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HEARING

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INDEPENDENT COMMISSION AGAINST CORRUPTION

THE HONOURABLE MEGAN LATHAM

PUBLIC HEARING

OPERATION YANCEY

Reference: Operation E13/1916

TRANSCRIPT OF PROCEEDINGS

AT SYDNEY

ON THURSDAY 2 JULY, 2015

AT 2.18PM

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This transcript has been prepared in accordance with conventions used in the Supreme Court.

THE COMMISSIONER: Yes, Mr Brady.

MR BRADY: Yes, I call Fatima Hammoud.

MR CHALMERS: Yes, Commissioner, I act for Fatima Hammoud.

THE COMMISSIONER: Yes, Mr Chalmers.

10 MR CHALMERS: I have explained to her the section 38 and she'll be taking an oath.

THE COMMISSIONER: Thank you. Pursuant to section 38 of the Independent Commission Against Corruption Act, I declare that all answers given by this witness and all documents and things produced by this witness during the course of the witness's evidence at this public inquiry are to be regarded as having been given or produced on objection and there is no need for the witness to make objection in respect of any particular answer given or document or thing produced.

20

PURSUANT TO SECTION 38 OF THE INDEPENDENT COMMISSION AGAINST CORRUPTION ACT, I DECLARE THAT ALL ANSWERS GIVEN BY THIS WITNESS AND ALL DOCUMENTS AND THINGS PRODUCED BY THIS WITNESS DURING THE COURSE OF THE WITNESS'S EVIDENCE AT THIS PUBLIC INQUIRY ARE TO BE REGARDED AS HAVING BEEN GIVEN OR PRODUCED ON OBJECTION AND THERE IS NO NEED FOR THE WITNESS TO MAKE OBJECTION IN RESPECT OF ANY PARTICULAR ANSWER GIVEN OR DOCUMENT OR

30 **THING PRODUCED.**

THE COMMISSIONER: Could we have the witness sworn please.

THE COMMISSIONER: Yes, Mr Brady.

MR BRADY: Yes, thank you, Commissioner. Could you please tell the Commission your full name?---Ah, Fatima Hammoud.

10 And your occupation, Ms Hammoud?---I'm – my substantive position is a procurement analyst but I've been seconded to a procurement manager.

With whom?---The Office of Finance and Services.

How long have you been there?---Ah, since March, 2014, so I'd say a year and a bit.

20 And before March, 2014, what were you doing?---I was with the Department of Attorney-General and Justice as a contracts and procurement officer.

Particular branch with the Department of Justice?---Ah, my business group is procurement but within the Asset Management Branch.

All right. And how long were you in that position?---Since November, 2013.

THE COMMISSIONER: Sorry, November, what?---Ah, 2011, sorry.

30 '11?---Yeah.

MR BRADY: Before November 2011, what did you do?---Well, I can't really remember, I think I was contracting a bit with Randstad.

What's Randstad?---It's a recruitment firm.

Right?---But before that was with ParaQuad New South Wales.

And how long were you with them?---I think about five years.

40 And what was your role with ParaQuad New South Wales?---I had various roles. So it ranged from – I started as a client executive and then senior client executive and then team leader.

Was does client executive mean?---It's like a – they have a contract with the Department of Veteran Affairs and we administer that contract on behalf of the Department.

What do you mean you administer it?---They provide mobility services to veterans so we co-ordinate the subcontractors and the orders and requests and phone calls.

Now, I want to take you if I can to the end of 2013.

THE COMMISSIONER: Just before that, Ms Hammoud, could I ask you what year was it that you left school?---I graduated in 2001.

10 Thank you.

MR BRADY: While the Commissioner is asking that, did you then do a degree at all?---Yes, I did.

In what?---A Bachelor of Business.

Where?---University of Western Sydney.

20 How long did that take?---I think it was a three year course but I think I extended it over four years or five years. I can't, I can't remember.

Well, when did you graduate?---2005.

All right?---So four years.

Did you then go to ParaQuad NSW after that?---No.

30 Where did you go?---I was at Nielson, I think it was Nielson Media Research.

Doing what?---Well, I was a client executive. Similar. So a client executive for media.

All right. The end of 2013 were you thinking about buying a house?---Yes.

And you'd started looking to buy a house?---Yes.

With Mr Andjic?---Yes.

40 And you ultimately bought a house?---Yes.

And you paid a deposit on a house in March, 2014?---Yes.

And exchanged contracts in March, on March, 2014?---Yes.

And then you settled the purchase of that house in April, 2014?---Yes.

Leading up to that do you say that you asked your mother for a loan of cash?---Yes.

And you say do you that you asked your mother for some cash to put into your account?---Yes.

You say don't you that you asked your mother for a loan of some \$8,800? ---I asked her for some money. There was no specific amount.

10 And what did she do?---She just gave me the money.

And what did you do with the money?---I deposited it into my bank account.

When you say you asked your mother for some, what did you say to her?---I don't remember the specific words but it was around do you have any money? Can I please borrow it.

20 That was in December, 2013 - - -?---Yes.

- - -when you first did that?---Yes.

You didn't have a mortgage at that stage?---No.

What was the purpose of borrowing the money at that stage?---Because I knew we were going to buy a house and eventually have a mortgage.

30 So what was the purpose of asking for it in December, 2013?---Like I said, we knew we were going to buy a house a and I thought why not ask as early as possible to see if she does have any money.

So you deposited you say \$8,800 in December, 2013?---Yes.

In anticipation of perhaps having a mortgage sometime the following year? ---Yeah, that's correct.

You asked for some money from your mother and she gave you, you say, \$8,800?---Yes.

40 You asked her for some further money?---Yes.

Well, what led you to do that?---I just wanted, I just asked her like do you have any other money.

Well, when you asked her the first time for the money and she gave you 8,800 did you say to her have you got anything more?---No.

Why not?---Just didn't come to me.

Sorry?---It just didn't come to me.

And it came to you then you say within a month to ask for some more?
---Yes, because our activity of looking for a house got more, what do you call it, more, more obvious.

Well, let me take you if I can to your bank account, 34. In fact we'll go to 33 if we can to start with please, Mr Thomas.

10

Do you see that's your bank account?---Yes.

Fatima Hammoud at the top, right?---Yeah.

And at that stage you were living at [REDACTED] ---?---Yes.

--- [REDACTED] ?---Yeah.

That's the family home?---Yeah.

20

Living there with your mother, father, grandmother and siblings?---Yeah.

Can I go over to the next page please, Mr Thomas.

See there's a cash deposit on 30 December, 2013 of \$8,800?---Yeah.

You say that came from your mother?---Correct.

30

And do you say between then and the next cash deposit the house search became more concerted?---Yes.

And that's why you asked for some more?---Yes.

See, when you first get the \$8,800 why don't you say to your mum well, how much have you got?---Because I just didn't, I think it's rude.

Well, is it less rude than going and asking for money?---No, because she's my mum.

40

So why asking how much have you got, why is that rude if it's your mum?
---Because I'm not going to say oh, give me more, I just asked in general, "Do you have any other money?", she's like, "Yes, I do."

Well, you did ask her give me more?---The first time I said, "Do you have any money?" She said, "Yes." And then the second time I said, "Do you have any more money?"

So you did say effectively give me more?---The second time.

Yes?---Yes.

Well, why in the world why wouldn't you say that the first time round?
---Because I said just give me – I don't, I don't know the exact words but I asked her do you have any money.

10 THE COMMISSIONER: Just pausing there, Mr Brady, just for more abundant caution I notice that the address came up on the screen in relation to the bank account and consistent with the order I made at the beginning of the proceedings there can be no publication of private addresses.

MR BRADY: So you say between 30 December, 2013 when you asked for money and she gave you \$8,800 and you didn't think to yourself I should ask for more?---No.

The search for the house became more concerted?---Yes.

20 Leading to you going back to her and asking for some more, right?---Yes.

And she gave you more you say?---Yes.

Can I go to 37.

THE COMMISSIONER: Just while we're looking at that you deposited 8,800 in cash on 30 December and transferred it almost immediately to another account?---Yeah.

30 And the other account was what?---It's like an interest account that I have with the bank.

A separate account from your savings account?---Yeah, it's like a direct saver.

Right. Why couldn't you deposit the cash directly into the account to which you transferred the money to?---I don't know, I didn't know you can do that, I don't know.

40 MR BRADY: You see 16 January there's another cash deposit?---Yeah.

7,200?---Yeah.

And you say that's money from your mother?---Yes.

How did that come about?---I just said I asked her if she had any more money.

And she handed over 7,200?---Yes.

Did you tell her what it was for?---No.

Why not?---Because she didn't need to know. She knew – she, she was aware that we were looking for a home but she didn't ask or it didn't come up.

So you go and ask your mum for some money and she gives you \$8,800, right?---Yeah.

10

You then say the house search is becoming more concerted so you wanted to put some more money in there in anticipation of getting a mortgage?
---Yes.

So you go back to your mum and ask her for some more?---Yes.

And worked out earlier that asking for more was somewhat rude, right?
---Yes.

20

Well, why didn't you go to your mum and say look, have you got any more? Let me tell you the reason is because we want to put it in. We're looking to buy a house and we want to get it ready for the mortgage. Why wouldn't you say that to her?---I have no idea. I just didn't mention it.

Did you actually get it from your mum?---Yeah, of course.

So it wasn't, for example, a little bit of a kickback from Shadi and Fayrouz for all the help you gave them?---No, Mr Brady.

30

So of course within your family though going and asking your mum for money and her giving it to you that was something you would expect her to do?---You would think, yes, of course parents help their children.

Yeah. Because you were very close weren't you, the family?---Yes.

If someone had money there'd be no difficulty in asking them for a loan?
---Well, if – I didn't know who had money so - - -

40

If someone in your family had money there's no difficulty in asking for a loan?---Well, if – we asked my mum so - - -

Well, you also asked your brother too didn't you?---That's right, yeah.

In fact \$375,000 worth you asked your brother?---Yes.

No difficulty in doing that?---No.

Because of the close-knit family that you're in?---That's right.

If one of your family is doing well you all feel like you're doing well, right?---No, not really.

Anyway, you say that that was your mother giving that money to you and then you depositing, right?---Yes.

10 You see, at this time where you're putting money into your bank account because you say you were getting it ready in anticipation for a mortgage, you had cash yourself at home didn't you?---Yes.

You say don't you that at this stage when you were getting ready for the mortgage and putting money into your account from your mother you had \$50,000-odd sitting at home don't you?---Yes.

20 Why in the world when you asked your mother for 8,800 – sorry, withdraw that. Why in the world when you asked your mother for some money and she gives you 8,800 to put into your bank account in anticipation for a mortgage, don't you think to yourself, you know, I've got 50K sitting in my cupboard. Perhaps I should pop that in my account as well?---No, I didn't think that.

Why not?---Because that's separate money.

What do you mean it's separate money?---I knew we were going to get a loan and the purpose of that money was for the, what are they called, what is it called, stamp duty and the – I don't know what they're called when you first buy a house.

30 THE COMMISSIONER: But if you required it for stamp duty or other expenses you would still have been able to withdraw it from your account. The point is that the – if you want the bank to look at your financial position and recognise that you're a good risk in terms of lending the money, they would have to see that in an account somewhere wouldn't they?---Yes.

Wasn't that the point?---Yeah. I did already have a large sum amount saved in there anyway so that didn't worry me.

40 MR BRADY: Well, what's the extra 8,800 and 7, 200 going to do then? ---Do you know how much a mortgage is? It's like over 500,000 so any money that I thought I could use for my offset would help me.

So you've got 50,000 sitting in a cupboard isn't it at home?---That's right, yes.

Why not take that \$50,000 and put that into your bank account?---Because I like keeping money at home.

Why?---It's just a habit from our parents.

Right. You see, you actually have an interest bearing account too don't you?---Yeah.

So you've got \$50,000 in cash you say sitting at home in a cupboard, right?
---Yes.

10 You've thought enough that you want to get money in your bank account to go to your mum and ask her for some cash, right?---Yes.

You've thought enough about wanting money in your bank account to go to your mum twice for cash to put in your bank account?---Yes.

Why not think to yourself that 50,000 could be earning a bit of interest in anticipation for us getting a mortgage?---I didn't want to touch that money originally and as I said, I like to keep money at home.

20 Why?---Why not?

Because you're going to lose interest for example, right?---Yeah, you can put it that way.

Well, isn't that right?---Well, that's one way if you view it, yes.

When you say one way of viewing it it's actually correct isn't it that you're losing interest while it's sitting in your cupboard rather than in a bank account?---If you have an interest account, yes.

30 You had an interest account didn't you?---Yes.

You were losing interest, right?---Yes.

And you just never thought about that?---No.

THE COMMISSIONER: Aside from that though what other reasons would there be for keeping that amount of cash at home?---I just like, it was just a habit from my parents, we always just saved money at home.

40 Yes, but the habit usually has an underlying purpose, that's what I'm trying to understand?---Oh, okay, yeah.

What was the reason for keeping that amount of money at home?---
Originally it was because when I first started I, because of my HECS debt I used to get taxed a lot and then once I paid it off I just still kept saving money at home, that was the original reason.

MR BRADY: So you've got \$50,000 sitting in your cupboard at home at the time that you've asked your mum for these two lots, right?---Yes.

You then use 30,000 of that, don't you, for a deposit on the house?---Yes.

You actually take \$30,000 in cash and you take it to the bank don't you?
---Yeah.

And get a bank cheque from the \$30,000 in cash?---Yeah.

10

How did you take it into the bank?---Oh, gosh, I can't remember, it was in my bag. I don't remember.

How were you keeping the money at home?---It was in my cupboard.

What, just loose in your cupboard?---Oh, I don't remember, I remember I used to just pile them together and just save them in my cupboard.

Well, you're saving, no doubt what you're doing is you're counting it as you're saving it?---Oh, rarely.

20

Well, how did you know how much was there?---Because when I did end up putting my deposit I counted at the end of December.

So you were just – sorry at the end of December you counted the money you had there?---Yeah.

I see, right. So you had then when you counted it obviously setting it into piles were you?---No.

30

Well, how did you go about counting it?---I just counted it like normal how you count money.

Well, what sort of bills were?---Oh, god, I can't remember, 100's, 50's, 20's.

Well, surely you had to separate them in piles to work out how much you had?---No, I just count like 1,000 and then two, three, four, five.

All right. Anyway, so you take in \$30,000 in cash and get a bank cheque for the deposit, right?---Yes.

40

And you say that 30,000 in cash was just something that you've saved along the way?---Yes.

How did you manage to save that?---I'd either withdraw money or if it was a gift, like usually birthday and (not transcribable) we get money.

Because your wage was going directly into your bank account wasn't it?
---Yes.

And your bank account was in fact quite healthy at this stage wasn't it?
---Yes.

Because you were saving money in your bank account, right?---And at home, yeah.

10 Sorry?---And at home.

You were saving money in your bank account, right?---And at home.

So saying and at home means yes - - -?---Yes, and at home.

- - - to the proposition you were saving money in your bank account?
---Yes.

20 Well, why not if you want to save everything at home just take all of that out and put that at home?---No, I don't like carrying that much money at home.

So it's okay carrying around 30,000 to 50,000?---Yes.

Carrying around what, 180, is just a bit too much?---Yeah.

You must have felt a bit vulnerable then taking \$30,000 in cash into the bank?---No, not at all.

30 What about when you were taking 40,000 from your brother?---No.

But taking out too much was too much was it?---Yes.

All right. Anyway, so you spend another \$30,000 in cash on the – oh, you spend \$30,000 in cash on your bank cheque?---Yeah.

And then you spend another \$22,218 in cash for your stamp duty don't you?
---Yes.

40 Within a week of getting the bank cheque?---Yes.

So by that stage you've just spent \$52,000 in cash for two cheques, right?
---Yes.

That must have basically wiped out what you had at home mustn't it?---Yes.

So you didn't have any cash left?---Not that I can remember.

THE COMMISSIONER: What did you have in your savings account about this time? Was it over \$150,000 or something less than that, what was it?
---I think over \$100,000, I don't know the amount.

MR BRADY: Was it about 180,000?---Yeah.

Is that right?---Ah, I don't remember the amount, no.

10 All right. So by March, 2014, you've wiped out your cash reserves at home, right?---Ah, no, not really. I had some money at home but it wasn't much.

All right. So you've wiped out the vast majority of the cash you had at home?---Yes.

How much did you have left then say at the beginning of April, 2014?---I had a fair bit because of the engagement.

Right. How much is a fair bit because of the engagement?---About 20,000.

20 Right. So as at April, 2014 you say you had another 20,000 in cash at home?---Yes.

Did you pay for the engagement party?---Some of it, yeah.

Did you pay cash for the engagement party?---Ah, yes.

And did the engagement party cost you about 10,000 bucks?---Yeah. Just under.

30 Sorry, I say \$10,000, about that?---Yeah.

How much did you get from your engagement?---About \$20,000.

So you had about 10,000 left would that be fair to say?---Yeah.

So as at April, 2014 you had about \$10,000 in cash?---Yes.

40 THE COMMISSIONER: Ms Hammoud, can I just ask you what was the \$10,000 spent on for the engagement party?---Ah, we had – my parents, at my parent's house they have a big backyard so we hired a marquee, tables, chairs, entertainment, my dress obviously, shoes, hair, makeup, Anthony's suit - - -

This was just for the engagement party?---Yeah, yeah.

So the hire of tables and chairs, a marquee and your and Anthony's clothing?—Ah, yeah. And the, what do you call it, the – my bridesmaids' outfits, junior bridesmaids' outfits, and the - - -

You're talking about the engagement party not the wedding?---No, the engagement party, yeah. That's all I can remember really.

MR BRADY: So by April, 2014 – I'll withdraw that. Between December, 2013 and April, 2014 you've put about \$16,000 in cash in your bank account from your mum, right?---Ah, I don't – I can't remember the amount.

No?---I don't know.

10

THE COMMISSIONER: Well it's 8,800 plus 7,200 that's \$16,000?---Okay.

MR BRADY: Yes?---Okay, yes.

You've spent \$30,000 in cash on a deposit?---Ah, yeah.

That's \$46,000 in cash between those two dates, right?---What do you mean?

20

Right. Between December, 2013 and April, 2014 I want to suggest to you that you put \$7,200 in cash in the bank, right?---Yeah.

You put \$8,800 in cash in the bank?---Yes.

Making \$16,000 in cash that you've used between those two times?---In the bank account, yeah.

30 In the bank. You've paid \$30,000 in cash for a cheque for the deposit on the house?---Ah, yes.

That's \$46,000 at the moment between those two dates?---Ah, only \$30,000 is mine, the \$16,000 isn't mine.

Well, in any event it's \$46,000 in cash, isn't it?---Ah, no. I don't see it like that.

40 THE COMMISSIONER: At the moment we're just – all we're doing is adding the amounts of cash that have been either deposited into your account whether they were your monies or not and monies that you have paid in cash for the purposes paying the deposit and the stamp duty. So that's all we're doing. So we're adding the 16 to the 30 and then the stamp duty which is about 22, right?---Yeah. That's correct, yeah.

MR BRADY: So that's then 68,000?---Yeah.

And about 10,000 on the engagement in cash?---Yes.

So \$78,000 in cash has either gone into your bank account or been paid out by you between 30 December and the beginning of April, hasn't it?---Yes.

And you say all of that was just kept at home by either you and your mum?--Yes.

And none of that you say was from Fayrouz or Shadi?---That's correct.

10 All right. Well did you get anything more in cash then after that into your bank account?---Anthony used to give me money and I used to deposit that but that's – that was for – once we had the mortgage.

Yes. Any other cash that you got?---Yeah, when people found out that we were engaged they started sending us money.

And they sent you bits and pieces?---Yeah.

20 Right. Any other cash that you got after March 2014?---Ah, yes, my brother.

Yeah. What did your brother give you?---Ah, \$75,000 I think it was.

Right. And I'll come back to that. So your brother gave you \$75,000. Any other amounts in cash that you got?---Ah, not that I can remember.

30 I just want to make it perfectly clear so you've got every opportunity. You got \$7,200 from your mum, you got another \$8,800 from your mum, I got those the wrong way round but you'll understand what I mean, you've got money for the deposit, you got money for the stamp duty, bits and pieces from the engagement, Anthony helping with the mortgage and \$75,000 from your brother?---Yeah.

Any other cash that you got after March 2014?---Oh, yes, yes, yes.

The light's gone on, has it?---Yeah.

What else did you get?---Ah, my, my mum gave me more money.

40 Did she? How much did she give you?---Ah, \$53,000.

Slipped your mind just for a moment, did it?---Yeah.

\$53,000 slipped your mind?---Yeah, 'cause it's not my money so - - -

Well, even more reason you might think to remember it, wouldn't it?---No, not really.

All right. What circumstances do you say that your mum gave you \$53,000?---The same reason. That's when we had the mortgage or we got the house or I can't remember and I asked her for money and then she gave it to me and she says it's your, I don't remember the exact words but she said, "This is your grandmother's money, what's it for?" And I just explained to her what it was for.

You actually remember that occurring?---Yeah, I do.

10 Clear memory of - - -?---Yeah.

- - - your mum giving you \$53,000?---Yeah.

And what did you do in your memory with that \$53,000?---I just remember going to my room and I don't know if I deposited it on the same day or the next day, I can't remember that.

20 Can I take you to page 52. Do you see there there is purportedly on there, 15 April cash deposit, \$53,000? Do you see that?---Ah, yes.

Do you say that's something that you did by way of a cash deposit from money that your mum gave you?---Yes.

No doubt about that?---Yeah.

You actually remember, do you, going into the bank and depositing \$53,000?---Yeah, I do, yeah.

30 I wonder if I might make an application to cross-examine in relation to a transcript of 3 June, 2015?

THE COMMISSIONER: Yes, the transcript of 3 June, 2015 is relieved from the suppression order made on that day for the purposes of the following questions.

40 **THE TRANSCRIPT OF 3 JUNE, 2015 IS RELIEVED FROM THE SUPPRESSION ORDER MADE ON THAT DAY FOR THE PURPOSES OF THE FOLLOWING QUESTIONS**

MR BRADY: You remember me asking you questions about cash at a hearing previously?---Yeah, yeah.

And we were going through the cash that we'd been talking about today, right?---Ah, yes.

I went through the \$7,200. Remember me asking you questions about that?

---Yeah, yeah.

The \$8,800?---Yeah.

And then of course the \$30,000 by way of stamp duty?---Yeah.

And the \$52,228?---Ah - - -

10 Sorry, the \$22,228 in – withdraw that. \$30,000 by way of cheque for a deposit and then \$22,000 for the stamp duty?---Yes, yeah.

And I took you through those, didn't I?---Yeah.

I then showed you the page at 52. I then showed you that page before then starting to move on to some more questions. Do you remember me showing you that page?---Hmm, I don't remember but yeah.

All right. Let me get you a copy of a transcript if I can. I'll hand you this?
---Thanks.

20

Can you turn over to page 268, you'll see that in the bottom right-hand corner?---Yeah.

Now you see that I was asking you about whether or not at the end of April you had very much cash at home, do you see that, about line 8?---Line 8.

“All right. So that by the end of April you don't have very much cash at home at all.” Do you see that?---No.

30 THE COMMISSIONER: It's at the top of the page and then you read down to about line 8, sorry, that's at line 8 and then you read down to about the middle of the page?---Oh, yeah.

MR BRADY: Do you see where I say, “All right. So by the end of April you don't have very much cash at home at all.”?---Yeah.

Yeah. You say, “Yes,” and I say, “Less than 10 at least,” and you say, “Yeah.”?---Yeah.

40 “The money for the wedding is not coming in yet, that would be fair to say.” You say, “No, it started coming in again.”?---Yeah.

I asked, “No in large sums by that stage though,” and you say, “No, no,” effectively agreeing with what I'm saying, right?---Ah, no, I didn't mean that.

Well, if you go onto the next question and answer, "So by May, that is the month later, you have less than 10,000 in cash at home," and you agree, "Yes," don't you - - -?---Yes.

- - - or Yeah?---That's right, yeah.

10 All right. And I said, "Did you have any other sources of cash?" "Ah
hmm." "In May?" and you said, "I don't know if it's in May again, but
again I did get large sums of money again." I ask, "From whom?", right?
---Yes.

And you say, "My mum, so that 53,000 you see deposited, again that's my
mum's and some also a huge amount from my brother."?---Yeah.

And you said that because I was showing you on the screen wasn't I that
statement that you see in front of you?---Yeah.

20 And you volunteered didn't you that that \$53,000 that was set out there as
being a cash deposit was money that you put in there from your mum?---
Yes.

And I went on to ask you and you've said today that you actually
specifically remember getting \$53,000 from your mum?---Yeah.

\$53,000 in cash?---Yeah.

And taking that cash and putting it into the bank account as set out there?
---Yeah.

30 And you say honestly that's what you did?---Yes.

No doubt about that?---Yes, from my recollection, yes, that's what I did.

Do you see on that bank statement just above it 15 April, do you see an
Internet deposit there of \$52,975.15, sorry, 52,795.15, do you see that?
---Yeah.

40 And that's from one of your accounts 7-6-7-6 isn't it?---Oh, yes, I, I guess
so.

And 7-6-7-6 was an account that you had where you were just putting bits
and pieces of money in at various times?---Yeah, yeah.

The \$53,000 in cash didn't go in there?---Oh, I don't know what you mean.

Well, let me show it to you, page 68, so that's a bank account, right?---Ah,
yes.

And you can see it's F Hammoud, that's you isn't it?---Yeah.

Because it's got Fatima underneath?---Yeah.

And there's credits going in at various stages there, right?---Ah, yes.

And we see down the bottom don't we as at 15 April there's a total of \$52,795?---Yeah.

10 And that's been built up over time hasn't it?---Yeah.

And then the Internet withdrawal of \$52,795.15?---Yeah.

And we go back to page 52 and we see that come in there, do you see that?
---Ah, yes, yeah.

Okay. So that brings that account up to \$53,000 doesn't it?---Well - - -

20 It's not difficult, it's just there isn't it?---I don't, I don't understand it.

THE COMMISSIONER: Slightly more, 53 – well, look – if you look at the deposit of 52,795.15?---Yeah.

The balance then is representative as 53,043.54. You see that?---Yeah.

Right.

30 MR BRADY: And do you see there underneath that on 15 April an Internet withdrawal of \$53,000?---Yeah.

Do you see that?---Yeah.

Then you see just under that at 15 April a cash deposit going back into that account - - -?---Yeah.

- - - of \$53,000?---Yeah.

What happened was this, wasn't it, you - - -?---I have no idea.

40 I'm about to tell you what happened. You accidentally moved \$53,000 into your mortgage and then asked the bank - - -?---No.

- - - to refund it because you had accidentally moved it to your mortgage hadn't you?---I remember some – that happening, yeah, yeah.

That was for that \$53,000 wasn't it?---No. No. I also remember depositing \$53,000.

Well, when you say you remember depositing we went through all of that and you said it was cash that \$53,000, right?---Yeah, I do, I do remember depositing money on behalf of my mum.

\$53,000 - - -?---Yes, I do.

- - - is what you said, actually getting it in cash and putting it in there?
---Yes, I do.

10 Let me show you if I can this, 82. Do you see that's your mortgage account?---Yeah.

Do you see the loan advance on 14 April that is - - -?---Yeah.

- - - 474,700?---Yeah.

Do you see there's an Internet payment of \$53,000 that goes across into your mortgage account?---Yes.

20 Do you see the correction of Internet payment of \$53,000?---Yeah.

That's as a result of you writing to the bank and saying I accidentally transferred \$53,000 into the mortgage account?---Yeah, but I - - -

I didn't meant to do that. Can you correct it?---Yes, I do remember that.

And that is what's occurred on 15 April at page 52 isn't it?---Well, I guess so if the dates match, yeah.

30 What do you mean you guess so. It's obvious isn't it?---Well, I, I also remember depositing money on behalf of my mum for \$53,000.

THE COMMISSIONER: Ms Hammoud, look, it seems clear enough that you remember instructing the bank that you'd made a mistake and you wanted the transaction reversed. You've agreed to that haven't you?---Yeah, I do, yeah.

You now say that you also deposited \$53,000 in cash that you got from your mother?---Yeah, I do. I remember that.

40

Well, if that's the case one would expect to see two lots of \$53,000 represented on that account wouldn't one?---Yeah, yeah.

And it's not there is it?---No.

So where is it?---I don't know. It should be in there.

What, you're saying that the bank mislaid \$53,000 in cash are you?---I don't know what the bank has done but I remember depositing \$53,000 on behalf of my mum.

You're being given an opportunity, Ms Hammoud, to think very carefully about this. Do you adhere to the evidence that you deposited \$53,000 in cash that you received from your mother?---Yeah, I do. I remember depositing money on her behalf.

10 MR BRADY There is no doubt is there that that \$53,000 that I have just taken to you is a reversal of a payment that you'd made into your mortgage?---Yeah, I do, I do agree with that.

It's obvious isn't it?---Yes, yes, I do.

So that \$53,000 that you previously gave evidence about saying that was a deposit from – of cash from my mum is just wrong isn't it?---Yeah, it would seem because of the dates, yeah.

20 Well, it wouldn't seem it. It's clear isn't it?---Yes.

You see, when I was asking you questions in your previous examination did you just see what you thought was a cash deposit of \$53,000 and make up on the spot that it must have come from your mum?---No, because she did give me money. I do, I remember - - -

It clearly isn't the \$53,000 there is it?---No. It doesn't, doesn't add up so I don't know.

30 Well, see you're giving evidence that you could actually remember getting from your mother \$53,000, right?---Yeah.

You gave evidence that you had a clear recollection - - -?---Yeah, I do - - -
- - - of getting 53 - - -?---I do remember. Yes.

- - - \$53,000?---Yes.

40 Where has it gone?---I have no idea. I can't say because I know - - -

You have no idea - - -?--- - - - what the money was saved up for.

You have no idea what happened to \$53,000 in cash that your mother handed over to you?---No.

Seriously, you say no idea at all where it went?---No. I would say – if I thought I made up a whole lie I would, I would say it.

THE COMMISSIONER: Ms Hammoud, you went further. In response to a question from me you actually said "That standing at the counter while the teller counted all of that \$53,000 in cash took some time"?---Yeah, I do, I remember that.

So it appears that \$53,000 of your grandmother's money has gone west and you won't ever be able to repay it. Is that the position?---Well it looks like it.

10 MR BRADY: And the first time you realised that \$53,000 in cash of your grandmother's money has disappeared is today?---Yes. It's very weird like because I know what that money's for and why my mum was saving it, that's why.

You see, I'll suggest to you is that you saw \$53,000 in cash there and you just made that up on the spot that it came from your mum, right?---No, no. She did give me money.

20 Then you spoke to your mum about that before she came in to give evidence?---No.

That's what I what to suggest to you?---No.

So this will be coming as a great shock to your mum too, that the \$53,000 from your grandmother that she entrusted to you has suddenly just disappeared according to you?---Yeah.

30 Are you seriously telling us that you received \$53,000 in cash and you have no idea where it is?---Yeah.

And it just so happened, coincidentally, that you transferred \$53,000 by mistake, it got put back into your account under the mistaken statement of cash deposit. That's just a complete coincidence?---It looks like it.

Let me just confirm something with you as well. You actually wrote a letter to the bank asking them to refund that, didn't you?---Yes, I do, I remember that.

40 So you were onto the job enough to ensure that \$53,000 that you'd sent through to your mortgage account got reversed, right?---Ah, yes.

But of course not on the job enough to find out where \$53,000 in cash that you were given which was your grandmother's money went?---Because I didn't even notice. I didn't notice that until you brought it up like - - -

For a moment let's accept that what you're saying – no, I won't do that. You didn't notice it until I brought up that \$53,000 in cash is missing from your bank account?---Yes.

Ms Hammoud, are you seriously trying to suggest to us that this was not you trying to make up and excuse when you thought there looked like there was a cash deposit of \$53,000 in your account?---It's not an excuse at all.

And that you didn't get your mum to come along and give false evidence to try and cover it up?---No.

10 And it's just an unbelievable coincidence that the one that you thought was \$53,000 in cash happened to be simply transfers between accounts?---Yeah.

And it just happened to be exactly the same amount as what you've given evidence about in relation to cash, right?---Yeah.

And the cash that you supposedly put in there just happened coincidentally to have disappeared entirely?---Yes. Like it's not making sense to me.

20 Well you might not be the only one, Ms Hammoud that that's not making sense to but you want to adhere to that, do you?---Yeah. It doesn't make sense to me.

THE COMMISSIONER: Ms Hammoud, just for more abundant caution, you have to appreciate that what Mr Brady is putting to you is that not only did you fabricate that evidence but that you then spoke to your mother and you asked her to give the same fabricated account in order to support you and the consequence of that, if the Commission forms the view that it is a fabrication is that both you and your mother have lied under oath and I want you to be clear about that. Do you understand that?---I do, yeah.

30 Right.

MR BRADY: Well, let's give you the opportunity. What other explanation is there?---Oh, I have no idea, I'm shocked, like, I, I can't say, I have no idea.

All right. Well, why we're finishing off with cash, you then got some cash from your brother?---Ah, yes.

40 And he handed over to you \$35,000 in cash?---Ah, yes.

That was on 29 May?---Yes.

And then he gave you \$40,000 in cash - - -?---Yes.

- - - on 30 May?---Yes.

Why do you know do he give you 35,000 on 29 May and then 40,000 on 30 May rather than just giving you \$75,000 on the 29th?---Oh, well, I have no idea.

Well, you were the one who was getting the money?---Yeah.

He was handing it over to you?---Yes.

10 Well, when he handed over \$35,000 one day and then \$40,000 the next what happened?---Oh, I really, I can't remember. I do remember asking him for money.

Well, how did it come about that he gave you \$35,000 one day and then \$40,000 the very next day?---Oh, I have no idea.

Well, you were there weren't you?---Yes.

You were actually getting the money, right?---Yeah.

20 He's actually handing over to you \$35,000 in cash - - -?---Yes.

- - - for you to take into the bank?---Yes.

And then \$40,000 in cash, right?---Yes.

To take into your bank?---Yeah.

Well, tell us what happened?---Oh, I don't remember, I really don't.

30 You've got no recollection at all of your brother handing over these two sums?---Oh, no, I do remember him giving me the money, yes.

But you don't remember in which circumstances?---No.

No recollection at all?---Not at the moment, no.

What do you mean not at the moment?---It's not coming to me why it happened over consecutive days or anything, I have no idea.

40 Well, just take your time and think about it for a moment. Are you able to help us now?---No, I have no idea. I don't know.

Well, do you actually remember getting the \$35,000 from him?---Yeah, I do, I do remember getting the money.

Well, where were you?---We were at home.

How did it come about that you actually got that \$35,000?---It was, it was just a conversation about the house or the home or something.

And?---And I don't, I don't know exactly what the conversation was but it was something around if he had any money or I could borrow it for an offset.

You asked him?---Oh, I don't, I don't remember how the conversation went.

10 So you don't remember how it came about that your brother gave you \$35,000 in cash, is that what you say?---Yeah, I don't, I don't remember the conversation with, with this, I don't.

And then don't remember how it is that he happened to give you another \$40,000 in cash the very next day, no recollection at all?---No, not really, yeah.

20 Well, what does not really mean?---No, I don't -- like I remember receiving the sums, I just don't remember what the conversation was or what we had or - - -

So no recollection of the conversation of you getting \$75,000 in cash over two days from your brother?---No. I knew he had money but I just didn't know how much or, or why or what the conversation was.

And you say none of the cash that actually went into your account had anything to do with Fayrouz?---That's correct.

30 None of it had anything to do with Shadi?---That's correct.

You see by the time December 2013 comes around, Shadi and Fayrouz have been paid about \$1.285 million by the Department that you were working for, hadn't they?---Ah, yeah, so I've heard.

You knew, didn't you?---I had no idea, no.

You must have had some idea how much they got paid?---Not at all, until this hearing.

40 No idea at all that they got paid over a million dollars by the Department? ---At all.

That came as a massive shock to you, did it?---Yep, I had no idea how much the sums of the projects were or anything.

So you had no concept until you turned up to this public hearing that your sister and brother-in-law got paid over a million dollars by the Department for which you worked?---No idea.

THE COMMISSIONER: All of which your husband approved, might I add. You have no knowledge of that at all?---At all.

MR BRADY: And in relation to projects that you were helping your husband work on?---Ah, yes. I had nothing to do with the sums or budgets or, or what, I have no idea, I had no idea.

10 Well, what were you doing on these projects then if you didn't have any idea about the sums or the budgets or anything like that?---It was documentation preparation, he was teaching me how to do certain things.

Right. And is that because you didn't know anything about project management for construction?---Yeah, that's correct.

You were going to Capital Works one day a week initially, right?---It wasn't really like that, but yeah, you'd say one day - - -

20 Well, if it's not like that, you tell us how it is?---It was just whenever he needed help I'd help.

So it might not have even been one day a week initially?---Yeah.

It might have been less than that?---Yeah, whenever he needed something done or help or I was available.

All right. So that was in about February 2013 you started doing that? ---That's correct.

30 All right. So in February 2013 you might have been doing maybe one day a week but maybe not even that much?---Yeah, you'd say about one day a week.

About one day. All right. And the one day a week that you were doing in February 2013 and on from there was basically helping Anthony?---Ah, yes.

Learning while you were doing that?---Ah, yes.

40 Because you had no experience in project management for construction? ---That's right, yeah.

You had no qualifications in project management for construction?---That's correct.

And so over that couple of months up until sort of May/June you were basically trying to learn as much as you could?---That's correct.

But you weren't involved in the budget at all?---No.

You didn't know what money was being paid out?---No.

You were effectively – I don't mean this in any pejorative way, but you were basically acting as a bit of an assistant?---Ah, not really. He'd, like, say give this a go, do it and come back to me.

Yeah?---Yeah.

10 So basically he'd give you something for you to have a bit of a go at. Is that right?---Yes.

And then he'd review it?---Ah, yes.

Have a bit of a chat to you about it?---Yeah.

Talk about where you might have gone wrong?---Yes.

To help you improve?---Yes.

20

Basically to give you a bit of work experience in the project management field?---Ah, yes.

And so by May/June you've got a little bit of experience in project management?---I was a very quick learner so it wasn't that hard to be honest.

Sorry?---I was a very quick learner, it wasn't hard at all.

30 Well, that means surely if that's the case you must have by then understood the budgets and the money that was being paid in and out?---Ah, no, the only way I knew the project value was during my substantive role.

That is procurements?---Yes.

Right. So you had nothing to do with, you say even as May/June, allocating budget?---No.

Nothing to do with making payments?---No.

40

Nothing to do with confirming that work had been done before payments were made?---Ah, no.

That was all Anthony doing that for the various projects you were helping him with?---Ah, yeah. You need to have delegation or – it's attached to your role, so yeah.

So that by the time it gets to May/June you've learnt a bit about project management, right?---Ah, somewhat a lot, yeah.

But there's still a lot to learn. Right?---Ah, practically, yeah.

Do you recall when it was that you started assisting Anthony one day a week?---Ah, February, I'd say February.

10 And how long did it go that you were doing it basically about one day a week?---I have no idea.

Give some idea?---No idea.

A month, two months, three months?---I have no idea, no.

Did it start becoming more?---No, it was the same the whole way through.

20 All right. So we can therefore say that you're basically doing one day a week on project management from February through until you stop doing project management?---Yes.

That means that, for example, even if you start at the beginning of February you've done about four or five days of project management in February?---Yes.

March you would have done another four or five days of project management work?---If you're looking at full-time, yeah.

30 Okay?---I do things during my work or - - -

So maybe about 10 or 11 days of full-time work by the end of March?---Yeah. If you want to put a quantitative number to it.

And a lot of that is of course having a go at things and having Anthony talk to you about whether you've done it well?---Yeah, and doing it - - -

Making suggestions about how to change it?---Yeah.

40 So then April another four or five days?---Yeah.

And then May another four or five days?---Yes.

So by the end of May you might have done all up full-time sort of about a month?---Maybe more. I'd say a bit more, yeah.

A bit more than a month?---Yeah.

With this Assistant role to Anthony?---Some things – sometimes I do things on my own because it was easy.

Yeah?---But, yeah.

All right. You see, in June you put in an application don't you as a job as a development officer with Capital Works?---Yes, if you look at it that way.

10 What do you mean if I look at it that way?---The whole thing was meant to be a learning exercise so - - -

Sorry, the whole thing was meant to be a learning exercise. What do you mean the whole thing was meant to be a learning exercise?---From when he helped me write my selection criteria to the résumé to the interview.

Are you saying therefore, and please don't accept it if it's not right, that you had no intention of applying for this job?---Correct, yes.

20 You never intended to apply for the job?---Correct.

You didn't apply for the job?---Oh, no, I did apply for the job but the intention was to learn from it.

Well, when you say you did apply for the job, did you actually apply for the job or you're just doing the whole thing as a training exercise?---The whole thing as a training exercise.

So you say really you did not even apply for the job?---Oh, I don't - - -

30 MR CHALMERS: That's – can I, can I object to that. That really is semantics and confusing.

THE COMMISSIONER: Anyway, it wasn't a genuine application for the job. Can we put it that way?---Yeah.

Yes. Thank you?---Yeah.

40 MR BRADY: And you say do you that in making this non-genuine application for the job you were practising what, for future recruitment?
---Correct, yes.

So no doubt one of the things that you wanted to do is you wanted to make sure that when you did your résumé and filled out the selection criteria that you did it properly?---No, there were a lot of errors because my background isn't building.

Sorry, there were a lot of errors?---Yes.

Well, how in the world does that help you have practice if you're going to put in a raft of stuff that's wrong?---Because the whole purpose was to tailor it to the job description and to learn how to tailor your résumé and write selection criteria to address the, the JD.

So let me get this right. You were practising writing things that were completely in error?---Not error because I did work on some of the stuff but it was just, what's the word, over exaggerating.

10 So you were practising writing a selection criteria that exaggerated your abilities?---Yes, if you put it that way.

Practising writing a selection criteria that exaggerated your qualifications? ---Yeah, you would say that.

Practising writing a selection criteria that exaggerated your experience? ---It's not really the right words but it was practice.

20 Well, were you practising writing a selection criteria that exaggerated your experience?---Yes. If you put it that way, yes.

What's the purpose of practising doing something wrong?---It was just a learning exercise. It wasn't meant to go anywhere or mean anything.

Let me take you if I can to 2563. It's a letter of 12 June, 2013, isn't it?---Ah, yes.

It's a letter from you?---Ah, yes.

30 To Mr Andjic?---That's correct, yeah.

As the assistant director of Asset Management Branch?---Ah, yes.

Re development project officer?---Correct.

40 Dear sir, I'm writing to express my interest in the advertised expression of interest dated 30 May, 2013 for the development project officer within major works at the Department of Attorney-General and Justice. Do you see that?---Ah, yes.

I believe I have the required skills and experience to undertake the challenge of this important role. Right?---Ah, yes.

That's a letter that you drafted, is it?---Ah, Anthony helped me draft it, yeah.

Sorry?---Anthony helped me draft it as well.

Right. What part of this practicing that you were doing?---Ah, yes.

You got him to assist you in writing just a covering letter?---Yeah. Because I can always tailor this to whatever I needed it.

Why write something that you then need to tailor later on?---Because the whole purpose is each job application is different. You need to address the job description or the selection criteria. So it didn't really matter what I wrote in this one because it had to address development or the role,
10 development project officer.

Why not go to the Department that's specifically set aside to assist people with doing things like resumes?---I did.

When?---Ah, possibly when I first started, ah, no, no. When I became permanent 20, ah, 2012.

All right. And who did you see there?---I have no idea. I didn't know anyone then. I didn't know anyone's names like I - - -
20

Well what did you do there?---Ah, they go through your resume and how to write a job description.

Right?---I don't remember what happened but I do, I remember going and getting help from it.

And why not do it then in 2013?---Because I spoke to Anthony about it and I thought, I thought it would be okay to practice through him like - - -

30 Well couldn't the people who actually trained to assist with these things do a better job?---No, I didn't like the process I went through with them.

So what, you didn't think it was much of a process or you didn't like the particular person or what?---No, I just remember I didn't really get anything out of it. They just gave me all these documents and said "Go for it".

Right. So these people who are specifically designated to do this task you say just fobbed you off?---No.

40 MR CHALMERS: No, she didn't say that?---No, I did not say that.

MR BRADY: No, I'm asking her?---No, I did not say that. I remember having one meeting with them and then they just sent me documents and said "This is what you use and this is how you go". I'm pretty sure you'll find it if you go through my emails. And I was like "Is that the help I get"?

Well you're doing this because you were thinking about a particular job?---Ah, doing which?

This with Mr Andjic?---No. I was thinking about this job. Like if I were, if my expertise were this how would I respond to this?

Well, you must've been thinking about another job if you wanted to go through this process then?---Yeah, I was at the time.

Well what job were you thinking about?---Ah, through transport, I think it was.

10

For what?---I think it was contracts role or something, contracts officer. I can't remember the role I applied for.

Well why not go and see this other department and talk to them about the specifics that you wanted?---What do you mean?

Well how in the world is doing something up as a Capital Works project manager going to assist you with then writing a resume and selection criteria - - -?---Because the template - - -

20

- - - in relation to a completely different job?---Because the template and the substance is there it's not hard to amend a cover letter.

Let's go to the selection criteria, 2564. See that, "superior expertise in building project management."?---Yes.

"I have extensive experience in both business and project management across a number of employers within both the private and public sectors."? ---Yes.

30

Is that true?---No, I told you, most of the stuff in here is not true or it's exaggerated.

So how is writing something that's just wholly exaggerated going to assist you in then writing a legitimate selection criteria in a later job?---Like I said it's not hard to amend something that's already written.

40

THE COMMISSIONER: Ms Hammoud, I have a different question and that is that both the covering letter that we saw previous to Mr Andjic and this document, the selection criteria that you wrote, both of these documents, doubtless there were others, were treated by the Department as genuine representations of your qualification weren't they?---Yeah, I understand, yes.

Well, you knew you were doing that, you knew you were making representations that were untrue?---Yes, I knew because I took it as a whole learning exercise.

Well, you might have but the Department now has documents under your authorship which misrepresent your qualifications?---Yes, I understand.

And you didn't think there was anything wrong with that?---No, not at the time at all.

MR BRADY: You didn't think it was worthwhile saying for example in the covering letter this of course is only a practice?---No, which I should of, I shouldn't of asking to practice from the beginning.

10

Well, you didn't do it because you were actually going for the job weren't you?---No, I do not have the experience that they asked for.

You won't hear argument from this side of the bar table but you were going for the job weren't you?---No.

All right. Well, you've then said, "To support my practical experience," you see in the second paragraph, "I have completed my Diploma in Project Management with Blue Visions International in 2012", do you see that?

20

---Yes.

Had you completed a Diploma in Project Management with Blue Vision International in 2012?---No.

Had you started a Diploma in Project Management with Blue Vision International in 2012?---No.

Had you done any Diploma in Project Management?---No.

30

Had you started any Diploma in Project Management?---No, I already answered that.

No, with Blue Vision or otherwise?---No.

That's just a straight lie?---Like I said it was a learning exercise and I just copied most of the things that Anthony put in his and we just worked through it together, like it wasn't meant to take, be taken literally.

40

Well, how is it writing down a qualification that you never had going to assist you in then meeting selection criteria in another job interview?---Like I said as long as the substance was there I could always change it to address what I needed to apply for.

THE COMMISSIONER: But you'd have to do more than change it, you'd have to delete three quarters of what's asserted on this page?---Yeah.

It's not changing, it's deleting isn't it?---Yes. What I thought is as long as the content was there I could amend it or change it and delete whatever wasn't right.

MR BRADY: So down to the third paragraph, "My proven expertise in the building project management process has allowed me to successfully deliver critical and complex projects from inception through to post-completion," just completely wrong, right?---No, I did understand that, it made sense to me.

10

Sorry, "My proven expertise in the building project management process," true, not true?---It is true, I did do a lot of that work.

Sorry, you had proven expertise in the building project management process did you?---Yes, that's what I was working with Anthony on.

So that's not overstating what your expertise was?---Oh, you could say that.

I know I can say that - - -?---Like, it's just a play with words.

20

- - - you'd agree with it wouldn't you?---Ah, umm.

Is it overstating what your experience was?---Oh, possibly, yeah, yes.

You then say down the bottom, sorry, the next paragraph, "As acting project officer for Major Works within the Department of Attorney-General and Justice I managed and coordinated the delivery of building projects within Treasury approved court upgrade program." That's untrue as well isn't it? ---Ah, yes.

30

In fact, is anything in that paragraph true?---I don't know. I can't remember what I worked on when I was there.

THE COMMISSIONER: Well, wasn't, wasn't the Disability Discrimination Access and the Building Code of Australia compliance at Camden, Picton, Cessnock and Cowra all of the projects that your sister and her husband were involved in?---The - why, why that was there is whatever Anthony worked on and I assisted is what we put in there.

40

Yes, but you know that they were all the projects that - - -?---Yeah. Now I do, yeah.

Oh, you didn't know that then?---No. I had no idea what they worked on or didn't work on.

MR BRADY: So you didn't know as at 12 June, 2013 that your sister and brother-in-law had contracts for the Camden and Picton Courthouse,

Cessnock Courthouse and Cowra Courthouse?---I knew Cessnock. I was aware of Camden and Picton. I have no idea about Cowra.

So you knew Cessnock, aware of Camden and Picton. What do you mean aware of Camden and Picton?---Because when Kerrie left I just took over her work or - - -

You mean you were aware that there was a Camden and Picton project?
---Yes.

10

Were you aware that Triton had the project management of it?---Not at that time, no. In May or June?

Yeah?---I don't recall I knew then. I don't think so.

So one would assume therefore you had very little to do with Camden and Picton?---Yes.

20

You had something to do with Cessnock?---Yes.

And nothing at all to do with Cowra?---Maybe admin work but not really – I've never been there. I don't even know where Cowra is.

What about Spring Street?---Yes. I went to the initial meeting.

Sorry, you went to?---The initial meeting.

And that was it?---That was it.

30

Well, you must have been aware then that your brother-in-law had the contract – sorry, the construction job at Spring Street?---No. I, I wasn't allowed to do any more work.

Sorry?---I wasn't allowed to do any more work with Capital Works.

When?---I think it was beginning of May or mid-May.

40

Sorry, you weren't allowed to do any more work with Capital Works as at the beginning of May?---It was around May. I don't remember the date. May, June, I can't remember.

Well, what happened?---Oh, I don't know. Something happened. I don't really - - -

Well, tell us what it was?---I don't know. It was emails back and forth between Jamie, Martin and Anthony. I don't remember the content of the emails but no one advised me that I couldn't work or help but I, but I knew like, common sense that they were all arguing about something.

So as at May or the beginning of June you say you no longer worked at Capital Works?---Yeah. I no longer assisted.

At all?---I did bits and pieces just to finish off things but I was under the impression that I was not allowed to work with them.

10 Well, being under the impression not allowed to work, I just want to know whether or not you did any work after end of May, beginning of June?---Not that I can recall. Maybe bits and pieces but not, not like February, March or April.

Then the next paragraph, "With the commencement of the noted projects I initially developed project plans that provided guidance in the execution and control of the projects." True or not true?---No, that's true.

20 So for Camden and Picton Courthouse you developed project plans that provided guidance in the execution and control of the project?---No, that wasn't me. I think Cessnock and Cowra initially did.

Sorry, you did with Cowra did you?---Yes. That was one of like, before we all started.

Right. And what about Spring Street?---Maybe. I don't remember.

"I then managed each project in accordance with the project plans through a quality and disciplined management approach." True or not true?---Well, when I started yes, but then I was taken off so I couldn't really.

30 Well, you weren't managing them were you?---Well, I wanted to but wasn't allowed to do anything so - - -

Well, even when you were working with Anthony and actually working at Capital Works you weren't managing each project in accordance with the project plan through a quality and disciplined management approach were you?---Well, what I did was, yeah, I would think as I did.

40 THE COMMISSIONER: Beg your pardon?---I would think that that's how I did my work.

Well if you were - - -?---Do you mean as a project manager in charge of the entire project?

MR BRADY: Have a look at what's written and tell us whether or not you meant project manager managing the project?---Which sentence is it?

"I then managed each project in accordance with the project plan through a quality and disciplined management approach"?---Ah - - -

It's obvious, isn't it, you're saying that you were the project manager - - -?--
-Yeah.

- - - and you managed each project?---Yeah. In that sense, yeah.

And that's just a lie again, isn't it?---Over exaggeration.

A lie?---Okay, a lie if you want to say.

10

Well it's not a question of whether I want to say, do you accept that it is?---
No, because I did do – when I was doing the project plans and co-ordinating
things, yes, I did do, I did do that.

THE COMMISSIONER: But which, which projects are we talking about
when you say that you, that you managed the project, which ones are we
talking about?---Originally I was meant to be in charge of Cessnock and
Spring Street.

20

I'm not thinking about what you were meant to be in charge of which
projects are you referring to when you say I managed each project?---I
didn't really – I didn't.

At all?---At all, no.

In relation to any of them?---No.

Well, then it's not an exaggeration it's just an outright falsehood?---Yeah.

30

MR BRADY: As is the rest of the paragraph, isn't it?---No, I did do that
through all my project plans.

“I implemented processes throughout the proposals life cycle including
forward planning of milestones and outcomes, developing strategic
methodologies and delivering the projects in a live environment,
undertaking risk and stakeholder management, processes and establishing
effective governance overarching the proposals”?---Yeah. That was through
the project plans.

40

“I also ensured that the budgets were monitored effectively”?---Projects.

“Projects were monitored effectively to mitigate any underlying risks such
as budget over runs”?---No, that's not true.

It's just a straight lie, isn't it?---Yeah. It's not – well it's not a lie it does
happen but I didn't do it.

Well you're saying that you did?---No.

“I also ensured that projects were monitored effectively to mitigate any underlying risk such as budget over runs”?---No. It’s not true.

Right. “By initiating and sharing project control group meetings and steering committees”. It’s all a lie as well, isn’t it?---Ah, yeah.

And this is all to have a bit of a practice run at how to meet selection criteria?---Yes.

10

So over the page, 2565. “Further to my role as the acting project officer I was also responsible in managing and supervising external consultants and providing subject matter experience to projects”. True or not true?---Ah, that’s not true, no. I wasn’t in charge, no.

Let’s go down to the next. “I was responsible interpreting plans to ensure they aligned with the Departmental visions and requirements”?---That’s true.

20

You interpreted plans to ensure that they aligned with the Departmental visions and requirements, did you?---Yeah.

What plans did you interpret to ensure they aligned with the Departmental visions and requirements?---They’re the floor plans. They’re the floor plans that they have, what the plans - - -

Did you have any experience as an architect?---No.

30

Do have any experience as a builder?---No.

Any experience in construction whatsoever?---No. Not before this, no.

“I’ve planned construction methods of delivery in live court environments, through communication strategy I developed with stakeholders in ensuring all proposals were within the required budgets and building regulations and standards”?---No, that’s not true.

And can just cross that out as well?---Okay.

40

Is that right?---Yeah.

Just not true?---No.

“During the course of delivery of the works,” do you see where I’m starting there, five lines up from that same paragraph?---Ah, no.

“I ensure the quality of the works were delivered in accordance with the contract”?---Ah, no. No.

Is there anything in here that is true?---Ah, some of it is but most of it's just over exaggeration or I copied from Anthony's or - - -

And quite frankly if we go through the rest of the selection criteria we'd be saying exactly the same, wouldn't we?---For some of it, yes.

Well, let's go over to page 2566.

10 THE COMMISSIONER: Just before we do that can we just go back to that page, do you see where it says in the second paragraph, "Under my control each project is currently within budget and within project timeframes, the total portfolio amount of the projects is close to a million," you see that? ---Yeah.

You were referring there to the projects that you'd noted on the previous page weren't you?---Yeah.

Camden, Picton, Cessnock et cetera?---Yeah.

20

Was that the figure given to you by Mr Andjic when you put that letter together?---No, I just took it by, in my Procurement role.

What do you mean you took it in your Procurement role?---I fill out this Excel sheet for any RFT tenders that go out and they put the projected value and I just sort of collated them and guessed.

So you knew that the total portfolio amount of the projects was close to a million - - -?---Yeah.

30

- - - and you knew that your sister and brother-in-law were involved in either project managing or constructing some of these projects but you say you had absolutely no idea what they were paid?---Yeah, that's right, yeah.

Doesn't it make sense that if the total portfolio amount of the projects is close to a million that that would possibly represent the amount that they were paid for those projects?---It could, yeah.

40 MR BRADY: Just while we're on there, "My success with these projects has allowed me to be appointed to manage and oversee the \$5.7 million Hornsby Courthouse upgrade."?---Well, that started to happen but then I was pulled off so - - -

What, you were appointed to manage and oversee a \$5.75 million courthouse upgrade?---Well, that was, it was sort of Anthony's thought but, yeah.

Anthony was thinking of giving you, and let me make this perfectly clear just so we know what you're saying, Anthony had talked about giving you - - -?---Not giving - - -

- - - the management of the \$5.75 million courthouse upgrade at Hornsby?
---Not giving to me, helping me.

10 Right. So let me ask you again, "My success with these projects has allowed me to be appointed to manage and oversee the \$5.75 million Hornsby Courthouse upgrade."?---The wording's wrong, yeah, so it's wrong.

Can I go over to 2566. "This was the extensive experience through either design" - - -?---No, I don't have anything up on my screen.

20 All right. Let me wait for a moment. In fact I might just stop there for a moment. Commissioner, I seek the Commission's indulgence by interposing a witness, I want to recall Hakime Hammoud and of course we have the interpreter for today.

THE COMMISSIONER: And today only, yes, right.

MR BRADY: And today only so I wonder whether I could do that and interpose - - -

THE COMMISSIONER: All right. Ms Hammoud, could you step down for the time being and we'll just resume as quickly as we can. Thank you, Mr Chalmers, if you could be patient.

30 MR CHALMERS: Yes, Commissioner, what I was just going to request is could I have copies of these bank statements?

THE COMMISSIONER: Yes, yes.

MR BRADY: And in fact I should tendered them and given them and I apologise for that.

MR CHALMERS: Well, just for me, yeah.

40 MR BRADY: Yeah.

THE COMMISSIONER: Yes, all right.

MR BRADY: In fact why don't I tender - - -

THE COMMISSIONER: Yes, that's probably a good idea - - -

MR BRADY: - - - the bundle - - -

THE COMMISSIONER: - - - to do that now.

MR BRADY: - - - which includes the – in fact I won't tender the bundle now, I'll do that in a moment if I can once I confirm what I'm tendering.

THE COMMISSIONER: All right. Yes, thank you, just take a seat and can we have Ms Najjar and Mrs Hakime Hammoud back into the box please. Madam Interpreter your oath naturally still applies as does the section 38 order and the oath that was previously administered to Mrs Hammoud.

10

<RAYMONDA NAJJAR, on former oath

[3.44pm]

THE COMMISSIONER: Yes, Mr Brady.

MR BRADY: Yes, thank you.

10 Ms Hammoud, could you just understand then, I know it was in English, the evidence that your daughter was giving about the \$53,000?---I don't know English.

Your daughter just gave evidence that the \$53,000 that she says and you say she gave – you gave her in cash has disappeared?---I gave it to her. I promise. I gave it to her and they were – they're mum's money until she dies.

20 So I wonder why when I asked you that question you were very firm to say that you gave it to her rather than where has it gone?---Yes, she said she was going to use for the house.

THE COMMISSIONER: No, I think there's been a miscommunication. What Fatima Hammoud said a short time ago is that the \$53,000 in cash that she said she deposited into the bank that came from her mother, you, that that has not found its way into her bank account and she doesn't know where it is?---That I don't know. I don't know anything about her. All I know is that I gave her that money.

30 MR BRADY: I understand that. Are you a bit concerned that the money that you've given has suddenly disappeared?---How could it disappear?

Do you understand that your daughter has just given evidence saying that the \$53,000 you say you gave her and she said she received from you she doesn't know where it is?---Now, I hear this now.

What do you think about that?---What I'm thinking is that she has to now – she now has to go and get me the money now, today, because that's my mother's money and even if she has to sell her house.

40 All right?---Because they're not mine.

So you didn't give her \$53,000 in cash did you?---Yes. I, I do not swear and, and tell lies and I'm not – and I do not fast and tell lies and I don't know anything about them.

You've never checked with her what happened with the \$53,000?---She told me initially when she took them it's for the house so I – what am I going to ask her. I don't know anything about it.

You see, did your daughter come to you and say there was \$53,000. Can you say it came from you?---No, she did not tell me and I don't know anything of that. I don't know anything of that, no.

Did you know that your daughter was - - -?---I didn't know what was happening until I got here.

So did you know that your daughter was being investigated by ICAC?---No way.

10

No idea?---*No, no, no, no, no.* No, until I came here and when I got here I got a shock.

So you had no idea that Fatima was being investigated by this Department? ---Not until I got here.

No idea that Mr Andjic, your son-in-law was being investigated?---No.

Not until you turned up here?---*No, no, no, nothing*.

20

No idea that your daughter Fayrouz was being investigated?---Now I hear it, now I'm hearing it. I'm hearing the names here now.

You had no idea before you turned up here that - - -?---I'm hearing their names but I don't know what it's about.

You had no idea before you turned up here that your daughter, Fayrouz was being investigated?---No.

30

No idea that your other son-in-law, Shadi Chacra was being investigated?---I don't know anything at all, at all, at all.

Fayrouz and Fatima both living at home in 2013, weren't they?---Yeah. When they were both single and one of them when they were first married.

All right. Were they both living at your place in 2014?---Yeah. A year ago you mean?

Yes?---Yes.

40

And Fatima and Mr Andjic are living at your place in 2015?---The girl, when the girl was there?

Sorry. This year Mr Andjic and Fatima are living at your place?---Yes, they live with me. They sleep, they sleep on the floor. I don't have room.

And they've been living there for most of this year, haven't they?---Yes, from the time they started to do renovations on the house.

And you see Fayrouz regularly, don't you?---She goes to school, she comes – takes breaks for 20 minutes, 40 minutes, I see her. Yeah, she comes.

And you say until you turned up here you had no idea any of those four family members of yours were being investigated?---*No way, no way, no way*.

10 THE COMMISSIONER: Madam Interpreter, can I ask you to clarify something with the witness. When she says she has no – she had no idea that any of those persons were investigated by ICAC or any basis for the investigation until she turned up here, is she talking about turning up here today or is she talking about turning up at ICAC on some prior occasion?--- The first time, Commissioner.

Right. And when she came here the first time which was 11 June, she, she, she came in response to a summons, did she not?---Yes.

20 And she understood when she received the summons or at least when it was explained to her what the nature of the allegations were?---Yes.

Thank you.

MR BRADY: Did you – when you got the summons and understood it say anything to Fatima about the summons?---No, because I didn't understand. No, because she does not understand the Arabic, I showed it to my brother.

30 Well, when your brother told you what it was about and the allegations did you say anything to Fatima about that?---No, I was told that I could not talk. They, because they can't talk about it.

Who told her that?---She did and her sister.

Who did?---All of them. Every time I said something they said we can't talk about it.

Right. So you did talk about the summons with Fatima?---She said to me, "Look at what it says here. We can't talk."

40 When she said that to you what did you say?---I waited until I got here.

So you didn't talk about the \$53,000 at all?---No. I came here and you made me swear not to. How can I talk and say anything to her.

Did you think to yourself gee, I wonder if it's about the money I've given her?---In my own mind?

Yeah.

MR CHALMERS: Sorry, Commissioner, is this at the private hearing or the public hearing?

THE COMMISSIONER: I think we're referring to the first summons, Mr Chalmers.

MR BRADY: We are referring to the first summons?---I did not think. I, I did not think. I thought but I did not think.

10

I have nothing further. Thank you, Commissioner.

THE COMMISSIONER: Does anyone have any questions of Mrs Hammoud? No. All right. Thank you. You can step down and I think Mrs Hammoud can be excused.

MR BRADY: She can. Thank you, Commissioner.

THE WITNESS: Thank you.

20

THE INTERPRETER: Am I excused, Commissioner?

THE COMMISSIONER: Yes. Yes, Madam Interpreter. Thank you very much.

THE WITNESS EXCUSED

[3.57pm]

30 THE COMMISSIONER: Can you tender that bundle now, Mr Brady, and -
- -

MR BRADY: I'm sorry, Commissioner, would you excuse me just one moment.

THE COMMISSIONER: Yes.

MR BRADY: I'm sorry, Commissioner. Can I tender some financial documents.

40

THE COMMISSIONER: Yes.

MR BRADY: In fact, I have two bundles of financial documents in relation to Fatima Hammoud.

THE COMMISSIONER: Those two folders I'll - - -

MR BRADY: Two copies. In fact, sorry, they're - - -

THE COMMISSIONER: Oh, copies of the same thing.

MR BRADY: Copies of the same.

THE COMMISSIONER: A folder of financial records Exhibit X – sorry, Exhibit Y7.

10 **#EXHIBIT Y7 - FOLDER OF FINANCIAL DOCUMENTS IN
RELATION TO FATIMA HAMMOUD**

THE COMMISSIONER: Yes, thank you. I'll adjourn to 10.00am tomorrow morning.

**AT 3.58PM THE MATTER WAS ADJOURNED ACCORDINGLY
[3.58PM]**

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