

Form 59
Rule 29.02(1)

Affidavit

No. NSD103 of 2023

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

BRUCE LEHRMANN

Applicant

NETWORK TEN PTY LIMITED ACN 052 515 250 and another
Respondents

Affidavit of: **Jesse David Wotton**
Address: [REDACTED]
Occupation: Deputy Director, Liberal Party of Australia (WA Division)
Date: 28 September 2023

I, Jesse David Wotton, of [REDACTED], Deputy State Director, Liberal Party of Australia (WA Division), say on oath:

1. The matters set out in this affidavit are based on my own knowledge, except where I have stated or qualified otherwise. Where I have set out my recollection of conversations in this affidavit I have included the effect of the words spoken as I recall them.
2. Where I refer to a document in this affidavit, that document was produced to me at the time of swearing this affidavit and verified by me as a true copy of the relevant document.

Background

3. I am currently the deputy state director of the WA Liberal Party.

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



4. I began working for Senator Linda Reynolds in her Perth electorate office when she became a Senator for Western Australia in July 2014. She travelled between Perth and Canberra during sitting weeks.
5. After Senator Reynolds became Assistant Minister for Home Affairs in late 2018, I travelled to Canberra more frequently. I was promoted at that time to the role of assistant advisor in her ministerial office, with a focus on emergency management, firearms and modern slavery.
6. I started working with Bruce Lehrmann a few weeks after Senator Reynolds became the Assistant Minister for Home Affairs. I understand Mr Lehrmann came across from Senator Bridget McKenzie's office.

Resignation of Steven Ciobo

7. In early March 2019, Steven Ciobo resigned as the Minister for Defence Industry.
8. On Saturday 2 March 2019, Senator Reynolds was sworn in as the Minister for Defence Industry.

9. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



32. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Senator Reynolds' Office

36. Senator Reynolds ended up taking on a number of the team from Mr Ciobo's office.
37. Ms Higgins joined Senator Reynolds' team as an assistant media advisor.
38. I recall Mr Lehrmann keeping bottles of scotch on his desk.

Mr Lehrmann's departure

39. In or around late March 2019, I travelled to Brisbane with Senator Reynolds, where she attended a Cabinet meeting. I was with Senator Reynolds' aide-de-camp Nikita Irvine when Ms Irvine got a call to pick up Senator Reynolds as soon as the meeting was finished.
40. Whilst Ms Irvine was doing so, I got a call from Mr Lehrmann.
41. He told me, in substance, that he was leaving the office and it was time for him to go off and do other things.
42. Very shortly after this, probably within a few days, I found out more information from staff in the office about Mr Lehrmann's departure. I found this out through general chatter around the office. I understood at the time that something had happened between Ms Higgins and Mr Lehrmann involving after-hours access, but I didn't know what.
43. In my experience of working at Parliament House, I am not aware of any reason why someone would need to go back to Parliament House late at night to make notes. I was set up to work remotely and could access my emails on my work phone and tablet and send myself notes and reminders via email, to action when I returned to the office.

2019 Federal election

44. I do not remember any substantive conversations Ms Higgins and I had, although I did sit next to her when I was in the Canberra office, so I probably did spend some time with her.
45. In the lead-up to the 2019 Federal election on 18 May 2019, I remember Ms Higgins coming to Perth.



46. I did not see her often, as both of us were regularly out of the office.

47. After the Coalition won the Federal election in May 2019, I left Senator Reynolds' office.

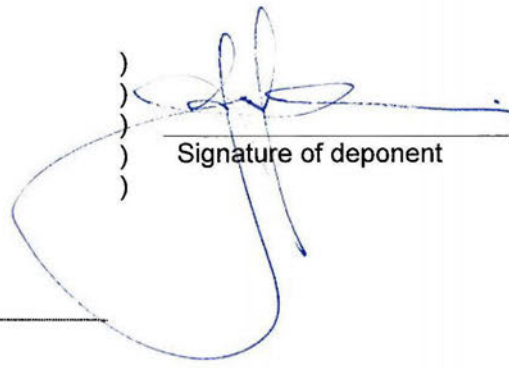
Watching *The Project*

48. The first time I found out details of the alleged incident was when I was watching *The Project* in February 2021 with my now-wife. My wife turned to me on the couch and said, in jest, words to the effect of: *Oh my goodness, that sounds like you.*

49. My LinkedIn views spiked after the program aired. I took screenshots of the LinkedIn statistics at the time. On 17 February 2021, LinkedIn reported my LinkedIn viewers had increased by 925% compared to the previous week. On 18 February 2021, LinkedIn reported my LinkedIn viewers had increased by 2,650% compared to the previous week. There was no work-related reason at the time for such a spike to have occurred.

Sworn by the deponent
at West Perth
in Western Australia
on 28 September 2023
Before me:

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Signature of deponent



Signature of witness

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