

Mr Dougal Ross  
Partner  
Johnson Winter & Slattery  
Level 25  
20 Bond Street,  
SYDNEY. NSW 2000

11<sup>th</sup> August 2020

Your Ref:

Our Ref: E18/0093

Dear Sir,

**SUBJECT: Operation Aero - request for information**

I refer to the Commission's investigation known as Operation Aero into alleged breaches of NSW electoral law. I note that your firm represented the Australian Labor Party (NSW Branch) ("NSW Labor") and Country Labor during the Commission's public inquiry in this matter.

The basis of this letter is to seek the cooperation of NSW Labor in establishing certain facts surrounding the circumstances in which monies were donated to NSW Labor and Country Labor in connection with the Chinese Friends of Labor function held at The Eight Chinese Restaurant on 12 March 2015.

The Commission understands that Magenta Linas Software developed and hosted a web-based software program called Campaign Central, which was used by NSW Labor for constituent management and campaign purposes during 2015. Part of this service included receiving NSW Electoral Roll information from NSW Labor and loading that data into the Campaign Central software system where it could be accessed by staff of NSW Labor.

In order to assist this investigation, the Commission is seeking the following information and or records in relation to NSW Electoral Roll inquiries conducted by staff of NSW Labor during 2015:

1. As at 2015, was the Campaign Central database the only database or system utilised by staff of NSW Labor to access NSW Electoral Roll information?
2. If, as at 2015, NSW Labor utilised any other database or system to enable staff to access NSW Electoral Roll information, please identify those databases or systems and the persons with responsibility for their audit trail maintenance.

**Sensitive**

To assist in your inquiries, the Commission has previously communicated with Mr Tony Beuk of NSW Labor.

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

Yours sincerely

Philip Vickery  
Investigator

# JOHNSON WINTER & SLATTERY

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**Your Ref:** E18/0093  
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21 August 2020

Mr Paul Johnston  
Senior Lawyer  
Independent Commission Against Corruption  
GPO Box 500  
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**BY EMAIL** pjohnston@icac.nsw.gov.au

Dear Mr Johnston

## **Operation Aero Public Inquiry – Further Information Request**

We refer to your letter dated 11 August 2020, requesting information from NSW Labor in relation its access to NSW Electoral Roll information in 2015.

We are instructed to respond to the two questions in your letter as follows.

1. *As at 2015, was the Campaign Central database the only database or system utilised by staff of NSW Labor to access NSW Electoral Roll information?*

Campaign Central was the only database or system utilised by staff of NSW Labor in 2015 to access NSW Electoral Roll information. NSW Labor is not aware of any alternative database or system used at that time.

2. *If, as at 2015, NSW Labor utilised any other database or system to enable staff to access NSW Electoral Roll information, please identify those databases or systems and the persons with responsibility for their audit trail maintenance.*

As stated above, apart from Campaign Central, NSW Labor is not aware of any alternative database or system utilised in 2015 to enable staff to access NSW Electoral Roll information. (It is noted that the NSW Labor Membership application has an option to cross reference new member details with the NSW Electoral Roll. However, there is no audit trail on this cross reference, only an audit of who created the new membership record.)

Should you have any further questions in relation to the above, please let us know.

Yours faithfully

