a warrant for you, which is Search Warrant for a Person, it's in relation to your phone.
- A Mm-hmm.
- Q9. All right. Now, you can have a read of that. It authorises myself and other police present, obviously to conduct a personal search and get the phone, but we don't need to do that because you've got your phone right in front of you. Is that is that right?
- A That's right.
- Q10. All right. So, I'll give you a copy of the warrant to read. So, for the purpose of the tape, Bruce, can you just read the just the first few paragraphs out aloud to me?
- A Ah, just starting here?
- Q11. Yeah, yeah, that'll do.
- A Oh, yeah. Yep. "Marcus BOORMAN, a constable within the meaning of the Crimes Act nineteen fourteen, who is the executing officer in relation to this warrant. And to any other constable whose name may be written on this warrant in accordance with section 3(C)(1) of the Crimes Act nineteen fourteen, in which event that constable shall be the executing officer in relation to this warrant. Whereas I, J ."
  Who's that?
- Q12. That's the registrar at the court, that's that's all right, that's all I need.
- A Oh, oh, sorry.
- Q13. You can read the rest to yourself, but it's just for the benefit of the recording to show that you are reading it.
- A' Yep. Oh, got you. Yep. Sorry. Yep. Okay. Ah, so, it will cover social media as well?
- Q14. Yeah, your data on your phone.
- A That's yeah, and that's good. Okay. Because I haven't been able I've got evidence of making the reports to Twitter, but you might be able to get some of these out.

Q15.

Yep.

Α

Okay. Oh, okay, maybe not. It's only in relation to that I'm

assuming.

Q16.

Yeah, in relation to the second condition.

Δ

Brilliant, yeah.

FRIZZELL: And then ---

**BOORMAN:** 

Q17.

And then all the - - -

A

Oh, sorry.

FRIZZELL:

Q18.

--- if you can finish reading ---

Λ

I'm sorry, just keep reading, okay.

No, that's okay.

**BOORMAN:** 

Q19.

All the - all of the stuff around it. Read it and then if you have any

questions.

Α

Oh, so, do you need to frisk me as well?

Q20.

No, no, no, I don't need to do that because I can see your phone is -

is right in front of you.

Α

No, all right. You've got - oh, good, oh, right, sorry. Sorry.

Q21.

That's okay.

Α

Do I get to keep this copy?

Q22.

Yeah.

Α

Oh, good. Because that is the first time I'm seeing those times, so.

All right, that's fine, thank you.

Q23.

Now, do you have any questions in relation to that - that warrant at

the moment, like without going into specifics?

Α

Not - not at the moment, no.

Q24.

All right.

Α

No, but I haven't gone through it with - with my counsel, but if I do

|'|| - - -

Q25.

Yeah, yeah, that's all right. All right. So, you've read the whole

warrant?

A Yes.

Q26.

Do you understand the warrant?

On 26 July 2021, I listened to the audio recording of this conversation whilst reading this transcript. I found this transcript to be a true and accurate record of the audio recording. – Senior Constable Emma Frizzell 12896

A Yes.

Q27. All right. Now, I'll now give you the copy of the Rights of the Occupier, it normally relates to – in relation where we're executing a search warrant at a premises.

A Mm-hmm.

Q28. But also in relation to they're – they're your rights, ah, in relation to the Rights of a Person Searched. So, you can have a copy of that.

A Mm-hmm.

Q29. Just a lot of legal definitions. A Yeah. I have seen this before.

Q30. Have you?

A In the course of my work in Parliament.

Q31. Mm-hmm.

A Okay. That's all good.

Q32. Okay. Now, do you agree that I've provided you with a copy of the search warrant and the Rights of a Person Searched documentation?

A Yep

Q33. All right. Bruce, now I'm going to ask you some questions in relation to this warrant, but before continuing, I must give you a caution and inform you of your rights. Okay. I must caution you that you do not have to say or do anything, but anything you say or do may be used in evidence. Do you understand that?

A Yes.

Q34. Can you tell me what that means to you, what I've just told you?

A h, well, if the matter proceeds further that you can use this in a brief of evidence or not moving forward, yep.

Q35. Yeah. So, I'm just making it clear that, you know, anything you say

A Yes.

Q36. --- could be used as evidence.

A Yeah, yes.

Q37. At a future time in relation to this matter.

A Yes, yes.

Q38. Are you clear on that?

A Yes, yeah.

Q39. All right. Are you Aboriginal or Torres Strait Islander?

A No

Q40. Are you an Australian citizen?

On 26 July 2021, I listened to the audio recording of this conversation whilst reading this transcript. I found this transcript to be a true and accurate record of the audio recording. — Senior Constable Emma Frizzell 12896

A Yes, I'm also a dual citizen.

Q41. A dual citizen. A Mm-hmm.

Q42. All right. What – what country are you a dual citizen of?

A The other nationality is the USA.

Q43. Sorry? A USA.

Q44. USA? A Yeah.

Q45. And you're an Australian citizen as well?
A As well, yep, yep.

Q46. All right. Do you want to communicate with your consular of the USA in relation to this matter?

A No.

Q47. I have to ask these questions.

A No, no, I have not been back since we returned, so, that's all good.

Q48. Because you may communicate or attempt to communicate with the consular office of your country.

A No

Q49. Do you understand that?

A Yeah, I do understand it, no, thank you.

Q50. All right. Now, you also may communicate or attempt to communicate with a friend or relative to inform that person of your whereabouts. Do you understand that?

A I do, yes.

Q51. So, does anyone know that you're here, family or anything like that? Um, ah, my mum does and my counsel.

Q52. Yes

A But I suppose upon taking my phone I'd like to get a couple of numbers of - - -

Q53. Absolutely, we can facilitate that.

A --- I've only got a very few amount of people that still talk to me of course, but yeah.

Q54. We – we will facilitate all that, I understand the, um, - the – ah, inconvenience. But it's part of the investigative procedure.

A Oh, no, I understand that. Yeah, I understand.

Q55. All right. And you may communicate with or attempt to communicate with a legal practitioner of your choice and/or attempt to arrange for a legal practitioner of your choice to be present. Do you understand that? Yes.

Α

Q56. Now, do you wish to communicate with your legal practitioner at this point?

No. But I can during breaks.

Q57. Absolutely. You can contact your legal practitioner at any time you feel like it.

Α Yes, okay.

Q58. And just to be - just to clarify, that you attended at the Sydney Office here with your legal representative, Mr John KORN, just before. Is that right directly?

I did, yep, yes, that's right. Α

Q59. You're over eighteen years of age?

Q60. Okay. Have you recently consumed any alcohol, medication or drugs?

No.

Q61. Have you been interviewed by an investigating official or police officer in the last forty-eight hours?

Q62. At the completion of this interview, in relation to the execution of this warrant. A transcript will be made available to you as soon as practicable. Do you understand?

Α Okay. Yes.

Q63. But we will have to get that transcribed.

A Yep, yep.

Q64. But we will get that to you as soon as practicable.

Sure.

Now, obviously the allegation that - I'm investigating here at the Q65. moment. It's written in the warrant.

Mm-hmm.

Q66. As you - as you can see.

Mm-hmm.

# FRIZZELL:

Q67. Turn it over. Just there, yeah.

> On 26 July 2021, I listened to the audio recording of this conversation whilst reading this transcript. I found this transcript to be a true and accurate record of the audio recording. - Senior Constable Emma Frizzell 12896

#### BOORMAN:

Q68. No worries, I'll just follow that in. And it's, um, the allegation is that

between eleven forty-eight - - -

A One forty-eight.

Q69. One forty-eight am, thank you. And two thirty-three am on Saturday, the twenty-third of March, two thousand and nineteen, that you engaged in sexual intercourse with a Miss Brittany HIGGINS at the Australian Parliament House in the Australian Capital Territory without her consent contrary to section fifty-four of the Crimes Act. That's what this is all about, as I believe you're aware, that – that's why we've asked you to come here.

A Ah, oh, yes, yes.

Q70. Yeah, yeah. A Oh, yep.

Q71. All right. I just wanted to be clear on that. So, right at this point in time, so that I can get my colleague here to start looking through your phone. I'm going to suspend the tape for the purposes of, you know, viewing your phone.

A Mm-hmm.

#### FRIZZELL:

Q72. I might just – before we do suspend, just have a look back at the warrant to the second condition and we had a discussion earlier about whether there would be anything relevant to the warrant on your mobile device.

A Mm-hmm.

Q73. Is there anything relevant to the warrant on your phone?

A Not – not to my knowledge.

# **BOORMAN:**

Q74. Mm-hmm

A I've – I've, of course, discussed, um, the media inquiries.

Q75. Mm-hmm.

A Um, because that's all I've ever had.

Q76. Mm-hmm.

A Um, with (coughs) um, you know, very few people, my mum included.

Q77. Mm-hmm.

A Um, ah, that's all I can think of in terms of emails, no. There would be emails between myself and my counsel.

Q78.

Mm-hmm.

Α

Um, yeah, not to my knowledge.

FRIZZELL: Okay.

BOORMAN: All right.

#### FRIZZELL:

Q79.

So, is there any say discussions, correspondence about the

allegation at all on your phone?

Α

Oh, there - there is, yes.

Q80.

Okay.

Α

Yeah.

Q81.

So, that would be relevant?

A

Oh, sorry, okay, okay, yeah. Sorry, I didn't, yeah.

#### **BOORMAN:**

Q82.

That's all right.

A

Count it as directly, but yeah, they're just based on from when a journalist would enquire and then I would try and, you know, think back and recall and whatever.

Q83.

So, is there communications on your phone with journalists?
I haven't responded back, but there is them reaching out to me, yes.

Q84.

Mm-hmm.

A I can probably name them off if you want them.

Q85. M

A There was – there was – there hasn't been a flurry, they've just been consistently – there's been a consistent of one, um, that has - - -

Q86.

But there's no communication between you and them backwards or

forwards it's just been - - -

.

No, no, no. No, oh, the only one I had a very brief phone call with Sean NICHOLLS, who did the Four Corners report.

Q87.

Mm-hmm.

Α

That was a very short phone call because the number kept ringing me.

Q88.

Mm-hmm.

A

And it was – it was during a quiet period where I thought journalists would no longer contact me.

Q89.

So, that was a voice conversation was it that you had with him?

A Yes, yes, yes.

All right. No, that's okay.

# FRIZZELL:

Q90. What about do you have any – is there any correspondence, um, with

**Brittany HIGGINS herself?** 

A Not to my knowledge, nothing, no, not to my knowledge at all. Um, and I have thought about that and the only – the only correspondence I would have had with her ever, would have been in professional context – context briefly on my ministerial phone about work matters.

#### **BOORMAN:**

Q91. Mm-hmm, mm-hmm.

A But for a very brief period, I didn't work with her for very long, so.

Q92. So, we'll suspend the tape so that we can have a look at the phone. Bruce, is there – you know, for like emails or like passwords and everything like that, are you prepared to give those to us?

A Oh, yeah.

Q93. So, that we can access obviously, yeah.

A Yeah, yeah, absolutely. I can – what do you need, I suppose I can jot them down on the - - -

Q94. All right. I'll let you write it down on here.

A Ah, so, I've got, um, well, the phone is, um, nine five one four is the PIN code.

Q95. Mm-hmm.

A Um, ah, Hotmail email is just my personal which – ah, because that's through Outlook, so I think and don't diss me for my passwords, but this was back when I worked for George BRANDIS, I think it's attorneyninefive or attorneyoneonenine, no, yeah, nineteen ninety-five.

Q96. Mm-hmm.

A That or it could be cricketeighteen.

Q97, Mm-hmm

A Um, and now what else do you want? Um, Facebook I suppose.

Q98. Yep.

A Um, I've suspended all of them because once all this started I - - -

Q99. Yep, yep.

A --- 1-so, Facebook is probably also is my email address and then I think, but feel free to come back and ask me, like I don't ---

Yeah, I appreciate your co-operation.

# **BROWN:**

Q100.

And what is your email?

Α

Oh, um, bdotlehrmann at Hotmall. I do have a Gmail but that's – it's not used for anything, it's like where crap goes to. Like when I sign up to newsletters and things, so.

Okay.

#### **BOORMAN:**

Q101.

Mm-hmm.

Α

Um, now, Twitter I suspended my Twitter account way back in January when I was – this – whoever this was impersonating my account. So, I don't know what – how to get that, um, because I understand Twitter gets rid of it after thirty days or something, I'm not sure.

Yeah.

# **BROWN:**

Q102.

That's all right.

Α

But I did have Twitter.

### **BOORMAN:**

Q103.

Mm-hmm.

Α

Um, Instagram, ah, there won't be anything on Instagram but I'll give it to you anyway. Ah, I think it's lehrmannb and then password, I think it's cricketeighteen. What else did you need?

BROWN: Um, let me think.

### FRIZZELL:

Q104. A Do you have any WhatsApp, Signal or anything like that? Oh, yes, I've got all of that. Um, um, so, signal – are they – but they're not pass – they're already like unlocked.

# **BROWN:**

Q105.

Yep.

Α

So, feel free to go through them.

Q106.

Do you have any secure folders or anything like that? No, the only thing I've got In my files of what – like my bank accounts, which I've saved on there, which I'm going to give you anyway.

# **BOORMAN:**

Q107. Sure. Yeah.

A You know, I've taken like screenshots of media of – over the course of it coming out, when I've – I've saved a media article or whatever.

#### Mm-hmm.

# **BROWN:**

Q108. And what type of phone do you have?

A iPhone XS or something, yeah.

Q109. Okay. And how long have you had that for?

A Oh, two years, yeah.

Q110. Okay. You've had that phone at the time of the allegation?

No

Q111. Okay.

A No. That – no, this no. But I've had the number the whole time, so

#### **BOORMAN:**

Q112. When you changed phones - - -

A Mm-hmm.

Q113. --- did you mirror your other phone to that phone?

A Yeah, yeah, I have always, yeah.

Q114. Yeah.

A Because an iPhone, yeah, I just do that.

# **BROWN:**

Q115. Oh, good.

A All right. I'll give you that and that's the phone, so, I'll just put that there as well.

Q116. No problem. If I have any questions on finding anything, I'll pop back in, but, um, that should do.

A Yeah, please, yeah. Sorry.

# **BOORMAN:**

Q117. That's all right. Thank you. All right. So, do you agree the – I'll suspend the tape now for the purposes of obviously going through and having a look at your phone.

A Mm-hmm.

Q118. And that's for us to determine whether there's any evidentiary value from an investigation point of view. Do you understand?

A Mm-hmm. Yes, yep.

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Q119. All right. Do you agree the time is now by my watch – is about three

thirty pm?

A Yes. Mm-hmm.

All right. Interview suspended.

ROC SUSPENDED AT THREE THIRTY PM

**ROC RESUMED AT SEVEN ZERO NINE PM** 

#### BOORMAN:

Q120. All right. This is a recommencement of taped record of conversation between Detective Inspector Marcus BOORMAN and Bruce

LINDEMAN. LEHRMANN.

Q121. LEHRMANN.

A You did that once too.

Q122. I'll get it right once before. Bruce, do you agree the time is now nine

minutes past seven pm in the evening, by my watch?

A Yep, yep.

Q123. All right. And the interview recommencement is obviously in the AFP Sydney Office, Goulburn Street in Sydney. And it's in relation to the execution of a 3E, section 3E Crimes Act search warrant for a Person on yourself, Bruce. And we've initially taken your phone.

A Mm-hmm.

Q124. All right. Now, I'll remind you that the caution I gave you before, this still applies. You do not have to say or do anything, but anything you say or do, may be used in evidence. Do you understand that?

ې Yep،

Q125. All right. Now, we've, um, my colleague here has done a brief analysis of that and looked through your phone.

A Mm-hmm.

Q126. And I have also had a look. And basically I've viewed – viewed a number of images on the phone of handwritten notes relating to a Miss Brittany HIGGINS.

A Yep.

Q127. I have reasonable grounds to believe there is evidential material on the phone, being those – those photographs.

A Okay. Yep.

Q128. So, therefore I will be seizing the phone.

A Yep.

Q129. To conduct further analysis and examination under section 3F of the Crimes Act in accordance with this warrant. Do you understand

that?

A Yep. I do.

All right. Basically now I've got a Property Seizure Record. Um, so the warrant is now complete, I've got the – I've got the – I've got the phone. Um, ---

BROWN: So, I'll go through this part if you like?

BOORMAN: Yeah, I'll get James to do that while I sign the Property Seizure Record.

### **BROWN:**

Q130. So, for the purpose of the audio, Acting Sergeant James BROWN, AFP two one double eight three. Every search warrant, there's certain roles that we are allocated.

A Mm-hmm.

Q131. In this case, um, I'm managing the property that has been seized and it's just one mobile phone.

A Mm-hmm.

Q132. Again, there's a little bit of a proforma that I will go through, but effectively do you agree that during the search warrant police have seized one item?

A Correct.

Q133. Being your mobile phone. For the audio, the phone is in front of us at the moment, it is bagged, taped and sealed. Do you agree?

A Yes.

Q134. I'll go through what's called a Property Seizure Record, it's basically a receipt for the item that we're taking. You'll get a copy as well.

A Mm-hmm.

# **BROWN: Perfect.**

Q135. So, for the audio, we've got Property Seizure Record number M four eight four five four one. Do you agree?

A Yep.

Q136. So, listed on here, we've got obviously the date, today's date.

A Mm-hmm.

Q137. Our location which is the AFP Office, a hundred and ten Goulburn

Street, Sydney.

A Mm-hmm.

Q138. We've got your details up here. Can I just confirm the date of birth is

correct, fourteenth of June, ninety-five?

A Yeah, yep.

Q139. And just one item listed, being item number zero zero one.

A Mm-hmm.

Q140. Being one Apple iPhone XS Max in a brown case.

A Yep.

Q141. Which was located on you earlier today. It was seized at seven ten pm by Detective Inspector BOORMAN. Do you agree that this is the

only item listed on the Property Seizure Record?

A Correct, yep.

Q142. So, I've ruled off here just to solidify that fact and we can't add any

other items.

A Yep, mm-hmm.

Q143. I've got the warrant holder details being Detective Inspector

BOORMAN. My details acting as the Property Officer for today.

A Mm-hmm.

Q144. What I'll get you to do is to just fill out the owner section there for

me.

A Right, yep.

Q145. One thing I neglected to mention, you can see over on this side of

the Property Seizure Record a seal number, so, we've got one one four one zero seven zero and the seal on the bag one one four one zero seven zero. Do you agree that both of those numbers match?

A Yes. I do, yep.

Q146. Okay. As I said you get a copy of the Property Seizure Record, this

green one here.

A Oh, okay.

BOORMAN: All right.

BROWN: That's all,

BOORMAN:

Q147. All right. Now, we'll just wind this up, Bruce. Detective Inspector

Marcus BOORMAN. Have the answers you have provided during this

conversation been made of your own free will?

A Yes.

Q148. Has any threat, promise, inducement been held out to you to provide the answers you have given?

A No

Q149. Before we complete is there anything else that you – further you wish to say in relation to the phone?

A No

Q150. All right. Do you have any complaints regarding the way the execution of this Person search warrant was conducted?

A No

Q151. Do you agree the time is now seven fifteen pm by my watch?

A I do, yep.

All right. Record of conversation complete.

**ROC CONCLUDED AT SEVEN FIFTEEN PM**