

**From:** [Phil Vickery](#)  
**To:** [Tim Unsworth](#)  
**Cc:** [Jeffrey Lawrence](#)  
**Subject:** RE: Yuhu Group  
**Date:** Thursday, 7 February 2019 1:05:40 PM

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Tim Unsworth  
Director  
Unsworth Legal

Dear Sir,

I acknowledge your reply. Thank you for your assistance.

Yours Sincerely,

**Phil Vickery** | Investigator

**NSW Independent Commission Against Corruption**

Level 7, 255 Elizabeth Street Sydney NSW 2000 | GPO Box 500 Sydney NSW 2001

tel: 8281 5747 | fax: 9264 5364 | web: [www.icac.nsw.gov.au](http://www.icac.nsw.gov.au)

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**From:** Tim Unsworth <[tunsworth@ulegal.com.au](mailto:tunsworth@ulegal.com.au)>  
**Sent:** Thursday, 7 February 2019 1:01 PM  
**To:** Phil Vickery <[philvickery@icac.nsw.gov.au](mailto:philvickery@icac.nsw.gov.au)>  
**Cc:** Jeffrey Lawrence <[jrlawrence@icac.nsw.gov.au](mailto:jrlawrence@icac.nsw.gov.au)>  
**Subject:** RE: Yuhu Group

Dear Mr Vickery,

Mr Huang has instructed me to inform you that he declines the ICAC's invitation to participate in an interview.

Regards,

Tim Unsworth | Director  
02 8004 7707 | 0405 493 795



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**From:** Phil Vickery <[philvickery@icac.nsw.gov.au](mailto:philvickery@icac.nsw.gov.au)>  
**Sent:** Thursday, 7 February 2019 12:03 PM  
**To:** Tim Unsworth <[tunsworth@ulegal.com.au](mailto:tunsworth@ulegal.com.au)>  
**Cc:** Jeffrey Lawrence <[jrlawrence@icac.nsw.gov.au](mailto:jrlawrence@icac.nsw.gov.au)>  
**Subject:** RE: Yuhu Group

Tim Unsworth  
Director  
Unsworth Legal

Dear Sir,

Officers of the Independent Commission Against Corruption (the Commission) attended the offices of the Yuhu Group with a view of obtaining contact details for Mr Xiangmo Huang. It is our intention to inform Mr Huang that the Commission wish to conduct a formal interview with him in relation to a matter involving donations to the Australian Labor Party and Country Labor Party. This offer is on a voluntary basis. Should Mr Huang agree to participate in an interview, arrangements can be made for the interview to be conducted by live video feed at a time mutual to both parties.

Should you have any questions, please do not hesitate to contact me direct on my telephone number, email or mobile No. 0436639994. I await your reply.

Yours Sincerely,

**Phil Vickery** | Investigator  
**NSW Independent Commission Against Corruption**  
Level 7, 255 Elizabeth Street Sydney NSW 2000 | GPO Box 500 Sydney NSW 2001  
tel: 8281 5747 | fax: 9264 5364 | web: [www.icac.nsw.gov.au](http://www.icac.nsw.gov.au)

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**From:** Tim Unsworth <[tunsworth@ulegal.com.au](mailto:tunsworth@ulegal.com.au)>  
**Sent:** Thursday, 7 February 2019 11:26 AM  
**To:** Phil Vickery <[philvickery@icac.nsw.gov.au](mailto:philvickery@icac.nsw.gov.au)>  
**Subject:** Yuhu Group

Dear Mr Vickery,

I act for the Yuhu Group.

I am informed that this morning that one of the ICAC's officers attended my client's premises.

I have asked been asked by my client to invite your office to direct its enquiries through me, if that is possible.

Please let me know if I can assist.

Regards,

Tim Unsworth | Director

02 8004 7707 | 0405 493 795



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LEAP Email Reference [F:2f3e3c0c-5869-4e22-a9b7-185817470773][M:4e738911-dfe5-4c3b-945d-f9211757b218] (Please do not delete)

Mr Xiangmo Huang  
c/- Unsworth Legal  
Level 14, 68 Pitt Street  
SYDNEY NSW 2000

Attention: Tim Unsworth, Director

**By email:** tunsworth@ulegal.com.au

31 July 2019

Our Ref: E18/0093

Dear Mr Huang

### **OPERATION AERO PUBLIC INQUIRY**

I advise that the Commission has today announced that a public inquiry will be conducted in respect of Operation Aero, commencing at 10:00am on 26 August 2019.

I understand that you no longer reside in Australia. I note that you declined an invitation from the Commission on 7 February 2019 to participate in an interview in connection with the above matter.

I am writing to you because you may have a substantial and direct interest in the subject matter of the public inquiry, and may wish to seek leave to appear and be represented in the inquiry.

#### **Scope and purpose of the public inquiry**

The public inquiry is being conducted for the purposes of an investigation of an allegation or complaint of the following nature:

Whether, from January 2015, officials of the New South Wales Branch of the Australian Labor Party, members of Chinese Friends of Labor, political donors and others have entered into or carried out a scheme to circumvent prohibitions or requirements under Part 6 of the *Election Funding, Expenditure and Disclosures Act 1981* relating to political donations.

The general scope and purpose of the public inquiry is to gather evidence relevant to the allegation being investigated for the purpose of an investigation under s 13A of the *Independent Commission Against Corruption Act 1988* (the ICAC Act).

#### **Public inquiry schedule**

The inquiry will commence at 10:00am on Monday 26 August 2019 and will continue until completed.

**Sensitive**

### **Leave to appear and be represented**

Section 32 of the ICAC Act provides that, if it is shown to the satisfaction of the Commission that any person is substantially and directly interested in any subject-matter of a public inquiry, the Commission may authorise the person to appear at the public inquiry or a specified part of the public inquiry.

The Commission may permit a person who is authorised to appear in a public inquiry to be legally represented, pursuant to s 33 of the ICAC Act.

If you wish to appear in the public inquiry, could you please advise the Commission of your substantial and direct interest in the subject-matter of the inquiry. If you are authorised to appear in the public inquiry, you may seek authorisation to be legally represented by an Australian legal practitioner.

### **Standard directions for public inquiries**

The Commission's standard directions for public inquiries will apply to this public inquiry. They are available at [www.icac.nsw.gov.au/investigations/information-for-people-involved-in-investigations](http://www.icac.nsw.gov.au/investigations/information-for-people-involved-in-investigations).

### **Restricted website**

The Commission may make some documents available in advance of the public inquiry to witnesses, their legal representatives and other parties deemed to have sufficient interest in the subject matter of the investigation.

Such documents will be made available on the Commission's restricted website. Witnesses, their legal representatives and other parties wishing to apply for access to the restricted website must do so using the "application for access to ICAC restricted website" form available at [www.icac.nsw.gov.au](http://www.icac.nsw.gov.au) under "Restricted Access Portal".

### **Voluntary statement**

The Commission invites you to provide a version of events in relation to this matter by way of a voluntary statement which can be obtained by telephone interview with investigators. Please advise the Commission if you would like to take up this offer.

Please contact me on (02) 8281 5999 or at [pjohnston@icac.nsw.gov.au](mailto:pjohnston@icac.nsw.gov.au) if you have any questions regarding this matter.

Yours sincerely



Paul Johnston  
Senior Lawyer

**Sensitive**

**Paul Johnston**

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**From:** Paul Johnston  
**Sent:** Monday, 19 August 2019 10:59 AM  
**To:** Tim Unsworth  
**Cc:** Bronte Walker  
**Subject:** RE: Operation Aero - public inquiry [SEC=UNCLASSIFIED]

**Security Classification:**  
UNCLASSIFIED

Dear Mr Unsworth,

Thank you for your reply. I note the position regarding the invitation to make a statement.

Kind regards,  
Paul

Paul Johnston | Senior Lawyer  
NSW Independent Commission Against Corruption  
Level 7, 255 Elizabeth St, Sydney NSW 2000  
GPO Box 500 Sydney NSW 2001  
☎: 8281 5964 | 📠: 9264 5364 | ✉: [pjohnston@icac.nsw.gov.au](mailto:pjohnston@icac.nsw.gov.au)

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**From:** Tim Unsworth <[tunsworth@ulegal.com.au](mailto:tunsworth@ulegal.com.au)>  
**Sent:** Monday, 19 August 2019 10:35 AM  
**To:** Paul Johnston <[pjohnston@icac.nsw.gov.au](mailto:pjohnston@icac.nsw.gov.au)>  
**Cc:** Bronte Walker <[bwalker@ulegal.com.au](mailto:bwalker@ulegal.com.au)>  
**Subject:** RE: Operation Aero - public inquiry [SEC=UNCLASSIFIED]

Noted, thank you.

I don't think that Mr Huang is in a position to provide a statement to you as he has not been informed about the detail of the matters which are the subject of the enquiry. I don't mean that remark to be interpreted as an invitation to provide further material to him. However, I will keep the invitation in mind as the inquiry develops.

Tim Unsworth | Director  
02 8004 7707 | 0405 493 795



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**From:** Paul Johnston <[pjohnston@icac.nsw.gov.au](mailto:pjohnston@icac.nsw.gov.au)>  
**Sent:** Friday, 16 August 2019 8:44 PM  
**To:** Tim Unsworth <[tunsworth@ulegal.com.au](mailto:tunsworth@ulegal.com.au)>  
**Cc:** Bronte Walker <[bwalker@ulegal.com.au](mailto:bwalker@ulegal.com.au)>  
**Subject:** RE: Operation Aero - public inquiry [SEC=UNCLASSIFIED]

Dear Mr Unsworth,

Apologies for the delay in getting back to you.

I advise that the Chief Commissioner has granted the application for Mr Huang to appear at the public inquiry and for you to legally represent him.

I **attach** for your information a copy of the Commission's Standard Directions for Public Inquiries and draw your attention, in particular, to paragraph 13 relating to cross-examination. I also **attach** a copy of the Commission's Section 31B Guidelines. Should you wish to seek access to the Commission's restricted website for the purposes of the public inquiry, please complete the **attached** application form and return it to me.

I note that my letter dated 31 July 2019 extended a further invitation for Mr Huang to provide a version of events in relation to this matter by way of a statement. Please do not hesitate to contact me should Mr Huang wish to take up this offer.

Kind regards,  
Paul

Paul Johnston | Senior Lawyer  
NSW Independent Commission Against Corruption  
Level 7, 255 Elizabeth St, Sydney NSW 2000  
GPO Box 500 Sydney NSW 2001  
☎: 8281 5964 | 📠: 9264 5364 | ✉: [pjohnston@icac.nsw.gov.au](mailto:pjohnston@icac.nsw.gov.au)

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**From:** Tim Unsworth <[tunsworth@ulegal.com.au](mailto:tunsworth@ulegal.com.au)>  
**Sent:** Monday, 12 August 2019 3:54 PM  
**To:** Paul Johnston <[pjohnston@icac.nsw.gov.au](mailto:pjohnston@icac.nsw.gov.au)>  
**Cc:** Bronte Walker <[bwalker@ulegal.com.au](mailto:bwalker@ulegal.com.au)>  
**Subject:** RE: Operation Aero - public inquiry [SEC=UNCLASSIFIED]

Thank you.

Tim Unsworth | Director  
02 8004 7707 | 0405 493 795



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**From:** Paul Johnston <[pjohnston@icac.nsw.gov.au](mailto:pjohnston@icac.nsw.gov.au)>  
**Sent:** Monday, 12 August 2019 3:40 PM  
**To:** Tim Unsworth <[tunsworth@ulegal.com.au](mailto:tunsworth@ulegal.com.au)>  
**Cc:** Bronte Walker <[bwalker@ulegal.com.au](mailto:bwalker@ulegal.com.au)>  
**Subject:** RE: Operation Aero - public inquiry [SEC=UNCLASSIFIED]

Dear Mr Unsworth,

I will follow this up and will let you know the outcome as soon as I hear from the Chief Commissioner.

Kind regards,

Paul Johnston | Senior Lawyer  
NSW Independent Commission Against Corruption  
Level 7, 255 Elizabeth St, Sydney NSW 2000  
GPO Box 500 Sydney NSW 2001  
☎: 8281 5964 | 📠: 9264 5364 | ✉: [pjohnston@icac.nsw.gov.au](mailto:pjohnston@icac.nsw.gov.au)

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**From:** Tim Unsworth <[tunsworth@ulegal.com.au](mailto:tunsworth@ulegal.com.au)>  
**Sent:** Monday, 12 August 2019 2:55 PM  
**To:** Paul Johnston <[pjohnston@icac.nsw.gov.au](mailto:pjohnston@icac.nsw.gov.au)>

**Cc:** Bronte Walker <[bwalker@ulegal.com.au](mailto:bwalker@ulegal.com.au)>

**Subject:** RE: Operation Aero - public inquiry [SEC=UNCLASSIFIED]

Dear Mr Johnston,

Are you able to indicate when I may hear from you about whether leave will be given?

Tim Unsworth | Director  
02 8004 7707 | 0405 493 795



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**From:** Paul Johnston <[pjohnston@icac.nsw.gov.au](mailto:pjohnston@icac.nsw.gov.au)>

**Sent:** Monday, 5 August 2019 10:00 AM

**To:** Tim Unsworth <[tunsworth@ulegal.com.au](mailto:tunsworth@ulegal.com.au)>

**Cc:** Bronte Walker <[bwalker@ulegal.com.au](mailto:bwalker@ulegal.com.au)>

**Subject:** RE: Operation Aero - public inquiry [SEC=UNCLASSIFIED]

Dear Mr Unsworth,

Thank you for confirming your instructions. Your email below should be sufficient at this stage for me to put your application to appear for Mr Huang at the public inquiry to the Chief Commissioner for his consideration. I will advise you of the Chief Commissioner's determination in due course.

If Mr Huang wishes to provide a version of events in relation to this matter, the Commission's invitation for him to do so by way of a voluntary statement remains open. Please do not hesitate to contact me should you wish to discuss.

Kind regards,

Paul Johnston | Senior Lawyer  
NSW Independent Commission Against Corruption  
Level 7, 255 Elizabeth St, Sydney NSW 2000  
GPO Box 500 Sydney NSW 2001  
☎: 8281 5964 | 📠: 9264 5364 | ✉: [pjohnston@icac.nsw.gov.au](mailto:pjohnston@icac.nsw.gov.au)

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**From:** Tim Unsworth <[tunsworth@ulegal.com.au](mailto:tunsworth@ulegal.com.au)>

**Sent:** Friday, 2 August 2019 4:41 PM

**To:** Paul Johnston <[pjohnston@icac.nsw.gov.au](mailto:pjohnston@icac.nsw.gov.au)>

**Cc:** Bronte Walker <[bwalker@ulegal.com.au](mailto:bwalker@ulegal.com.au)>

**Subject:** FW: Operation Aero - public inquiry [SEC=UNCLASSIFIED]

Dear Mr Johnston

Mr Huang has instructed me to seek leave to represent him at the public inquiry. Could you please let me know what you require for this leave to be given?

Tim Unsworth | Director  
02 8004 7707 | 0405 493 795



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**From:** Paul Johnston <[pjohnston@icac.nsw.gov.au](mailto:pjohnston@icac.nsw.gov.au)>  
**Sent:** Wednesday, 31 July 2019 11:42 AM  
**To:** Tim Unsworth <[tunsworth@ulegal.com.au](mailto:tunsworth@ulegal.com.au)>  
**Subject:** Operation Aero - public inquiry [SEC=UNCLASSIFIED]

Dear Mr Unsworth,

I note that you acted for Mr Xiangmo Huang in February 2019 in connection with enquiries by Commission officers regarding an invitation for him to participate in an interview.

Please find attached a letter dated today, 31 July 2019, addressed to Mr Huang.

Please not hesitate to contact me on the number below, should you wish to discuss.

Kind regards,

Paul Johnston | Senior Lawyer  
NSW Independent Commission Against Corruption  
Level 7, 255 Elizabeth St, Sydney NSW 2000  
GPO Box 500 Sydney NSW 2001  
☎: 8281 5964 | 📠: 9264 5364 | ✉: [pjohnston@icac.nsw.gov.au](mailto:pjohnston@icac.nsw.gov.au)

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