

**INDEPENDENT COMMISSION AGAINST CORRUPTION**

**RECORD OF INTERVIEW BETWEEN SENIOR INVESTIGATOR MICHAEL KANE OF THE INDEPENDENT COMMISSION AGAINST CORRUPTION AND  
5 ERNEST CHAN AT ICAC BUSINESS PREMISES, LEVEL 7, 255 ELIZABETH STREET, SYDNEY ON 1 MARCH 2019**

**PRESENT: SENIOR INVESTIGATOR MICHAEL KANE  
10 ERNEST CHAN**

KANE: This is a electronically recorded interview between ICAC Senior Investigator Michael Kane, K-A-N-E, and Mr Ernest Chan, C-H-A-N -

CHAN: Correct.

15 KANE: - at the premises of the Independent Commission Against Corruption, level 7, 255 Elizabeth Street, Sydney on Friday, the 1st of March, 2019. Mr Chan, before we start, did you - do you agree there's no other persons present in this room?

CHAN: No, there's only two of us here.

20 KANE: Great. Did you agree prior to the commencement of this interview to be - to have our conversation electronically recorded on this digital voice recorder?

CHAN: Yes, I did.

25 KANE: You understand that my questions and any answers you give to those questions will be electronically recorded on the digital voice recorder as the interview takes place?

CHAN: Yes, I understand that.

KANE: And you've got no objections of the, the conversation being recorded electronically?

CHAN: There's no objection.

30 KANE: Okay. As I've previously explained to you, I must advise you that it's pursuant to the Independent Commission Against Corruption Act, it is a criminal offence to deliberately provide false or misleading evidence to an officer of the commission exercising the functions under the act. Any information you provide in this interview needs to be true and correct to  
35 the best of your knowledge and belief. Do you clearly understand that?

CHAN: Yes.

KANE: For the purpose of this interview, can I get your full name, please.

CHAN: Ernest Yinson Chan.

KANE: And can you spell your middle name, sorry.

CHAN: Y-I-N -

KANE: Yep.

5 CHAN: - S-O-N.

KANE: Thank you very much. Your current address?

CHAN: [REDACTED] is - I stay there most of the time. But occasionally I do stay in a [REDACTED], which is [REDACTED].

10 KANE: Thank you. And your occupation?

CHAN: I'm an orthodontist by profession.

KANE: Okay. And I believe you may also be a councillor with the Burwood Council?

CHAN: Yes, I got elected onto the Burwood council in September 2017.

15 KANE: Okay. And you - you're not mayor or deputy mayor at this stage?

CHAN: No, I'm just a councillor at this stage.

KANE: Just a councillor. Okay. And are you known by any other names?

CHAN: No. It's all I - Ernest most of the time.

KANE: So, so mostly just referred to as Ernest Chan?

20 CHAN: Yeah.

KANE: Okay. And are you a financial, or have you ever been a financial member of the Australian Labor Party?

CHAN: Yes. I am still a financial member -

KANE: And -

25 CHAN: - of the ALP. Yes.

KANE: And when did you commence being a, a member of the ALP?

CHAN: Either 2013 or maybe the end of 2012. I'm not too sure.

KANE: Okay. And have you ever been a member of the Country Labor Party?

CHAN: Not that I'm aware of.

30 KANE: Okay. Have you ever been a member of the Australian Young Labor Party?

CHAN: No.

KANE: Have you ever held any positions within the ALP office at all?

CHAN: No.

KANE: You've never worked at any electoral offices?

5 CHAN: No.

KANE: Okay. Have you ever been a volunteer for the ALP or the Country Labor Party in any capacity?

10 CHAN: I have been, and I was a volunteer for that - maybe affiliated society, the Chinese Friends of Labor. But I don't know exactly what is the affiliation between that and the Labor Party. I believe that there are Irish Friends of Labor and all, all the other Friends of Labor as well. So Chinese Friend of Labors, yes. I am a volunteer of that.

KANE: Okay. Well, we might get into that -

CHAN: Yep.

15 KANE: - shortly and that. But you've, you've never assisted with any campaign?

CHAN: Only as a volunteer handing out flyers on the street and stuff like that.

KANE: And, and where was that at?

CHAN: Oh, where - wherever they want me to be at.

20 KANE: Okay. And was it for a particular candidate that you're handing out the flyers for?

25 CHAN: Normally we were - we will be ask, let's say in the coming election. I will be probably handing out flyers for the skate - the state election for the Strathfield one, Ms Jodi McKay, all right, in Burwood. In the coming federal election, I could be asked to be a volunteer to hand out flyers as well for our ALP federal candidate, Sam Crosby, as well. So basically whenever there's a - we need for volunteers in whatever election, they will ask for volunteers. They normally get emails regarding that. And we got time, we just volunteer. Otherwise we just ignore it.

KANE: Okay. So they, they ask you particular areas that you may -

30 CHAN: They -

KANE: - could volunteer and hand out flyers on their - candidates' behalf?

CHAN: Yeah, yes. And also for pre-poll and stuff like that as well.

KANE: Okay. Now, are you or have you been a member of the Chinese Friends of Labor?



CHAN: Yeah.

KANE: What, what was your understanding his position was with the Chinese Friends of Labor?

5 CHAN: He would - he - at least, I think in 2015, he could be the president of that organisation.

KANE: Do you know anyone else who held, like, the secretary position for the Chinese Friends of Labor?

CHAN: No.

10 KANE: Do you know if the Chinese Friends of Labor have regular political fundraising events?

CHAN: Normally Ernest Wong would try to host an annual event, once a year.

KANE: Okay.

CHAN: Yep.

KANE: And was that usually at the, The Eight restaurant down in Haymarket?

15 CHAN: Normally yes, because that is the only venue in Chinatown that could host up to 50 plus tables.

KANE: Okay. Now, we might move onto the actual Chinese Friends of Labor function at The Eight restaurant, Haymarket on the 12th of March, 2015. What role, if any, did you have in relation to that event?

20 CHAN: I would definitely be a volunteers, as I mentioned in the previous emails that I wrote to you. Greeting peoples, maybe reception, taking them from the reception to wherever table that the receptionist asked me to do so. I could be involved as one of the Master of Ceremonies. I can't recall that, whether I was or not, because normally the task was virtually being

25 handed out on the day. It's, it's like, whoever is there, then whoever get tasked certain, certain jobs.

KANE: Okay.

CHAN: But because - yeah.

KANE: So as a volunteer, who, who would you be accountable to or answer to at the event?

30 CHAN: Well, the rundown is normally prepared by either the Honourable Ernest Wong office - the rundown of the event -

KANE: Yep.

35 CHAN: - or Johnathan, or both. So we normally get the rundown on the day. And when we arrive at the venue, we'll be assigned for whatever task that, you know, we, we can probably carry out.

- KANE: So you said people from the Honourable Ernest Wong's office. Who would that be? Do you know any names or -
- CHAN: I don't know. It could be Ernest himself. It could be one of his - one of the workers there.
- 5 KANE: You know his, electoral roll staff's name or workers?
- CHAN: Probably not, because I think it's difficult to other people to get the people allotted into the sitting right. I mean, it's impossible for anyone of the volunteers to know who is who.
- KANE: Okay. And were you required to pay for a ticket or a seat at the function?
- 10 CHAN: As a volunteer, normally not. Because as a volunteer, normally they have two or three - two or three tables set aside to have the meals before the, the function. So it's not necessary for volunteers to pay for the event.
- KANE: Do you know -
- CHAN: Because you don't get time to eat, really, yeah, sit on the table.
- 15 KANE: Do you know any of the other volunteers at the Chinese Friends of Labor function in March 2015?
- CHAN: Yes.
- KANE: And who were they that you knew were the other volunteers?
- CHAN: Off my head?
- 20 KANE: Yep.
- CHAN: I think Forrest Lam is one of them who's working for the, the office part-time for Sophie Cotsis, all right, in Campsie. Mr Mak, Van Mak. Pinky Leong. If you got a photo of the event, maybe - I saw a photo in the newspaper.
- 25 KANE: Oh, yeah.
- CHAN: Yep. Maybe I can, yeah, identify some of them for you.
- KANE: Was Simon Zhou there?
- CHAN: Simon? If, if Simon is supposed to be there, then he's supposed to be there. Normally he could be one of the Master of Ceremonies as well.
- 30 KANE: Okay. All right. And were, were their responsibilities similar to yours as to showing guests to the, the tables and -
- CHAN: Yeah, because basically what they do is that they assign people to greet the people only. All right? They assign you to collect the, the, the money for the dinner. And then there will be people assigned to sell raffle tickets or whatever. And then the people that supposed to collect the money, they're normally - they are people from the Young Labor
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whatever coming in to make sure that they sign the declaration, the electoral declaration they are not a developer and such like that as well. So, yeah, the different people are doing different task. So, yeah.

KANE: Why, why couldn't they take money from developers?

5 CHAN: Because that part of the policy.

KANE: Okay. So prohibited donors?

CHAN: Yeah. They can't - cannot be, you know, cannot be developers at all.

KANE: Okay.

CHAN: So there's a declaration they'd have to -

10 KANE: Okay. Is there any other people that, to your knowledge, that are prohibited donors?

CHAN: Is on the form, but I'm not -

KANE: Not -

CHAN: - not sure.

15 KANE: Okay. So as a volunteer, if you're showing people to their, their tables, are you allocated a specific area within the restaurant, or it's just the entire -

CHAN: It's just whoever happens to stand next to receptionist, and then it goes, "This, this gentleman or lady is table whatever." Then you just, yeah,  
20 take, take them across.

KANE: And on this evening, were you given any instructions or directions in relation to the collection of cash, credit card, or cheque donations?

CHAN: No, because if you are that particular group of people, you have to stay behind. And I, I tend to leave early, so I never got involved with any  
25 money handling part in just events like that.

KANE: Do you know who, who from the Chinese Friends of Labor was in - was in charge of donations or collection of donations at the function?

CHAN: I can't answer that. I don't know. I can't remember.

KANE: Did you receive any written directions, including emails, before, during  
30 or after the, the function in relation to arrangements, feedbacks or any other matters?

CHAN: Before?

KANE: Yeah, yeah, the -

CHAN: Well, before would probably be a rundown.

KANE: Yep. But did, did anyone seek instructions or, like, feedback after the event have occurred, how that - how you felt that it - the event went?

CHAN: Not, not that I'm aware of.

5 KANE: See, do you have any knowledge what happened in relation to the forms collected in relation - with the payments after the event finished that night?

CHAN: No.

KANE: Do you know who was responsible for counting the moneys donated during the event and reconciling those payments against donation forms?

10 CHAN: No. No.

KANE: And you had no responsibility in relation to the banking of any moneys collected at the function?

CHAN: No.

15 KANE: And were you aware if there was different types or classes of tables at the Chinese Friends of Labor function?

CHAN: Yes, the table - yep, the tablecloth would be different as well.

KANE: Okay. What was the different class of tables that were available at the Chinese Friends of Labor function in 2015?

20 CHAN: I can't remember exactly. But normally there would be at least two, the normal one and the VIP one.

KANE: Okay. Do you know how many VIP tables there were, roughly?

CHAN: I can't remember, honestly.

KANE: And there would, would have been a Head Table with all the dignitaries on it?

25 CHAN: It could be but I can't tell. Because normally what happen is, with the VIP people, normally they would probably get one of the still serving, sit - sitting Member of Parliament to be there, to, to network with the VIPs.

KANE: Do you know what the price difference between the, the different tables may have been?

30 CHAN: I can't remember that. But I would say the normal one would probably be under 1000, and the VIP one would be over that mark.

KANE: And how many people would you - would have estimated were in attendance at the Chinese Friends of Labor function in March 2015?

CHAN: Oh, definitely more than 400. It could be close to 500 plus. I'm not sure.

35 KANE: Okay.



CHAN: But as I - as I mentioned earlier, the reason why they chose The Eight is the one that has the - at that time, the biggest floor space.

KANE: And how many tables were you - were set up for this function in March 2015?

5 CHAN: I can't recall that. But would say over 40's.

KANE: Okay. And you - I think I've asked you before. Do you know how many VIP tables there may have been?

CHAN: No.

10 KANE: Were people able to purchase a seat at a table at the Chinese Friends of Labor function in March 2015 on the night, or -

CHAN: I don't know. Normally you can. You kind of walk in. But unlikely. But, but you can.

KANE: You don't know how those, those payments would have been reconciled against the -

15 CHAN: No, because I don't do the money side.

KANE: Do you know who was seated at the Head Table at the Chinese Friends of Labor function in March 2015?

CHAN: If you give me that photo, maybe I can peg one or two people. But off my head I can't.

20 KANE: All right. I'll try and get a picture of the function.

CHAN: Yeah, that's fine. That's good. Yep, good.

KANE: And do you know if the people at the head table were required to pay for their seats?

25 CHAN: No, but I would imagine that either they are - they've contributed a lot to the ALP in whatever ways, then they won't be seated on that table. Because normally you have - on the Head Table, normally they - they normally get either someone from the federal or the state parliament to network with those people. So therefore, yeah.

KANE: And you said that you didn't collect any donation money on the night?

30 CHAN: Nope. I never touch the money side.

KANE: Did you receive any feedback how much money they may have collected during the Chinese Friends of Labor function in March 2015?

CHAN: No.

KANE: Do you know Johnathan Yee's family members at all?

35 CHAN: Yes. I'm treating, as an orthodontist, his niece at the moment.

KANE: Okay.

CHAN: Yeah.

KANE: You don't know his brother, mother or father at all?

CHAN: Yeah, I, I know Ven Tai, because Ven Tai is the father of my patient.

5 KANE: Oh, Okay. Yep.

CHAN: All right? So, yes, I do - I knew - I do know them. I know the, the older brother of Johnathan Yee. But I don't know the parents that well. I could probably recognise the face. But, but they probably won't know who I am.

10 KANE: Do you know where the Yee family was seated during the 2015 Chinese Friends of Labor dinner at all?

CHAN: Can't recall anything like that.

KANE: Do you know if Johnathan Yee was responsible for collecting money at the function?

15 CHAN: I doubt he will have time to collect the money physically.

KANE: And Johnathan Yee never gave you any money that he may have collected on the evening?

CHAN: Nope. I don't think Johnathan will actually be involved in actually physical collection of money on the day.

20 KANE: Do you know a gentleman by the name of Xiangmo Huang? I might have pronounced that wrong.

CHAN: Maybe. If I see the photograph, maybe I can -

KANE: Okay. I'll, I'll, I'll -

CHAN: - yeah, assist you with that.

25 KANE: Okay. And from your understanding, who was in charge of the event at the 2015 Chinese Friends of Labor function at -

CHAN: I would imagine that would be the Honourable Ernest Wong.

KANE: Yep, okay. All right. I might suspend for a short time to see if I can get a photograph of the - of - from the event and a picture of Mr Huang. And I'll just -

30 CHAN: Oh, Mr Huang.

KANE: Yep. Do you know who he is?

CHAN: Is that the -

KANE: They - he's been described as the papers as the Chinese billionaire that they've -

CHAN: Yeah, yep.

KANE: Do you know him at all?

5 CHAN: Not personally. I know -

KANE: Oh.

CHAN: I know the photo.

KANE: Yep. Have you - do you know if he was at the Chinese Friends of Labor function?

10 CHAN: If, if he is there, then he would be one of the people seated at the Head Table, I'd imagine.

KANE: Why would that be?

CHAN: He has been - I don't know - donating, I guess. And even from the media, a fair bit to the ALP. So, yep.

15 KANE: But can you recall if you saw him there on that evening?

CHAN: No, but if the photograph has him on it -

KANE: Yep.

CHAN: - then I think I recall the photograph that's actually been published in the - one, one of the newspaper, I think I saw his face there.

20 KANE: Okay. I'll just suspend for a short time, see if I can find that - it was in the paper, was it?

CHAN: I think - I think it was in the paper.

KANE: Okay. I'll just see if I can find that, that newspaper article.

CHAN: Yep.

25 KANE: And I'll bring it back.

CHAN: Okay.

KANE: So I'll just suspend. The time by my watch is 10.09. We'll suspend for a short time to just see if I can locate that photograph.

INTERVIEW SUSPENDED

30 INTERVIEW RESUMED

KANE: Time now by my watch is 10.14am on Friday, the 1st of March, 2019. We suspended the interview for a short time so I could search the internet for a photograph of the Chinese Friends of Labor function for 2015. I

was able to find one on the ABC News website. It appears to be a colour photograph of the attendees. So -

CHAN: That would be me.

KANE: Okay. So you're pointing to - in the front row.

5 CHAN: Myself, which is myself.

KANE: Yep.

CHAN: All right. This lady here -

KANE: Beside you, yep.

CHAN: - this would be Pinky.

10 KANE: Pinky Leong?

CHAN: Pinky Leong.

KANE: Yep.

CHAN: That one will be Mr Mak, Van. Mak Van.

KANE: Mr - next, next to - see you're going -

15 CHAN: Next to Pinky.

KANE: Yep.

CHAN: I'm going to the right -

KANE: Yep.

CHAN: - of the photograph.

20 KANE: Yep.

CHAN: And then you have Johnathan Yee.

KANE: In the centre, yes.

CHAN: In the centre. And then you have - there's - the lady beside Johnathan, on the left of Johnathan on the photo -

25 KANE: Yep.

CHAN: I don't know who that is. And then the lady in red is Floris.

KANE: Florist Lam?

CHAN: Floris Lam.

KANE: Yep.

CHAN: In red. And I think the gentleman next to Floris Lam, to the left of Floris Lam, would be Mr Simon Zhou.

KANE: Yep.

CHAN: And then the one with the glasses here -

5 KANE: Yep, in the far right corner.

CHAN: - with Mr John Tsang -

KANE: Yep.

CHAN: - he's a - he's a solicitor. In the second row, that would be James. I, I forgot his surname. But I think he could be still working for Mr Chris Minn.

10 KANE: So Nung, N, N, N-G, Chris Nung?

CHAN: No, Chris Minn. Chris Minn is the -

KANE: Yeah, yeah, but this gentleman here is -

CHAN: I, I can't - I can't - I don't know his surname.

15 KANE: Oh, you don't know his name? okay, sorry. Yep.

CHAN: That is Mr Huang.

KANE: Okay. So at the back row -

CHAN: That, that, that person there.

KANE: Yep.

20 CHAN: I don't know - yep.

KANE: So the back row -

CHAN: I think - I think - I think this is Chris Bowen.

KANE: Yep.

CHAN: Bill Shorten.

25 KANE: Yep.

CHAN: And then Luke Foley.

KANE: Yep.

CHAN: There's Ernest Wong. I think he's - can't remember his name, but I think he's one of the ALP parliamentarian as well.

30 KANE: Okay. So the back row, second from the right.

CHAN: Right. Not sure if that's Chris Minn or not. Looks - it could - it could be him.

KANE: OK.

5 CHAN: This one, tall guy, right at the back, could be the current mayor of - could be my council, Jerome - Jerome -

KANE: Laxale?

CHAN: Yeah.

KANE: Yep.

10 CHAN: There's Luke Foley. Don't know - don't know these people. No. This could be Sophie. I'm not sure.

KANE: Could be, sorry?

CHAN: Could be - could be Sophie Cotsis. I don't know.

KANE: Oh, Sophie Cotsis.

CHAN: Yeah, could be. I don't know.

15 KANE: Yeah, yep, yep.

CHAN: Yeah.

KANE: Okay.

CHAN: Yep.

20 KANE: All right. Can I - can I just, on the back of it, just so we know that's the - this is the picture I showed you, if you could just sign -

CHAN: Do you want me to sign the front as well?

KANE: Oh, oh, sign the front, yep. Just - and today - just today's date, if you don't mind, so we can have a - thank you very much.

CHAN: You're welcome.

25 KANE: Okay. Is there anything further in relation to this matter which you think might be relevant to our inquiries which we haven't discussed here today?

CHAN: Not really.

30 KANE: Okay. Have the answers recorded here today been made from your own free will?

CHAN: Yep.

KANE: Has any threat, promise or offer of advantage been held out to you to give the answers as recorded here today?

## NSW ICAC EXHIBIT

CHAN: No.

KANE: Do you have any complaints of the matter which myself have conducted this interview today?

CHAN: No.

5 KANE: Okay. The time by my watch is 10.18am. This interview is now concluded. Thank you very much.

CHAN: Oh, okay. Thank you.

**INDEPENDENT COMMISSION AGAINST CORRUPTION**

**RECORD OF INTERVIEW BETWEEN SENIOR INVESTIGATOR MICHAEL KANE AND INVESTIGATOR KELLY MOORHOUSE OF THE INDEPENDENT COMMISSION AGAINST CORRUPTION AND LEWIS NAPIER HAMILTON AT ICAC BUSINESS PREMISES, LEVEL 7, 255 ELIZABETH STREET, SYDNEY ON 11 APRIL 2019**

**TIME: 1:11PM**

**PRESENT: SENIOR INVESTIGATOR MICHAEL KANE  
INVESTIGATOR KELLY MOORHOUSE  
LEWIS NAPIER HAMILTON**

KANE: This is an electronically recorded interview between ICAC Senior Investigator, Michael Kane. K-A-N-E and Lewis Hamilton at the premises of the Independent Commission Against Corruption, Level 7, 255 Elizabeth Street, Sydney, on Thursday, the 11th of April, 2019. The time by my watch is 1.11pm. Also present is ICAC investigator, Kelly MOORHOUSE. What, for the purpose of voice identification, Kelly, can I just get your name and position, please?

MOORHOUSE: Kelly MOORHOUSE, Investor, Investigator at the ICAC.

KANE: Thank you. Lewis, apart from the persons I've just announced, do you agree there's no other persons present in this room?

HAMILTON: Yes, I agree.

KANE: Thank you. As I've already explained to you, we're just currently making inquiries into allegations that from January 2015 officials of the New South Wales Branch of the Australian Labor Party, members of the Chinese Friends of Labor, political donors, and others, have entered into or carried out, a scheme to circumvent the prohibitions, or requirements under Part 6 of the Election Funding, Expenditure and Disclosure Act 1981, relating to political donations. I intend to ask you further questions about this matter which will be electronically recorded on this digital voice recorder. Do you clearly understand that?

HAMILTON: I do.

KANE: Did you agree to have our conversation electronically recorded here today?

HAMILTON: I did.

KANE: Has any threat, promise or offer of advantage been held out to you to participate in this interview?



HAMILTON: No.

KANE: For the purpose of this interview, what is your full name?

HAMILTON: Lewis, L-E-W-I-S, Napier Hamilton.

KANE: Okay. And your current address?

5 HAMILTON: [REDACTED].

KANE: And your date of birth?

HAMILTON: [REDACTED]

KANE: Your current occupation, position?

HAMILTON: Yeah, a lawyer.

10 KANE: Okay. And are you - got your own practice, or are you - what's your -

HAMILTON: I am at - I'm at a law firm.

KANE: Do you know - and the name of that law firm?

HAMILTON: Yeah, Maurice Blackburn Lawyers.

KANE: Okay. Thank you.

15 HAMILTON: Yeah.

KANE: And how long have you been a practising lawyer for?

HAMILTON: I've been a practising lawyer since May 2016.

KANE: Okay. And have you always been with Maurice Blackburn Lawyers?

HAMILTON: Yes, I have.

20 KANE: Okay. Thank you. Now are you, or have you ever been, a Member of the Australian Labor Party?

HAMILTON: Yes. I've been a member of the Labor Party since 2010.

KANE: Are you currently -

HAMILTON: I'm currently a member.

25 KANE: And what branch do you belong to?

HAMILTON: At a State level? Or, like, New South Wales -

KANE: Yeah.

HAMILTON: - but the branch would be Arncliffe, Wolli Creek.

KANE: Thank you. And have you ever been a member of the Country Labor Party?

HAMILTON: No.

KANE: And have you ever been a Member of the Australian Young Labor?

5 HAMILTON: So you're - if you're a Member of the Labor Party and you're under the age of, maybe 26, then you're automatically a member of Young Labor.

KANE: Thank you.

HAMILTON: And I have been a member of Young Labor.

KANE: And did you hold any Executive level with the Australian Young Labor?

10 HAMILTON: Sorry, just to distinguish. There's Australian Young Labor and there's New South Wales Young Labor.

KANE: Okay.

HAMILTON: And so I was on the executive of New South Wales Young Labor. I was in General Executive for some time, and previously, before that, I was a Member of one of their policy committees.

15 KANE: Okay. Thank you. Thanks for clarifying that.

HAMILTON: That's Okay.

KANE: And have you ever been an employee of the Australian Labor Party or Country Labor Party?

20 HAMILTON: So again, there's a State, Federal distinction. I've been an employee of the New South Wales Labor Party in their Head Office, and that was from about - shortly before the Federal Election in 2013. So around July I started in 2013 through to about May or June, 2015 -

KANE: And what -

25 HAMILTON: - following the State Election in 2015.

KANE: And what role did you - were you engaged and employed with the New South Wales Branch of the Australian Labor Party?

HAMILTON: Yeah. So I think my official title was Digital Campaign Organiser. So that role involved all kinds of things. But primarily the social media aspect of their campaigns. So that was in relation to the 2013 Federal Election and the 2015 State Election.

30 KANE: Okay. Thank you. And how long did that employment last till?

HAMILTON: So I was employed until - I can't remember the exact date - but it was shortly after the State Election in 2015. And so I think I was employed until about May, 2015.

35

KANE: And have you ever been employed, or engaged by, any local or State member for the Australian Labor Party, New South Wales Branch?

5 HAMILTON: I think I did temporary work at one point for John Robertson. But that was only one month of work. And he was the Opposition Leader at the time, but I was in his electoral office as a temporary employee. And I think separately to that I did a very brief period of work for Chris Bowen.

KANE: Okay. And that was in his Federal office?

HAMILTON: His Federal office -

KANE: Yeah.

10 HAMILTON: - yes.

KANE: And have you ever been a volunteer for the Australian Labor Party, or Country Labor Party?

HAMILTON: This - yeah. So I've been a volunteer for the Australian Labor Party.

15 KANE: And in what capacity? What duties would you perform as a volunteer member, for the ALP or Country Labor Party?

HAMILTON: Yeah, it's really a bit of everything. So it's hard to distinguish between just volunteering for them, volunteering for Young Labor, and doing work for Head Office. But in summary, it's really, the volunteer side of things is, you'll either doorknock on weekends, or you'll do phone calls at night, or you'll go to campaign events, occasionally fundraisers, really just promoting the party externally at an electorate level. But separately to that, I think there's you would also do work around - for example, in Young Labor, if you're involved in the executive of Young Labor, you'd spend quite a lot of time organising events, attending events, doing policy papers, attending various Young Labor functions. And so it's - yeah, there's quite a wide of variety of things that you do as a volunteer.

20

25

KANE: Okay. And are you, or have you ever been, a member of the Chinese Friends of Labor?

30 HAMILTON: No. You, you can't - because, my understanding is Chinese Friends of Labor is a Labor Action Committee, which is a kind of community group within the Labor Party that's affiliated to the Labor Party, and there's a number of those committees. But I don't think they have a sort of formal membership per se. I mean, I could be wrong on that because I'm not too familiar with the rules around that area but I certainly have never been a member of Chinese Friends of Labor, if they have a membership.

35

KANE: Do you know if there's a difference between the Australian Labor Party and Country Labor Party at all?

HAMILTON: My understanding is that Country Labor Party is - there are certain Members of Parliament that are aligned with the Country Labor Party and that the Country Labor Party is focussed on regional - rural/regional seats in New South Wales. I'm not exactly sure what the boundaries are,

40

5 but my understanding is that they - I think Port Stephens, for example, is part of the Country Labor Party, Queanbeyan, that sort of area, or Eden-Monaro, as the State seat is called, is part of the Country Labor Party. And so there is a separation in terms of - the Country Labor Party is focussed on rural/regional seats, whereas the New South Wales Labor Party is focussed on, you know, inner city/outer suburban seats. And I think that's the primary distinction. I think they have a different internal objective and they've also got a Country Labor Party Organiser. But a Country Labor Party Organiser is based in the same building.

10 KANE: Okay. Thank you. Do you know if there's, like, a executive, or board of directors, for the Chinese Friends of Labor at all?

HAMILTON: I wouldn't be able to tell you. I think there's a convenor, but I can't remember whether there's an executive.

KANE: Okay. Do you know who the convenor might be?

15 HAMILTON: No. Sorry.

KANE: And do you know what role, if any, Ernest Wong MLC, may have with the Chinese Friends of Labor?

20 HAMILTON: Well - So Ernest was obviously a member of the Legislative Council, he was very well known in the Chinese community. He, I think, was - I don't know whether he was the convenor of Chinese Friends of Labor - but he was certainly involved in it. And he was very active in the group. And on various occasions would organise fundraisers for the Chinese Friends of Labor that were raising fund for the party.

25 KANE: Okay. Do you know what role, if any, a gentleman by the name of Jonathan Yee may have with the Chinese Friends of Labor?

HAMILTON: I know he owns a restaurant and he probably assists with the fundraisers, but that's - I don't know him personally.

KANE: Okay. Do you know what restaurant he may own?

HAMILTON: I think it's called Emperor's Garden.

30 KANE: Okay.

HAMILTON: I think it's on Dixon Street.

KANE: Okay. And how do you know that?

35 HAMILTON: Because I've read at various points in newspapers that he owns it. I think I've been at the - honestly, I cannot remember what restaurant it is, but I think I have been to his restaurant at one point as well.

KANE: He owns a restaurant in, what, in Chinatown?

HAMILTON: In Chinatown, yeah.

KANE: And -

- HAMILTON: But I know that he has been involved from time to time with fundraisers, but I don't know him personally.
- KANE: Yeah. And do you know how regularly the Chinese Friends of Labor would hold a political fundraising event for the Australian Labor Party?
- 5 HAMILTON: Look, at a guess, I would say about every 6 months. Maybe ever 12 months. But they're pretty haphazard.
- KANE: And would these Chinese Friends of Labor functions usually occur at The Eight Restaurant at Haymarket?
- 10 HAMILTON: Yes. When I first started they were in restaurant called, Zilver. But then basically since by 2011, '12, they've been at The Eight Restaurant.
- KANE: And have you ever been a volunteer at a Chinese Friends of Labor function at The Eight Restaurant , Haymarket?
- HAMILTON: I have.
- KANE: On many -
- 15 HAMILTON: I -
- KANE: On how many occasions would you say?
- HAMILTON: Well because I was in Young Labor we often got asked to help out at fundraisers. I'd probably say - I mean there were a lot of functions held at Eight Restaurant, not just Chinese Friends of Labor, because they're kind of convenient restaurants to hold functions in. But for Chinese Friends of Labor I'd say I was a volunteer on maybe, between five and 20. Yeah -
- KANE: And -
- HAMILTON: - over the course of 10 years.
- 25 KANE: And as a volunteer at these type of events, what would your roles and responsibilities be during these events?
- HAMILTON: Yeah, so, Young Labor volunteers - and it was always, I'd always be volunteering as a Young Labor volunteer - would be tasked with standing at the door and directing people to tables, and sometimes they would assist with - I'd say more often than and not - they'd assist with collecting raffles - raffle money from guests at the dinner. They're various, various types of tasks, not particularly glamorous work.
- 30 KANE: And prior to these events are the volunteers given a briefing at all by any person?
- 35 HAMILTON: Like, obviously my, my memory is a bit vague with some of these dinners, but, you know, I would say, generally speaking, the person that was involved with organising the function, or at least organising the volunteers, would give a brief introduction at the beginning prior to those people going out and collecting funds.

KANE: And would that person be someone from the Chinese Friends of Labor in this instance, or someone from Head Office?

5 HAMILTON: Again, I think it depends on the dinner. It's not always the same. But in the past it's been, you know, it could be the State Organiser, it could be the Community Relations Director, it could be someone else. It could be someone from Young Labor -

KANE: Yeah.

HAMILTON: - so it just depends.

10 KANE: And do you know who the State Organiser may have been, roughly in 2015?

HAMILTON: In 2015 it was David Latham.

KANE: And you said also the Communications Director?

HAMILTON: Kendrick Cheah.

KANE: Okay.

15 HAMILTON: And, sorry, not Communications, Community Relations Director -

KANE: Sorry. Thanks.

HAMILTON: - or whatever his title is. Yeah.

KANE: Okay. Now, do you know if you actually attended the Chinese Friends of Labor function at The Eight Restaurant, Haymarket, on the 12th of March, 2015?

20 HAMILTON: I cannot remember whether I attended that function. I've checked my diary and it's not in there. That doesn't necessarily mean that I didn't attend it. I've attended - I attended quite a lot of functions around that time on behalf of parties. I was also working for the party. I think I attended it, but I, I cannot tell you with certainty. But I could potentially get a record of that at a later point.

25 KANE: That's all right. Thank you. And I think you said previously that part of the roles of the volunteers during these events would be usher people to their seats, but also sell raffle tickets.

30 HAMILTON: Yeah.

KANE: Would someone who wanted to purchase raffle tickets have to fill out a particular form?

HAMILTON: Yeah. So in my experience, what happens at these functions is, on the table - it's usually - sorry. I should have said that Young Labor volunteers also help set up the dinner beforehand as well.

35 KANE: Okay. Yeah.

5 HAMILTON: And so they put things on tables. And included in those things that all right put no tables, are often forms for raffle tickets. And they're basically, you know, forms that explain, you know, what it is you can win if you win the raffle. And then there's a declaration, and you have a part - a section, for whether you're donating cash, or you're donating by credit card, and your credit card forms can be put on the form - your credit card details can be put on the form.

KANE: Okay. So the method - I meant to say the method of payment can be cash -

10 HAMILTON: Yes.

KANE: - cheque, credit card -

HAMILTON: Yeah. Definitely credit card and cash. I think they can take cheque as well. They, they, I'm, like -

KANE: Yeah.

15 HAMILTON: Yeah. I don't think I ever took any cheques.

KANE: Okay. All right. And what would you do with - once those forms are filled out and completed as a volunteer, what would happen with the forms or cash or cheques that were collected as part of the raffles?

20 HAMILTON: Yeah. So at the beginning, prior to the raffles being - the raffle money being collected, people are usually given a bag, and that bag has in it raffle tickets, and it has additional forms that you wouldn't, that, you know, the same forms that are at the table, these bags usually have extra forms in them as well. And then you're given a sort of, usually a quick briefing at the beginning, before you go out to collect the money, and

25 then you go out to the tables and essentially people are distributed certain tables at the dinner, and the volunteers' task was going out to those tables and asking whether anyone wants to be part of the raffle. Yeah.

KANE: I think we discussed this probably at the commencement of this interview, but is it a common practice that someone who has already purchased a seat at these events, and purchased raffle tickets, would also make a cash or a further donation at these fundraising events?

30 HAMILTON: Yeah, I, I've never seen anyone make a extra cash donation beyond the forms. So I mean sometimes, someone's, sometimes someone might make a extra donation, but you would be told to fill out a form or a -

35 KANE: So it would be like a declaration form, or a -

HAMILTON: Yes.

KANE: - donation form, or something like that?

HAMILTON: Yes. Yeah, you'd have to, you'd have to ask them to fill out a donation form -

40 KANE: Okay.

HAMILTON: - yeah.

KANE: Okay.

HAMILTON: And the - I never, I never usually see - in fact I can't recall any time that I've seen someone give a donation that wasn't raffle related -

5 KANE: Yeah.

HAMILTON: - so, because usually the Young Labor people are collecting raffle tickets. Yeah.

KANE: And at the conclusion of the event, after the raffles and that -

HAMILTON: Yeah.

10 KANE: - you - you've got bags with these forms in it you would collect from the tables, hand out further -

HAMILTON: Yeah.

KANE: - ones, if required. Where would that money, who would that money be provided to?

15 HAMILTON: Yeah. So you'd be collecting it in the - you could be collecting it in the bags and then you'd take the bags over to whoever the person was that was the local point person for volunteers. And that, the bag of money would essentially be given to that person.

KANE: Okay.

20 HAMILTON: Yeah.

KANE: I think previously we've talked about, it could be possibly someone like the State Organiser, or it could be the Community Relations -

HAMILTON: Director, or -

KANE: - Director .

25 HAMILTON: Or it could be a Young Labor person who then - yeah. I, I was never the point person, so I -

KANE: Yeah.

HAMILTON: - can't tell you what happens after that. But -

KANE: Yeah.

30 HAMILTON: - you would give the bag to that person.

KANE: And is that person responsible for counting the money and reconciling the declaration forms?



HAMILTON: I'm not sure. I would say, not always. That someone would do it, either probably back at Head Office. But I was never involved in that sort of side of it, so, I'm about to.

5 KANE: Would the money be taken back to Head Office that night, or would it be someone's responsibility to -

HAMILTON: Yeah. Again, I couldn't tell you. Head Office is very close to the dinner, so, you know, it's about a 10 minute walk from the dinner to Head Office. So I think that usually it would just be taken straight back.

10 KANE: And at these events, were there different classes of tables that could be purchased for the fundraising events?

HAMILTON: In my experience, no. I mean, you - there's the form here and -

KANE: Okay.

HAMILTON: - it does -

15 KANE: Well so we'll just - this is the invitation reservation form for the Chinese Friends of Labor dinner for the 12th of March, 2015 at The Eight Restaurant -

HAMILTON: Yeah.

KANE: - Haymarket. And here it has, A person could purchase a seat at the - for \$80.00 -

20 HAMILTON: Yeah.

KANE: - a table of 10 for 800, or a - \$2,000.00 for a VIP table. So -

HAMILTON: Yeah. So -

KANE: - there was -

25 HAMILTON: - ordinary tables and probably - yeah, and I think the VIP table would usually be the one that's, you know, put next to whoever the guest speaker is and -

KANE: Like a Head Table with the dignitaries or the -

HAMILTON: Yeah.

KANE: - the people -

30 HAMILTON: Yeah.

KANE: - that promoted the event?

HAMILTON: But I should say that's not always the case. I mean, it appears to be the case for this dinner, but often it's the case that, I think, the tickets are just sold for the tables and then someone else decides, basically, like, you

know, these are reasonably important people, so they go to the front of the room basically.

KANE: Okay.

HAMILTON: But the tickets, the tables I think, often are the same, the same price.

5 KANE: Okay. So the, the prices indicated on this reservation form are -

HAMILTON: Yes.

KANE: - are roughly for what someone would pay for these type of event? \$80.00 a seat, or 800 for an ordinary table, and \$2,000.00 for a VIP table?

10 HAMILTON: Yeah. Again, again though, like, I don't remember the VIP table option being available on most forms. But, yeah, look, 800, 800 to \$1,000.00 is usually the price for those kind of dinners, I would have thought.

KANE: And have you ever heard -

HAMILTON: Plus or minus a few -

15 KANE: Have you ever heard of a class of table, VVIP?

HAMILTON: No.

KANE: Okay.

HAMILTON: Yeah. [LAUGHS]

KANE: So there wouldn't be another class above VIP, being a VVIP?

20 HAMILTON: I, I've never heard of the acronym, VVIP.

KANE: Okay.

HAMILTON: Like, I can't, I can't tell you off the top of my head -

KANE: Yeah -

HAMILTON: - whether there's -

25 KANE: - that's fine.

HAMILTON: - classes as -

KANE: And at these things you've got - like, and you, you've got, like, a Head Table where you've got your special guests -

HAMILTON: Yes.

30 KANE: - or dignitaries with -

HAMILTON: Yeah.

KANE: - a seat. Are people able to buy a seat at that Head Table with the dignitaries?

HAMILTON: Sorry, what, what do you, what do you mean?

KANE: So if we use this example again -

5 HAMILTON: Yeah.

KANE: - the Chinese Friends of Labor, you've got Mr Bill Shorten, you've got Luke Foley, and Ernest Wong -

HAMILTON: Yeah.

KANE: - appears to be the -

10 HAMILTON: Yeah.

KANE: - dignitaries, VI, sorry, the guests for this event, would that - I'd, I'd say they, they would be seated at, like, a Head Table with maybe other high-ranking party officials.

HAMILTON: Yeah.

15 KANE: Could someone from the public purchase a seat at their table if they wanted to?

HAMILTON: Well, you know, I mean, I can't tell you off the top of my head, but how I imaged this one worked was the VIP table is - the tables clustered around those people -

20 KANE: Okay.

HAMILTON: - so -

KANE: But no one could sit at their actual - sit with Mr Shorten? They couldn't purchase a seat with Mr Shorten and Mr Foley, or Ernest Wong?

25 HAMILTON: I, I don't remember you ever being able to particularly purchase individual seats next to these people, but, but I imagine how this one worked was, the VIP table was - it is the table with Shorten, Foley, Wong, or one of the tables around it.

KANE: Okay.

30 HAMILTON: That, that, I, I don't remember ever seeing a fundraising form where it's, like purchase a seat next to -

KANE: Yeah.

HAMILTON: - Luke Foley.

KANE: And as a volunteer, would you be given, like, a floor plan of the event and where the different tables are allocated?

35 HAMILTON: Yes. Yeah, it was usually included in the bags that you're given.

KANE: And how -

HAMILTON: And they'd just circle the tables that you're responsible for.

KANE: And how would you differentiate between different tables? Are there  
5 different coloured, between an ordinary table and a VIP table, there  
would be just -

HAMILTON: No, they've just got numbers, so, so on the floor plan you've got the  
numbers of the table, and they just circle them and then you're the ones  
responsible for those.

KANE: And are people's name tags at the tables, or -

10 HAMILTON: Yeah, they're not usually that organised.

KANE: Fair enough.

HAMILTON: Yeah.

KANE: Okay.

HAMILTON: Yeah, usually, usually it's a case of, There is the list in the front of the  
15 venue, and then you're just told to go, just fill a table.

KANE: You said that you've been to a number of events at The Eight Restaurant,  
Haymarket -

HAMILTON: Yes.

KANE: - and that the Chinese Friends of Labor dinner -

20 HAMILTON: Yeah.

KANE: - how many people would normally attend these type of events?

HAMILTON: I don't know what the capacity of Eight Restaurant is, but, I mean,  
sometimes the venue's sort of cut off a little bit. At a guess, look, the  
capacity is, it's probably about, probably about 30 tables. 30 to 40 -

25 KANE: And if there's -

HAMILTON: - 10 to a table.

KANE: - a table of 10 -

HAMILTON: 10 people to a table. So -

KANE: That's about 300 to 400 people.

30 HAMILTON: Yeah. Yeah, potentially. But it just depends on the event. I mean,  
sometimes they, you know, divide up the restaurant so some of it is open  
to the public and other parts of it are closed off. But usually, I should say  
that usually the Chinese Friends of Labor dinners are well attended. So  
usually they fill them up.

KANE: Okay. And are the special guests like Mr Shorten, Mr Foley, Mr, are they required to pay for a seat at the table for these events? Or would they -

5 HAMILTON: I, I don't think so. I'd be surprised if they, if they were. I can't really say for every single dinner, but they're, they're guests, so they don't usually pay.

KANE: And would it be unusual at these type of events that a person would make a separate donation, over \$1,000.00, other than purchasing raffle tickets or a seat at the, the event?

10 HAMILTON: Over \$1,000.00? I don't, I don't think so. I don't think so.

KANE: So if -

HAMILTON: But occasionally there were auctions. You might get over 1,000 with an auction. But, but yeah, you'd, usually, generally speaking, I've never seen anyone donate over \$1,000.00. Or I might have, but I just can't recall.

15 KANE: Yeah. Yeah. But if someone, for -

HAMILTON: You, you do -

KANE: - argument's sake -

HAMILTON: - get a lot of money per table. But usually they chuck in with, like, 100 bucks so you've got 200 bucks. So -

20 KANE: Would it be a common practice that someone would pay a \$5,000.00 donation above any raffle tickets -

HAMILTON: No.

KANE: - one - well 5,000 for the Australian Labor Party, and another \$5,000.00 towards the Country Labor Party? So all up, a \$10,000.00 donation?

25 HAMILTON: I've never seen that happen.

KANE: All right.

HAMILTON: Yeah.

KANE: Would and, would, if someone did make that would that be something that would stick in your mind and -

30 HAMILTON: Probably -

KANE: Yeah.

HAMILTON: - yeah.

KANE: And what would happen? Would you have to get an official from the Head Office to handle that money or to make sure it's properly reconciled? Or -

5 HAMILTON: Well I, I don't know. And I say that because I don't think I've ever seen more than \$1,000.00 donated, myself.

KANE: Okay. Is this - and we use -

HAMILTON: But, but then again -

KANE: - the 2,000 -

HAMILTON: - it's a long time ago.

10 KANE: Yeah. If we talk about March, 2015, was there a cap of how much a person could donate to the political party, or to a constituent - not a constituent - a -

HAMILTON: Is there a -

KANE: - a local member?

15 HAMILTON: - cap? Is there a cap?

KANE: Yeah, a cap.

HAMILTON: Yeah, well, I mean I can't remember what the cap was back then. I know it's, like, \$5,500.00 to a State Party now, and I think it's 2,750 to a candidate. I could be wrong on those figures.

20 KANE: No, no. But, yeah -

HAMILTON: I think it's an indexed amount, and back then - I can't remember exactly what it was but it might be on the form. So it says, it says here, "I have not exceeded the \$5,000.00 cap which I can donate to this candidate."

KANE: Okay. So that's -

25 HAMILTON: Yeah.

KANE: - part of the declaration. The bottom of these forms -

HAMILTON: Yes. So usually, usually the, like, the amount is specified on the form.

KANE: Okay. And how much money would normally one event like Chinese Friends of Labor, would generate through their fundraising events?

30 HAMILTON: I don't, I don't think I ever saw the collective figures. But it would be, it would be thousands your dollars. But I don't, I've never seen the - I didn't do any of the finance or anything at the other end. I mean, we sometimes, sometimes in my capacity as digital guy we did, like, donation forms on the website, and we'd, you know, we'd export the form and then send it to our finance people. But I can't remember exactly how much it was. It would have been thousands of dollars, and obviously that

35

form that's done through the website wouldn't take into account donations that are made at the dinner.

KANE: Okay.

HAMILTON: Yeah.

5 KANE: Is there some, any, as a volunteer, would there be any feedback or a debrief of how much money was raised at an event such as the Chinese Friends of Labor dinners and that?

10 HAMILTON: No. No. You would, you've finished with the donations, you hand it back to the point person and that's, that's it. Yeah, you're done. You get a meal.

KANE: Do you know a gentleman by the name of Xiangmo Huang?

HAMILTON: Again, I've seen him referenced a lot in the media recently. I think I have seen him at dinners before, but I don't know him at all. And I can't tell you whether he was present at this dinner, but apparently -

15 KANE: Okay.

HAMILTON: - from, presumably his, he was -

KANE: All right.

HAMILTON: - but I'm just looking at the photo. Yeah, so it looks like he was there.

20 KANE: Yeah. So just for the reference, we, we're looking at a photograph taken from the ABC website of attendee - of some of the attendees at the 2015 Chinese Friends of Labor. And Mr Xiangmo Huang appears to be in that photograph beside Mr Foley and the - its the Treasurer - the Opposition Treasurer.

HAMILTON: Maybe Chris Bowen.

25 KANE: Yeah, it looks like -

HAMILTON: Yeah, I'm not, I'm not -

KANE: - Chris Bowen.

HAMILTON: - I'm not sure -

KANE: Yeah, it appears to -

30 HAMILTON: It's -

KANE: - be - it might be -

HAMILTON: - it's not a great photo.

35 KANE: - Chris Bowen there. Now it's the Commission's understanding that you may have, in your previous role with the Australian Labor Party, New South Wales Branch -

HAMILTON: Yes. Yeah.

KANE: - as you're a Digital Media Officer -

HAMILTON: Yeah. Kind of.

KANE: - that -

5 HAMILTON: Kind of, whatever.

KANE: - that you created -

HAMILTON: (UNDECIPHERABLE)

KANE: - you may have created the Chinese Friends of Labor invitation reservation form for the 2015, March, 2015 event.

10 HAMILTON: Yeah.

KANE: Would that be something that would be within your role at the time?

HAMILTON: Yeah, it was, yeah. I did a lot of design work when I was, when I was there.

KANE: So I've got a copy of it here, does -

15 HAMILTON: Yeah.

KANE: Would that be - appear to be something that you would normally - appear to be part of your work? Is it -

HAMILTON: Yeah. I, I often produce those kind of invitations.

20 KANE: Okay. Now can you just outline what, how you would generate a form like this? What feedback or what instructions you would receive, and who would give you those instructions?

HAMILTON: So the answer to that again, it depends. And so it's, what, what it is, is, there'll be someone that's a point person in Head Office, usually for organising a fundraiser. They might not be the ones that are actually organising it, but they're the ones that are in contact with the person who is organising it. And so there'll be a request that's sent through to Head Office, either informally, like, on the phone, or by email, whatever, to produce a invitation form for a fundraiser. And then we've got a standard template that we work with in design, totally in design. And so

25 30 most of the invitations around that time you'll see look pretty similar. And you've got sort of basic, you know, you've got your basic look for the credit card part of the form, and then you've got a declaration. And often that declaration can be changed depending on whether it's a Federal fundraiser, whether it's a State fundraiser, and obviously the ticket prices change depending on the dinner. And the details on this - on the left-hand side of the form - including the photos and the guests and that, that all sort of changes depending on, depending on who the person is that's

35 requesting it. But usually someone will, usually someone will request



that you produce this form, and you'll just gather all the details from them, chuck them into the template, and then kick it off.

KANE: Okay.

HAMILTON: Yeah.

5 KANE: So, someone similar to the Community Liaison Director, Kenneth Chee, may ask - come to you and say -

HAMILTON: Yeah.

KANE: - "We're organising the - this Chinese Friends of Labor" -

HAMILTON: "Can you produce the invitation?"

10 KANE: So you would draft something up, and then would you give it back to Mr Chee and then he would send it off to someone to get feedback, and changes, or -

HAMILTON: Yeah. I mean, off, often it would be the case that there's a bit of back and forth.

15 KANE: Yeah.

HAMILTON: It depends on the flyer. Sometimes you do it right the first time. But often there are sort of changes. So, I mean, on average you'd sort of go back and forth, maybe two or three times until you got that flyer into some sort of -

20 KANE: But once it's -

HAMILTON: - order.

KANE: Once it's finalised, are, is it then your responsibility to have the invitations printed off? Or whose responsibility is that?

25 HAMILTON: Yeah. It's not my responsibility. They'll probably, they'll usually send it to one - this, this flyer will often be sent out by email to, like, at least the people that might be interested in the fundraiser. Sometimes I would probably print it. But generally speaking I think it's just sent off to whoever it is, and then they take it from there.

30 KANE: And would also design the - this one's the invitation, reservation form, for purchasing tables and that at the event -

HAMILTON: Yeah.

KANE: - would you also design the raffle ticket?

HAMILTON: No. I think that was a separate invitation form. Or a separate template that they just had that they used for -

35 KANE: So that wasn't one of your responsibilities as well as doing the -

- 5 HAMILTON: I mean, I might have. I might have done one from time to time, but from memory the, the donation forms for raffle tickets were substantially different when it's, when it's good-looking as these kinds of flyers, that were a, I think just a Word document that was a template that they just kicked off. I mean, maybe from time to time these forms were put on the tables as well. But, but as you can see, it's just largely for ticket purchases. I think there was a separate form for - there was a separate form for raffle tickets.
- KANE: Okay. Yeah.
- 10 HAMILTON: And that was just used at all dinners, basically. Yeah.
- KANE: But ideally, similar information as on the right-hand corner of this reservation form would need to be included in the ticket money which gives the person the opportunity of how they want to make the purchase, method -
- 15 HAMILTON: Yes. It -
- KANE: - of payment -
- HAMILTON: - is a similar method of payment.
- KANE: And that, and the second one, the declaration not being a prohibited donor?
- 20 HAMILTON: Yeah, I, honestly, as to the declaration I have - I have no idea. I just can't tell you off the top of my head what those forms said, 'cause I, they never really came through me, so -
- KANE: Yeah. And it mentions in the declaration, a prohibited donor. What -
- HAMILTON: Yeah.
- 25 KANE: Who or what is a prohibited donor from making a, a political donation?
- HAMILTON: So in New South Wales I think it's tobacco companies and related entities, and liquor companies and related entities gambling, I think. I can't tell you off the top of my head. But I, I think that's the list of things, but there might be others as well.
- 30 KANE: Okay.
- HAMILTON: Yeah.
- KANE: That's fine. And -
- HAMILTON: I definitely was not a lawyer at the time, although I was studying.
- KANE: Yeah. And, sorry.
- 35 MOORHOUSE: Lost it?
- KANE: Yeah, it's gone. Is there anything you'd like to ask, Kelly?

MOORHOUSE: No. No.

KANE: Okay. Is there anything further, Lewis, that you think may be relevant to our inquiries that we haven't discussed here today at all?

HAMILTON: Not a, no, not that I, not that I can think of.

5 KANE: Okay.

MOORHOUSE: When you worked at - you worked at the ALP New South Wales Headquarters -

HAMILTON: Yeah, on -

KANE: - in your second -

10 HAMILTON: - Sussex Street.

MOORHOUSE: - year.

HAMILTON: Yeah.

MOORHOUSE: Yeah.

HAMILTON: Yeah.

15 MOORHOUSE: Did you have an office or -

HAMILTON: No.

MOORHOUSE: - anything like that?

HAMILTON: We worked on what was called the polyhedron, which was a polyhedron shaped desk that contained I think, seven, six or seven people. We called it a polyhedron 'cause it sounded cool.

20 MOORHOUSE: Yeah.

HAMILTON: Probably - better it was open-plan.

MOORHOUSE: Open-plan. So -

HAMILTON: Yeah, so I didn't get my own office, unfortunately.

25 KANE: Stitchin' you -

MOORHOUSE: So there was a lot of tables and stuff that were in the middle. And was it like a -

HAMILTON: Yeah.

MOORHOUSE: - hot desk kind of thing that you just grabbed a -

30 HAMILTON: It wasn't a -

MOORHOUSE: - spot, or

- HAMILTON: - hot desk, we had our own places.
- MOORHOUSE: You had your own places?
- HAMILTON: But it was, yeah, it was just a, a, I can't describe what the shape was, but it was just this -
- 5 MOORHOUSE: No, that's okay.
- HAMILTON: - this desk, and then you'd have one person at each end, and then there were two on both of -
- MOORHOUSE: Yeah.
- HAMILTON: - of the sides.
- 10 MOORHOUSE: And -
- HAMILTON: So -
- MOORHOUSE: - there was offices as well around there?
- HAMILTON: Yes.
- MOORHOUSE: Or other employees?
- 15 HAMILTON: Yeah.
- MOORHOUSE: Who sat near you? Do you remember?
- HAMILTON: Yeah. So the, do you want me to name them, or do you want the positions?
- MOORHOUSE: No. Just name them, yeah.
- 20 HAMILTON: Yeah. So the, so Kendrick sat across from me, a guy called Zac, who did all the data management, like, data analysis for campaigns -
- MOORHOUSE: Yeah.
- HAMILTON: - he sat with us.
- MOORHOUSE: Yeah.
- 25 HAMILTON: My other half, which was a guy called John -
- MOORHOUSE: Yeah.
- HAMILTON: - he, we job-shared because he was also at uni and I was at uni, so we job-shared. And then at various time someone else sat on the end. But that was - they were sort of interchangeable.
- 30 MOORHOUSE: Okay.
- HAMILTON: And I think that was it, actually. I think -

MOORHOUSE: And -

HAMILTON: - the other two were sort of - one was taken from time to time and the other vacant.

MOORHOUSE: Okay.

5 HAMILTON: Yeah.

MOORHOUSE: So, this was 2015. Were you, like, you said you were job-sharing. Was it part time? Like, what sort of hours were you doing? Do you remember?

HAMILTON: Yeah, I was going a lot of hours.

10 MOORHOUSE: Yeah.

HAMILTON: And so I -

MOORHOUSE: It wasn't really -

HAMILTON: - think I was -

MOORHOUSE: - part time.

15 HAMILTON: I think I was doing 3 days a week -

MOORHOUSE: Okay.

HAMILTON: - and uni full time.

MOORHOUSE: Yeah. Yeah.

HAMILTON: So you can imagine how busy that was.

20 MOORHOUSE: Yeah.

HAMILTON: But I'd often do more than that as well. Like, I do weekends.

MOORHOUSE: Yeah.

HAMILTON: So.

25 MOORHOUSE: And around the time of this - I know you said you can't remember whether you attended or not, but do you remember being in the office around that time? Is there a - can you recall anything?

HAMILTON: Sorry? Around the time of the dinner?

MOORHOUSE: The dinner, yeah, 2015. Is there anything -

HAMILTON: Like, there would have been, but I can't, I can't remember. Yeah.

30 MOORHOUSE: So -

HAMILTON: I just can't remember what happened.

- MOORHOUSE: - if, you mentioned that you've seen Mr Huang through the media and, like -
- HAMILTON: Yeah.
- MOORHOUSE: - you've become aware of him. Did you ever see him in the office?
- 5 HAMILTON: No.
- MOORHOUSE: No?
- HAMILTON: I don't think so.
- MOORHOUSE: Because you couldn't - you really couldn't recall -
- HAMILTON: The thing is -
- 10 MOORHOUSE: - who he was -
- HAMILTON: The thing is, right, like, at that time in 2015, he wasn't, like, no one really sort of noticed him.
- MOORHOUSE: No one knew him.
- HAMILTON: It's only sort of in the last few years he's sort of -
- 15 MOORHOUSE: Yeah.
- HAMILTON: Well after I left, that he's sort of hit off. So he wasn't in the, the office, I would never would've -
- MOORHOUSE: Yeah.
- HAMILTON: - I wouldn't have noticed. I don't remember seeing him in the office -
- 20 MOORHOUSE: Yeah.
- HAMILTON: - but I do, I think, remember seeing him at dinners.
- MOORHOUSE: Okay.
- HAMILTON: So.
- MOORHOUSE: Do you ever remember anyone counting money at the office?
- 25 HAMILTON: Well the, the thing is, the finance - so the finance people were kind of, like, quite far away in the office -
- MOORHOUSE: Okay.
- HAMILTON: - and in their own offices.
- MOORHOUSE: Yeah.
- 30 HAMILTON: And they would, I think, be the ones that -

MOORHOUSE: Yeah.

HAMILTON: - that count the money. So I, yeah.

MOORHOUSE: That's, - so you never saw, like, we've been using the example for the Chinese Friends of Labor have, the money would go to you. I think Kendrick Cheah, I think you've mentioned that, for that particular function money would go there. Would you ever see -

5

HAMILTON: I -

MOORHOUSE: - him with a large pile of money?

HAMILTON: Yeah. And can I just say that I don't remember seeing Ken, I don't particularly remember Kendrick being the point person.

10

MOORHOUSE: Oh, no, no, no, sorry. Not for this, but just for an example, like -

KANE: Yeah. Just as an example, like -

MOORHOUSE: Yeah.

KANE: - if Kendrick was in charge, or -

15

MOORHOUSE: Because he's the -

KANE: - if someone -

MOORHOUSE: - Community Liaison -

KANE: Or if whoever was in charge of it -

MOORHOUSE: Yeah.

20

KANE: - you'd give them the money at the dinner, and then -

MOORHOUSE: But your time -

KANE: - like, at, it would pretty -

MOORHOUSE: - back at the office, did you ever, was there anyone sitting around with the cash there, or it would go -

25

HAMILTON: Going to -

MOORHOUSE: - straight to -

HAMILTON: I, I can't remember -

MOORHOUSE: - it would go straight -

HAMILTON: - of anyone doing that. I'm pretty sure -

30

MOORHOUSE: Okay.

HAMILTON: - they just, like, dropped it straight off to the finance person.

MOORHOUSE: Straight to the finance.

HAMILTON: Yeah.

MOORHOUSE: To who it was.

HAMILTON: Yeah. And then they would just reconcile it, I think.

5 MOORHOUSE: Yeah.

HAMILTON: Yeah.

MOORHOUSE: Okay.

HAMILTON: And send out receipts and, like, whatever.

MOORHOUSE: Yeah. The money went -

10 HAMILTON: So -

MOORHOUSE: - the money went to the money people.

HAMILTON: Yeah.

MOORHOUSE: Yeah.

KANE: Yeah.

15 MOORHOUSE: Yeah.

HAMILTON: And I, like, I obviously knew them, but, like, they were over the other side of the office -

KANE: Yeah.

HAMILTON: - and in, and in an enclosed office, so -

20 MOORHOUSE: Yeah.

HAMILTON: - and they kind of kept to themselves, pretty much, so I didn't really - I didn't really have much to do with them in, unless they needed, for example, export of funds that were donated via the website or something like that.

25 MOORHOUSE: Okay. Yeah.

HAMILTON: So that would be my only interaction with them.

MOORHOUSE: Okay.

KANE: Okay. Have the answers recorded here today been made of your own free will?

30 HAMILTON: Yeah.



## NSW ICAC EXHIBIT

- 5 KANE: Has any threat, promise or offer of advantage been held out to you to give the answers as recorded here today?
- HAMILTON: No.
- KANE: Do you have any complaint to make about manner in which myself or Investigator MOORHOUSE conducted ourselves here today?
- HAMILTON: No. It's been good.
- KANE: The time by my watch is 1.51pm. This interview is now concluded. Thank you very much.

**INDEPENDENT COMMISSION AGAINST CORRUPTION**

**RECORD OF INTERVIEW BETWEEN SENIOR INVESTIGATOR MICHAEL KANE, INVESTIGATOR WAYNE SMITH AND SENIOR CORRUPTION PREVENTION OFFICER IRIS KIRKPATRICK OF THE INDEPENDENT COMMISSION AGAINST CORRUPTION AND FLORIS LAM AT ICAC BUSINESS PREMISES, LEVEL 7, 255 ELIZABETH STREET, SYDNEY ON 20 MARCH 2019**

**TIME: 4:53PM**

**PRESENT: SENIOR INVESTIGATOR MICHAEL KANE  
INVESTIGATOR WAYNE SMITH  
SENIOR CORRUPTION PREVENTION OFFICER IRIS KIRKPATRICK  
FLORIS LAM  
ROY YAU  
SARAH BUTLER - SOLICITOR**

KANE: This is a electronic record of interview between ICAC Senior Investigator Michael Kane, K-A-N-E, and Mrs Floris Lam, that's F-L-O-R-I-S Lam, L-A-M, at the premises of the Independent Commission Against Corruption, level 7, 255 Elizabeth Street, Sydney on Wednesday, the 20th of March, 2019. The time by my watch is 4.53pm. Also present is ICAC Investigator Wayne Smith. For voice identification, Wayne, could I have your full name, please.

SMITH: Yeah, Wayne Lindsay Smith.

KANE: Also present is ICAC Senior Corruption Prevention Officer Iris Kirkpatrick. Can you - for voice identification, Iris, could I just get your name and position, thank you.

KIRKPATRICK: Iris Kirkpatrick, Senior Corruption Prevention Officer.

KANE: Thank you. Also present is Cantonese interpreter Roy Yau. For voice identification, Mr Yau, could I get your full name and position, thank you.

YAU: Roy Yau, surname spelt Y-A-U, Cantonese interpreter from Multicultural NSW.

KANE: Thank you. Also present is Sarah Butler, solicitor for Ms Lam. For voice identification, Sarah, can I just get your name and position, thanks.

BUTLER: Sarah Louise Butler, Senior Associate, Holding Redlich.

KANE: Thank you. Ms Lam, apart from the persons that I've just announced, do you agree there's no other persons present in this room?

LAM: Yeah, I agree. Yeah.

5 KANE: Okay. As I've already explained to you, the commission's making inquiries into allegations of, of attempts to bypass the electoral commission's legislation in relation to the use of prohibited donors during the 2015 Chinese Friends of Labor function at The Eight restaurant, Haymarket. I intend to ask you further questions about this matter, which will be electronically recorded on this digital voice recorder. Do you understand that?

LAM: Yes.

10 KANE: Did you agree to have our conversation electronically recorded here today?

LAM: Yes.

KANE: Has any threat, promise or offer of advantage been held out to you to participate in this interview?

15 LAM: No.

KANE: Okay. Just for the record, could I just get your full name, please?

LAM: Floris Shuiyaah Lam.

KANE: Now, can you just spell your -

20 LAM: Floris, F-L-O-R-I-S, Shuiyaah, S-H-U-I-Y-A-A-H, surname Lam, L-A-M.

KANE: Thank you. And can I just get your current address, please. Your current address.

LAM: Oh, [REDACTED].

KANE: Thank you. And your date of birth?

25 LAM: [REDACTED].

KANE: And your current occupation or job?

LAM: Medical receptionist.

KANE: And where's that at?

LAM: In Canberra.

30 KANE: OK. Is that with a hospital or medical centre?

LAM: For a private surgery, yeah.

KANE: OK, thank you. And are, are you or have you ever been a financial member of the Australian Labor Party?

YAU: You mean, an average member?

KANE: Yeah, have you ever been a member of the -

LAM: Yes.

KANE: And how long have you been, or were you a member, of the Australian Labor Party?

5 LAM: Probably 6 years, I think.

KANE: Are you still a member today?

LAM: Yes.

KANE: And have you ever been a member of the Country Labor Party?

LAM: No.

10 KANE: Have you ever been a member of the Young Australian Labor?

LAM: No.

KANE: Have you ever been an employee of the Australian Labor Party or Country Labor Party?

LAM: No.

15 KANE: Have you ever been a volunteer for the Australian Labor Party or Country Labor Party?

LAM: Volunteer for the normal Labor, yeah.

KANE: And what duties did you perform as a volunteer?

20 LAM: When the campaign's coming, ask me to stand in the street, just putting the, you know, the information or something like that. Yeah.

KANE: So just handing out the leaflets -

LAM: Yes, yes.

KANE: - for the local candidate?

LAM: Yeah.

25 KANE: And what - whereabouts did you work as a volunteer handing out leaflets for the local candidate?

YAU: So, like, where, where -

KANE: What, what location did you -

LAM: Different year, different place, different time, different city, yeah.

30 KANE: So wherever they asked you to be, you just handed -

LAM: Yeah.

KANE: Are you a member of the Chinese Friends of Labor?

LAM: Yes.

KANE: And how long have you been a member of the Chinese Friends of Labor for?

5 LAM: I think - can't remember. Four - four - can't remember. Around four.

KANE: About 4 - 4 years?

LAM: 4 years around. I'm not quite remember.

KANE: Okay. And do you hold a position within the Chinese Friends of Labor?

10 LAM: I don't know it's a - I - not quite. Just - I'm looking after in Bankstown area. But I don't know if this call position.

KANE: Okay. So you look after people within the Bankstown area?

LAM: Bankstown Canterbury, yeah.

KANE: Okay. And is that your local area, is it?

LAM: Yes.

15 KANE: And what does that involve when - looking for - trying to get new members?

LAM: No. It's that they need volunteer or some, something. Then I call if any people can help. If they want to come to the Labor, then ask them to come join Labor.

20 KANE: Okay. Do you know who may hold other positions within the Chinese Friends of Labor - sorry, yeah, Chinese Friends of Labor?

LAM: It's my position or -

KANE: Like, like - no, no, like, it's like an executive group, a, a team that runs the Chinese Friends of Labor?

25 LAM: Yep. One's is Ernest Wong.

KANE: And what position does he hold with the -

LAM: I'm not quite sure. But always he ask us to do thing.

KANE: So, like, an organiser?

LAM: Yeah, sort of. Yeah.

30 KANE: Yep, yep, yep.

LAM: And John is - Johnathan Yee.

KANE: That's Y-E-E, I think?

LAM: Yep.

KANE: Yep.

LAM: And -

KANE: And what position does he have?

5 LAM: I think he's the president when - because they are not regular, have meeting or whatever.

KANE: Yeah, yep.

LAM: So I'm not quite sure, is - he's - I think he's the president at - is it 2015 you're talking about or this around 2000 -

10 KANE: Yeah. Well, well, well, is he still the president today?

LAM: No, no. As, as far as I -

KANE: How long has - was he the president for?

LAM: Can't remember.

KANE: Okay.

15 LAM: Yeah.

KANE: Okay. Anyone else that -

LAM: And that is Dominic Sin.

KANE: Dominic Sin?

LAM: Sin, yeah.

20 KANE: How - S -

LAM: D - Sin, I think's S-I-N.

KANE: Yep, Sin, yep.

LAM: Yeah, Dominic Sin. And -

KANE: What position does Dominic have with the Chinese Friends of Labor?

25 LAM: He is former councillor in Hurstville. So he sometime is organise something. Yeah, ask us to go for there.

KANE: Have you ever run for a local council or government at all?

LAM: Me?

KANE: Yeah.

- LAM: Yes, as a candidate, yes, in the local council. But I don't know - 2000 and something. Can't remember. And the 2015, I'm - they put my name down in - what they call - lower house or upper house?
- LAM (INTERPRETER): Can't remember whether he was lower house or upper house.
- 5 KANE: So if the - is this the state or federal?
- LAM: State, state.
- KANE: State. So what the, the -
- LAM: Help so many people under, under.
- KANE: Yep, yep. So what council did you run as a candidate for?
- 10 LAM: Canterbury.
- KANE: Canterbury?
- LAM: Yep.
- KANE: And what year was that, I'm sorry?
- LAM: Can't remember.
- 15 KANE: You can't remember. Okay. Sorry. We were talking about the Chinese Friends of Labor. So we had Dominic Sin.
- LAM: Yeah.
- KANE: Who else may hold like a, a -
- LAM: Johnathan Yee.
- 20 KANE: Johnathan Yee, yeah.
- LAM: And Ernest Wong.
- KANE: Yep.
- LAM: The other, can't remember if they're position or not. I don't know.
- KANE: Does Pinky Leung -
- 25 LAM: Oh, yeah, Pinky Leong is organiser. Is -
- KANE: She's an - like an organiser?
- LAM: Yeah. She's a top of me organiser.
- KANE: Okay. So I think it's L - is it L-E or L-U -
- LAM: L-E-U-N-G, yeah.

- KANE: Right, thank you. And how regularly does the Chinese Friends of, of Labor have political fundraising events?
- LAM: I think when the campaign is coming, I, I can't remember, really. Is a - I know that it's a big one, that's on 2015. That's - I remember that.
- 5 KANE: So is it prior to -
- LAM: It's maybe one - just only one per year. Just when the campaign is coming.
- KANE: About once a year, or is it once before every state election or federal election?
- 10 LAM: Yes, yes. For, for the elections coming -
- KANE: Yep.
- LAM: Yeah, they have one. Yeah.
- KANE: Okay. Do they have any other events other than trying to fundraise for the state or federal elections?
- 15 LAM: No.
- KANE: Were you a volunteer at the Chinese Friends of Labor function at The Eight restaurant, Haymarket on the 12th of March, 2015?
- LAM: Yes, I am.
- KANE: Were you a volunteer or an - or an organiser?
- 20 LAM: I'm a volunteer.
- KANE: Sorry, I -
- LAM: I'm volunteer.
- KANE: Oh, volunteer, yep.
- LAM: Yeah, under Pinky. Yeah.
- 25 KANE: OK. And what was your role as a volunteer at the 2015 Chinese Friends of Labor function?
- LAM (INTERPRETER): Working as a receptionist -
- LAM: I'm not reception -
- LAM (INTERPRETER): - to receive -
- 30 LAM: Like, people come - the guests coming, say, "Hello. How are you? Have a seat."
- KANE: So you escort - you would -



LAM: Yeah, escort. Yeah.

KANE: - greet people at the front.

LAM: Sort of.

KANE: And then take them to their people?

5 LAM: Table, yeah. And -

KANE: Did, did you have any other roles other than escorting guests to their, their, their seats or tables?

LAM: Yes. I am selling the raffle ticket. And then the - I also look after the raffle ticket gift when they draw, and then bring them the gift. Yeah.

10 KANE: And who did you have to report to as part of your - as a volunteer?

LAM: The Young Labor. Because when I - we - normally is, when you guessing - you know, the people who sit down or checking or whatever, then in the middle of sometimes we sell ticket. And then every one of the volunteer is look after table with one Young Labor to selling the ticket. But I can't remember how sell, if table or on hand. Can't remember. But they collect the money and just translate sometimes, say, "It's a raffle ticket," to some people. Yeah, that's my role. Yeah.

15 KANE: And prior to the 2015 Chinese Friends of Dinner - Chinese Friends of Labor dinner, did you receive any directions or instructions from anyone?

20 LAM: No, because we follow the rundown.

KANE: And where did you get that rundown from?

LAM: On the night, I can't remember who, it's Pinky or whatever, give, give us a rundown. And then we follow the rundown, what time do what. And then the table lists, what table number. Yeah, that's it. Yeah.

25 KANE: So as a, a volunteer who was showing people to the - their tables, were you given a list of all the guests and their - and their allocated table numbers or chair numbers?

LAM: We only had the table number when - in the reception, they came and what table number, and then we bring them to the table. That's it. We don't have the list of guests, what they are. Some I know. If I know, then I know. If someone I don't know, I don't know. Yeah.

30 KANE: Who would have had the, the list of the guests attending the functions and the seating arrangements?

LAM: That is from Pinky. So, yeah.

35 KANE: So Pinky would have had that list?

LAM: Yeah.

KANE: And as a volunteer, did you have to buy or pay for a seat at the, the Chinese Friends of Labor dinner at - in 2015?

LAM: No. We get a crew meal before the - before the event start.

KANE: So you get, like, a crew meal?

5 LAM: Crew meal, yeah, before.

KANE: Yep.

LAM: Like, eat something first. Yeah.

KANE: Yep. Do you know any of the other volunteers at the Chinese Friends of Labor function in March 2015?

10 LAM: Yes. I think I received the - some people in email for me. I have two friend, but I haven't a long time - haven't checked with them, so I don't know their update detail. If you wanted, I can give you the email.

KANE: If you would have a list of other volunteers and their contact details, who - just -

15 LAM: Can't - can't remember.

KANE: No, no. If, if you do have the -

LAM: Yeah, okay.

KANE: If you could please either give it to Sarah or email it to me, it'd be much appreciated.

20 LAM: Okay. I'll give it to Sarah to give you.

KANE: Okay. Thank you. Did you have any control or responsibility over any of the other volunteers?

LAM: Yes, I think so. I can't remember who, who I - but I, I know have few - two or three people. Because we separate the table to look after. But I

25 LAM: can't remember who's under me at the moment, at that time. Can't remember.

KANE: Okay. Were you given any instructions or directions about collection of cash, credit cards or cheque donations during the Chinese Friends of Labor function in 2015?

30 LAM: No, but I remember - so the rough - is it me? Oh, sorry. Just don't worry.

KANE: Okay.

LAM: Yeah. I just remember it's the raffle ticket I have to give back all - everything, but I don't collect the money. It's a Young Labor, they

35 LAM: collect the money. We just ask them to fill out the form. Yeah. And that's it.

KANE: So you didn't collect any donations on the night?

LAM: No.

KANE: That was the responsibility of the Young Labor volunteers?

LAM: Yeah.

5 KANE: And they had specific forms, was it -

LAM: Yeah.

KANE: - to - for the donors to fill out?

LAM: Yes.

10 KANE: Did you receive any written directions, including emails, before, during or after the function in relation to arrangements or feedback or any other matters in relation to the Chinese Friends of Labor function in 2015?

LAM: No, I haven't received before or after.

KANE: What happened with the money that you collected in relation to the donations - sorry, the raffle tickets you were selling on the night? What

15 happened to that money?

LAM: Well, I didn't touch the money. It's Young Labor. Because I'm just go with them to the table, and they could count, and then they do whatever. So that's all. Yeah.

KANE: So the Young Labor people were also selling the raffle tickets or -

20 LAM: Yes, me and one -

KANE: Yep.

LAM: - one Labor. Yeah.

KANE: Yep. Do you know what happened with the donation forms after the Young Labor people collected them from the various donors at the

25 Chinese Friends of Labor dinner in 2015?

LAM: I don't have a clue. Yeah. Because that late's, very tired. So -

KANE: So what time did you start at the, the Chinese Friends of Labor function in 2015? What time would you have started?

LAM: On that night?

30 KANE: Yeah, that night.

LAM: I think it's 5.00-something. Can't remember.

KANE: And what time would you have finished that evening?

LAM: 11.00, I think. After pack up all the staff. Yeah.

## NSW ICAC EXHIBIT

KANE: Do you know who was responsible for counting the moneys donated at the function and reconciling payments against the donation forms?

LAM: I don't have a clue. I don't know.

5 KANE: Do you know who was responsible for banking the moneys collected during the function?

LAM: No, I don't know.

KANE: Do you know if there was different classes of tables at the Chinese Friends of Labor function in March 2015?

LAM: Yes.

10 KANE: Can you tell me what the different classes or tables that were available at the Chinese Friends of Labor dinner in 2015 were?

LAM: I can't remember how much, but I just don't know it's VIP and normal.

KANE: So VIP?

LAM: Yeah.

15 KANE: And normal?

LAM: Yeah.

KANE: And do you know how much each - a normal table would go for, or what the price was for a normal table was at the 2015 Chinese Friends of Labor dinner?

20 LAM: Go for?

KANE: Sell, how much that they were selling the -

LAM: Can't remember.

KANE: Do you know how much a position was selling for at a VIP table at the Chinese Friends of Labor dinner in 2015?

25 LAM: Can't remember.

KANE: Do you know if the different types of tables were distinguished by anything, so you knew if they were a VIP table or a - just a normal table?

LAM: They just - they just write "VIP 1," "VIP 2," something like that.

KANE: Was that on the, the actual table or was it on the list?

30 LAM: On the table.

KANE: Okay.

LAM: Just have a stand up.

KANE: Did they have different coloured tablecloths for the VIPs to the normal tables?

LAM: Can't remember.

5 KANE: Were you allocated a specific section or tables within the restaurant during the Chinese Friends of Labor function in March 2015?

LAM: You mean, with sitting, or -

KANE: Were you given a - like, the restaurant is very large. Were you giving a number - a certain number of tables that - or you looked after the whole restaurant tables?

10 LAM: For the selling the raffle ticket, yes. But normally, no.

KANE: So whoever turned up to the table, you - and you were asked to take them to their table, you just take them to their table?

LAM: Yeah, that's it.

15 KANE: Was there a, a, a Head Table or Guest Table at the function for the Chinese Friends of Labor dinner in 2015?

LAM: Well, just VIP table and normal table. So I don't know which is - you mean, head table? I don't know.

KANE: The Head Table where - I think on the invitations, they had a number of dignitaries, like Mr Shorten and Mr Foley, the State Opposition and the Federal Opposition?

20 LAM: Can't remember where they sit. Can't remember.

KANE: Okay. So if I showed you a table, you would know where the head table was, if I showed you a floor plan?

LAM: No. I just know it's near the front desk. So -

25 KANE: Okay, all right. So I've got a, a, a - this is a, a plan which has been provided to the commission by the Australian Labor Party, and it was the seating plan for the ALP Chinese Friends of Labor dinner on the 12th of March, 2015. So I'll just show you that. On that diagram at all, can you indicate where the, the dignitaries or the Head Table may have been seated?

30 LAM: This - is it this - oh, this is the front. This is the perform - I think it's around here.

KANE: So you're indicating around -

LAM: Around maybe - I don't know it's up to here or just this.

35 KANE: And so -

LAM: I can't remember.

KANE: The area where it's marked 30, 27, 23, 31, 28, 25, 32, 29, and 26, so it's the centre area near -

LAM: Yeah, the -

KANE: - this stage area?

5 LAM: Yeah, yeah.

KANE: Okay. Thank you. Were each of the tables allocated at a specific number or was there cards on the tables to identify which table the people would be seated at?

LAM: They have VIP. That's it.

10 KANE: So VIP, but would they have a table number as well which identify which table?

LAM: Yes, they have. I can't remember if that one is - they use VIP 1, 2, 3, 4, something like that.

KANE: Were there also nametags on each of the tables for each of the guests that were attending?

15 LAM: This one, can't remember.

KANE: Okay. And how many people would you estimate would have been at the Chinese Friends of Labor dinner in March 2015?

LAM: Full house. About 5 - 500.

20 KANE: Yep.

LAM: 10, 10 for each table. Yeah, probably be. Yeah.

KANE: So the - you said 10, 10 people?

LAM: 10 or 12 people per table.

KANE: So there would have been roughly -

25 LAM: Probably about 500.

KANE: So how many tables? So would have been roughly 40, 50 tables?

LAM: 50, I think. I can't really remember.

KANE: And you don't know how many VIP tables there were and how many normal tables there were?

30 LAM: Yeah.

KANE: Were people able to buy a seat at a table at the Chinese Friends of Labor function in March 2015 on the night?

LAM: No. It's full beforehand.

KANE: It was - all tickets were sold beforehand?

LAM: Yeah.

KANE: Do you, you - do you know who may have been sitting at the dignitary or Head Table at the Chinese Friends of Labor function in March 2015?

5 LAM: Can't remember.

KANE: Do you know if the, the people who were - the dignitaries who were seated at the, the Head Table had to pay for their seats at the Chinese Friends of Labor function in March 2015?

LAM: VIP, they all pay. Yeah. As far as I know.

10 KANE: But the people who - the - all the dignitaries who were sitting at the Head Table - so there's VIPs, ordinary tables, and then there was the dignitaries at the Head Table - were the people at the Head Table have to pay for their seats?

LAM: I can't answer this one correctly. Yeah.

15 KANE: Okay. Do you know if you were able to buy any - a seat at the Head Table to be seated with the dignitaries or, or extremely VIP people?

LAM: Yeah.

LAM (INTERPRETER): Yes.

20 KANE: And do you know how much they had to pay to be seated at the dignitaries' Head Table?

LAM: I don't know.

KANE: You said that you went around with some of the Young Labor people to collect ticket - sell raffle tickets and well as donations.

LAM: Not donation, raffle ticket only.

25 KANE: Did you see any of the Young Labor people collecting donations from any of the tables at all?

LAM: Collect?

YAU: Collecting, sorry?

KANE: Donations from the - from any of the table.

30 LAM: I don't know.

KANE: Were you ever told how much money the Chinese Friends of Labor raised during the function in March 2015?

LAM: I can't remember.

KANE: Do you know if Johnathan Yee and his family members, did - oh, sorry, do you know Johnathan Yee and his family members?

LAM: I know them, but not really - just see the face. Yes.

KANE: So you know them by sight but -

5 LAM: Yeah.

KANE: - not really friendly with them?

LAM: No.

KANE: Do you know where Johnathan Yee and his family were seated on the night of the Chinese Friends of Labor function in March 2015?

10 LAM: Can't remember.

KANE: Do you know if Johnathan Yee had any responsibility for the collection of money at the Chinese Friends of Labor function in March 2015?

LAM: I don't know.

15 KANE: Did Johnathan Yee give you any donation money or forms during the Chinese Friends of Labor function in March 2015?

LAM: Johnathan Yee?

KANE: Yeah, did he give you any money or donation forms at all?

LAM: No.

20 KANE: Have you worked at any other Australian Labor Party or Country Labor Party political or fundraising functions prior to the Chinese Friends of Labor function in March 2015?

LAM: No, no.

KANE: So that, that was the first function that you had worked at?

LAM: Yeah.

25 KANE: Do you know a gentleman by the name of - now, I may mispronounce his name - Mr Xiangmo Huang?

YAU: What, what do you -

KANE: (UNDECIPHERABLE) pronounce that first -

YAU: Yes.

30 LAM: Not by that time. Only after.

KANE: After?

LAM: Yeah, the news.



- KANE: Oh, it's - so when, when did you become aware of this gentleman?
- LAM: After see the newspaper.
- KANE: So just recently since he has appeared in the various newspapers?
- LAM: Yes.
- 5 KANE: So that's like, probably last year and this year?
- LAM: Well, when, when the first - I don't know the first paper news about donation. Then, yeah, I heard.
- KANE: Do you know if Mr Huang was seated at the head dignitary table at all?
- LAM: Can't remember.
- 10 KANE: Do you know if Mr Huang collected any money from any of the donors at the Chinese Friends of Labor function in, in March 2015?
- LAM: Is it the same guy, is it?
- KANE: Yeah, same fellow.
- LAM: I don't know.
- 15 KANE: From your understanding, who was in charge for the organising of the 2015 Chinese Friends of Labor function at The Eight restaurant?
- LAM: I'm not quite sure, because I just follow Pinky, ask us to come here. And I know it's few people at the top. That's all. So I don't exactly know who's who, so when one or in charge or two in charge or something like that.
- 20 KANE: So you're not sure if there was a - was there an organising committee that organised the Chinese Friends of Labor function in March 2015?
- LAM: Not quite sure. Yeah.
- 25 KANE: And what involvement, if any, did Ernest Wong have in relation to the March 2015 Chinese Friends of Labor function?
- LAM: He just - can't - I don't know how to describe. It's just - he look like every people know him. He have a speech. And something like that. I know he's on the top Chinese Friends of Labor. And that's all I know. Yeah.
- 30 KANE: Wayne, is there anything you'd like to add?
- SMITH: Yeah, I've just got a few questions for you, Floris. It won't be long. In relation to this particular dinner in 2015, who first - did, did someone ask you to do the volunteering, or did you -
- 35 LAM: Yes, yes. Because I'm a part of Friends of Labor, so the events come, they will call you, say, "That's the event," or, or, "Coming help?" Yeah.

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SMITH: Okay. So someone -

LAM: Yeah.

SMITH: - called you?

LAM: Yeah, yeah.

5 SMITH: Do you know who that was?

LAM: Can't exactly - can't remember.

SMITH: So who could it have been?

LAM: Right. Pinky, Johnathan Yee, Ernest Wong, and other people, don't - I can't remember which one. Yeah.

10 SMITH: All right. So it could have been those three or someone else?

LAM: Yeah, yeah, yeah, yeah.

SMITH: Okay. And when you arrived at the dinner, you, you said you arrived earlier. Did you - could you go there and eat a meal?

15 LAM: We, we - at the time, they ask us to eat first, yeah, in the - in the table, just small dishes.

SMITH: Okay.

LAM: And then we eat before we working. Yeah.

SMITH: And how many volunteers were there, including yourself, approximately?

20 LAM: Can't, can't remember. Maybe 10. I, I can't remember.

SMITH: All right.

LAM: I don't know that.

SMITH: But, but there was certainly yourself.

LAM: Yes.

25 SMITH: And there were people from -

LAM: People -

SMITH: - from Young Labor?

LAM: Yeah. Young Labor is different.

SMITH: Okay. Well -

30 LAM: Yeah, because we are not seated. Because we Chinese, another table.

SMITH: Yeah, okay. But I'm talking about when you arrived at 5.30. Was the Young Labor people volunteers also there?

LAM: Some is arrive. Yeah.

5 SMITH: Yep. And were they given any - or were you all given any instructions as to what people were going to be doing at the dinner?

LAM: No, just have a - for myself, just a rundown. Yeah.

SMITH: Yeah. Who gave you the rundown?

LAM: Pinky. They have a, a - volunteer have a rundown. And then we just look at what, what to do. Yeah.

10 SMITH: Also, so Pinky, did she hand out a, a document or did -

LAM: In, in the reception, yeah. The volunteer, they - if, if I'm just look after the guests and the raffle, then the guest raffle have a rundown. Yeah.

SMITH: Yeah. So you, you were given some instructions about what you -

LAM: Yeah.

15 SMITH: - your role was going to be?

LAM: Yeah.

SMITH: And do I take it - well, were you present when the other volunteers, including the Young Labor volunteers, were they given instructions as well?

20 LAM: I'm, I'm not sure they have. I don't know.

SMITH: All right.

LAM: Yeah, I don't know.

SMITH: Was Pinky there at that time -

LAM: Yeah.

25 SMITH: - when you - when you arrived?

LAM: Yeah.

SMITH: Was there anyone else other than Pinky there?

LAM: Can't remember.

30 SMITH: Okay. When you were given the instructions, were they verbal or were they written instructions?

LAM: The rundown is what time to do that is - sometimes they would briefing when close to 6 o'clock. Yeah. Then we have the briefing, and just talk about what is the, you know, process, something like that. Just roughly.

SMITH: You, you said a "briefing," is that -

LAM: Yeah, briefing. Yeah.

SMITH: Yeah, okay. And would Pinky or someone else do that?

LAM: Pinky. Yeah.

5 SMITH: Pink would do that? Okay. All right, I think that's all. Thank you.

KANE: OK. And is that it?

KIRKPATRICK: Yeah. I think - I think Wayne's covered it.

KANE: Yep, yep. Well, just one question. We've spoke about Ernest Wong. What's your relationship with Ernest Wong?

10 LAM: Ernest Wong like our head, when we know them. He - he's very good guy, and, and tell us how good is Labor. And then we sure we can help committee. Yeah.

KANE: Does he like, speak at your, like, local branches about what the Australian Labor Party can do for you and your community?

15 LAM: He haven't comet to the branch to speak, but we always have a, a Chinese community together, and then he will have a little bit of speech. Yeah.

KANE: And you spoke to about, you received a, a, a rundown of your duties as a volunteer. Are you aware if a rundown was given to the Young Labor people about collecting donations from the attendees at the Chinese Friends of Labor function?

20 LAM: I don't know. Yeah.

KANE: Okay.

LAM: I don't know if they have.

KANE: If I show you a photograph taken from the Chinese Friends of Labor function in 2015, do you think you could identify the other volunteers that may have been helping you on the night?

25 LAM: Yeah, Pinky, is it - but Johnathan still is a - is a - is a head, so he's subordinate - one of volunteer too.

KANE: So that's, sorry, Jonathan Yee, is it?

30 LAM: Yeah, yeah, yeah.

KANE: Yeah, yep.

LAM: Of course he is.

KANE: Yep.

LAM: The, the other, I can't remember they are -

## NSW ICAC EXHIBIT

KANE: Yep.

LAM: - a guest or volunteer.

KANE: Okay.

LAM: Yeah.

5 KANE: Okay, that's fine.

LAM: Yeah.

KANE: I just thought it might have helped you. All right. Anything else from that?

SMITH: No.

10 KANE: All right.

KIRKPATRICK: No.

KANE: Have - is there anything further that you think may be relevant to our inquiries which we haven't discussed here today?

LAM: Whatever you ask me, I tell already. Yeah.

15 KANE: Yep. And has the answers as recorded in this interview been made from your own free will?

LAM: No. What - sorry.

KANE: Or I can get the Sergeant into -

LAM: Sorry, sorry. I misunderstand. Yeah, I was. Yeah. Yes.

20 YAU: Yes.

KANE: All good.

LAM: Sorry.

KANE: Can breathe - so I can breathe again.

LAM: Sorry. It's just -

25 KANE: Has any threat, promise or offer of advantage been held out to you to give the answers as recorded here today?

LAM: No.

KANE: Do you have any complaints to make which myself, Investigator Smith or Senior Corruption Prevention Kirkpatrick have conducted ourselves here today?

30 LAM: No.

## **NSW ICAC EXHIBIT**

KANE: This interview is now concluded. The time by my watch is 11.15pm.  
Thank you very much.

LAM: Thank you.

**INDEPENDENT COMMISSION AGAINST CORRUPTION**

**RECORD OF INTERVIEW BETWEEN INVESTIGATOR MICHAEL KANE OF THE  
INDEPENDENT COMMISSION AGAINST CORRUPTION AND EDWARD  
5 MCDUGALL AT ICAC BUSINESS PREMISES, LEVEL 7, 255 ELIZABETH  
STREET, SYDNEY ON 9 APRIL 2019**

**TIME: 01:19PM**

**PRESENT: INVESTIGATOR MICHAEL KANE  
10 EDWARD MCDUGALL**

MCDUGALL: I might just pull up the questions that you sent me.

15 KANE: This is electronic record of interview between ICAC Investigator Michael Kane, K-A-N-E and Edward McDougall at the premises of the Independent Commission Against Corruption, Level 7, 255 Elizabeth Street, Sydney on Tuesday, the 9th of April, 2019. The time by my watch is 1.19pm. Edward, apart from the persons I've just announced, do you agree there's no other persons present in this room?

20 MCDUGALL: I agree.

25 KANE: Okay. The Commission is currently making inquiries in relation to whether from January 2015 officials of the New South Wales Branch of the Australian Labor Party, members of the Chinese Friends of Labor, political donors and others have entered into or carried out a scheme to circumvent the prohibited - prohibition or requirements under Part 6 of the Electoral Funding and Expenditure and Disclosure Act 1981 relating to political donations. I intend to ask you further questions about this matter which will be electronically recorded on this digital voice recorder. Do you clearly understand that?

30 MCDUGALL: I clearly understand.

KANE: Did you agree to have our conversations electronically recorded here today?

MCDUGALL: Yes.

35 KANE: Has any threat, promise, or offer of advantage been handed out to you to participate in this interview at all -

MCDUGALL: No.

KANE: This recording, for the time being, is - will be used for the Commission for it's own personal use during the course of this investigation. At some

later stage if this requiring - is required to be converted to statement you'll be contacted. Do you understand that?

MCDOUGALL: I understand that.

5 KANE: Okay. Just for the record, could I just get your full name. Thank you. For the record.

MCDOUGALL: Edward Stuart McDougall, M-C-D-O-U-G-A-L-L.

KANE: Your current address.

MCDOUGALL: [REDACTED].

KANE: And your date of birth.

10 MCDOUGALL: [REDACTED]

KANE: Your current occupation or position.

MCDOUGALL: Par - Electorate Officer.

KANE: And -

MCDOUGALL: With the Parliament of New South Wales.

15 KANE: And who is the Member of Parliament that -

MCDOUGALL: Steve Kamper.

KANE: And he's the - a Member for what -

MCDOUGALL: Of Rockdale.

KANE: Rockdale. Thank you - and how long have you held that position for?

20 MCDOUGALL: Four years.

KANE: Okay, and as electoral officer for Mr Kamper, what, what does your roles and responsibilities involve?

MCDOUGALL: Look after his office, there's deal with constituent matters, all that sort of stuff.

25 KANE: So do you work from his electoral office or his parliamentary office?

MCDOUGALL: So sometimes I'll be at the parliamentary office but most of the time at the electorate office.

KANE: And are you, you a full time employee of -

MCDOUGALL: Yep, that's correct.

30 KANE: And are you a member of the Australian Labor Party -

MCDOUGALL: Yes. New -



KANE: And -

MCDOUGALL: - South Wales branch.

KANE: And how long have you been a member?

MCDOUGALL: October 2010 I think I signed up.

5 KANE: Okay, and are, are you a member of the local branch of the Australian Labor Party -

MCDOUGALL: Yep, the Arncliffe-Wolli Creek branch.

KANE: Okay, and I think previously you've told me that you were a member of the Australian Young Labor -

10 MCDOUGALL: Yep.

KANE: - and when were you a member of the Australian Young Labor Party?

MCDOUGALL: So if you - I think you're a member by default if you're a member of - member of the party and you're under the age of 26. But I was involved in Young Labor from 2010 and probably ceased involvement late, late 15 2015, early 2016. I forget when I was - I finished up as the President of Australian Young Labor and I finished up whenever the last conference was.

KANE: And you've never been a member of the Country Labor Party?

MCDOUGALL: Nope.

20 KANE: Now, I think from our previous discussions earlier this morning you said that when you were a, a Young Labor member you would - you were required from time to time to volunteer at various ALP events, is that correct?

MCDOUGALL: I don't think you're required but - yeah - I -

25 KANE: What, were you were requested -

MCDOUGALL: Yep, absolutely.

KANE: And in general what, as a volunteer of - a Young Labor volunteer, what would your roles and responsibilities or duties -

MCDOUGALL: Basically just ushering. So taking people to their tables and selling raffle tickets.

30 KANE: Okay. Would you collect political donations at these various event - fundraiser events for the ALP?

MCDOUGALL: Well - so I guess it's a political donation when somebody buys a raffle ticket at one of -

35 KANE: Okay.

- MCDOUGALL: - the events. Yeah.
- KANE: But any other - if it's outside a, a raffle ticket, if there was someone who wanted to make a donation at the event is there separate forms that they would have to complete in relation to that?
- 5 MCDOUGALL: So I guess there were two at the - you'd either be selling tickets to the event. So -
- KANE: Yep.
- MCDOUGALL: - people who'd book tables or whatever might be paying on the night so they'd fill out one of these forms like you have -
- 10 KANE: Okay. Just for the record -
- MCDOUGALL: - in front of us.
- KANE: - we're, we're discussing - in front of me is an invitation to the Chinese Friends of Labor. This is for the 2015 event on the 12th of March, 2015 at The Eight restaurant, Market City, Haymarket Street, Haymarket.
- 15 Yep. So they'd fill out a reservation form -
- MCDOUGALL: Yep.
- KANE: Yep. So they could purchase - pay for their tickets on the night -
- MCDOUGALL: Yeah, that's right. Or raffle tickets. If somebody was making another donation I don't think it would be handled by a Young Labor person.
- 20 KANE: Who, who would normally take, if someone wanted to make a, a separate - if it's not a raffle and it's not paying for their seat on the evening - if they wanted to make a separate donation, how would that be - who would collect that sort of money?
- MCDOUGALL: Probably a party official or an Event Organiser.
- 25 KANE: Okay, and have you ever been a member of the Chinese Friends of Labor?
- MCDOUGALL: I've got to say, I don't think so. But I think the way those things are constituted, they'll often, at their formation meeting or whatever, hand it around to anyone just to get - I think they need 15 or 30 members or something to sign up. It's in the ALP rules. I'm sure you can check with us.
- 30 KANE: Mm-hmm.
- MCDOUGALL: I might have signed one of those at some point. I don't think I have, but -
- KANE: Do you know if you've ever been an executive member of the Chinese Friends of Labor?
- 35 MCDOUGALL: Certainly not.

KANE: And you've never been on the board of the Chinese Friends of Labor -

MCDUGALL: No.

KANE: - Committee? And do you know what role, if any, Ernest Wong, MLC had with the Chinese Friends of Labor?

5 MCDUGALL: I think it was, sort of, oversight and drive.

KANE: Do you know if he was a founding member of the Chinese Friends of Labor?

MCDUGALL: I'm not sure. I'd imagine probably yes, but I don't know.

10 KANE: So would he be, like, a conduit between head office and the Chinese Friends of Labor organisation for these fundraising events?

MCDUGALL: I really don't know.

KANE: And have you had any previous relationship with Ernest Wong, MLC at all?

15 MCDUGALL: Oh, I've work - I've worked for a Member of Parliament for the last - or State Member of Parliament for the last eight years or so, so I know him but I probably haven't had a conversation with him -

KANE: But there's no - you've never been a electoral officer for him or -

MCDUGALL: No, no, no. I've never worked for him, I've -

KANE: - or -

20 MCDUGALL: - never - I wouldn't consider myself to have a relationship with him, no.

KANE: Okay, and do you know what role, if any, Jonathan Yee may have with the Chinese Friends of Labor?

MCDUGALL: I think, again, just a bit of an organiser in the Chinese Friends of Labor but I don't know. I think I've been in the same room with Jonathan once or twice now.

25 KANE: And how regularly does the Chinese Friends of Labor run a, a political fundraising event such as the one that we were discussing in here today, the 2015 event?

MCDUGALL: Sorry, did you say "how readily"?

30 KANE: Yeah, how regular.

MCDUGALL: Oh, regularly. I think they'd usually have an event once a year.

KANE: Okay, and is it usually at The Eight restaurant in Haymarket?

MCDUGALL: It has been for many years.

- KANE: And can you recall if you were a volunteer or requested to be a volunteer at the Chinese Friends of Labor function at The Eight restaurant, Haymarket, on the 12th of March, 2015?
- MCDOUGALL: I'm not sure.
- 5 KANE: But if you had been requested to be a volunteer, the roles and responsibilities that you've outlined previously - just selling tickets, ushering people to their seats - would be generally what you would have done if you were a volunteer at that event?
- MCDOUGALL: Yeah. Like, I've volunteered at similar events -
- 10 KANE: Yep.
- MCDOUGALL: - many times over previous years -
- KANE: At the -
- MCDOUGALL: - and it was all pretty standard.
- 15 KANE: Yep. At these political fundraising events and that, is it common that a, a large amount of money would be collected other than paying for the, the seats or tables or the raffles? Would there be - people on the night be able to make donations of large sums of money at all?
- MCDOUGALL: Not in my experience.
- KANE: Yep.
- 20 MCDOUGALL: But I wouldn't necessarily know.
- KANE: Yep. Would it be uncommon for someone to, say, make a \$5,000.00 or \$10,000.00 donation at these events, separate from purchasing a table or purchasing raffle tickets?
- MCDOUGALL: Yeah, because it would breach electoral donation caps.
- 25 KANE: Yep, okay.
- MCDOUGALL: I think at the time it was two - was it 2000? I know it's up to 2800 now, but was it -
- KANE: Yeah, it, it - it's changed a number of times since then -
- MCDOUGALL: Before the 2015 election was it just -
- 30 KANE: Yep.
- MCDOUGALL: - 2000? I don't think the -
- KANE: Yeah, I think so.
- MCDOUGALL: - increase had been applied. Or maybe it had. Maybe it was 22 -
- KANE: I, I think it was up to -

MCDOUGALL: 2200 or something like -

KANE: Yeah.

MCDOUGALL: I'm not sure. But it'd certainly - I've certainly never seen it and it would be a bit strange.

5 KANE: Yeah, and at these events if someone wanted to make donations, would you have received any, like, instructions or - about people who were prohibited to providing donations to the party?

MCDOUGALL: Yeah. So if you're going around selling raffle tickets you'd get some sort of instruction that people need to sign a donation form similar to that

10 expect for, you know -

KANE: Yep.

MCDOUGALL: - raffle ticket form and, you know, they have to sign it and they've got declarations on there that says they're not a developer or a tobacco entity or a whatever, you know, gambling -

15 KANE: Alcohol or -

MCDOUGALL: Yeah, yep, yep.

KANE: - yeah, gambling. Yep. Okay. Do you know any of the other, other volunteers that may have attended the Chinese Friends of Labor function in March 2015?

20 MCDOUGALL: No. If you have - if you give me a list I probably know most of them -

KANE: Yep.

MCDOUGALL: - but -

KANE: A list. I think we've mentioned Lewis Hamilton, who is your housemate at the -

25 MCDOUGALL: Yep.

KANE: - moment. A James Josef, J-O-S-E-F.

MCDOUGALL: No, his name is James Hammerton.

KANE: Oh, sorry. James Hammerton.

MCDOUGALL: Yeah, that's why I was confused.

30 KANE: Yeah, yeah -

MCDOUGALL: I mean, I, I was sort of involved in this organisation for -

KANE: Yep, yep. Sorry.

MCDOUGALL: - six years -

KANE: So James Hammerton, H-A-M-M-E-R-T-O-N.

MCDUGALL: Yep.

KANE: Do you know him at all?

MCDUGALL: Yeah, yeah, I know him.

5 KANE: OK. Is he another Young Labor -

MCDUGALL: Yep.

KANE: And the other person is -

MCDUGALL: Sravya Abbineni.

10 KANE: Yeah, and that's S-R-A-V-Y-A and the surname is A-B-B-I-N-E-N-I. So do you know both of those -

MCDUGALL: Yep, yep.

KANE: And they were former members of the Young Labor?

MCDUGALL: I'm not sure if they might still be members of Young Labor -

KANE: Okay.

15 MCDUGALL: Maybe they've just left.

KANE: All right. Okay, and at these political fundraising events are donations usually accepted only by cash or can they pay by cheque or credit card?

MCDUGALL: So donations - a donation by cheque would be unusual, but certainly credit card is accepted. You'd see on the - if you get one of the forms from the night for -

20 KANE: Yep.

MCDUGALL: - raffle tickets, which there would have been plenty of 'cause they -

KANE: Yep.

MCDUGALL: - they'd have a form that says, these are the raffle prizes, here's the, you know -

25 KANE: So similar to this reservation form -

MCDUGALL: Yeah -

KANE: - for the tables -

MCDUGALL: - and, you know -

30 KANE: - there's a section -

MCDUGALL: - people would be encouraged to sort of pre-fill that section.

KANE: Mm-hmm.

MCDOUGALL: You know, like when somebody comes around selling raffle tickets for all compliance purposes -

KANE: Yep.

5 MCDOUGALL: - it's always sort of been encouraged to get people to pay by card, 'cause obviously it makes it much easier to track the donation.

KANE: Great. So just for the - we're, we're looking at the Chinese Friends of Labor invitation reservation form for the 2015 event. On the right-hand corner there it says, "Payment" and you can nominate - if it's a, a credit card it allows Visa, MasterCard, AMEX and Diners. They put - the person puts their card number, the name on the card, expiry date and signature and underneath there they sign another declaration that they're not a prohibited donor, involved with property development, tobacco industry, or liquor and gaming industry. So that's basically, I think, what you've discussed -

10

15 MCDOUGALL: Yep.

KANE: - previously. And who would collect these forms? Are they - are they - once the -

MCDOUGALL: The person selling the raffle tickets.

20 KANE: So if you were a volunteer through Young Labor you would collect the - from the tables -

MCDOUGALL: Yep.

KANE: - and what would you do with them after they, they're collected?

MCDOUGALL: Generally give them over to an event organiser or somebody more senior in Young Labor - or, or somebody from Head Office.

25 KANE: Okay. So you weren't required to reconcile money or acquit these forms at the conclusion of the evening at all?

MCDOUGALL: Not generally, no.

KANE: Would you be given a verbal briefing before one of these events or was it written instructions that you received about collection of raffle money or donation money?

30 MCDOUGALL: Generally a verbal, verbal briefing. But it'd probably be quite informal. Most of the people who would be doing it would have done it many times before.

35 KANE: Mm-hmm, and that would be from a event organiser or someone from the Head Office.

MCDOUGALL: Yep.

- KANE: And at the conclusion of the events is there some sort of debrief with the event organiser or the Head Office in relation to how the event went, or how many money was collected - or is there any feedback given to the -
- MCDOUGALL: Nuh.
- 5 KANE: - as a volunteer?
- MCDOUGALL: No. Or if there was, it would be out of the -
- KANE: Yep.
- MCDOUGALL: - room.
- KANE: Do you know -
- 10 MCDOUGALL: Sort of top-down.
- KANE: Do you know a, a gentleman by the name of Kendrick Cheah?
- MCDOUGALL: Yep. Cheah.
- KANE: Cheah, sorry. I - and I think it's C-H-E-A-H.
- MCDOUGALL: Yep.
- 15 KANE: What involvement does he have with the Australian Labor Party?
- MCDOUGALL: He's a staffer, he's involved with Chinese Friends of Labor as well as a bunch of a - I think he helps coordinate most of the, sort of, friends of Labor groups.
- KANE: Okay. What, through Head Office and that?
- 20 MCDOUGALL: I think he works one day a week at Head Office.
- KANE: And does he work for an electoral office after that or -
- MCDOUGALL: Yeah.
- KANE: Do you know which -
- MCDOUGALL: Nick -
- 25 KANE: - local member?
- MCDOUGALL: Nick Lalich.
- KANE: Oh, Okay, Okay.
- MCDOUGALL: That - so that might have changed in the last - but -
- KANE: Yep, but -
- 30 MCDOUGALL: To the best of my knowledge and -



KANE: And what relationship does Kendrick Cheah may have had with Ernest Wong, MLC at all, if there was any relationship?

MCDOUGALL: You should probably ask them.

KANE: Okay.

5 MCDOUGALL: I think they were both involved in this sort of stuff.

KANE: So he - would Kendrick have involvement with - liaison between head office and the Chinese Friends of Labor to organise these sort of events? Is that part of his roles and responsibilities?

10 MCDOUGALL: I don't know. But I'd say he took on that sort of role - and I think you - maybe - I think you, sort of - Chinese Friends of Labor you might view more as sort of a small group of people who are, you know, making decisions under the banner, rather than some organisation that -

KANE: Mmm.

MCDOUGALL: - collectively makes decisions.

15 KANE: So who would be the event coordinator or who would run these Chinese Friends of Labor organisational events?

MCDOUGALL: I'd assume whoever was the contact on the - on the event.

KANE: Mmm. It doesn't - yeah, it doesn't really say. It just says, "Cheques made out to the Prospect campaign account." So I don't know what the -

20 do you know what the Prospect -

MCDOUGALL: So that's a seat in the New South Wales Parliament.

KANE: Okay.

MCDOUGALL: So I guess this event was being used to raise money for Hugh McDermott's campaign.

25 KANE: OK, and who is Hugh McDermott, sorry?

MCDOUGALL: He's a Member for Prospect, so -

KANE: Okay.

MCDOUGALL: - in that seat.

KANE: So the Chinese Friends of Labor were running money for the Prospect -

30 MCDOUGALL: I suppose.

KANE: Yep, yep. Okay. Do you know if Kendrick Cheah had any involvement with reconciling the money for the - at the Chinese Friends of Labor -

MCDOUGALL: I have no idea.

- KANE: Are you aware of - if there's different types or divisions or classes of tables at these fundraising events at all?
- MCDOUGALL: Sometimes there'll, there'll be a premium price to sit with, you know, whoever the chief special guests are.
- 5 KANE: Mmm.
- MCDOUGALL: But usually that's not - I, I mean this one says "VIP table" so presumably they were trying to sell a couple of those at this and you'd get -
- KANE: Okay.
- MCDOUGALL: - to sit with some Members of Parliament.
- 10 KANE: So just using the example of this reservation form, I think a standard table - well, a standard person for a standard table was \$80.00 per person or a table for 80 - \$800.00 for a table of 10, and the VIP was \$2,000.00 at the VIP table. Were they - are they sort of standard rates they normally charge for these type of events?
- 15 MCDOUGALL: That'd be pretty standard still.
- KANE: Yep.
- MCDOUGALL: Maybe a little bit more now with four years of inflation.
- KANE: Yep.
- MCDOUGALL: It's pretty current.
- 20 KANE: Okay, and would the, the people at the, the - the dignitaries that are at the Head Table and that - on this instance it was Mr Bill Shorten, MP, Luke Foley, MLC and Ernst Wong, MLC - would they have to pay for their seats or because they're guests -
- MCDOUGALL: Generally guests wouldn't pay, you know -
- 25 KANE: Okay.
- MCDOUGALL: - special guests wouldn't pay.
- KANE: Can people -
- MCDOUGALL: And I, I - sorry, I don't know that in relation to events that Head Office ran but I -
- 30 KANE: Yeah.
- MCDOUGALL: - for example, run fundraisers for my Member of Parliament -
- KANE: Yep.
- MCDOUGALL: - we - you wouldn't charge the person you're inviting -
- KANE: Okay.

MCDOUGALL: - as a special guest.

KANE: Are people able to buy a seat at the Head Table with the - with the dignitaries at all? Is that normal practice or -

MCDOUGALL: Potentially.

5 KANE: And how much would someone be able to, if they wanted to sit at the Head Table with the -

MCDOUGALL: I wouldn't - I wouldn't know.

10 KANE: And would you - if you were volunteering at a, a fundraising event, would you be given a particular area within the event to operate, or would, would you do the entire area for the event?

MCDOUGALL: It would vary. So sometimes people would be organised and you'd go and do tables 1 through 10 and you'd go and do blah, blah, blah -

KANE: Mmm.

15 MCDOUGALL: - but other times it might be, "You sort of go in that direction and you go in that direction," and blah, blah, blah. Otherwise it'd just be, you know, send people out and go around.

KANE: Normally at a ALP fundraising event are there nametags on the tables to identify - or table numbers? How would people find their tables -

MCDOUGALL: Table numbers.

20 KANE: Okay, and when they come to the front desk are they escorted by someone to their, their -

MCDOUGALL: They might just be pointed in the direction or they might have, you know, somebody usher them in. As I previously said, that's something Young Labor people regularly do, is usher people towards their tables.

25 KANE: And have you attended the - any Chinese Friends of Labor functions previously?

MCDOUGALL: Yep.

30 KANE: And how many - and I - you - I think you - for a number years they've done it at the, The Eight restaurant at Haymarket. How many people would they normally generate at these types of events?

MCDOUGALL: Oh, a few hundred. It might be 300 to - it'd be anywhere from sort of 20 to 50 tables, I think.

KANE: And how many -

MCDOUGALL: You'd get a -

35 KANE: - VIP tables would there normally be at these type of -

MCDOUGALL: I'm not sure - and it wouldn't be easily identifiable, what a VIP table was. You'd have to ask somebody who's actually organised one.

KANE: And you can't recall if you were at the, the 2015 Chinese Friends of Labor function -

5 MCDOUGALL: No.

KANE: Do you know -

MCDOUGALL: If you had some contemporaneous information to help me it -

KANE: No.

MCDOUGALL: - might jog my memory, but -

10 KANE: Unfortunately all I've got -

MCDOUGALL: - as I said -

KANE: - I've got a - prior to the commencement of this interview I showed you a photograph which you don't appear to be -

MCDOUGALL: Yeah.

15 KANE: - in the -

MCDOUGALL: No.

KANE: - at all.

MCDOUGALL: And for example, I would have attended another function at the restaurant, it would have had a lot of the same people there and it would have been a couple of months out and I was like, "Oh, I do remember that," but then it's -

20 KANE: Yep.

MCDOUGALL: - you know, something else.

KANE: Do you know a, a gentleman by the name of - he's a property developer - Chinese property - Xiangmo Huang?

25 MCDOUGALL: Yep.

KANE: The Chinese -

MCDOUGALL: I do - I do know - I do know - I don't know how to pronounce his name.

KANE: Mr - Mr - we'll call him -

30 MCDOUGALL: Mr Huang.

KANE: - Mr Huang.

MCDOUGALL: Yeah.

KANE: Yeah, and how do you know him?

MCDOUGALL: I've met him once. I know who he is. He's a notorious public figure, obviously.

5 KANE: Mm-hmm, and you're not - you can't recall if, if he's ever attended any of these Chinese Friends of Labor functions?

MCDOUGALL: No.

KANE: Do you know if he has any sort of relationship with Ernest Wong at all?

MCDOUGALL: I only know that they have a relationship through media coverage.

10 KANE: Mmm. But previously to that media coverage have you seen them together at any events at all?

MCDOUGALL: No, I don't think so.

KANE: And are you aware if Mr Huang has donated to the - any Australian Labor Party events or fundraisers?

MCDOUGALL: Only by notoriety.

15 KANE: Through the media,

MCDOUGALL: Yep.

KANE: No independent knowledge about any donations?

MCDOUGALL: I'm aware of one solicitation of a donation for the 2016 Federal election, but I think that actually fell through.

20 KANE: Okay. Was that the one that was put in the media?

MCDOUGALL: I think it was the thing if you've - and I, I don't know. I -

KANE: Yep.

MCDOUGALL: - wouldn't have handled it or had anything to -

KANE: Yep.

25 MCDOUGALL: - do with it. I was only aware of it because part of the money was going to go to a - and this is all - money is fungible, you know -

KANE: Mm-hmm.

MCDOUGALL: - but I think at the time he wanted to fund several, several seats and one of them I was a campaign manager on.

30 KANE: Mmm.

MCDOUGALL: But, yeah, I don't - I think that donation actually fell through. I think that was the widely reported South China Sea -

KANE: Yep.

MCDOUGALL: - stuff.

5 KANE: Yep, yep, yep. Would it be unusual for someone to make political donations other than raffle or purchasing a ticket that would exceed \$1,000.00 at these fundraising events?

MCDOUGALL: It wouldn't be that unusual for somebody to buy a couple of thousand dollars worth of raffle tickets on the night, but they're sort of the exception rather than the rule.

10 KANE: So would it be unusual if someone made a, a separate donation, say, of 5,000 or 10,000 dollars? Would that be something that would - you would - you would recall -

MCDOUGALL: I would have recalled if somebody had said, "I want to donate \$10,000.00 to the -"

KANE: Would that be something you would bring to the event's organisers -

15 MCDOUGALL: Yeah, I -

KANE: - and say, like -

MCDOUGALL: If, if, if that was me and I was there, I'd go and tell somebody else.

KANE: Yep, and how much money would, would you estimate - like, at a event such as this - Chinese Friends of Labor would make fundraising in one night?

20 MCDOUGALL: Oh, I don't know. There were lots of things. But just to, you know, just to clarify that, I mean you don't know how much they're being charged per - like -

KANE: Yep, yeah.

25 MCDOUGALL: - for dinner, how many free seats have been given out, all that sort of stuff and, you know, what the raffle turnover is or -

KANE: Mmm.

MCDOUGALL: - auctions, anything else.

30 KANE: Is there anything further you think may be relevant to our inquiries which we, we haven't discussed here today at all?

MCDOUGALL: Not that I know of.

KANE: Okay. Have the answers recorded here today been made of your own free will?

MCDOUGALL: Yep.

## NSW ICAC EXHIBIT

- 5 KANE: Has any threat, promise, or offer of advantage been held out to you to provide the answers as recorded in this interview?
- MCDUGALL: No.
- KANE: Do you have any complaints the way in which myself have conducted this interview today?
- MCDUGALL: No.
- KANE: The time by my watch is 1.44pm. This interview is now concluded. Thank you very much.