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INDEPENDENT COMMISSION AGAINST CORRUPTION

THE HONOURABLE PETER M. HALL QC
CHIEF COMMISSIONER

PUBLIC HEARING

OPERATION PARAGON

Reference: Operation E18/0736

TRANSCRIPT OF PROCEEDINGS

AT SYDNEY

ON MONDAY 6 DECEMBER, 2021

AT 2.00PM

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

THE COMMISSIONER: Yes. Thank you.

MS SPRUCE: Mr Alameddine, just before the break I was taking you to volume 4.7, page 7, if we could have that back on-screen, please. You'll recall I was asking you about the whiteboard that your brother kept in his office with notes on it from time to time.---Okay.

10

Mr Alameddine, this is a photograph taken from your brother's Samsung Galaxy phone, taken on the 11th of February, 2017. You recognise that as being a note attached to the whiteboard in your brother's office?---I don't recall seeing it, no.

Do you recognise the handwriting on the note?---Yeah. That's his writing.

20

All right. And do you see the first heading is Over Height and then it lists "10 sites, three quotes" and it looks like it says Seina and a price of \$223,500 and then there's room for a price to be listed for Acate and EPMD?---Yeah.

Now, I appreciate you say you don't recall seeing this note but do you recall seeing notes of this kind from time to time where the various companies that your brother was operating were listed in respect of particular RMS jobs? ---No. I've never seen three, I've never seen Acate put on the board, no.

30

Sorry, you've never seen what?---I've never seen Acate written on the board.

I see. But what about just EPMD and Seina. Do you recall seeing notes like this written on the board where different prices were - - -?---No, no, no. No. So I, I think you see that he's got it on a piece of paper. He's not actually written it on the whiteboard.

Yes. Thank you. That's correct. It seems to be - - -?---Yeah.

- - - magnetically attached to the whiteboard.---Yeah.

40

Mr Alameddine, what was your understanding about why it was that your brother was operating under at least two different company names in respect of the work he was doing for the one client, being the RMS?---I just assumed that you, you get a larger portion of the work.

Well, why couldn't he get a larger portion of the work just operating through one company?---I, I don't know. Maybe that's a question for him?

Mr Alameddine, is it the case that you deliberately refrained from asking your brother any questions about how this all operated?---No. No. I knew my place and my place wasn't to ask any questions.

I see. And is that your place as the younger brother?---As it is with most younger brothers, yeah.

THE COMMISSIONER: But your brother, as you said, had a longstanding relationship with Mr Dubois and it was through that friendship, as you
10 frankly acknowledged, that your brother had the benefit of RMS work?
---Correct.

And it was also the position, was it not, that through your brother, you also benefitted in - - -?---That's not – incorrect. That's incorrect.

Well, you benefitted in the sense, did you not, in having some of the RMS work provided to you for which you received payment?---That's incorrect.

I'm sorry?---That's incorrect. You mean labour work?
20

Sorry?---You mean labour work?

Yeah, whatever, however you describe the work you did. All I'm putting to you is that the facts are, and there's nothing that I'm suggesting is wrong in you receiving money for doing work, but you realised that your brother was getting the benefit of the friendship he had, the work coming from RMS, right?---Mmm.

And, as you've said, in 2017 and perhaps (not transcribable) '18 at least,
30 and maybe beyond 2018, your brother made available some of the RMS work for you to perform?---No, no. I think you're misunderstanding.

Well - - -?---I was, I, I, I was an employee for him. I wasn't benefitting out of, benefitting out of any of the RMS work.

No. But I'm not suggesting you benefitted from the overheads or anything like that. All I'm suggesting is you draw a wage or however you describe it, cash money being given to you by your brother for doing something in relation to RMS work. It's a benefit that flowed through your brother to you
40 for doing the work. So it comes back to the fact that all of the benefits your brother derived, however you'd describe these benefits, and that what you term the wages that you earned through your brother getting that work all comes back to the friendship arrangement that existed between your brother and Dubois.---Yes, if you look at it - - -

In that sense. I'm not imputing anything wrong on your part at this point. But that was the reality, that you were happy to do the work if it was available and happy to earn money through doing the work.---Okay.

That's right, isn't it?---Yeah, that's, that's correct.

So I'm just simply saying it was an arrangement that was based on friendship with Dubois, that it had all material benefits flowing out of that arrangement.---Okay.

Right. Yes. You continue.

10 MS SPRUCE: Mr Alameddine, you gave evidence before the break that sometimes you would telephone subcontractors to obtain quotes - - -?
---Correct.

- - - in respect of RMS work at your brother's instruction?---Correct.

On occasions when you were told by your brother to ring on behalf of EMDR - - -?---EPMD?

20 Sorry. I withdraw that. Thank you. EPMD.---Yeah.

Did you say to the relevant subcontractor on the phone that your name was Simon Raha?---No. No. My name was always Ahmed.

I see. You always used your own name?---Yes. From memory, that is. I don't ever recall using Simon.

30 All right. You don't recall ever using Simon's name in speech or in writing. Is that correct?---Possibly writing, maybe, when I'm asking them for a quote by email but I don't ever recall in speech, no. Possibly writing. I can't, I can't be sure so I'm saying possibly.

Right. Now, Mr Alameddine, it's the case, isn't it, that from time to time, your brother Hassan went overseas?---Yes.

And he did that relatively regularly. Is that correct?---Towards, yeah, '17, '18, '19 it was regular, yes.

40 And is that because he had a meat business that was operating overseas?
---Correct. Yes. He had a meat business.

All right. And on the occasions when he went overseas, did your brother ask you to look after his business while he was gone?---Yeah. To a limit, yeah.

And when you say "to a limit", what was - - -?---Oh, I was still doing the designing and he would look after everything else.

As I understand what you've just said, you were just continuing to do the aspects of the work that you would ordinarily do?---Correct, correct, correct.

But my question is when your brother went overseas, did he ask you to do anything additional to that which you would ordinarily do in relation to RMS work?---I have to think about that. I did once go and check out a gantry to see the, yeah, I think they were building a gantry at the time and I needed to see the production of it but, take a few pictures. I'm just trying to think really. No, I can't think of anything. If you want to jog my memory, I, I can't think of anything.

All right. Well, do you recall an occasion when you were involved in preparing a quote for EPMD while your brother was overseas?---Yeah. This was the occasion that I mentioned earlier.

That's correct. You gave evidence earlier this morning that there was one occasion where you have been involved in preparing a quotation?---Correct.

If I could just take you to, please, to volume 4.9, page 18. Mr Alameddine, this is a document which records your brother's travel movements in and out of the country, and if you have a look at the sixth line down, you can see there's a, there's an entry for the 20th of February, 2018.---Yeah.

And you can take it from me that that entry records that on flight EK413 your brother flew from Sydney to Dubai on that day.---Okay.

And then the entry above that one records that on 2 March, 2018, on flight EK412 he returned to Sydney from Dubai.---Okay.

So if you just could hold that date range in your mind, that your brother was out of the country from 20 February, 2018, until 2 March, 2018.---Okay.

And then if we could please take Mr Alameddine to volume 4.9, page 20. Mr Alameddine, you can see that this is an email from Mr Dubois in relation to HVIS signage replacement.---Okay.

And in the body of the email it says that RMS is seeking a quotation for installation, repair and replacement of signage. "Please refer to the RFQ for scope and details and please provide quotations by close of business on the 2nd of March." And I take it you know what an RFQ is referring to?---I do now, request for quote.

Right. And if you have a look in the address of the email, you can see that Mr Dubois has sent this email to a number of different email addresses. ---Yep.

See that it's been sent to H Alameddine and you recognise that as the Seina Group email address?---That's correct.

And it's also been sent to the EPMD email address.---Correct.

And then it's also sent to info@cbfprojects and admin@ozcorp civil.
---Okay.

Were you familiar with a company called CBF Projects Pty Ltd?---Yes.

10 And what did you understand that company - - -?---I know them to be other companies like Hassan's was.

When you say - - -?---They were, they were other civil contractors that were onsite.

Right. Another company that was doing contract work for the RMS?
---Correct.

20 And do you know who ran that company?---Yeah. I've said earlier there was two people, there was a partnership that ran that company.

Do you recognise the name Barrak Hadid?---Yes.

And do you recognise the name Chahid Chahine?---I don't recognise that name. I knew him as Hoody.

I see. So, and did you know Mr Hadid as Baz?---Yes.

30 And so you knew that CBF Projects was another company that did work for the RMS run by people you knew as Baz and Hoody?---Correct, yes.

And were Baz and Hoody, to your knowledge, friends of your brother's?---I don't know about friends. They were – I, I don't know, I never really saw them other than onsite. They were friendly onsite. I, I probably saw them a couple of times outside of site, but mainly onsite.

40 What were the circumstances in which you would see them outside of site?
---There was an instance where Baz came to the [REDACTED] house to pick up something, maybe once or twice, and I was, I had to give it to him. Bollards one time and I think cable on another time. Hoody, I've seen him maybe once or twice at the Colebee yard when we were picking up signage.

All right. And what about the company Ozcorp Civil? Are you familiar with that company?---I, I found out later during the inquiry that it's also owned by them two, but I wasn't aware of that during the, during the – yeah.

You're referring to Baz and Hoody when you refer to these two?---Correct, yes.

But you weren't aware of that until you heard evidence about it?---Yes, during the inquiry, yes.

All right, so the – if we could just have that document back on-screen, please, page 20 of volume 4.9. So if you look at the date of that email, Mr Alameddine, you'll see it's sent on the 26th of February, 2018. And you will recall that that is within the date range where I indicated that your brother Hassan was overseas.---Yep.

10

And the quotations are said to be due by close of business on 2 March. ---Okay.

Which you will recall is the day that your brother flew back into Sydney from Dubai.---Correct.

Now, looking at that email, do you recall whether you received that email on the Senai email address while your brother was overseas?---Either I received it or he had received it and called me and told me to action it.

20

All right. But you do have a recollection of - - -?---I don't have a recollection, no. But it was brought to my attention that I did submit a quote, and it was also brought to my attention that the quote is in relation to this matter, and this is why I am saying what I am saying. I have no recollection of doing the quote and sending it off, but I don't deny doing the quote or sending it off.

I see. But you have no present recollection of it.---No. But I don't deny them either.

30

Well, Mr Alameddine, I'll take you to some documents to see whether they refresh your memory.---Yep.

First of all if we could just go to page 21, the next page. Or actually page 22. You'll see, Mr Alameddine, that this is a list of the sites the request for quotation relates to.---Yep. Yep.

Does that assist you in any way to refresh your memory?---I was at most of these sites except two. I physically done the job.

40

All right, so you recall physically doing the work - - -?---Yeah.

- - - at the sites.---Yes.

Do you recall designing documents for these sites?---I don't know if these sites required documents. Like, I can't be too sure.

All right, and then just onto page 23, please. You see there's an additional two sites there listed on the next page.---Yep.

And is it the case that you were present and did the physical work at those sites as well?---Correct.

Okay, thank you. And it's the case, isn't it, Mr Alameddine, that in the period we're discussing, in 2018, you and your brother sometimes communicated with each other by WhatsApp?---Correct.

10

And you used WhatsApp to send both messages and sometimes voice (not transcribable) to each other?---Correct. Yeah.

If I could take you, please, to volume 4.5, page 5.---Yeah.

Mr Alameddine, this is a WhatsApp conversation between you and your brother, which was extracted from your brother's Samsung Galaxy phone. ---Yep.

20 If you have a look at the second blue message from the top.---Yep.

You see the phone number that it's sent from is your phone number. ---That's mine. Yeah.

And it's obviously recorded in your brother's phone as Ahmed Bro.---Yeah.

And so you can see that in the conversation I'm going to take you to, where the messages appear in blue, they're sent by you.---Yeah.

30 And then you can see in the first green message that it's sent by a phone number.---Yep.

And you recognise that phone number as your brother's mobile number? ---Yeah.

And so where messages in the conversation I'm going to take you appear in green, that's sent by your brother to you. Now, I'm going to take you through this chat, and it's a relatively lengthy one, to see if it assists you recall these events. There are both written messages and voice messages.

40 And just to warn you, there is going to be some delay as the voice messages are played because of the technology involved in playing them. So, I apologise if there is a slightly disjointed nature to it, but we'll go through it as quickly as we can. So looking at that second blue message from the top, sent by you, you can see it's sent on the 28 February, 2018.---Ah hmm.

And it says, "Did you do the RFQ?"---Yep.

And you gave evidence a moment ago that that's a reference to the request for quote, correct?---Yes, that's correct.

And the request for quote that Mr Dubois emailed to the Seina Group and EPMD was sent on Monday, 26 February, and your text to your brother is on 28 February, two days later.---Yep.

10 It's likely, isn't it, that what you're referring to is that email from Mr Dubois that I showed you a moment ago?---Oh, no doubt.

No doubt about that, okay. And then in the next message you see just a few minutes later, you say, "Please Hass, it's already overdue."---Yep.

Now, do you recall why it is that you would be concerned with whether or not the RFQ was submitted on time?---I think that time, look, I don't remember the occasion. I'm not going to sit here and say something. I don't remember it. I don't know why I was concerned, no.

20 You don't have any recollection of Mr Dubois contacting you directly and - - -?---He, he does contact me somewhere, I've already been through all of this. He does contact me somewhere down the line.

All right. But you have no memory at this point?---But if you're asking me about the specific message there, I can't answer that.

Sure.---I, I really don't have any recollection of it. If you want me to jump the gun, I can and let you know but as for that message, I don't recall.

30 Thank you. And your brother then sends you a voicemail message in response.---Yep.

And if we could please play for Mr Alameddine the voice message that is WA0024. And as I understand it, a transcript of this will come up on the screen at the same time and the reference for the transcript is volume 4.9, page 33.

AUDIO RECORDING PLAYED

[2.23pm]

40 MS SPRUCE: Do you recognise that as your brother's voice, Mr Alameddine?---That's my brother, yes.

And you can see on the transcript, he says, "I'm going to do it. He'll wake up and he'll find it in his fucking email," and then there's also some Arabic at the beginning and end of that message.---That's correct.

And is it correct that the Arabic section of the messages was more expletives?---Possibly. Yeah, that's correct.

All right. And if we could then go back, please, to volume 4.5, page 5, and where your brother says in the message we just heard, "He'll wake up and find it in his fucking email," it's obvious, isn't it, he's referring to Mr Dubois?---Of course.

10 All right. And then you see that you then send a further series of messages. ---Ah hmm.

These are sent the next day. So, on the 1st of the 3rd, at 6.30am in the morning you send your brother a message saying, "How did you go?" ---Yep.

And then the next message at 6.34 is, "Hass, he's coming over in one hour and you still haven't sent it, bro."---Yeah.

20 Now, I take it "he's coming over" is a reference to Mr Dubois.---Of course.

So do you recall this now? Because it seems to me that it might be something that would stick in your memory. It's very early in the morning, around 6.30am in the morning. You've obviously had some contact with Mr Dubois directly, and Mr Dubois has obviously indicated that he's coming over to your house.---I have no recollection of this incident. However, I do not deny this incident. I've said it many times and I'll continue to say it. I have no recollection of this incident but I don't deny it.

30 I understand that.---Yes.

But I'm just giving you an opportunity, as you go through the messages - - - ?---Yes.

- - - to see whether it prompts your memory.---It does not prompt my memory, no.

40 All right. And is it something that happened from time to time, that Mr Dubois would come over to your house and ask you for some sort of RMS work?---No, very rarely. Very rarely. Possibly four or five times it's happened. But he used to store a car or two at our house. He had some goods for his café also there 'cause the block was very large, so we had the space for it. So it wasn't, I wasn't surprised ever to see him there because there was, he did have some assets that were there.

Right. And just while we're on that topic, you say he used to store a car or two at your place.---Yeah.

Do you recall what sort of cars he stored?---Yeah, they were classic cars. They were, one was a, like a Chevrolet or something, and another car was just a standard Holden Commodore or Ford Falcon or something like that, just a white sedan. Sorry, sorry, no, it wasn't. No, it wasn't. It was a Chrysler 300C. A white sedan car.

And did you understand that Mr Dubois collected vintage cars?---It was made, I was made aware of it, yes.

10 By Mr Dubois?---Yes. He had told me.

What did Mr Dubois say to you about it?---He told me that he collected, he's got a thing for cars and he collects cars. We were on a job site, from memory, when he said that to me.

And were you aware of any other (not transcribable)?---I know from the inquiry that he has a large collection of expensive cars.

20 Right. You didn't know that at the time, is that correct?---I didn't know the extent of his collection. I knew he had like a, I mean, I knew he had a Mercedes in his driveway. I knew – he, he mentioned something about a car overseas and mentioned something about a Porsche. I knew he had a certain amount of cars but I didn't know to the extent of which he had them, no.

Right. And you knew that Mr Dubois was a public servant of the RMS.
---Yep.

30 Did it strike you as unusual when you learned about Mr Dubois' car collection, to the extent you were aware of it at the time, did it strike you as unusual that a public servant would be able to afford a Porsche and a Mercedes and a Chevrolet and multiple vehicles?---With finance these days, you can afford everything. He, he told me he was also a car dealer, he used to trade and buy and sell cars. So I would expect it from a car dealer, and he said he has his car dealer licence, so I would expect it from a car dealer to have cars.

40 All right. Thank you. Now, coming back to these messages, if we could go, please, to page 6. You see at the top of the page you send your brother another message. "He messaged me he'll be here in 15." And then again an hour or so later, "Please send EPMD ASAP. Wallah, he's on his way."
---Yeah.

And then if we could please play the voice recording WA0029, and the transcription of that is at volume 4.9, page 34.

AUDIO RECORDING PLAYED

[2.29pm]

MS SPRUCE: Do you recall receiving that message?---No.

All right. And then back to volume 4.5, page 6, please? And you'll see after that voice message, you instruct him to send the quote to your personal email address.---That's correct.

10 And did you sometimes use your personal email address to do RMS work?
---I don't think so, no. No. If there is, you probably have access to it. If there is, it's probably one or two files.

All right. And do you recall why you wanted it sent to your personal email address in circumstances where you had access to the EPMD address?---I don't recall this entire incident, sorry.

All right. And then if we could please play the next voice message, which ends in 118.OPUS and the transcription of it is volume 4.9, page 35.

20

AUDIO RECORDING PLAYED [2.31pm]

MS SPRUCE: So it appears from that message that your brother's going to send you some things and he's going to give you instructions about what to do in relation to them.---It appears so.

30 And you then send a message back saying, "How's it looking? Chasing him up again."---Yeah.

And then if we could go, please, to volume 4.15, page 7. See at the top of that page, you send a message, saying, "He's here. Don't call," at around 9.31 in the morning?---Okay.

Now, that's clearly a reference to Mr Dubois being at your place?---Yes.

40 Do you have any idea why it is that you wouldn't have wanted your brother to call when Mr Dubois was present?---No, I have no recollection of that day, sorry.

Wouldn't it have been preferable for you to say, "Here's here. Why don't you ring and speak to him?"---It would have made sense, would it? It would have made perfect sense. I don't recall, sorry.

Do you recall whether you or your brother felt nervous or intimidated about Mr Dubois?---If you've got the project manager calling you and you know this man, I'm, I'm, I'm assuming here, reading this conversation, and you know this man is in control of giving your brother some work, you'd tend to

have a, a bit of nerves flowing. So it, it looks like I'm acting in my brother's best interest. However, he, it looks like he's not doing so.

10 All right. And then you get a message from your brother a few minutes later saying, "Almost done." And then you chase him again, saying, "How long do you need?" And then at 9.58, he sends through a document to you, followed by a message directly underneath it that says, "Needs finalising. No time. About to take off." And then if we could go, please, to volume 4.5, page 121? Sorry. That's not the correct page. There you are. You'll see this is a photo of what your brother sent to you.---Okay.

So it's the quote on Efficient Project Management & Deliveries letterhead and it's dated 1 March, 2018. And if you go, please, to page 120, you'll see that down the bottom where the costings should be listed, that it's not properly formatted and it's still in what appears to be a draft form?---Yeah.

You have no recollection of receiving that document?---No.

20 All right. And then if we could please play the voice recording WA0031 the transcript of which is at volume 4.9, page 36?

AUDIO RECORDING PLAYED

[2.34pm]

MS SPRUCE: So Mr Alameddine, your brother's giving you fairly explicit instructions there about what you're to do with the draft quote that he's sent you and the email that you're to send in relation to it.---Okay.

30 You don't recall receiving that message?---No, I do not.

And then if we could please play the voice recording WA0034, which you received a couple of - - -

40 MR DOWNING: Just before we do that, Commissioner, and I'm sorry to jump in. Just there may have been just some slight confusion with some of the page references, because volume – and I'm sorry, Ms Spruce, to jump in but volume 4.5 does have in it three different page numbers on some of the pages. I think she's referred to pages 120 and 121 of that volume when it should in fact have been references to page 17 and 18. Just so that we're clear for the transcript, and I'm sorry, this is one of the complications of not being in the one place.

THE COMMISSIONER: No, no. It's important to get it right.

MS SPRUCE: Thank you. That's correct. There are three page numbers on the relevant volume and I've referenced the wrong one. So, the reference

that I made to page 121 in volume 4.5 should be page 18, and the reference to page 120 should be to page 17.

THE COMMISSIONER: Yes. All right.

MS SPRUCE: All right. So if we could now play, please, voice recording number WA0034.

10 **AUDIO RECORDING PLAYED** [2.36pm]

MS SPRUCE: All right. And then back to volume 4.5, page 9, please. Can you see that after your brother sends you the voice message we've just heard there's another flurry of messages where he says, "Are you alone? Can you talk?" And then you reply, "10 minutes." Presumably that's because Mr Dubois is still there. Is that a likely assumption?---I, I don't recall, I don't recall the day, sorry. Yes, maybe, I assume so.

20 All right. And then over the page on page 10, he sends you further instructions, "Add the total amount, calculate the total amount, add GST." And then over the page, "Calculate total" and then there's another voice message. If we could please play WA0036.

AUDIO RECORDING PLAYED [2.38pm]

30 MS SPRUCE: All right. And then back to volume 4.5, page 11, please. Then you receive further written instructions. "I think the total was 237,600." And then he tells you the GST amount you need to add. And then over the page on page 12, he tell you that's the grand total should be 261,360. And then the next message, "About to take off. Will chat when I get to Dubai in four hours." And then presumably just before he takes off, he leaves you another voice message. And if we could please play WA0037.

40 **AUDIO RECORDING PLAYED** [2.40pm]

MS SPRUCE: I'm sorry, that was WA0038. Could we just play 37 first, please. The transcript is at volume 4.9, page 39, if that assists.

AUDIO RECORDING PLAYED [2.41pm]

MS SPRUCE: So, Mr Alameddine, it appears to be the case, doesn't it, that you were being charged with making sure that it didn't look like the EPMD quote was being made on the run, and that EPMD was running smoothly while your brother was overseas?---Yeah, that does look like the case, yes.

10 All right. And you've said already that you can imagine – although you don't recall this incident – but you can imagine you would feel nervous having the project manager at your house, and obviously while he's there you're receiving a fairly frantic flurry of texts and messages from your brother.---That is correct.

And you're being instructed to prepare a quotation, which, as I understand, is something you've never done in the past.---That is correct from what I can understand through this transcript.

20 All right. Well, isn't this something that would stay in your memory? It's early in the morning. Mr Dubois has turned up at the house. Your brother's not there. A quote needs to be done. You're getting frantic calls.---I, no, you're incorrect. I, I don't, I do remember Alex coming to the house. I don't recall the, the quote and the invoice. I do, I do recall getting a USB off him, as the next message will show. And I've never denied that.

30 All right, well, if we just go back to volume 4.5, page 12. You'll see that the last message – we'll just wait for it to come up. The last message from your brother, just as he's about to take off, is at 10.15am on 1 March. And then down the bottom of that page you see, at 12.45pm, you sent him a message saying, "Please call me as soon as you see this." And then over the page, on page 13, at 2.33, you send your brother a voice message. ---Okay.

And it's the voice message we heard a moment ago, which was played slightly out of order, where you said, "Oh, Hass, he came past now and gave me another USB, but this time Baz came." Would you like to hear that message again before I ask you questions about it?---No, no. No, no. No, no questions about it.

Sorry?---No questions. I remember that incident.

40 All right. Well, what do you recall then happening on that afternoon?---He, he either gave me one or two USBs that afternoon, and I just had to hand it to my brother, who was going to arrive the next day.

So, Mr Alameddine, you recall, do you recall Mr Dubois coming to your house early that morning?---I don't think it was early. What time is it?

Well, this, as I understand the messages, this is his second visit for the day. ---I don't recall him coming twice, sorry.

All right, but you do recall in the afternoon he arrives and he has a USB?
---Yes, I do recall getting a USB off him.

Okay, and in the message you say to your brother, you say, “He’s given me another USB but this time he came with Baz.”---Yeah, okay.

So do you recall receiving a USB from Mr Dubois on an earlier occasion?
---I don’t recall, no, but the messages seem to indicate that, but I don’t recall it, no. I do recall getting a USB. I do recall Baz. I don’t recall the, I don’t
10 recall if there was one or two visits. I do recall a visit and it was with Baz.

Mr Alameddine, was it part of the way that your brother ran his businesses that documents were passed around by USB rather than by emailing documents?---I don’t know. I don’t know. I wasn’t involved in that section.

Well, you gave evidence earlier today that when you prepared documents for your brother – for example, design documents – you would hand them to him on a USB.---Yeah, documents I prepared and gave to him, yes.
20

All right. And - - -?---Or they were, say, or, that’s if they were done on my laptop, which were very rarely. If, if they were done on the office computers, they were just saved on the office computers.

All right. So now on this occasion we have Mr Dubois handing you a USB.---Correct.

And do you recall Baz being with him?---I do recall Baz being with him.

30 And when you refer to Baz, you’re referring to Barrak Hadid?---Yes.

And do you have any recollection of why it was that Baz was with Mr Dubois?---No, but I do recall meeting them outside, on, in the driveway, and they were in an orange car. That, that’s all I recall. Baz was driving and Alex was in the passenger seat. If I’m referring to the same incident, because like I said, Baz did come to the house a few times.

Well, do you think there might be more than one incident where Mr Dubois came and handed you a USB with documents on them?---I only recall the
40 one incident.

All right. And then you say in your message to your brother, “Yeah, he gave me another USB to fix, oh, to send him more stuff.”---Okay.

And you gave evidence earlier, as I understand it, that you think that that was stuff that Hassan was going to send him once he was back from overseas.---Yeah, oh, that, that’s the go, yeah.

Well, is that a recollection that you have or are you just guessing?---I don't, I don't have a recollection, no.

I see.---I, the, the whole, the only thing I recollect from this entire incident is that he actually came to the house with Baz in an orange car and gave me a USB. I recall it once. I don't recall it twice.

10 Well, you agree, don't you, though, that it seems from these frantic messages back and forth that there are documents that Mr Dubois wants by the end of that day.---I don't, I didn't recall hearing that in the, I don't recall it being at the end of the day, sorry.

Mr Alameddine, if I can just, if I can just show you, please, volume 4.9, page 41. And this is your message that we've just referred to, where you say – this is the transcript of the message where you say that Mr Dubois has been and given you another USB.---Ah hmm.

20 Now, you see that that message was recorded at 2.33pm on 1 March?---I see that.

And then if we could please go to volume 4.9, page 30. You'll see that this is an email sent from the EPMD email address - - -?---Ah hmm.

- - - at 2.49 on 1 March.---Okay.

10 minutes or so later.---Okay. Is that not the quote that was originally sent to me by my brother?

30 Well, you'll see that there's an email saying, "Hi. I've attached the HVIS signage quote." And then if we go to the next page, you see that that's the first page of the attached quote. And then if we go to the second page of the quote, please, you see there that in the costings the formatting errors that appeared in the draft that your brother sent you have been corrected.---Ah hmm.

And the amounts appear to have been corrected.---Yeah.

40 And so it appears to be the case, doesn't it, that you've amended the document according to your brother's instructions and then emailed it to Mr Dubois from the EPMD email address?---That does appear to be the case, yes.

But I take it you say you have no recollection of doing that?---I have no recollection, but I'm going to reiterate this a million times, I do not deny doing it. But if you're asking me if I remember, no, I do not remember. Did I do it? Yes.

THE COMMISSIONER: Well, how did you go about inserting the, well, firstly determining what costings to go into the document?---He mentioned it. He had allowed for it in the - - -

What?---It, it was already there in the, I just had to realign it.

10 There were some figures he left for you to work out, did he?---No. He said in the message, if you recall the message, it said the first one's a certain amount and then the rest of them are the same number. That's what he had said in the voice message.

Apart from the first item, number 1 - - -?---Number 1 is meant to be Silverwater.

Sorry?---Number 1 is meant to be Silverwater.

20 As to the others, they're all the same amount, different projects.---Okay. So Silverwater, Silverwater I did not attend and Bodalla I didn't attend. Silverwater was a, a heavy-vehicle inspection site, that's a, a permanent site. It's a permanent site, it's not a, it's not one – it's got, it's got an actual building. I didn't attend that site so I don't know what happened there, and I didn't attend Bodalla but I attended everything else. Braemar also I didn't attend.

But all those projects from 2 down to 12, they weren't identical projects, were they?---Like, so I, I can't speak for number 10 but 2 to 12 were identical projects.

30 They were?---They were identical projects, yes, but I can't speak for number 10 because I wasn't there.

When you say "identical projects", what do you mean by that?---Lead-up signage for HVIS on the road.

Sorry, I don't understand, I can't hear.---Lead-up signage for HVIS sites on the road.

40 Ah hmm. What sort of signage is that?---You've got one kilometre, you've got 500, so you've got the one kilometre sign, you've got the 500 and another sign saying "Keep left" and then the last one was, "Inspection bay, keep left. Enter if required" or something like that. And then I think there's a series of stop signs, no stopping signs inside the actual bay.

Every one of them identical, you think?---Every single one of them identical.

So, forensic example - - -?---The, the only thing that might be differ is if we're going to install maybe eight no stopping signs on one side and, or 10

on the other. Just it depends on the site, how big the area is. As I said earlier, I was very, very familiar with the, with the, the rule regarding to signage placing, placement and, yeah.

Yes, very well. Yes.

MS SPRUCE: Mr Alameddine, if we could go, please, to page 4.5, sorry, volume 4.5, page 13. If you see the message that appears at the top of that page is the voice message we've already heard where you tell your brother
10 that Mr Dubois is back at the house with another USB.---Okay.

And then you see that following on from that message there's what appears to be a series of attempts by you to get in contact with your brother.---Is that calling him?

I, I - - -?---Okay, yeah, maybe, yeah. Doesn't, yeah.

I'm sorry, I'm not sure but certainly if we go down the page, you send a message at 3.40pm on 1 March where you say, "Bro, answer. It's
20 important."---Okay.

All right. And then your next message to your brother is at 4.03pm and there's still be no response from Hassan.---Okay.

But if we could go, please, to volume 4.9, page 48. You can see, Mr Alameddine, that this is a quotation in respect of the same job that you sent a quotation from the EPMD email account earlier that afternoon, but this time, it's sent from the Seina Group email address to Mr Dubois, and it's sent at 3.52pm, so that is shortly after you sent your brother a text message
30 saying, "Bro, answer. It's important," but before you had received any answer, an email is sent from the Seina Group email address attaching a quotation in respect of the same signage works. And you can see that quotation at page 49 and following.---Was my brother on a layover at that time?

I'm not sure.---In flight?

I can't answer that question, Mr Alameddine. I'm just showing you this quotation.---Okay.
40

If we just go to the next page, please, so that Mr Alameddine can see the quotation? Do you have any recollection of emailing this quotation from the Seina email address?---No, I don't have any recollection.

Well, would you agree that in circumstances where Mr Dubois has come back to the house with a USB stick with some documents on it and you've tried to contact your brother after receiving that USB stick unsuccessfully, and there's then shortly thereafter an email sent from the Seina Group

account attaching this quotation, that it's likely that that was sent by you and that it's the document that was on the USB that Mr Dubois gave you?---I can't answer that question. I'm not sure, because if he was in layover, then he might have done that, that quotation. I can't, I can't answer that truthfully, sorry.

Mr Alameddine, you said you recall Mr Dubois coming over and handing you the USB stick?---Yeah.

10 Do you recall what you did with the USB stick?---No. Usually it goes in the office drawer.

But you don't recall on this occasion whether you put it into the computer to see what was on it?---I'm sorry. I don't recall, no. The whole incident's, it's a blur.

All right. And then if we could please play WA0053? This is now a voice message which you sent your brother the following day, on 2 March, at 11.14am.

20

AUDIO RECORDING PLAYED

[2.57pm]

THE WITNESS: Okay.

MS SPRUCE: Well, it would appear, wouldn't it, Mr Alameddine, that you are keeping track of emails that your brother's receiving while he's away?

30 ---That's not necessarily true, no. So he's, he's in the aeroplane, I'm assuming he's in the aeroplane and that's possibly why I was keeping track of the email. But that, that, that statement you said wasn't entirely true, no.

But, Mr Alameddine, we've just heard a message where you're notifying your brother that he's been sent a purchase order.---Yes, but you made it sound like I keep track of his emails. I don't. So I, the, the reason, there's possibly, I don't recall the incident but for me to go into his email address, there must have been a reason and that reason was possibly 'cause he's in, 'cause he's, 'cause he's still flying over, if that makes sense.

40 That's all I'm putting to you, Mr Alameddine, is that while your brother was overseas it would appear that you were monitoring his emails for him. Do you agree with that?---In certain instances, yes, not all the time.

On this particular - - -?---In this particular incident, yes. There is no other explanation for it, even though I don't recall the incident.

All right. And then if we could go please to volume 4.5, page 16, you'll see the last message on that page is on the 3rd of the 3rd, 2018. So this is after your brother's back in Sydney?---Okay, yeah.

And you notify him, "Email in Seina. You've been paid."---Okay.

So it would appear, wouldn't it, that you were monitoring the Seina email account for your brother?---When was this? Was this the day he arrived?

10 This was the day after he arrived back in Sydney.---Okay, yep. That's what it appears like, yes.

And I take it that you say that's the only occasion on which you were ever involved in providing quotes for the RMS?---I don't recall the incident, so I'm going to say yes, but I don't recall the incident.

20 But you don't doubt that it happened, having just - - -?---No, no, no. I never doubted ever. From before, what I mentioned as soon as I walked in, I said there is an incident, I don't remember it, but there is an incident, and this is it. I never doubted that, and I made it very, very clear as soon as I walked in.

All right. Now, Mr Alameddine, I want to ask you some questions about the day that search warrants were executed - - -?---Yes.

- - - in relation to the [REDACTED] Street address.---Okay.

And also the [REDACTED] address.---Okay.

30 Now, first of all, you're aware, aren't you, that on the 18th of June, 2019, a search warrant was executed at your parents' residence?---That is correct.

And were you present at the premises when that search warrant was executed?---Not when it was executed. An hour or so later. Two hours later.

I see. And was the search still underway when you arrived?---It was, yes.

40 And you must have been alarmed, I take it, when you arrived?---Very, very alarmed. Very alarmed.

And how did you find out what it was that was going on?---I saw the, one of the nice officers there gave me the warrant. I read the warrant.

Right. And so you read, I take it, that there was an investigation in relation to Mr Dubois?---Yeah, it said Mr Dubois's name, Mr Steyn's name, and it mentioned CBF Projects, the warrant.

And had you had any dealings with Mr Steyn at the RMS?---Mr Steyn, if, if I did, it was towards the end of it. Maybe towards 2018, the end of it. I probably, I met him, I met him at Albury and I met – actually, I don't know if I met him at Albury. I did meet him at Nyngan. I don't know if Albury. I don't know. But I also did drop off something to his house, so a pile of rocks that I picked up on a tipper and I dropped it off at his house.

10 All right. And when you arrived at the [REDACTED] Street address on the 18th of June and found this search warrant executed, was your brother Hassan there?---Yes.

And so what did you say to Hassan, to the best of your recollection?---I don't remember. I don't think I spoke to him straight away.

Well, that's - - -?---I don't remember. I, I, when I first walked in, he was inside the house, in the lounge room. My old man was there, my old lady, my sister and my niece and nephew. I don't recall speaking to him when I walked in.

20 Well, you've said that you were shocked, and it must have been obvious to you from what you saw on the warrant that it was to do with the work that you'd been doing for your brother in relation to the RMS?---That I'd been helping with my brother, yep.

And so you must have had a number of questions for your brother about what was going on, true?---The warrant mentioned CBF to me. I, I, I didn't entirely believe he was guilty at that time. 'Cause the warrant did mention CBF, it didn't mention him or his companies, associated companies.

30 Well, when was the first occasion when you asked your brother what was going on in relation to the search warrant?---When we, things were starting to slow down inside. The ICAC had all the, the investigators they were wrapping up, and he walked outside and he told me, "I think I'm in trouble."

"I think I'm in trouble." And did you ask him why?---No, I didn't. I don't recall asking him why. He gave me a bunch of papers that were in his pocket, a forklift licence. Whatever he had in his pocket, he gave them to me.

40 And did he ask you what you were to do with those papers?---No, he just told me, "Keep them with you." They were nothing, they were a bunch of receipts and, he was just nervous. He just gave me everything that was in his pockets.

And so you say you didn't ask him any further questions at that point about his - - -?---At that point, no, I never asked him anything.

All right. And did he ask you to do anything else other than take those papers?---Yeah. Yeah, he asked me to go to someone's house in Chester Hill. His spiritual leader, if you want to put it like that. I went there. When I got there I was there for around five minutes, no answer. He told me to go tell him that Hassan has been raided. When I got there, no answer, I was about to leave. As soon as I was about to leave, Alex rocked up. Turns out it's his spiritual leader too. Alex knocks on the door harder, not as hard as I was knocking, and the guy, I think he was sleeping, he woke up and then he told him, "I've been raided," and then I told him, "Hassan sent me to you, told me he's been raided," and that was that and then I left. And I went, when I left, I went back to [REDACTED] house to console the tenant because the investigators, as peaceful as they were, knocked down the wall, knocked down the door of the tenant, not knowing that it was a tenant and scared the bejesus out of her.

All right, Mr Alameddine. So just going back step-by-step. You say that your brother asked you to go to a house in Chester Hill to visit his spiritual leader?---His spiritual somebody, I don't know who he is.

20 Well, do you know the name of the person you were asked to visit?---His first name, no, his last name is Hawcher.

Are you aware whether it's Ghassan Abdel Kader Hawcher?---That's, that's, I think it's him. I don't, I don't, his name, it sounds, it rings a bell. I can't be sure but his last name was Hawcher, so I am going to assume that, yes.

30 All right. And is this someone that you'd visited before?---I have dropped him off at his house before, that's why I knew where the house was, but no, visiting as in getting down and talking and having a cup of coffee, no.

All right. So I take it you didn't regard this person as your spiritual leader? ---No, no.

But he was a spiritual leader within the Muslim community, is that correct? ---I don't think so, no. He was his spiritual leader, I think we would just leave it as that. It was his spiritual leader.

40 When you say "his", are you referring to Hassan's?---My brother, yes.

But also, as it turns out, Mr Dubois' spiritual leader?---Yes.

I see. And was the only instruction you were given was to say to Mr Hawcher that Hassan has been raided?---Correct.

Did your brother tell you to say raided by whom or in relation to what? ---No. No, he just told me, "Tell, tell the guy we've been raided." So I just went and told the guy they'd been raided.

All right. So you arrive at the house in Chester Hill and is it correct that you're knocking on the door but there's no response initially?---Initially, yes. There's, he's got two front doors. If you're looking at the house, there's one right in front of you and one to the left. I was knocking, knocking on the one. I think he's got a house that's split into two units or something, and I was knocking on the one right in front of me, no answer. I knocked for a couple of minutes. I didn't, I didn't overburden myself. And then after I knocked, Alex rocked up, surprisingly in his pyjamas and a, and a, and a robe, and, and he knocked on the other door but he knocked a lot louder.

All right. So Alex knocks on the other door and Mr Hawcher answers.
---Yeah.

And are you within earshot, can you hear what Alex says?---I can, I can, I can hear. I'm standing maybe five metres away from him, and he, Alex tells him, "I've been raided, I've been raided."

20 And does Mr Dubois give any details about who he's been raided by or in relation to what?---No, no. Not, no, no. Definitely not. He just says, "I've been raided, I've been raided." And then and, and then they spoke in Arabic a little bit. Fuck, I'm just trying to remember. Sorry, that whole day's a blur. I, I just can't, I can't remember anything else. He said, "I've been raided, I've been raided."

All right. And then I take it that you then approach, do you, and say, "Hassan's been raided too"?---Yeah. I said it after Alex said it.

30 But while Alex was still present?---Yes. He was still present, definitely.

And do you recall what the response was that you received from Mr Hawcher?---No. I think it was just "Go home" or something. I, I don't actually recall. I'm just trying to think. Sorry, my, my brain is, memory is all over the place at the moment. I don't, I don't think, he, he told me, "Okay, okay. Well go home, okay, go home." Something like that. My conversation with him didn't last more than 15 seconds.

40 All right. And did you then have a conversation directly with Mr Dubois, given you were both standing there?---No, I did not. I had left before Mr Dubois left.

I see. So you had a very short conversation with Mr Hawcher and then you say you left?---I left before Mr Dubois left, yes, 100 per cent.

And then you say you went to the [REDACTED] House?---I went to [REDACTED] Road. The SWAT Team was there. And I went and spoke to the tenant that was there. I told her, "Nothing got to do with you. You just relax," 'cause

she couldn't speak English. At the time, there was only one tenant out of the three units, so I just, I consoled her, I said, "Look, it's got nothing to do with you. It's got something to do with my brother." And just, yeah. She, she thought she had done something wrong with Immigration and whatnot, but she was, she was completely legal, yeah.

And how did you know that a warrant was being executed at - - -?---I drove past [REDACTED] When I saw the police there, I put two and two together.

10 So was that something Hassan asked you to check or did you (not transcribable)?---No, no, I, I did that from my own (not transcribable)

All right. And so I take it you then were keen to get home and relay that news to Hassan, is that correct?---I did go back to my parents' house, yes. I did go back and I did tell him, yes. I don't recall his - - -

Told him that you'd spoken to Mr Hawcher and that you'd also been to the [REDACTED] premises?---Yes. I don't recall how the conversation went, though.

20

All right. And - - -?---The, the, the investigators were literally packing up and walking out when that happened.

And did you become aware that evening of whether anyone else that you knew, or that your brother was associated with, had had a search warrant executed at their premises?---Simon Raha. Simon Raha did.

30 How did you become aware that Simon's house had had a search warrant executed?---I saw his son. His son was driving past our house, my parents' house, while the investigators were leaving.

And did you speak to his son?---Yes, through the car window. I said what's - he told me, "Did, did they raid you too?" That's what he said.

Right. And did you understand that he was driving past your house to see whether you - - -?---Correct. Yeah, there wouldn't have been any other explanation? Past my parents' house, yes.

40 All right, and so you found out that Simon's house had also been raided, to use your language?---Correct, yes.

And did Simon's son want to relay any sort of message to you or to Hassan?---No, no.

All right. And was there anyone else that you heard from that evening in respect of - - -?---No, that wasn't during the evening. That was during the day.

Oh, beg your pardon. During the day.---Yeah.

Was there anyone else you heard from that day in respect of search warrants being executed?---Yeah, my cousin [REDACTED] came over and, cousin came over (not transcribable) because he had Hass's car and Hass called him, told him, "I want my car." And that day, no, no, don't know. No.

10 Well, I'll come back to your cousin in a minute, but did you have any contact with either Baz or Hoody?---No, no, no. Definitely not. I don't recall now, when we, when I meant to, when I went to, I met Alex in Chester Hill. He did mention that Baz and Hoody also got raided. And he mentioned Craig.

Right, so you found out while you were at Chester Hill.

THE COMMISSIONER: Which meeting with Alex at Chester Hill are you referring to?---The meeting that was directly after the raid in the morning.

20 And at that meeting, was it just you and Alex present?---No, me, Alex and the Hawcher bloke. I think that's how it went. Please excuse me, but I am trying to recollect as much memory – it was four years ago, three years ago now. Yeah, I think that's how it went.

MS SPRUCE: All right, and then, Mr Alameddine, you gave evidence that back at the [REDACTED] Street house your brother contacted his cousin.---Yeah, his cousin had his car, his HiLux, and he called him and told him, "I need my car." I think he had used it to tow something, tow I think his quad bike or something, so he came past.

30 And what was the name - - -?---He didn't leave straight, he didn't leave straight away. He hung out for a bit.

All right, and what was the name of your cousin that came over?---[REDACTED].

[REDACTED]?---Yeah.

THE COMMISSIONER: And did you say something about a quad bike? ---Yeah, a quad bike. I think he needed the car, he needed the HiLux to tow a quad bike or something 'cause he didn't have a towbar on his car.

40 Well, what was the problem with the quad bike? Was he trying to hide it or put it somewhere?---No, he had the car the day before. He had borrowed Hass's car, my brother Hassan's car to tow something. I think it was a quad bike. And then he had called him when, after he got raided, he called him and told him, "I need my car." So the car was already with him prior to the raid.

Yes. You continue.

MS SPRUCE: Mr Alameddine, when you were at the Chester Hill address speaking to Mr Dubois and Mr Hawcher, did Mr Hawcher dispense any spiritual advice to either you or Mr Dubois?---I, I don't know about Dubois but, like I said, I left fairly quickly.

All right. And then you're back at the [REDACTED] Street address - - -?---Yeah.

10 - - - with your brother and your cousin, [REDACTED]?---Yeah. My family was also there.

And is this still during the day or is it evening by now?---No, during the day.

During the day. And you said that your cousin stayed for some time? ---Yeah, he didn't leave straight way, yeah. He was there while the investigators were packing up. He was there for maybe an hour or so after that.

20 All right. And then after the investigators left, did you have any further discussions with your brother about what was going on?---I think I had left before they left.

Before the investigators had left?---Or, or while they were leaving. I needed to go to work that day.

THE COMMISSIONER: But at some stage, you and your brother were there in the house at [REDACTED] Street?---Correct, yes.

30 The day of the search warrant?---Correct, yes. And that's the time he gave me what was in his pockets, receipts and, and a forklift licence, I think from memory.

And no doubt the multiple search warrants, police, investigators going into the premises, searching, to you was a startling set of circumstances?---I was shocked.

40 The like of which you've probably never have experienced in your life. Is that right?---Hopefully, never ever experience again.

Am I right? It's probably the most startling exercise that you've ever witnessed, as well?---Correct.

So, no doubt, you turn to your brother and said, "Tell me what's this all about?"---I didn't ask him, but, yes, but, yes, you're correct.

Yeah. But you knew it concerned RMS contracting in some way or other? ---No doubt.

Mmm?---No doubt.

And you knew therefore that these investigations, execution of these warrants, was something that was immediately relevant to your brother and to Mr Dubois?---Yes.

And that it obviously related to the arrangements between them in terms of contracts?---Yeah.

10

And doing work for RMS?---Yes.

And receiving money from RMS?---Okay.

You realised that what was going with the multiple search warrants was extremely serious?---Not initially, no, but, yes, yes, that's, I was still trying to gather my thoughts, but, yes.

20

There's no doubt about it, is it, you knew, witnessing multiple police officers, investigators there for hours, going through, looking for documents, that this was about something extremely serious - - -?---Yes.

- - - involving your brother - - -?---Correct.

- - - involving Dubois - - -?---Correct.

- - - involving RMS?---Correct.

30

Right. And you realised that this investigation is obviously built upon evidence that had come into the hands of investigators and police concerning the RMS transactions?---Okay.

No, no. Don't say "okay". It was obvious to you, wasn't it, that this was an extremely serious matter now in the hands of police and investigators that concerned your brother - - -?---Yes.

- - - concerned Dubois - - -?---Yeah.

40

- - - concerned RMS and all the contracting between them?---Yes.

Right. And then, appreciating all of that, then at some stage, no doubt, you would have when you were with your brother have said, "Now, tell me, explain what is going on?" or words to that effect. You wanted an explanation, no doubt. Is that not so?---Yes.

And what did your brother say, how did he explain what this was all about, police everywhere, search warrants and so on? What was it about RMS and all the rest of it, his dealings with Dubois and so on, did he say it was

about?---Even though I, I understand your analogy, it didn't happen that way.

Okay.---I, I did ask him what's going on.

Sure. Well, it would be surprising if you didn't.---No, of course. I said, "What's going on?"

10 Yes.---And he told me they've got, they've got, they've got to – I'm trying to remember. "They, they got me and Alex." That's what he said. "They got me and Alex." I put two and two together, I put two and two together.

They were the words he said?---Yes, I've got, "They got me and Alex."

"They have got me" or they - - -?---"They got me."

"They got me."---Yeah. I don't know - - -

20 "Me and Alex"?---"They got me and Alex."

Okay. And what else did he say by way of explaining what that meant? ---Nothing, because, well, contrary to if you believe me or not, I left relatively soon after that.

But there must have been more said about this extraordinary series of events, as I said, there were police everywhere, investigators, and - - -? ---Like, I, I, put two and two together.

30 - - - you've got people's houses being raided and occupied for hours while searches went on. You would have, as a natural human reaction, have said, "I want to know more. Tell me, how much trouble are you in?" or something like this. "Tell me." So that even if an explanation would enable you to somehow help your brother, you would have been asking these questions, and I'm suggesting that that's more than likely what did happen, as a brother to brother wanting to know more detail - - -?---Your suggestion is appreciated but that's not what happened. I, like I said, I put two and two together and we, that night, went to meet a lawyer. So everything was going to be spilled anyway.

40 Ah hmm. So now, that was that day. Let's go to the day after the search warrants.---Day after the search warrants?

The next day. Did you have a discussion with your brother?---Oh.

Next day.---Commissioner, I can't say yes or no because I don't remember.

Well, do I dare say you saw your breather the next day?---No, I didn't see my brother the next day. Definitely not. He took my car that evening and I

didn't get my car back for a week. I didn't see my brother for a week after that.

Okay. The next day, you don't deny that you spoke to him, do you?---I didn't see my brother the next day, no.

No, no. I said, you do not deny, do you, that you spoke to your brother the next days after the search warrant?---I do deny that.

10 You do?---Yeah.

You didn't speak to him at all?---No. He took my car that evening.

Well, when do you say was the next time you spoke to your brother either face-to-face or over the phone or some other way about the events concerning the search warrants and the matters to which the search warrants related? When was the next occasion after the day of the search warrants you had discussion with your brother?---I don't remember, Commissioner.

20 No, well, how long, doing the best you can, after the search warrants did you have a conversation - - -?---I don't remember having a conversation with him about this yet.

Well, this is probably the biggest even in your life and his life, would you not agree?---His life, yes.

Well, without a doubt.---Yes.

30 Okay. So you've got an event which is the biggest event in your life and his life ever. Is that right?---Okay.

No, don't say okay. It's either yes or no.---Yes, yes, yes. Yes.

Yes, it was. Undoubtedly. It's undoubtedly, it was the biggest event in both your lives, I dare say. Is that right?---Commissioner, with all - - -

The most dramatic.---Dramatic, yes.

40 All right.---Significant, no.

Now, you tell me, because you're here to assist the Commission - - -?---I am, yes.

- - - and you've taken an affirmation and you've been told before about the importance of telling the truth here because otherwise it constitutes an offence.---I haven't lied, sir.

And the evidence – no, I'm not suggesting you have.---Okay.

Just so that you're fully aware of the important obligation you have at the moment to answer these questions to assist the Commission because I don't want you to put yourself into trouble. You're big enough to look after yourself but I'm just trying to warn you, when I'm asking questions, you are to give truthful answers. It's just a refresher warning if you like. When was the next occasion after the search warrants you had any discussion with your brother in which he explained to you what his involvement had been that had led to these investigations?---The next time I saw my brother was a
10 week later. After that night - - -

Sorry, was when?---One week later.

All right. And where – was that an occasion when you and he were at the same place?---Yes.

And where was that?---He went to stay at a friend's house.

At whose house?---I had - - -
20

Sorry?---He went to stay at a friend's house. I don't know who, I don't know where.

Right.---And I wanted my car back, so I had his car, and I called him up, I said, "I need my car back." Well, I called him up or I gave a message through my mum, not sure yet. One of the two. And I said, "I want my car back," and then I met him in Revesby somewhere, where we swapped cars. That was the next time I saw him. And - - -

30 My question was - - -?---Yeah, I'm trying, I'm trying, I'm getting there.

Yes, yeah, okay.---But I'm thinking and talking at the same time.

All right. Well, come - - -?---'Cause I don't recall.

Come to, just best you can, coming to the point of my question.---And he told me – Commissioner, you've got to believe me, I'm trying to recollect his memories.

40 I'm wanting to believe you.---Yeah. Mate, I'm trying my best. He, he told me that he stuffed up. He stuffed up. He, he stuffed up and I, I, Commissioner, you're not even going to – I don't know. I don't know. He, I don't recall anything. He told me he stuffed up, him and Alex. He, he did mention the word "colluding". He said him and Alex were colluding. Colluding. And he got caught. Along those lines. So I'm, I'm sorry, I don't recall.

Is there any other - - ?---Along those lines. And that was a week later. Because we did, the night, the night of the incident, the night of the raid, we did go to Bakery King in Yagoona to meet a lawyer that didn't show up.

Is there any other detail that you now recall that he related to you as to his involvement in the matters that were under investigation on the occasion you've referred to?---No. He did tell me he was colluding, but I already had, I already had known that. Like, I knew they were friends, and they were (not transcribable). I'm, I'm sorry, Commissioner. I, I, I want to
10 answer your question, but I can't because I don't know the answer to your question. I don't have an answer. It's not that I don't know it. I don't have an answer.

Is there any other - - ?---I put two and two together.

Was there any other occasion on which you had a discussion with him when he gave you an explanation as to what had happened in terms of the matters that were under investigation?---Like I said, he, he told me he was colluding with Alex and that he's going to get in trouble.
20

That he what?---He will get in trouble for it.

Mmm. Is there any other detail you now recall?---No, I'm sorry. Unless you can jog my memory. But, I'm sorry, I, I don't know of anything.

Thank you. Yes, Ms Spruce.

MS SPRUCE: Mr Alameddine, you said that on the night of the search warrants you and your brother went to Bakery King in Yagoona to meet a
30 lawyer, but the lawyer didn't turn up, is that correct?---Correct.

And was it just you and your brother that were there waiting for the lawyer?---Me and my brother, yes, correct.

And so you must have had an opportunity, both on the way there and while waiting for the lawyer who didn't turn up, and on the way home indeed, to have a conversation with your brother about what had occurred?---I don't have that relationship with my brother. It's not, I'm not, it was a very, very sensitive time. Wounds are open. I've put two and two together. Whether
40 the Commission can see that or not, I've put two and two together and I've realised that these guys were colluding or, and they had a, an agreement that's now come to surface, and the agreement mustn't have been ethical, and this was the reason they got raided. The warrant clearly says it. So, I'm sorry, no, there wasn't a conversation and I'm not going to accept anything otherwise.

Well, you - - -?---I know what happened. You guys, you guys weren't there. I know what happened. I haven't lied since I walked into here, this time and last time, and I don't intend on lying.

Mr Alameddine, you say that you'd seen the warrant and it was clear what had happened.---Yeah.

10 But you gave evidence earlier that when you saw the warrant you thought it had made reference to CBF?---It did make, it didn't, I didn't think, I know it made reference to CBF.

And you gave evidence that initially your view was that it was something to do primarily with CBF?---No, yes, initially, yes. Initially, yes. But I put two and two together. There's a panel. CBF is on that panel and I'm aware of the panel. And I know EPMD's on the panel and I know Seina Group's on that panel.

20 All right. And so when you you'd put two - - -?---And I know, on top of that, I know that my brother and Alex were friends and the only reason that Harry Hassan was getting the work was because they were friends.

All right. But, Mr Alameddine, you also knew, didn't you, that your name was on at least one company that your brother was using and that you'd also had your name on various bank accounts?---The company I was using, I was never aware that that company was used for any RMS tendering, any RMS work, any dummy quotes, anything like that. And I've made that clear. I was unaware of the email and I was unaware of anything else associated with Acate and the RMS.

30 I understand that. But you must have had some anxiety, didn't you, that you might get dragged in to the investigation because of the involvement you'd had assisting your brother with RMS work?---No, I didn't think that far ahead. I didn't think I would ever been sitting in this seat as a labourer. The majority of my time was designing stuff and being a labourer. So I don't, I don't, I never put, I never thought I was ever going to sit in this seat, no.

40 All right. So, Mr Alameddine, when you say that you put two and two together, is it your evidence – I withdraw that. Is what you're suggesting that because you believed you'd put two and two together in your own mind, that there wasn't any need to actually ask Mr Alameddine whether what you were assuming to have occurred is what had in fact occurred? You just didn't ask him what had happened between him and - - -?---Sorry. Sorry. Rephrase your question. Sorry. Restate it. I, I, I, I, my train, I lost my train of thought.

Mr Alameddine, what I'm asking you is you keep saying that you'd put two and two together.---Yeah.

And the implication is that therefore there was no need to ask your brother questions because you'd put it together in your own head?---I do remember one incident, I do remember one incident back to the Commissioner's question. He asked me, he told me that "if you get in trouble for anything, for whatever reason, I" he will look after my legal costs and legal fees. He did mention that. But where did he mention it? I have to try to remember now. It must have been when I went to pick up my car off him.

10 All right. And weren't you alarmed when he said, "If you get into trouble for any reason, I'll look after your legal costs"?---No, because, like I said earlier, I, my, my involvement in this was insignificant, in my eyes, in my eyes, in my opinion, my involvement was insignificant. So I didn't think nothing would ever come back to me.

All right. Mr Alameddine, if we can go back to the night that the search warrants were executed.---Yes.

20 You recall that after you ran into Mr Dubois at the Chester Hill residence - - -?---During the day?

- - - during the day - - -?---Yeah.

- - - that Mr Dubois subsequently came round to the [REDACTED] Street residence in the evening?---Okay. So that there, I don't remember. However, it was made evident to me previously. I don't remember that. I remember, if you want to go through the events of the night, I assume that's what you want to know?

30 Yes (not transcribable) remember about that night.---Yes. Okay. Yeah. So I remember being called by my brother to Mr Hawcher's house in Chester Hill. When I got there, he gave me the phone and he told me to organise two shipping containers that were, that were full of meat equipment that needed to go to Lebanon. So I sat outside with the transport company, even though I know it was, like, 6, 7 o'clock at night, but he was a sole trader. I sat outside probably for the better part of half an hour, 40 minutes, trying to organise the payment for containers going overseas and, and logistics for these containers. After I got off the phone, we went inside. Alex said or
40 there was a conversation happening that Alex needs to remove his Porsche from his house in Condell Park. We went to Condell Park, me and my brother in one car, and Alex and my cousin in another car and we went to Condell Park. We picked up that Porsche and I arranged a garage from one of my relatives to be parked, for the Porsche to be parked in at Granville. We took the Porsche there. I left a spare key with me and he had a key and my brother then after, sorry, before then – sorry, I'm just trying to remember. Yeah, after, oh, it was either before we picked up the Porsche or after we picked up the Porsche we went to Bakery King, I think it was after because we got to Bakery King at around 9.00pm, around that. After the

lawyer didn't show, my brother dropped me off at home, took my car and that was it for the night for me.

Mr Alameddine, what you're saying, as I understand it, is that sometime in the evening on the night the search warrants were executed, either Mr Dubois or your brother, and you can let me know which one, told you that a Porsche belonging to Mr Dubois needed to be moved from Mr Dubois' residence and stored somewhere else?---Yes, correct.

10 Is that correct?---Correct, yes.

And was it your brother or Mr Dubois who told you that?---I, I don't know. It was a conversation that was happening. Like I said, I was on the phone, I walked into the conversation. I think it was Mr Dubois. He said, I think, I, I think, yeah, I'm 80 per cent confident it was him saying, "I have to get the Porsche out of the yard." And he also, he also jumped on the phone, he was speaking to another guy, he was speaking to another bloke, I don't know where, and he said, "I have to get my cars out of your yard."

20 All right.---I don't know who that bloke was but, sorry.

Mr Alameddine, it's the case, isn't it, that ultimately Mr Dubois' Porsche was moved to your mother-in-law's driveway. Is that correct?---Correct, correct. Did we have to mention names?

Well, I didn't mention a name, Mr Alameddine.---Thank you. Yeah.

But, Mr Alameddine, did you volunteer to your brother and Mr Dubois that the car could be moved to your mother-in-law's driveway?---Yes, yes.

30 They asked me, "Do you know a secure place?" I said, "Yes."

And were you not concerned at this point that not only were you further implicating yourself but also implicating your mother-in-law by suggesting that Mr Dubois could store a Porsche (not transcribable) address?---She had no idea. She had absolutely no idea.

But you were putting her at some risk, weren't you? I mean, you must have known, didn't you, that Mr Dubois was seeking to hide the Porsche?---He was seeking to hide the Porsche.

40

You knew that was the reason why it needed to be moved?---Yes, yes.

And so up until this point, the evidence you've given is that you felt confident that as a labourer you didn't know you'd done anything wrong. ---Yes.

But now you're getting quite directly involved in wrongdoing, aren't you, by agreeing to assist in hiding the Porsche?---Towards the end the night, yes, I admit that, yes.

All right. And why did you do that?---I was asked and I said, I felt, I, I felt obliged to help.

10 Felt obliged in what sense?---I just, I don't know, I just felt obliged. I don't know. I felt like I needed to help. He asked for help and I said yes. Yes, that's the way it happened.

Mr Alameddine, it's the case, isn't it, that in giving your evidence about your understanding of what Hassan was doing and his dealings with Mr Dubois in performing RMS work and in your role on the evening of the raids in assisting your brother, that you're deliberately trying to play down and minimise your own involvement, aren't you?---No. No. I haven't come here to mislead the Commission and I haven't come here to lie. I've come here to tell the truth and I've told the truth. I was, they asked me, "Do you know somewhere?" I said yes. What I think the Commission is indicating is that I have a higher role, or larger role that what I am playing out, which is not the case.

Mr Alameddine, you've said that on the day that the search warrant was executed, your brother rang his cousin, [REDACTED], and said he needed his car, that is Hassan needed his car returned.---Correct, correct.

30 But then you've also said that Hassan apparently left that evening in your car.---Yeah, but where, where did we end up? He called me, like I said, if you recall, I said he had called me and told me to come to Chester Hill, and I went to Chester Hill and then from there he jumped in with me and we went to either Bakery King or we went to get the Porsche, one of the two.

All right. So this is in your car, the two of you went in your car?---Yes, yes, yes. We went in my car.

And you went in - - -?---I don't know where his car is at the moment. Sorry, you cut out.

40 All right. So you went with Hassan in your car to Mr Dubois' house?---In Condell Park, not Alex's house. I've never seen or I've never been there before.

All right. And Mr Dubois drove to Condell Park in another car with your cousin, [REDACTED]?---Yes, yes.

And then is it the case that Mr Dubois and [REDACTED] changed into the Porsche?---No. Only, only Dubois drove the Porsche.

All right. So Mr Dubois then drove the Porsche to your mother-in-law's house?---Yes.

And you and Hassan and [REDACTED] all followed, or rather led the way to your mother-in-law's house, is that correct?---We got there before him. We got there before him and, yeah, I got to my mother-in-law's house before him, yes.

10 All right. And did you tell your wife or mother-in-law what was going on?
---No.

All right. Did you tell them why a Porsche was being stored in their driveway?---She didn't know there was a Porsche in her driveway, in her, in her garage.

She didn't know there was a Porsche in her garage?---No. I told her I need to store my car there for a couple of days and she told me okay.

20 I see. And how was it that you came to have a spare key to the Porsche?
---There was two keys in the car. So when we went to drop off, when we got to Condell Park to pick up the Porsche there was two keys. I had one of the keys. That was given back to him a week later. A week later, he called, he wanted the car, so we have, so I went and met him and his brother in the driveway. My brother was already there and we gave him, I gave him back his key and his logbooks.

Sorry, so you're referring to Mr Dubois, is that correct?---Correct, yes.

30 So on the night that you dropped the Porsche off, you took the spare key?
---Yes. correct.

But with the knowledge of Mr Dubois?---I don't know. I don't think I took it with the knowledge, no. I took the key with the logbooks. I don't recall if it was with his knowledge. I don't, I don't think it was, no.

All right. And why did you take a key to the Porsche?---Oh, well, the, the car's in my mother-in-law's thing. If I need to move it, I need to move it.

40 All right. So, so you think that perhaps of your own accord you took the key?---Yes.

To protect your own interests as it were?---No, no. You're thinking too far ahead. I took the because if I need to move the car, I need to move the car.

All right. And you say that it was, the car was in your mother's driveway for a week, or garage rather, for a week?---Yeah, I think a tad over a week.

All right. And then Mr Dubois contacted you and came and collected - - -?
---It was either him or his brother that contacted – I don't know his brother's name, it is a younger brother, I think his youngest brother. Either he, I think he contacted me.

And I take it the Porsche was then removed from your mother-in-law's garage?---Yes. We had to jump start it because the battery had gone flat and, yes, it was removed.

10 All right.---And that was the end of that.

All right. And were you then asked to do any further favours for either Mr Dubois or your brother in relation to matters arising from the search warrants being executed?---No. That was it for me.

Now, Mr Alameddine, did your brother Hassan ever tell you what you should say if you were - - -?---I haven't spoken to him, the Commission made sure that I do not speak to him about this and I have not. There was a question that I asked prior to my first meeting and the Commissioner made
20 sure that I, I got told off for that and I never had any, ever had any involvement, never spoken to him since then about this matter. Especially about what's happened, yeah.

All right. But I take it you do speak to your brother regularly about other matters, is that correct?---Since the raids, the relationship has gone, I would say, not sour but if before we were the, if before we were normal friends and now we're, when we see each other, we talk to each other.

30 You're less close than you were before?---Yes.

All right. And Mr Alameddine, what about Mr Dubois? Did Mr Dubois ever tell you what you should say if you were asked?---Never, never, never, ever.

And, Mr Alameddine, you mentioned earlier that your brother had said to you that if you became involved in the investigation in any way that he would pay your legal expenses and (not transcribable)?---Correct. He did say that, yes.

40 And is that what's occurring? Is he looking after your legal expenses now?
---My brother, I owe my brother around \$6,000. I had to borrow some money off him a long time ago, so I'm going to deduct my lawyer's fees from that money that I owe him.

I see. Now, could I just show Mr Alameddine, please, volume 20.2, page 121? Mr Alameddine, this is a photograph of a Chevrolet car that Mr Dubois kept at his place. Do you recognise that car?---Yeah, that was a car in my backyard.

All right. So that's the car you referred to earlier as being in your backyard?---Correct.

Right. Thank you. Commissioner, I don't have any further questions.

THE COMMISSIONER: Yes. Thank you. Now, is there any application for cross-examination of the witness?

10 MR MULLIGAN: Not from my end, Commissioner.

THE COMMISSIONER: Yes. Thank you. No?

MR MULLIGAN: No application.

THE COMMISSIONER: All right. Very good. Mr Alameddine, that completes your evidence. Thank you for your attendance today.---Thank you.

20 You may step down. You are excused.---Thank you.

Thank you. Mr Downing or Ms Spruce, are there any other matters? You may step down. You're free to step down free to go. Thanks, Mr Alameddine.

THE WITNESS EXCUSED

[3.47pm]

30 THE COMMISSIONER: Any other matters?

MR DOWNING: Perhaps I'll let Ms Spruce go first and then I'll - - -

THE COMMISSIONER: Yes. Very good. Yes, Ms Spruce?

MS SPRUCE: No, not from me, Commissioner.

THE COMMISSIONER: Okay. Thank you. Mr - - -

40 MR DOWNING: And then other than just to say that at this stage, we don't have a witness for tomorrow because of the reshuffling this week, so that we will resume on Wednesday with Mr Soliman.

THE COMMISSIONER: Wednesday. Do I understand that, is Friday a day in which we're going to be taking evidence?

MR DOWNING: It looks like it's unlikely depending on what happens on Thursday.

THE COMMISSIONER: Unlikely? In any event, you'll keep those interested in the public inquiry informed as to the program from day to day?

MR DOWNING: We will.

THE COMMISSIONER: Yes. Thank you. Very good.

MR DOWNING: Thank you, Commissioner.

10

THE COMMISSIONER: Yes. Well, I'll adjourn.

**AT 3.48PM THE MATTER WAS ADJOURNED ACCORDINGLY
[3.48pm]**