

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: **Reginald Irwin Chamberlain**

Address: [REDACTED]

Occupation: Business consultant

Date: 22 September 2023

I Reginald Irwin Chamberlain of [REDACTED], business consultant,
affirm:

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

Background

2. Since October 2022, I have been a Director of [REDACTED], a marketing and strategic communications firm.
3. Between June 2019 and June 2022, I was a Senior Advisor in the Office of the Prime Minister.





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. Between September 2018 and May 2019, I was Chief of Staff to Special Minister of State Alex Hawke.
5. In this role as Chief of Staff, my duties included advising Minister Hawke on matters relating to his portfolio responsibilities, which included the Department of Finance and involved staffing matters. At that time, the Department of Finance was responsible for employees employed to assist parliamentarians under the *Members of Parliament (Staff) Act 1984* (Cth).

Conversation with Mr Lehrmann

6. In about late March or early April 2019, a person from the Department of Finance told me, in substance, that two staffers had entered Parliament House at an obscure hour of the night and that they were looking into it and speaking with Senator Reynolds' office. I cannot now remember who told me that information.
7. It was pretty strange for two staffers to be in Parliament House very late at night or in the early hours of the morning.
8. After being made aware of the incident, I contacted Fiona Brown, who was the Chief of Staff to Senator Reynolds, by text message or WhatsApp and said something to the effect that I was happy to help her. I am unable to locate a copy of this message.
9. I reached out to Ms Brown because someone in the Department of Finance, which sat within Minister Hawke's portfolio, had told me that they were dealing with Senator Reynolds' office in relation to the matter. I cannot now remember who told me that information.
10. Ms Brown responded and accepted my offer, but I cannot recall how.
11. In the days following this text or WhatsApp exchange with Ms Brown, she asked me, in substance, if I would witness a call between her and Bruce Lehrmann. At that time, I understood that Mr Lehrmann was one of the people who had entered Parliament House late at night because Ms Brown had told me. I did not know who Mr Lehrmann was, just that he was one of the people who had entered Parliament House late at night. I no longer have copies of these messages.
12. It was either before or after the call I witnessed between Ms Brown and Mr Lehrmann that Ms Brown informed me that Mr Lehrmann had already been reprimanded for mishandling sensitive documents in their office some weeks or months prior. It gave rise to grounds to terminate his employment, but whether this occurred was a matter for his employer.
13. On or about 5 April 2019, I was present during a telephone conversation between Mr Lehrmann and Ms Brown. My recollection is that the telephone call happened in my office

and Ms Brown used my landline phone. The conversation was on speaker so that I could hear it.

14. During this call, Ms Brown and Mr Lehrmann had a conversation that included words to the following effect:

Ms Brown *What was your purpose for attending Parliament House?*

Mr Lehrmann *To drink whiskey.*

15. I distinctly remember Mr Lehrmann saying that his purpose was to drink whiskey, because my immediate reaction was that his conduct was in breach of the Ministerial Staff Code of Conduct. Drinking whiskey was not a good enough reason to come into Parliament House.
16. Ms Brown asked Mr Lehrmann a series of questions during the call, but I cannot now recall any other questions she asked or answers Mr Lehrmann gave.
17. Ms Brown took notes during this conversation.
18. After the meeting I reviewed Ms Brown's notes with her. I recall that it was a conversation in which Ms Brown read out what she had written. I thought that the notes accurately recorded the conversation with Mr Lehrmann.
19. At some stage I remember thinking the situation sounded unprofessional. I do not recall whether I had this thought before or after I witnessed the call with Mr Lehrmann.
20. Around the time I was dealing with Ms Brown, she said words to the effect of: "*Do you know how to contact the AFP?*".
21. Coincidentally, the AFP had come up to my office about a month or months prior at which time I had been given their business cards.
22. I sent Ms Brown the details of the AFP officers in Parliament House. I do not recall how I sent their details to her. I no longer have a copy of this communication. I cannot recall whether Ms Brown asked me about contact details of the AFP officers before or after I witnessed the call with Mr Lehrmann.
23. To the best of my recollection, I had no further involvement in the matter.

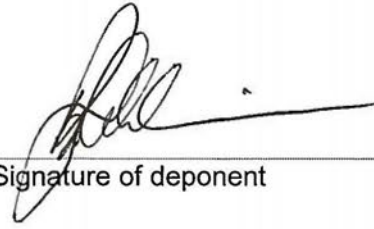
Claus Berg



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Affirmed by the deponent
at Sydney
in New South Wales
on 22 September 2023
Before me:

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Signature of deponent



Signature of witness

Amelia CausleyTodd
Solicitor
Level 14, 60 Martin Place, Sydney NSW 2000
An Australian Legal Practitioner within the meaning of the Legal Profession Uniform Law