NSW ICAC EXHIBIT



Ms Kaila Murnain General Secretary Australian Labor Party (NSW Branch) Level 9 377 Sussex Street, SYDNEY NSW 2000

17th July 2019

Your Ref:

Our Ref: E18/0093

Dear Ms Murnain

SUBJECT: Request for information

As you are aware, the Independent Commission Against Corruption (the Commission) is presently conducting an investigation concerning an allegation of breaches of the NSW Electoral law. The basis of this letter is to seek your cooperation in establishing the facts surrounding the circumstances in which monies were donated to the Australian Labor Party (NSW Branch) and the Country Labor Party (NSW Branch) before, during and after a Chinese Friends of Labor function held at the Modern 8 Chinese Restaurant on the 12 March 2015. In order to assist this investigation, the Commission is seeking the following information and or records:-

- Please provide a list of all ALP staff including Young Labor, volunteers and Chinese Friends of Labor personnel that attended the function on the 12 March 2015 and if known, their duties for that night.
- Was there any raffle money raised at the function? If so, could you please provide the details and any receipts or other relevant financial records?
- Please provide a daily list of all ALP staff including temporary staff and volunteers that were working at the ALP Sussex Street Headquarters of the week commencing the 6 April 2015.
- Could you please advise the status of Kenrick CHEAH's employment at ALP Sussex Street Headquarters during the week commencing the 6 April 2015 including days worked for that week.
- Could you please advise if former General Secretary, Jamie CLEMENTS was working at ALP Sussex Street Headquarters during the week commencing the 6 April 2015 including days worked for that week.
- Could you please provide a list of all ALP staff including temporary staff and volunteers that were working at the ALP Sussex Street Headquarters on the 22 April 2015?

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 Could you please provide in a diagrammatic form, all office holders and positions for the ALP/CLP (NSW Branch Sussex Street Head Office) for the period 1 January to 30 May 2015?

Additionally, the Commission understands the Chinese Friends of Labor Group falls within the category of 'Labor Action Committee'. It is intended to ascertain from you in your compulsory examination set down for hearing on the 29 July 2019, your knowledge and understanding of the relationship between the Australian Labor Party and Labor Action Committees including rules and regulations governing the committees.

Should you have any questions, please do not hesitate to contact Investigator Philip Vickery on email philvickery@icac.nsw.gov.au

Yours sincerely

John Hoitink
Executive Director
Investigation Division