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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 TUESDAY 11 MAY, 2021

AT 11.00AM

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

THE COMMISSIONER: Mr Downing.

MR DOWNING: Thank you, Commissioner. Before we call Sandra Alexander, I do now have the schedule I indicated I would have prepared yesterday, setting out the documents or the volumes of documents that I tender.

THE COMMISSIONER: Yes.

10 MR DOWNING: I'll provide – I understand you have a copy, Commissioner.

THE COMMISSIONER: I do.

MR DOWNING: And I understand also it's been provided to the various – pardon? All right. So it deals with, starting volume 1.2 and running through to volume 20.1. I won't read them all out to save time. It is contained the document and it will be provided - - -

20 THE COMMISSIONER: So the exhibit numbering system set out in the schedule, commencing with Exhibit 67, which will be volume 1.2, and it follows from there. Is that right?

MR DOWNING: Yes, Commissioner.

THE COMMISSIONER: So you're tendering all of the volumes and other documents set out in the schedule. Is that right?

30 MR DOWNING: Yes, Commissioner.

THE COMMISSIONER: Very well. Those volumes and documents will be admitted and they'll be marked with Exhibit numbers as set out in the schedule, which I'll have marked for identification MFI 1. So that is to say the first bundle volume, 1.2, will become Exhibit 67 and the exhibit numbering segments will follow from that number through the volumes and documents set out in the schedule MFI 1.

40 **#EXH-067 – PUBLIC INQUIRY BRIEF (VOLUME 1.2 RMS CODE OF CONDUCT)**

#EXH-068 – PUBLIC INQUIRY BRIEF (VOLUME 2.1 CHAHID – COMPLETE BUILDING FITOUT)

#EXH-069 – PUBLIC INQUIRY BRIEF (VOLUME 2.5 MT WHITE KANKOOL)

#EXH-070 – PUBLIC INQUIRY BRIEF (VOLUMES 3.2 INITIAL RMS WORK)

#EXH-071 – PUBLIC INQUIRY BRIEF (VOLUME 3.3 PART A ECM CONTRACTS)

#EXH-072 – PUBLIC INQUIRY BRIEF (VOLUME 3.4 FINANCIAL – OZCORP CIVIL SCHEDULE)

10 **#EXH-073 – PUBLIC INQUIRY BRIEF (VOLUME 3.6 OZCORP CONTRACTS)**

#EXH-074 – PUBLIC INQUIRY BRIEF (VOLUME 3.7 ECM SCHEDULE OF RMS PAYMENTS)

#EXH-075 – PUBLIC INQUIRY BRIEF (VOLUME 4.1 ALAMEDDINE & RAHA INTRO)

20 **#EXH-076 – PUBLIC INQUIRY BRIEF (VOLUME 4.2 AREVA CORP)**

#EXH-077 – PUBLIC INQUIRY BRIEF (VOLUME 4.3 EPMD)

#EXH-078 – PUBLIC INQUIRY BRIEF (VOLUME 4.4 FINANCIAL EPMD)

#EXH-079 – PUBLIC INQUIRY BRIEF (VOLUMES 4.5 SEINA PART 1)

30 **#EXH-080 – PUBLIC INQUIRY BRIEF (VOLUMES 4.6 SEINA PART 2)**

#EXH-081 – PUBLIC INQUIRY BRIEF (VOLUME 4.7 SEINA PART 3)

#EXH-082 – PUBLIC INQUIRY BRIEF (VOLUME 4.8 SEINA PART 4)

40 **#EXH-083 – PUBLIC INQUIRY BRIEF (VOLUME 4.9 SEINA PART 5)**

#EXH-084 – PUBLIC INQUIRY BRIEF (VOLUME 4.10 FINANCIAL SEINA)

#EXH-085 – PUBLIC INQUIRY BRIEF (VOLUME 5 TOUFIK TAHA)

#EXH-086 – PUBLIC INQUIRY BRIEF (VOLUMES 5.1 MWK FINANCIAL)

#EXH-087 – PUBLIC INQUIRY BRIEF (VOLUME 8 NACHABE BRIEF OF MATERIALS)

#EXH-088 – PUBLIC INQUIRY BRIEF (VOLUME 10.1A CRAIG STEYN EMPLOYMENT HISTORY)

10 **#EXH-089 – PUBLIC INQUIRY BRIEF (VOLUME 10.1B CRAIG STEYN COMPANIES & PROPERTIES)**

#EXH-090 – PUBLIC INQUIRY BRIEF (VOLUME 10.1C CRAIG STEYN CONTRACTOR RELATIONSHIPS)

#EXH-091 – PUBLIC INQUIRY BRIEF (VOLUME 10.2 STEYN DISCIPLINARY)

20 **#EXH-092 – PUBLIC INQUIRY BRIEF (VOLUME 10.3 DANSEL COURT)**

#EXH-093 – PUBLIC INQUIRY BRIEF (VOLUME 11.1A AA STEEL BACKGROUND)

#EXH-094 – PUBLIC INQUIRY BRIEF (VOLUME 20.1 MERCEDES C63)

30 MR DOWNING: Thank you, Commissioner. I'd like to call Sandra Alexander.

THE COMMISSIONER: Thank you, Ms Alexander. Now, just take a seat there, Ms Alexander. Mr Orr, you appear on behalf of Ms Alexander I understand.

MR ORR: Yes, I do. Peter Orr.

40 THE COMMISSIONER: If I haven't already granted leave I confirm leave for you to appear.

MR ORR: Thank you.

THE COMMISSIONER: Thank you. Now, Ms Alexander, to give evidence you either have to take an oath or an affirmation. Which would you elect?

MS ALEXANDER: Bible.

THE COMMISSIONER: Sorry, the Bible?

MS ALEXANDER: Yes.

THE COMMISSIONER: Yes, thank you. What I'll get you to do is stand with the Bible in a moment and my associate will administer the oath. So if you'd just mind standing. Thank you.

THE COMMISSIONER: Thank you, Ms Alexander. Ms Alexander, what's your full name?---Sandra Norma Alexander.

You'll have to keep your voice up. Let me just explain. These microphones, they need to be reasonably close to you.---Okay.

10 And the same applies to me.---Okay.

Otherwise the voice is not magnified. So if you wouldn't mind keeping your voice up and try and direct towards the microphone. Understand? So the person at the back of the room has got to hear you. Now, Mr Orr, is there any application for Ms Alexander?

MR ORR: No, Your Honour. No, Commissioner.

THE COMMISSIONER: Sorry?

20

MR ORR: No, Commissioner.

THE COMMISSIONER: Well, Mr Orr, it's a matter for you, or more particularly your client as to whether she wishes to avail, give her evidence on objection or not.

MR ORR: I'm sorry, Your Honour, yeah.

30 THE COMMISSIONER: You'll have to again, like the witness, speak into these microphones, otherwise I can't hear you.

MR ORR: Oh, sorry.

THE COMMISSIONER: That's all right.

MR ORR: Yes, Your Honour, yes, Commissioner. She makes this evidence on an objection and would ask Your Honour, the Commissioner, to give a - - -

40 THE COMMISSIONER: A declaration.

MR ORR: Thank you.

THE COMMISSIONER: Yes, very well. Ms Alexander, before we commence your evidence, you are entitled under the Act of Parliament that governs this Commission to object to answering questions or to produce documents or other items. The point of the objection is that whilst you still must answer the question and answer it truthfully, the effect of the objection

is that the evidence you give can't be used in the future in other proceedings that you might be involved in or against you. Do you understand?---I do.

So it offers a form of protection in that sense. There is an exception, and that is that it does not prevent your evidence from being used in the event of any prosecution for an offence under the Independent Commission Against Corruption Act itself, such as giving false evidence wilfully, or perjury in other words. That would be an offence under the Act and the evidence can be used in such a matter. But aside from that exception, you do have the benefit of that provision of the Act which entitles you to object. Do you understand what I'm saying?---Yes.

And I understand it is your wish to object on that basis. Is that right?---Yes.

All right. Pursuant to section 38 of the Independent Commission Against Corruption Act, I declare that all answers given by Ms Sandra Alexander and all documents and things that may be produced by her in the course of her evidence in this public inquiry are to be regarded as having been given or produced on objection. Accordingly there is no need for the witness to make objection in respect of any particular answer given or document or thing produced.

DIRECTION AS TO OBJECTIONS BY WITNESS: PURSUANT TO SECTION 38 OF THE INDEPENDENT COMMISSION AGAINST CORRUPTION ACT, I DECLARE THAT ALL ANSWERS GIVEN BY MS SANDRA ALEXANDER AND ALL DOCUMENTS AND THINGS THAT MAY BE PRODUCED BY HER IN THE COURSE OF HER EVIDENCE IN THIS PUBLIC INQUIRY ARE TO BE REGARDED AS HAVING BEEN GIVEN OR PRODUCED ON OBJECTION. ACCORDINGLY THERE IS NO NEED FOR THE WITNESS TO MAKE OBJECTION IN RESPECT OF ANY PARTICULAR ANSWER GIVEN OR DOCUMENT OR THING PRODUCED.

THE COMMISSIONER: Yes, Mr Downing.

MR DOWNING: Thank you, Commissioner. Ms Alexander, if you could just confirm your full name, please?---Sandra Norma Alexander.

And is it correct your date of birth is 24 August, 1962?---Yes.

And you were born in Durban, South Africa?---Yes.

It's correct, isn't it, that you are first cousins with Craig Steyn?---Yes.

And is it correct that's on your father's side?---Yes.

It's correct that you are married to Ashley Alexander?---Yes.

And is it correct that you met and married Ashley in South Africa?---Yes.

And is it correct that you emigrated to Australia in 1989?---Yes.

To your knowledge, did Mr Steyn emigrate at or around the same time?---I think it was about a year or two thereafter.

10

Thank you. It's correct, isn't it, that your family – that is, your family with your husband and your children – is close to Mr Steyn's family?---Yes.

And it's correct to say, isn't it, that prior to Mr Steyn's employment at the RMS coming to an end that the two families would frequently see each other and socialise together?---Yes.

It's correct, isn't it, that your husband Ashley's background back in South Africa was in boilermaking?---Correct.

20

And is it correct that in Australia he established a steel fabrication business?---Yes.

And it's correct, isn't it, that that business was established under the company name AA Steel Piping Pty Ltd?---Yes.

30

I'm going to have documents shown to you at various points in your evidence and they will come up on the screen. When I ask you to look at the document, if you could just have a look there or perhaps on the bigger screen if that might assist. But first of all, if I could have you shown, please, a document at volume 11A, page 7. And you'll see that that's a company search for AA Steel Piping Pty Ltd and it shows that the registration of that company, well the registration date was 20 February, 2004?---Yes.

Does that accord with your recollection as to when the company started its operations?---Yes.

40

And it's the case, isn't it, that at all relevant times your husband has been a director of the company?---Yes.

And that if we could go, please, to page 8, the next page, that as at 6 May, 2018, you also were added – I withdraw that – that on that date, 6 May, 2018, you also became a director?---Yes.

And was there a particular reason for you becoming a director at that time? ---My husband had had a heart attack and the accountant advised that I

should become a director in the event of anything else, if ever something else would happen to him.

You'll see, if we go down to the bottom of the page, the share structure of the company is that there are two shares.---Yes.

And if we go over the page, that you and your husband hold a share each.---Yes.

10 All right. Thank you. That's all I wanted to ask by reference to that document. Just thinking now about the operation of AA Steel, and I'll refer to the company as AA Steel if that's convenient. It's correct, isn't it, that your husband, Ashley, is the driving force of the business?---Yes.

He generates the work, correct?---Yes.

He physically performs some of it?---Yes.

And he supervises other staff in performing some of it?---Yes.

20

And it's correct, isn't it, that over the years, AA Steel has had a number of employees working in the company?---Yes.

So, is it the case that from the outset of the company, your husband has either worked in the business himself, that is in a physical hands-on sense, or supervises others in doing that?---Oh, he works supervises.

30 Thank you. When it comes to, for instance, jobs that AA Steel might quote for or put in for, is it fair to say – I withdraw that – is it accurate that your husband would prepare costings for those jobs?---That's correct.

And he would calculate prices that would ultimately be the subject of a quote?---Yes.

And is it also correct that your husband would determine what AA Steel would ultimately invoice on any particular job?---Yes.

40 Is it correct that you've had what I might describe as an administrative role in respect of the running of the business?---That's correct.

So, to put it in common terms, that you in effect run the office for AA Steel?---Yeah, do the administrations, yes.

Now, it's correct, isn't it, that there is a – you operate from an industrial unit premises, that is AA Steel does?---Yes.

And is there an office there or do you work from home?---I was working from home and at the office there as well.

And if you could just confirm where the office is.---It's in 3, Unit 3/8 Wainwright Road, Mt Druitt.

And it's correct, isn't it, that there is a steel fabrication workshop there?
---Yes.

And the company's operated from those premises for some years.---Yes.

10 So is it correct that you, in performing your duties for the company, do some of that work from the workshop and some from home?---Over the years, I was doing it from home because I had full-time job of 20 years. I would do my jobs with AA at night when I got home, filling in when I could, yeah.

And has that full-time job that you worked in, has that come to an end at some point?---Yeah, for the last three years I've given that up.

20 So did that then mean that you worked from the workshop?---That's correct.

Is it the case, though, that you had access to a computer either at home or at the workshop?---Yes.

And is it the case that, for instance, you would take care of things like all forms of correspondence on behalf of AA Steel?---I would take care of the correspondence as directed by Ashley.

It's correct, isn't it, that AA Steel has an email account?---That's correct.

30 And is the email account aasteelpiping@[REDACTED]?---Yes.

And is it the case that where emails come in or go out, that you would be the person that would either receive them or send them?---Yes, I would.

Is it the case that Ashley's not very keen on using the computer?---Yeah, well, he, yeah, he doesn't know how to, so he would tell me what to say and how to do it, yeah.

40 So that where, for instance, a – if I could use an example. If there was a quote to be done for a particular job, if a request came in for AA Steel to prepare a quote, would that typically come via email?---Yes.

And would you then either show the document on the screen to Ashley or print it out?---I would always print every document to him, for him, and then he would write up the response, and then I would type it up for him.

So would he provide you with some handwritten notes and you would then type it up?---Yes. Yes.

And would you then send out the emails?---That's right.

Likewise, when it came to submitting an invoice for a job, where the job had been performed, would Ashley speak to you about what to include in the invoice?---Absolutely.

Would he give you again a piece of paper with some detail as to that?
---Yeah, or he would sit next to me and say, "Put this in" or "Put that in."

10

I take it that you don't, in the course of the running of a business, go out onto sites and - - -?---No, never.

- - - be present when work is being done?---Never.

So is it the case that you rely on Ashley for information in relation to either quotes or invoices?---Everything.

And is it the case that since the outset that you've fulfilled that role in preparing the paperwork in the manner you've described for AA Steel?
---Is it what, sorry?

Is it the case that from the outset of the company's operation that you've fulfilled that role, preparing the paperwork for the company in the manner you've described?---Yes.

Now, thinking of the banking that the company does, do you take care of that?---Yes.

30 And it's correct, isn't it, that, for many years, AA Steel has operated a business account with the Commonwealth Bank?---Yes.

And could I ask that volume 11.3, page 9, be brought up? And if you do need anything enlarged, please let us know. Now, do you recognise that as a Commonwealth Bank account statement in the name of AA Steel Piping?
---Yes.

And do you see on the dates of the document it's a statement for the period 1 to 31 January, 2012?---Yes.

40

And you'll see that there's an account number. And I won't read all of the numbers, but it ends with the digits 5-1-0-5.---Yes.

And do you recognise that as a statement for the bank account that AA Steel operates?---Yes.

And is it the case that, on that account, while the statement is addressed to your husband, that both you and your husband are signatories on that account?---Yes.

And is that the account that the company has operated for many years?
---Yes.

10 Thinking then about the way in which payments might be made by the company in the course of the business, I take it from time to time you have bills that the company needs to pay?---Yes.

For instance, suppliers, materials, things of that nature.---Yes.

And when you receive an invoice, are those payments typically made by electronic funds transfer?---Yes.

20 And when that occurs, does that fall to you to do, or to Ashley?---I print it up, keep it for him, end of day when he gets home, then he signs off whether or not it's okay to pay, and then we process the payment.

So does it in effect work this way, that after he finishes whatever physical work he's doing during the day, you print out papers for him at the end of the day?---Yes.

He goes through them.---Yes.

And then indicates to you that you should pay or not pay as the case may be.
---That's, that's correct.

30 All right. So I take it also that where the business generates income that typically the income is paid into this account as well.---Yes.

And has it been typically the case that it's received electronic fund transfers or it's been paid for work for many years?---Yes.

Now, separate to this account, it's the case, isn't it, that you and Ashley also have personal accounts?---Yes.

40 And it's the case, isn't it, that separate to that account for AA Steel, you have a CBA account that's a joint account in your names?---Yes.

And if I could have brought up, please, volume 11.5, page 3. And do you recognise that as a Commonwealth Bank statement on the joint account that you and Ashley have?---Yes.

You'll see again that this is a statement for the period ending 3 June, 2012.
---Yes.

And you'll also see that – I won't read out all of the numbers, but with the account number, it ends in 5-0 – I think it's 8-4, but could I perhaps have that enlarged a little for my benefit? Yes, 5-0-8-4.---I don't recognise the address, though.

The address?---Yeah.

Right.---Mmm.

10 But you'll see the name of the account.---Yes, I can see that.

I take it that that is an account in your and Ashley's name?---Yes.

And did you operate the account at least for a period from the Auburn branch?---Yes.

But the Mount Druitt address that's listed there you don't recognise.---No.

20 All right. But it's the case, isn't it, that for a number of years, you and Ashley have had a joint CBA account, that is, a personal joint CBA account separate to the AA Steel account?---Yes.

I take it that typically, whereas you meet business expenses through the AA Steel account, you meet personal expenses through this joint account.---Yes.

If we could go, please, to volume 10.4. Sorry, 10.4(a), page 45. You'll see that this is a bank statement for the account again ending with 5-0-8-4.---Yes.

30 And you will see there, if we go down, please, to 11 October, you'll see for instance there are some entries there, things like, there's a Chamber Cellars, it looks like an EFT at St Marys for \$90.---Yes.

And on 13 October, Minchinbury Fruit Market, Minchinbury, and a debit there of \$47.82.---Yes.

So looking at that, does this appear to be the account that you use for your day-to-day expenditures and living expenses?---Yes.

40 You'll also see on 11 October, just slightly above that, there is a transfer that is indicated from account ending in 5-1-0-5.---Yes.

And it's headed Ashley Dividends.---Yes.

Now, is it the case that from the AA Steel CBA account that Ashley draws either a wage or a dividends or both?---That's correct.

And when that occurs, would that typically be paid into this joint account?
---Yes.

Now I can indicate that's the last question I have for that document, so we can take it down. Now, in the course of the operation of AA Steel, is it the case that you receive and reconcile monthly accounts for the company?---
Yes.

10 And do you prepare that in order to then submit that information to the company's accountants?---Yes.

And when it comes to doing a month-end reconciliation, do I take it that you go through bank statements?---Yes.

And try and match up with whatever records you have of income coming in or payments going out?---Yes.

20 When you then do that reconciliation do you compile it in some form?---
Yes.

Is it a form of spreadsheet?---A spreadsheet, yeah.

So I take it the spreadsheet then lists the income coming into the business and expenses going out.---Yes.

If I could ask that you now be shown volume 11.2, starting at page 1. Now, you'll see that this is a document that's headed AA Steel Piping July 2012.
---Yes.

30 And looking at the format there, do you recognise this as one of the spreadsheets you prepare for each month?---Yes.

And looking at it does the, under Income at the top left, does that list the income the company received from various clients during the month?---
Correct.

And then below that where it lists Received, does that list moneys that were actually paid by clients during the month?---Yes.

40 And then on the right under Expenses do we see the various expenses incurred or paid during the month?---Yes, yes.

So is this one example for July 2012 of the type of spreadsheet you prepare each month?---Yes.

And then if we move to the next page, please, page 2. You'll see that this appears to be a similar document but this time for August 2012. Do you see that?---Yes.

And it lists again income and expenses.---Yes.

For how many years has it been your practice to prepare this type of spreadsheet?---From the time the business has opened.

And is it done on an Excel spreadsheet document?---Yes, yes.

10 All right. Thank you. And I take it then once you've prepared it and done your reconciliation you send it off to the accountants?---Yes.

Now, you're aware, aren't you, that Mr Steyn worked for Telstra for a number of years while he's been living in Australia?---Yes.

And are you aware that he ceased that work in about 2008 or 2009?---No, I couldn't remember that.

20 Do you recall that at some point Mr Steyn started working at the RTA?
---Yes.

And you're aware I take it that at a later time the RTA became the RMS.
---Yes.

And he continued to work for it.---Yes.

And indeed worked for it for about a decade.---Yeah.

30 Now, I take it you were aware, in a general sense, of what the RTA was?
---Yes.

That is that it's a government authority that's responsible for certain things like driver's licensing.---Yes.

Car registration.---Yes.

And road infrastructure.---Yes.

40 Now, it's correct, isn't it, that you learnt not long after Mr Steyn started at the RTA that part of his role included allocating contracts in relation to certain road infrastructure works?---I wouldn't know what his role was. I know he worked there.

Right. But for - - ?---I didn't really know his role as such.

But did you become aware that part of what he did, even if you didn't know the specifics, involved giving out contract work in respect of the RTA?
---Yes.

And it's the case, isn't it, that at a point not long after he started at the RTA, A&A Steel began to obtain some of that contract work?---Yes.

And I take it you learnt from that, that at least some of the work that the RTA required involved some form of steel fabrication.---Yes.

Now, I'm going to suggest that by about mid-2009, AA Steel began to do RTA work. Do you have a recollection of when it was?---No.

10 Do you have any recollection of it being not long after you learnt Mr Steyn had started at the RTA that you learnt that A&A Steel, sorry, AA Steel was doing RTA work?---Quite possibly. I don't, I can't recall, you know, exactly when.

Are you able to assist us as to in what circumstances you learnt that either AA Steel was putting in for work or obtaining work from the RTA?---That was discussed between Ashley and Craig when it came to discussing work contracts or possibilities of work, so I wouldn't - - -

20 Sorry, I didn't mean to interrupt, but do you mean discussions that you were present for or - - -?---No.

Well, did you learn then through Ashley relaying things to you?---That's right.

And as best you can recall, what did Ashley relay to you about the RTA? ---He would come back and say that they require certain works to be done and he would need to do a quote, which he would then create and I would send it off and they he would say, "If we get the purchase order, then we
30 get, get to do the job."

And just from what you've referred to there with the purchase order, did you become aware that within the RTA there was a system where there might be a request that someone quote for some work?---Yes.

Quote would be submitted?---Yes.

If the quote was successful then the person would do the work?---Yes.

40 Then the RTA would issue what was known as a purchase order?---Yes.

And once that purchase order was created, then that would permit the company to then submit an invoice?---An invoice. That's correct.

And be paid?---Yes.

And I take it that your role then, in preparing paperwork, whether in respect of quoting or invoicing was as you've described before?---Yes.

Now, do you have a recollection that when Ashley spoke to you about the fact that AA Steel has been asked to quote for some work, he said anything at that point about Craig Steyn?---In relation to?

10 Well, pausing just at that point. Before Mr Steyn worked for the RTA, it's the case, isn't it, that AA Steel had not done any work for the RTA?---I can't recall that, whether he was the first or – I knew there was another person called Evan somebody that we, he did a bit of work for. Whether it was before Craig's time or after, I don't know.

But I take it through the preparation of the accounts and doing reconciliations each month, you would have had some familiarity with who the clients of AA Steel were?---Yes, I would. It's just a long time ago for me to try and recollect.

20 Doing your best, do you recall Ashley saying anything at or around the time Craig started work to the effect that, "We've been invited to tender for some work," or, "We've invited to put in a quote for some work"?---Yeah. He would tell me that there was tenders to be done.

And you would then assist him to prepare the documents that were submitted?---That's right.

Did you have any discussion with Craig at or around that time about the fact that AA Steel was now doing work for the organisation for which he worked?---A discussion as in verbal or - - -

30 A verbal discussion.---No. Not to my recollection. I mean, we would meet as family and discuss family stuff but we never ever spoke work.

But Craig is your cousin?---Yes.

And Craig works at the RTA?---Yes.

And your husband's company with which you also do the admin is now doing work for the RTA?---Yes.

40 Did you form a view in your own mind that there was likely some connection between, on the one hand, Craig being at the RTA and AA Steel doing RTA work?---I don't think so.

Did you have any discussion you can recall with Craig about the fact that it now seemed the organisation, that the government authority he worked for, was now giving some contract work in favour of AA Steel?---No, no.

So, do you say that you don't recall having any discussion at or around the time Mr Steyn started working at the RTA about the fact of AA Steel now getting RTA work?---No. I don't recall that.

Did you learn over time, through the preparation, your – I withdraw that. Did you learn over time, through your involvement in the preparation of documents in respect of RTA work, that some of the work that was coming into AA Steel was work that was under the responsibility of Mr Steyn?
---Yes.

10

Indeed, most of the work came under the area of responsibility from Mr Steyn, according to the documents you saw, correct?---Yes.

Did you become familiar with any other persons working at the RTA who, according to the documents, seemed to be giving work to AA Steel?---There was a person called Alex.

And do you recall Alex's surname?---Dubore or something like that. I don't

20

Dubois?---Yeah.

D-u-b-o-i-s?---Yes.

All right. Do you have a recollection of how that name first came to your attention?---Just through contract work that would come through. Other than that, nothing.

30

Is he a person that Craig ever mentioned to you?---Not to me. Ashley would have, as in, "I've got to do a quote for Alex," or, "We've got to do some work for Alex."

Other than a discussion of that nature that you've just described, do you recall Ashley saying anything else about Alex Dubois?---No.

All right. And I think you mentioned an Evan as well.---Yeah.

Was that also a name of someone at the RTA?---Yes.

40

That what you understood had asked AA Steel - - -?---Oh no, I recall doing an invoice at one stage to a person called Evan for works that were completed.

THE COMMISSIONER: Sorry, what's that person's name?---Evan King, I think it was.

Sorry?---Evan.

Evan.---Yeah.

King.

MR DOWNING: Thinking about the period from about mid-2009 to the middle of 2019, it's the case, isn't it, that over that period of time, AA Steel ended up doing a reasonable body of work for the RTA and then the RMS?
---Yes, they did.

10 And would you agree with this, that initially there seemed to be smallish jobs, not worth a lot of money?---Yes.

But over time the jobs got somewhat bigger?---Yes.

And there seemed to be more of them over time.---Yes.

All right. Now, it's correct, isn't it, that from about 2013 through to 2019, AA Steel, through its CBA account, and you and Ashley, through your joint CBA account, have paid many bills for either Craig or his family?---Yes.

20

And that was during a period where AA Steel was receiving RTA and, or – I withdraw that – RMS work, including from Mr Steyn.---Yes.

Now, it's the case, isn't it, and I'll come to specifics, but where it came to making any payments either to Mr Steyn or on his behalf, typically that was done via EFT?---Yes.

And that would mean that it was you who was typically making the EFT transaction through internet banking.---Yeah, it was me processing them.

30

And when you say processing, do you mean to say that on each occasion, you processed the payment after having a discussion with someone?---With Ashley. Yes.

So thinking about the payments that you made, and as I indicated, I'll come to specifics, was it Craig or Ashley who would speak to you about a particular payment to be, potentially to be made?---It would be Ashley.

40 And would he, for instance, give you a paper invoice or bill of some sort?
Or would he just speak to you and say something needs to be paid?
---Sometimes it would be a paper, and sometimes he would just verbally tell me what I needed to pay for.

All right. And I take it in order to make payments via EFT, you would need account names, account details, and account numbers and BSBs.---Yes.

So would you either get that from documents that Ashley gave you - - -?
---Yes.

- - - or would Ashley sometimes write things down for you?---Yes, either/or.

Can you recall Craig ever speaking to you or corresponding with you directly about the payment of particular bills for him or his family?---Yes.

And did that happen from time to time?---Yes.

10 And would you on those occasions simply make the payment without speaking to Ashley, or would you always speak to Ashley?---I would always speak to Ashley.

And would Ashley then give you some direction as to first of all whether to pay it or not pay it?---Yes.

And secondly, as to from where to pay it?---Yes.

20 So that, for instance, he might say to pay this from your personal joint account with the CBA.---Yes.

Or he might say on occasion to pay it from the AA Steel CBA account. ---Yes.

But you operated both of those, and you could make the transfers.---That's right. That's right.

30 Would it be the case that it was you rather than your husband who at all times operated the electronic banking?---I do it.

But did Ashley ever do it? Was he someone who ever sat down and actually logged on to internet banking and made transfers?---No. No.

And as well as making payments on behalf of Mr Steyn, it's the case that sometimes you made cash withdrawals?---Yes.

And paid that cash to Mr Steyn.---Me?

40 Did you?---Or Ashley?

Could you assist us, did – if you made a cash withdrawal - - -?---Yeah, yes. There - - -

- - - how would that come about? Would it be someone going to a branch? ---Going into the bank and getting the money out, and then yes.

Who would go in?---Him or I would do it. Yep, either one.

And then who would give the cash to – I’ll withdraw that. Was the cash then given to Mr Steyn?---Yes.

And who would give it to him?---Ashley.

So if you went into the branch, would it be the case that - - -?---I would give it to him.

- - - you would give the cash to Ashley - - -?---That’s right.

10

- - - and Ashley would then indicate to you that he’d given it to Craig?---He would give it, yes.

And on occasions would Ashley say to you, “I’ve been into the branch and got some money out and given it to Craig?”---Yes.

20

Now, can you explain how it was that you came to, either through the AA Steel account or through your joint personal account with your husband, to make these payments either to Mr Steyn or on his behalf?---At times there were invoices that were made out and Ashley would say, “Pay it through the account,” if it was steel or metal or certain stuff, and on other occasions he’d say, “Pay through either the other account.”

But going back in time, before the first bill that you were ever given or sent by Craig Steyn, was there some discussion – either involving you and Craig or you and Ashley or you, Ashley and Craig – about Craig’s desire that you meet some bills and expenses for him?---I do believe that Ashley and Craig had a discussion with regards to that.

30

Was that something you were present for?---No.

Did Ashley speak to you at some point about this subject matter, that is whether you and Ashley through your personal account or the AA Steel account might pay certain things for Craig?---Yes.

40

What did Ashley say to you in respect of that conversation?---I can recall him at one stage saying Craig needed some tiles or bricks of some sort and he was going to pay for that, and I think in the hope that perhaps he would get work. I don’t know.

Just pausing there. You, I take it, were aware that Craig lived at a particular address in [REDACTED].---That’s right.

And I’m talking now about the period from about 2009 onwards.---Yeah.

And you’re aware, aren’t you, that at some point, and I’m going to suggest in about 2013, he embarked on a project where he first of all knocked down an existing one-storey house on the property - - -?---Yeah.

- - - and then did some fairly extensive works which involved putting in an in-ground pool?---Yes.

Building an outside building connected to the pool?---Yeah.

And then building a two-storey house to replace the prior one-storey house. ---Yeah.

10 And it's the case, isn't it, that in the course of that work, Craig ultimately came to you or Ashley and sought that you pay for a number of items. ---Yeah, that he went to Ashley for.

Now, you say – I'm going to suggest to you – I withdraw that. I'm going to suggest to you that the development application in respect of the pool, the demolition of the pool was put in in about 2013, and that the development application in respect of the new house was put in in about 2015. Does that accord with your recollection in rough terms as to when you can recall the work being done?---I can't recall that, sorry.

20

Right. But going back, do you say you recall a discussion where Ashley said something to you about Craig approaching him and requesting that a particular item in respect of the house be paid?---Yeah. I don't know exactly what time frame or year, but there was that discussion.

Right. And trying as best you can, and I accept that it's some years ago and you're not going to remember word for word, do you recall that there was something said in the course of Ashley relaying that conversation back to you about AA Steel doing work or potentially doing work for the RMS?

30

---In what, what regard?

Well, at the time Ashley told you that Craig had approached him about paying for something to do with the house, thinking about the item, did you say it was tiles, was that your recollection or - - -?---Tiles or pavers or something to that effect, yeah.

THE COMMISSIONER: Tiles or bricks I think you said.---Bricks, bricks, yeah.

40

So this would be tiles or bricks for the new house, was it?---Yes.

MR DOWNING: At the time Ashley spoke to you and said that Craig had approached him in respect of either – well, I withdraw that. Do you recall whether Ashley said something about whether it was a payment that he was going – well, first of all – I withdraw that. I'll go back a step. Craig, according to Ashley, had approached Ashley and raised with him paying either for the cost of tiles or pavers to do with the house.---Yeah.

Did Ashley, when he recounted that to you, indicate that he thought it was okay that it be paid?---Yes.

And did he say something, that is Ashley, about Craig also raising something in the course of a conversation about the tiles or pavers, about RTA work that AA Steel might do?---Not that I can recall.

I thought that - - ?---Not with me anyway.

10 I thought your evidence not long ago was that there had been something said by Ashley at the time about the potential for doing further work.---Yeah, yeah.

What do you recall Ashley saying?---Look, I think at the time, when I said, I questioned what, the payment of these invoices was that the prospect of having, getting more work from Craig in the future.

So, that's something that Ashley said to you?---Yeah.

20 So was this the nature of the exchange, that he tells you that Craig has asked for these items to be paid for, tiles or pavers?---Yes.

You raise with him whether it's okay to pay it?---Yes.

And Ashley says something along the lines of, "Look, we should pay them. It might be good to get more work in the future"?---Yes.

But did he say anything to indicate that he had spoken directly with Craig about that?---I don't recall.

30 Can you tell us anything more about that discussion in terms of that you can recall Ashley recounting to you at the time?---I really don't know.

But I take it that at the time Ashley also said something to you about what account that should be paid from?---Yes.

And you would have then followed what he told you and made the payment?---That's right, that's right.

40 What then followed was many similar requests over quite a period of years, correct?---Yes.

And over that time, it's correct, isn't it, that either AA Steel, through its CBA account, or you and Ashley through your personal account, paid many, many invoices that were connected to the work that was being done at Mr Steyn's house?---Yes.

And it's correct, isn't it, that Ashley at no point said anything to you to suggest that this was money that was being loaned?---No.

In effect, what Ashley said to you was, "I think this would be good to pay because we're getting work from," – I withdraw that. "Because it may assist us in getting work from Craig at the RMS"?---May, yep, yep. Yes.

10 Now, beyond the work – I withdraw that. Beyond the cost of works associated with the house, it's correct, isn't it, that you also, over a number of years, paid many, what I will describe as, general living expenses for either Craig, his wife, Aleesha, or their family?---Yes.

And that included expenses related to their children?---Yes.

And also expenses related to either Craig's parents or Aleesha's parents? ---Yes.

20 Now, thinking about those items, which are of a different nature to costs associated with the either demolition or rebuilding of the house. How do you recall the first instance of you being asked by someone for those items to be paid coming about?---Well, if we're referring to, in particular, his wife had a birthday party. He did come to me and say, "Could you arrange, organise and pay for it?" Which I did.

It's correct, isn't it, that in respect of all of these general living expenses, as I have referred to them, that the requests that you meet the cost of them started occurring after AA Steel was doing RTA or RMS work?---Yes.

30 All right. And when it comes to making those payments, that is for general living expense-type items, again, did you typically make EFT payments? ---Yes.

Would you sometimes withdraw cash?---Or credit card.

Or pay on credit card?---My credit card, yeah.

And was the credit card one in your name or AA Steel's name?---It's in my name.

40 Did AA Steel have a credit card?---No.

And when it came to paying for those things, was that Craig approaching you directly or was it Ashley coming and relaying a request from Craig? ---Well, as I said, in the event of something like his wife's birthday, it was a discussion between him and I when he said, "Can you organise this and pay for it," which I did.

And it's the case, isn't it, that over, I'm going to suggest, a period of about 2013 to 2019, you made extensive payments of that nature for or on behalf of Craig or his family?---Probably.

Did he, in the course of coming to you to pay things, ever say anything about RTA work?---Not to me.

10 What was it that motivated you to make these payments for Craig or his family?---Again it goes back to the conversation with Ashley where it was my understanding that we would get more work, as in AA Steel. So when Craig approached for something to be paid I would discuss with Ashley, "What's your thoughts?" And he would say, "San, just pay it," and I would pay it.

So is it the case that before paying even the general living expenses you would always raise it with Ashley?---We always, we always discussed it.

20 So you would discuss that with Ashley and he would say either yes or no. ---Yes.

Did Ashley ever say no?---No.

But based on your discussion with Ashley, what you understood was the reason for paying it was to again try and ensure a flow of work from Craig at the RMS.---Yes.

And it's the case, isn't it, that besides Craig, you're a member of quite a large family when it comes to your cousins.---Yes.

30 You're Craig's first cousin I understand?---Yes.

And how many other first cousins are there in your family?---There's a lot.

But just a rough estimate. I don't need you to name them.---20-something maybe.

How many of them are in Sydney?---The majority.

40 Besides Craig, have you been requested to make payments of this nature by any of your other first cousins?---Not cousins, but my kids, yes.

Well, let's put your kids to one side.---Yeah.

All right. Now, it's the case, isn't it, that in the period after you began paying for these expenses – again I'll refer to them as general living expenses – that AA Steel did continue to receive a flow of work.---Yes.

And indeed over time there were bigger jobs and more of them compared to the early days.---Yes.

Have you ever had a discussion with Craig where he explicitly said anything about RTA work coming the way of AA Steel in connection with you paying for either expenses related to the knockdown and rebuild of the house or paying living expenses?---Not that I can recall.

10 But has Craig ever said anything to you to suggest that he had any intention to repay you for the various items you've paid, first of all in relation to the house?---No.

Or the living expenses?---No.

Now, just thinking about the way in which AA Steel prepared quotes for work, did you ever have a discussion with either Ashley or Craig about AA Steel including an amount in its quotes to reflect payments that would then be made to or on behalf of Mr Steyn?---As in inclusive of that quote?

20 So that to go back a step, you've described how you were involved in the process of AA Steel putting in quotes for RTA or RMS work.---Yes.

In that you might get a request for a particular job that would come in via email.---Yes.

You would speak to Ashley.---Yes.

30 It would be up to Ashley to work out whatever the calculations that were required to come up with a price.---Yes.

And the quote would then go out.---Yes.

40 Have you ever had a discussion, let's start with Ashley, where he suggested that for RTA jobs for Craig, as well as whatever the standard AA Steel quoted price was, that it would be necessary to include a component to reflect amounts that would then be paid to or on behalf of Mr Steyn?---Not with Ashley, but I do know on occasion we would submit a quote, send it through to RMS, to Craig, and he would then send it back to me, with a difference of a figure saying it's to incorporate this amount of work and it would change the figure, he would change the figure on it.

Right.---And say, "Resubmit it because this is what it needs to cover."

So breaking that down, you would speak to Ashley to come up with what was the estimated price for AA Steel.---Yeah.

And I take it that based on your discussion with your husband, did you understand that that would cover all of the various costs of the work?

---Yeah. Not that I understood costing when it came to the work because I have no idea how they run their day-to-day, you know, costings and stuff.

But putting aside the nuts and bolts of the costings, did you understand that AA Steel put a quote together, you would cover costs and include some level of margin to make the job worthwhile.---Yes.

10 All right. But are you saying that after doing that in respect of the RTA work that AA Steel was doing for Craig, you would submit the document to him via email?---Yes, yes.

He would then say, "I want you to increase it."---Yes.

And did he indicate that it was to be increased to reflect some particular cost or item?---He would reword the whole quote for me, and send it back to me as in this is what the works would be covering.

20 So that he would change not only the narrative but the cost, is that right?
---That's right.

And is it the case that whenever Craig did that, it was a case of increasing the quote, not decreasing it?---Yes.

And then it's the case, isn't it, that where that had occurred, that is, where a, I'll describe it as a genuine AA Steel price had been submitted, and then Craig suggested it to be increased, once that bill had been paid, you would then account, wouldn't you, in some way, for the difference?---Yes.

30 And it would then be accounted for so that it could be put towards the payments made to or on behalf of Mr Steyn.---Yes.

And did Mr Steyn request that you keep some sort of tab or tally on that amount?---He had put together a spreadsheet that he would send to me from time to time, asking me to update it as it went along to show what the differences were, in various jobs.

40 And just thinking about the spreadsheet, does that go back to fairly early in the time that AA Steel was doing RTA or RMS work?---I think so, I can't, I really can't recall how, you know, many years ago, but yeah.

And as best you can recall, what did the spreadsheet show?---It would have the invoice number, the cost as per AA Steel, and then the added extras on, as opposed to the, the, the corrected one that would be sent back to me, with the difference.

THE COMMISSIONER: What were the extra added - - -?---Excuse me?

What were the added extras?---Well, I can't – I mean, for argument's sake, if a quote was just, say, 5,000, and it came back to me at 15,000, then it would have five to AA, 10 to T-K-something-Y-something. And that would mean the difference.

So I take it that there were occasions, perhaps, they may be countless now, but in general terms, very often with substantially increased amounts to what the original invoice had recorded, is that right?---Yes, yes.

10 And you understood the increase when it came back from Mr Steyn represented what he would be receiving.---Yes.

I see. Thank you.

MR DOWNING: Perhaps – I withdraw that. You've indicated that you can recall receiving spreadsheets of that nature over some period of time.---Yes.

20 And is your recollection that Craig would send them to you and then ask you to do something with them?---Yes.

So would he fill them out himself with details of jobs, the quoted price from AA Steel, the altered price, and then the margin, if I can describe it as that? ---Yes.

And would he then send it to you and ask you to do something with it? ---Yes, to update it with wherever we were at.

30 All right. Now separate to those things that show references to the amounts, or I withdraw that, that show reference to particular AA Steel jobs for the RTA or RMS, and the amounts originally billed, then the increased figure, and then the margin - - -?---Yes.

- - - did the spreadsheet also include some reference to individual items that you were then meeting the cost of?---Yes.

Either yourself, that is you and your husband through your personal joint account, or through AA Steel.---Yes.

40 All right. And did the spreadsheet work in a way where in effect it showed a running tally?---That's correct.

So it would show, in effect, credits due to Craig.---Yes.

That is, all of his margin on the various jobs.---Yes.

So that each time a job was done which included a margin for Craig, the running tally would go up.---Yes.

And then for each item where either AA Steel or you and your husband in your personal account made a payment, the tally would go down.---That's correct.

All right. To give some substance of what you've said, I want you to now have a look at a document, please, and this is at volume 11.2, page 49.

10 Now, I'm going to suggest to you that this was an email which was located on a phone which was found at Mr Steyn's residences when a search warrant was executed at that house. But first of all, do you see that it seems that this is an email sent on 18 December, 2018?---Yes.

And it's from AA Steel Piping?---Yes.

THE COMMISSIONER: 18 December, yes, 2018. Thank you.

MR DOWNING: And I think you've confirmed already that AA Steel Piping was an email address that you operated?---That's right.

20 And it's to Creative Service. Do you recall if Creative Service was a particular personal email address that Craig used from time to time?---Yes.

You'll see that what it seems to attach is an Excel spreadsheet headed Craig Aug 2015.xls.---Yes.

And you'll see it reads, "Morning. Update with the inclusion of invoice 0608, which has just been paid."---Yes.

30 And then it's signed off "J". Is that you signing that off?---I'm the only one that uses the email, so I don't know the "J" but, yeah.

Do you recall that from time to time you would send emails of this nature so that where Craig had sent you a version of the spreadsheet, you would go through and update it?---I would, I would, at his request, he would ask me to send him an update of where we were at and then I would do this and send it back to him.

40 And when you say, "Where we're at," would he speak to you at various times and say, "Look, can you send me an update now"?---Yep.

And would he use the terms, "Where we're at"?---Oh, I probably just said that, yeah, but yeah. He would probably just say to me, "Can you send me an update on the spreadsheet," and that's the end.

Can you recall now, and it may be too long ago, what Craig said to you the first time he ever made mention about sending you a spreadsheet?---Oh, I can't.

All right. But you say that you do recall him from time to time saying, "I'm going to send you one and I want you to check it"? And I'm not suggesting the precise words but words to the effect of, "I want you to check it and let me know where we're at"?---Yep.

And what did you understand him to mean by, "Where we're at"?---Well, to see what was owed to him.

10 Well, if we then go, please, to the next page, to page 50, and I'm going to suggest that this is the Excel spreadsheet that is attached to that email.
---Yeah.

Do you recognise the format of it?---Yeah.

And looking, first of all, at the table, do you see the left-hand column had PO?---Yes.

Or PO with the symbol, I take it being, number?---Yes.

20 And what did you understand that to be a reference to?---Purchase order.

From the RTA or RMS?---Yes, yes.

THE COMMISSIONER: Sorry, what did you say it was?---Purchase order number.

Purchase order, thank you.

30 MR DOWNING: And just looking in that column, you will notice, for instance, that the first number – and I won't read all the digits out but – ends with 6428-10-20-30-40?---Yeah.

And do you recall that when you were submitting invoices, that there would be a purchase order number and then line items that would relate to particular aspects of work?---Line, as in specifying the work?

Within an invoice, there might be a breakdown with line items for different aspects of the work?---Yes, yes.

40 All right. And do you see the second lot of numbers there under PO also ends with 6428, but this time it goes -10-20-30-40-50-60?---Yes.

Then down below you'll see that there is a different number, and again I won't read all the digits, but ends with the numbers 6856-10-20-30-40.
---Yeah.

And then there is one other PO number of its own at the bottom.---Yeah.

And again, without reading all the digits, it ends with 9557-10?---Yeah.

All right. Moving to the next column, do you see it's headed Scope of Works?---Yes.

And did you understand that to be a reference to the particular, or a short-form description of the works that were involved for a particular purchase order that was awarded or issued to AA Steel?---Yes.

10 And I take it that when it came to preparing quote and invoices, you would get some idea of the scope of works through those documents as you typed them and sent them?---Yeah.

I'm not suggesting you were doing the work but you would be the one that was preparing the documentation?---Yep. That's right.

The next column, AA Steel Quoted Price, looking at this, what did you understand that reflected?---Is what we quoted, and what we were paid.

20 Well, you'll see the next column after that is Dollars Awarded to Job.---Yes.

Do you see, for instance, the first two line items, it's the same figure?---Yes.

So for "Handrail install top Mount Victoria," it shows the quoted price was 9,800.---Yes.

And the dollars awarded to job was the same figure.---Yes.

30 The same for the next line, "Fabricate container feet times 12."---Yes.

6,200 is the AA Steel quoted price, and also the dollars awarded to job.---Yes.

You'll see for those two items, there is nothing in the final column.---Yes.

But do you see for the next item, "Modify and generate a container," it shows you a AA Steel quoted price of \$13,000?---Yes.

40 But a dollars awarded to job of \$30,000.---Yes.

And in the last column, there is a figure of \$17,000.---Yes.

And that's under the heading Ki-Ty – K-i, hyphen, T-y – Investments.---Yes.

And trust my maths on this, I hope, but that 17,000 reflects the \$30,000 awarded to the job, less the AA Steel quoted price.---Yes.

So just pausing there, what did you understand then those three columns to reflect by reference to that line item?---That we would just get 13,000, and Craig would get the 17,000.

But would it work this way, that that would be an instance – or withdraw that. Does that reflect a job where your original quote was 13,000?---That’s correct.

10 Craig would suggest that you then increase it to 30,000.---Yes.

And that the 17,000 difference was then to be in effect allocated as Craig’s margin.---Yes.

And would then be set off against whatever payments that you were making either in respect of the house or in respect of general living expenses.---Yes.

20 And you will see then, when you go over to the right of the table, that there are a series of figures. So you’ll see at the very top of the table, it’s got Balance of Previous Investments.---Yes.

And it’s got \$16,000 in the Ki-Ty Investments.---Yes.

Now, just pausing there, K-i and T-y are the first two letters of Craig’s children’s names, correct?---Yes.

30 And do you recall him at some point suggesting to you that he would call the part of the spreadsheet that reflected his margin Ki-Ty Investments or something of that nature?---He never ever discussed it with me. He just put that together and sent that to me.

So the words “Balance of Previous Investments,” again, is that Craig’s entry?---Yes.

All right. Then if you go down the right-hand column, you’ll see for each entry in Ki-Ty Investments, then to the right of that, where there is an entry in Ki-Ty Investments, that figure appears. So next to “Balance of Previous Investments”, to the right of the table, the figure \$16,000 appears.---Yeah.

40 Then under “Modify generate a container,” the figure \$17,000 appears in Ki-Ty Investments and then also to the right.---Yes.

You’ll see that when you run down all of those figures, starting at \$16,000 and finish at \$500, you then get a figure in green, \$70,000.---Yeah.

And that reflects, doesn’t it, a running tally of all of the figures in the Ki-Ty Investments column?---Yes.

So did you understand that to reflect that, according to this table, that the running tally in terms of what Craig was owed from his margin from the balance of previous investments and these jobs was \$70,000?---Yes. Yes.

And looking then at the further items in the table, you'll see if we move down to the second purchase order number, 6428-10, with the line items 10, 20, 30, 40, 50, 60, so do you see that, the first item being antenna fabrication?---Yes.

10 So did you understand that each of those items worked in the same way as what you've described for the first lot?---Yes.

So that in each instance, the number in Ki-Ty Investments represented Craig's margin.---Yes.

Just looking at the third item in that section, "Modify frame and mounting brackets," you'll see that there's actually nothing in the AA Steel quoted price and the dollars awarded to job is \$6,000. Do you see that?---Yes, I see that.

20

And that figure then appears in the Ki-Ty Investments.---Yeah.

And you'll see that similarly in respect of the last item in that section, "Blacktown yard clean-up," there's no AA Steel quoted price but dollars awarded to job is 5,000 and the Ki-Ty Investments is 5,000.---I see that.

Do you have any knowledge of whether with certain items that you ultimately prepared bills for on behalf of AA Steel, in fact there was no work done at all?---Not that I know of.

30

When it came to preparing the invoices, would you prepare them according to what Ashley told you was to be included?---Was actually completed, yes.

But can you recall Craig ever suggesting to you that you should put in a bill for something where there had been no work done at all?---No, that never happened.

Now, if you look at – could I ask you please to go to volume 11.2.

40 THE COMMISSIONER: Are you coming back to this?

MR DOWNING: I will come back to this, Commissioner, yes. Actually, before we move on I'll just get you to confirm one thing for me, please. If you add up the first group of items at the top of the table, you'll see, I'll suggest to you, that is the purchase order number 66 – I withdraw that – 6428-10, 20, 30 and 40. I'll suggest to you that what that indicates is that when you add those figures in the Dollars Awarded to Job up, you get a

figure of \$47,000. So do you see that? 9,800 plus 6,200 is \$16,000, plus 30 is 46 plus one is 47.---(No Audible Reply)

THE COMMISSIONER: Do you see the first four columns, the first line entries starting 9,800?---Yes, I'm looking at that, yeah.

Okay.

10 MR DOWNING: So for those four items, the total awarded to the job when you add those up, and I'll ask you to accept my maths, is \$47,000.---Yeah.

And what it shows, doesn't it, that for those for items that the amount that was allocated to Ki-Ty Investments was \$17,000.---Yeah.

So do we take it from that, that \$47,000 was to be billed and in reality it was a genuine cost of \$30,000 with \$17,000 to be returned to Craig?---That's correct.

20 Could I ask you please, and I will come back to this, but to go to volume 11.2A, page 63. And do you see this is a bill from AA Steel dated 19 February, 2015, for various works and services for RMS?---(No Audible Reply)

Do you recognise that?---Is that the quotation?

Yes.---Yeah.

And you'll see that the quote price at the end is \$47,000 ex-GST.---Yeah.

30 And when you look at that, and I'll have the spreadsheet brought back up in a moment, but it's correct, isn't it, that these items correspond to the very items in the spreadsheet? So you'll see there's 9,800, 30,000, 6,200 and \$1,000.---Yeah.

With a total of 47,000 ex-GST.---Yes.

40 If we go back, please, to volume 11.2, page 50. Looking just again at those top four entries in the table in the spreadsheet, while your order is different you'll see the same sums 9,800, 6,200, 30,000 and \$1,000.---Yeah.

Looking at that, the invoice I just took you to, and if we could go back to it please, the invoice – I withdraw that. The quote at 11.2A, page 63. It seems to reflect, doesn't it, when you look at the amounts and indeed also the scope of works set out in each line the same work which is covered by the table in the spreadsheet?---Mmm.

Do you see for instance the first line is "Additional safety rail for Mount Victoria"?---Yes, I see that.

And if we go back, please, to volume 11.2, page 50 you'll see that the first line is "Handrail install top Mount Victoria."---Yeah.

I can go back and let you look at the other entry.---No, that's fine, but this was not created by me.

I know.---That was created by Craig so, yeah.

10 I accept that. Your evidence is that this was created by Craig.---Yeah.

But it was sent to you, as I understand your evidence, for you to review and check.---Yeah.

And when you got this spreadsheet would you have gone back to, for instance, invoices to check off what Craig had included in them?---I wouldn't even notice all of that.

20 All right. In any event, if we could go, please, to volume 11.2A, page 64 and you'll see that this is an RTA IMS purchase order request form, and you'll see that the numbers when you look at the service items again correspond with what is in the quote I just took you to and also the figures in the spreadsheet.---Okay.

That is \$9,800, \$6,200, 30,000 and \$1,000 with a total of 47,000 plus GST. ---Ah hmm.

30 And you'll see that according to this it was requested by Craig Steyn on 20 February, 2015 and then signed off by Samer Soliman on 23 February, 2015.---Ah hmm.

And I'm going to suggest to you, if we go back now, please, to the spreadsheet at page 50 that the analysis that I've just gone through with you in terms of what each column reflects is the same for the other two purchase order numbers that are recorded in that part of the table. Do you agree with that?---Yes.

40 So that what we then see when we get to the totals at the bottom of that is that across those jobs as referred to in, or reflected by those purchase order numbers you get a genuine AA Steel quoted price of \$80,500 but the actual cost that was ultimately billed of \$138,500.---Yes.

So that the difference, that is the margin was \$58,000. Correct?---Yes.

And that was the amount that was then allocated to set off against payments made to or on behalf of Mr Steyn.---Yes.

When you go below the table, you will see that the spreadsheet then lists certain, what are described as, Ki-Ty Investments expenses.---Yeah.

And looking at those, you can recognise, can't you, that they are expenses that Mr Steyn asked you to pay, looking at those items, in respect of either the demolition work or the pool work or the house work?---Yes.

So, for instance, there was \$700 that this reflects towards the cost of a pool equipment cover.---Yes.

10

\$14,000 in respect of demolition work by Advanced Demolition.---Yes.

Do you then see that there's an amount for, "AA Steel beam supply and install onsite," and it's noted, "Ash to price? Plus/minus price"?---Yes.

But a figure of \$33,000?---Yes.

20 Just pausing there, do you recall that your husband actually put in a steel beam for the purposes of the work being done at the Steyn's house?---I don't recall. Quite possibly but I really can't recall that. I'm assuming that that's what it could be. It, it looks - - -

THE COMMISSIONER: Looking in the items, one's something to do with the pool, a pool cover.---Yeah.

The other's Advanced Demolition, which suggests might have been related to the demolition of the old house, would it be?---Yeah, yes. And I'm assuming this - - -

30 Austral Bricks, did Austral Bricks' products end up being used in the construction of the new house?---Yes.

So, in context, is it likely that the beam, the steel beam referred to there was a steel beam for the new house construction?---Would have been installed in their home. Yes, quite possible.

By Mr Steyn, is that right?---Yes.

40 MR DOWNING: Just looking at the reference to, "AA Steel beam supply and install onsite." Do you believe the words, "Ash to price? Plus/minus price," were inserted by Craig or by you?---That was Craig.

And the figure \$33,000 that's put towards it, do you know whether that was Craig or was that something you inserted?---No. This, that's Craig.

And sitting here now are you not able to assist us to whether Ashley actually did install a beam for the purposes of the work on the house?---I'm

assuming, based on what I'm looking at, that it's quite possible that he would have done the installation of the beam work in the home.

Do you recall Ashley going and doing some work on the house?---He was quite often there. He was quite often there, so - - -

And to your knowledge was AA Steel ever paid for anything you did?---No.

10 So, you'll see that the \$70,000 figure that was at the bottom of the table then reduced down to \$47,700 after those items were seemingly deducted.---Yes.

Although I'm not sure that maths is actually correct, just looking at it. In any event – oh, I withdraw that, I withdraw that. The figure \$47,700 reflects the total of the AA Steel beam figure, the Advanced Demolition figure and the pool equipment cover, so that when you deduct \$47,700 from \$70,000, you get a figure of \$22,300. Do you see that?---Yes.

20 And as best you can recall, was that all the work that Mr Steyn, that is those figures and those words in the document?---Yes.

And as best you can recall, had you organised for the payment of those items, putting aside the work for the steel beam supply and installation, the pool equipment cover and the Advanced Demolition costs, and the Austral Bricks costs?---When you say organised, as in?

That is made transfers so that bills would be paid?---Yes, I would have.

30 Just dealing with Austral Bricks, you will see that on the table there is Austral Bricks paid on 5 August, and it shows \$15,000.---Yes.

So the balance then drops to \$7,300.---Yes.

And then paid 31 August, Austral Bricks, \$8,000.---Yes.

So that it actually shows a negative balance of \$700.---Yes.

40 Can you recall now whether Craig asked you to pay for the bricks or whether the request to pay for the bricks came from Ashley?---It came from Ashley.

But you're aware, I take it, that Craig was organising to buy bricks for the purposes of the work at his house?---I became aware when I was asked to pay, make the payments.

All right. In fairness to you, can I ask that you be shown volume 10.3, page 131. Now, first of all, even though there's no name on this, you'll see the account number in the top right corner ends with 5-0-8-4.---Yes.

And I took you earlier to two bank statements, one for AA Steel and one for you and Ashley personally.---Yes.

I'm going to suggest this is the personal account.---Yes.

Do you see that the first entry on that page is 5 August, 2015, \$15,000?
---Yes.

And it's marked as "Austral Craig".---Yes.

10

So I take it when you went to make the EFT payment, you would have to put in a description?---Yes.

And does that appear, looking at it now, that you've put in Austral Craig so that you could identify what the payment was?---That's correct.

20

All right and if we then go to the next page, please. I'm going to ask you to accept that this is bank data in respect of that transfer. You'll see that that shows a NetBank transfer to Austral Bricks and an NAB bank account, I won't read the number, which shows the transaction done by Ashley Alexander.---Yes.

But I take it from your evidence that it was you who would have actually carried out the transaction by using the internet banking.---I do the processing, that's correct. Ah hmm.

30

If we could then go, please, to page 135, you'll see that this is another page of a bank statement, but this time it's a different account number, and you'll see it ends with 5-1-0-5.---Yes.

And I can take you back if need be, but I'm going to suggest to you that this is the account for AA Steel, not the personal joint account that you and Ashley maintain.---Yes.

Do you see that on 31 August, 2015, what it shows is a transfer to other bank/NetBank, and it's Sam Jas Construction, and it's a debit of \$8,000.
---Yeah.

40

But if we go to the next page, please, the bank data, you'll see that it shows that in fact it was a NetBank transfer to Austral Bricks.---Yep.

And again, according to the bank data, transaction done by Ashley Benedict Alexander.---Yeah.

But do we take it though that consistent with the last transaction, that while that's the bank data's record of who created the transaction, it would have been you, not Ashley?---Yes, it is me that processes it, but again, like I said, I go to him for approval for all the processing and stuff.

So in this instance, it would seem that the original \$15,000 payment was made from your personal account.---Yes.

But this account, sorry, with this transfer of \$8,000 was made from the AA Steel account.---Correct.

And would that have been at Ashley's direction?---Absolutely.

10 Now, if we go back to the page before, please, you'll also see that it's marked as Sam Jas Construction.---Yep.

And again, is that something that you would have put in as part of the description of the transaction?---Probably.

Now, pausing there, if we could go back, please, to the spreadsheet that I first took you to, that is, volume 11.2, page 14. You recall I took you earlier to, not the spreadsheet that Craig had sent in 2018, but some examples of the spreadsheets that you prepared each month for AA Steel.---Yep.

20

If we could go, please, to – thank you. You'll see that this – well, first of all, I'll ask you, do you recognise that as the May 2013 spreadsheet that you prepared?---Yes.

And you'll see that when it comes to income that month, it shows that there were on 17 May two payments by Sam Jas Construction.---Yes.

One for 43,797.60 and one for 7,963.20.---Yes.

30 You're aware, aren't you, that Sam Jas Construction was a client for whom AA Steel did some work?---Yes.

That is, you would do steel fabrication work for that construction company. ---That's correct.

40 Can you explain then, going back to, if we could, please, to volume 10.3, page 135, why you would have entered Sam Jas Construction for this transfer when, according to the record on the next page, that is the bank data, it was in fact transferred not to Sam Jas Constructions, who was a client that you, AA Steel, did work for, but a transfer to Austral Bricks? ---It's quite obvious at the time that it was charged and described as being for Sam Jas but it was actually paid for the bricks.

You say that that would have been done at Ashley's direction?---Yes.

Can you recall Ashley suggesting to you that when it comes to paying for the bricks, put them through as Sam Jas Constructions?---Yes.

Did you understand at the time that what he was asking you to do was to in effect try and make this payment appear as a form of business expense?

---Yeah, I understand that.

All right. Did you recall whether you ever were provided either an invoice or a quote from Austral Bricks in order to make these payments?---I can't recall.

10 Is it the case that - - -?---There would have had to be for me to pay it so some kind of - - -

Or some written note from your husband perhaps, as to who the payment should be made to and what account details?---Probably.

If we could please go back now to the spreadsheet that I took you to, that is the 18 December, 2018 email on the attached spreadsheet, and if we could go back, please, to volume 11.2, page 50. So I took you to the spreadsheet down to the figure in red, \$700.---Ah hmm.

20 And I think you agreed with me that what that demonstrated is that the running total after deduction of the two payments of \$15,000 and \$8,000 to Austral Bricks was minus 700.---That's correct.

So in effect, Craig was in debit to you at that point to the tune of \$700.---Yes.

30 If we then look further down the page, you'll see that highlighted in yellow there are a series of, I'm going to describe them as scope of work descriptions.---Yeah.

And there are amounts that seem again to fall into the Ki-Ty Investments column.---Yeah.

And do we take it that they reflect again further work that AA Steel has done for the RMS?---I'm assuming so.

And where there was some margin for Craig so that when you added up the various margins you came to a figure of \$25,494.---Yeah.

40 So that in effect the running tally had gone from being a 700 debit, to back into credit.---Yeah.

Subject then the last item on the page, the \$700 shortfall.---Yeah.

All right. If we could then please go to page 51. Now, do you recall receiving the spreadsheet that included items of this type?---Yes.

And is this consistent with the various versions of the spreadsheet you received from Craig from time to time?---Yes.

So do we take the first figure is in effect the running tally sum?---Yes.

And as we go down the page, where figures appear with items written to the right, that they are debit items to reflect costs either related to the house or living expenses that have been paid by either AA Steel or you and your husband through your personal account?---Yes.

10

And do we take it that where there are items with invoice references or invoice number references, where it says "Plus" in the left-hand column - - - ?---Yes.

- - - they reflect jobs where AA Steel have been paid by the RMS and those jobs were ones where there was a margin to reflect a payment to Craig in effect.---Yes.

20

Now, if I could deal first of all with just the format of this part of the document, as best you can recall was this something that Craig drafted or something that you drafted?---This was just a continuation of the one that started on here that just carried on that way.

THE COMMISSIONER: Sorry, does that mean that he was the author of this document?---Yes.

30

MR DOWNING: And did you add anything to this? Like looking at this page - - -?---Yeah, well, yeah, the figures were me letting him know what invoices that (not transcribable). All of the rest of it would be my input sending back off to him.

So looking at this page now, what would it have consisted of when you received it before you made any annotations to it?---The first one that you just showed that's - - -

So that is if we go back to page 50?---Yes.

40

All right. But then what we now see on page 51, does this reflect you inserting - - -?---Yes.

- - - each of the less items and each of the plus items?---Yes.

So you edit it to bring it up to date in effect?---Yes.

And you'll see that the dates there seem to start, there's date 23 November but without a year.---Probably '15.

THE COMMISSIONER: Probably 2015 would it be?---Yeah.

MR DOWNING: And then a series of dates through 2016 spanning from the first date in March and the last date in October.---Yeah.

So for each less item I take it that is something where you had confirmed that you had paid for an item.---Correct.

And you inserted it so as to update the running tally to deduct that from the margin owing to Craig.---Yes.

10

So looking at the first item “Cavity sliders deposit paid.”---Yes.

I take it that that was an item relating to the work on the house.---Yes.

And then going down to the first item where the total increases, you’ll see just a few lines down the total is 13,764.90 but then there is a red figure of \$35,000.---Yes.

20

And it says “As per December paperwork” and the total then increases to 48,764.90.---Yeah.

So that increase of \$35,000 would reflect, I take it, the payment of either one or more invoices in December, 2015 where the margin that was included in that invoice or invoices came to \$35,000.---Yes.

Then running down we see further items where there are deductions.---Yes.

THE COMMISSIONER: What was “Aleesha party” - - -?---Her birthday - - -

30

- - - “\$4,491.85”?---Her birthday party.

I’m sorry, I can’t hear.---Her birthday party.

I see.

MR DOWNING: And in that respect if we could go, please, to page 55. You’ll see that there seems to be an actual breakdown of Aleesha birthday expenses.---Yes.

40

Which comes ultimately to 4,491.85.---Yes.

So looking at that, did Craig, as best you can recall, contact you and say, “I want you to pay for Aleesha’s birthday”?---Yeah, that’s, which I did with my credit card on the day, ah hmm.

And then going back, that’s the breakdown of the various items.---Yes.

So there was obviously a function deposit, some cupcakes, a birthday cake, alcohol, various items that came to a total of 4,491.85.---Yes.

And if we go back, please, to page 51 that is the sum that you see then deducted for Aleesha party partway down the page.----Yes.

You'll see TFO Factory Outlet. There is a sum there of \$13,438.92. Do you know what that relates to?---No, I don't.

10 I take it you know that the TFO Factory Outlet is a factory outlet shopping centre at Homebush.---Yeah.

Can you recall if you were ever asked to pay for some purchases from the factory outlet?---Look, I paid for - - -

There are some luxury stores out there.--- - - - some furniture and stuff like that so I can't recall exactly what.

20 All right. Can I take you, please, to the next credit items that appear on that page? You will see, 31 May, 2016, \$20,000 plus figure and it says, "Invoice 1705."---Yeah.

Can I ask you, please, to go to volume 11.2A, page 351? And I want you to bear in mind, while you're doing that, invoice 1705. Do you see on 17 May, 2016, there is, looking at the email down below, it seems an email from you to Craig with invoice 1705?---Yeah.

30 And then same day you get an email back from – I withdraw that. There's an email from Craig to the Finance section within the RMS confirming that it's approved.---Yeah.

And if we go over the page, please, you will see that this is invoice AA1705/16.---Yeah.

And that the total, inclusive of GST, is \$41,250.---Yeah.

40 And if we go, please, to volume 11.3, page 42, do you see on 30 May, 2016 – I'm going to suggest it's 2016 but I can take you back to the earlier pages if that assists. But it shows there is a credit and the RMS reference there is AA1705 for 41,250.---Yep.

So, it appears that that's the payment of that invoice that I just took you to, that was numbered 1705/16. Do you accept that?---Yes.

So, if we go back then, please, to the spreadsheet at volume 11.2, page 51, going back to that entry for 31 May, 2016, which shows a \$20,000 credit against invoice 1705, given that the amount paid was 41,250, do we discern from that that that was the actual price paid and that Craig's margin in

respect of that invoice and the payment that was made on it was \$20,000?
---Yes.

So that, in effect, his margin was almost half of the total price?---Yes.

And indeed, ex GST, slightly more than half of the total price?---Yes.

In respect of the next numbered invoice going down, you will see on 27
June, 2016, it shows a figure of, a credit figure of \$46,000 against invoice
10 2706. Do you see that?---Yes.

And again, looking at it, it's likely, isn't it, that that figure, the \$46,000
represents Craig's – I withdraw that – Craig's margin for the job that was
reflected by that invoice?---Yes.

And could I ask that you please go to volume 11.4, page 90? And bearing
in mind again that the invoice number referred to in that table on page 51
was invoiced 2706.---Yes.

20 Do you see that what this is, is an AA Steel tax invoice, AA2706/16, dated
17 June, 2016 in the sum of \$93,225?---Yes.

And if we could go, please, to volume 11.3, page 45. You'll see that on 22
July, 2016, I'm going to suggest to you, according to the bank statement for
AA Steel, there was a credit from Transport NSW in the sum of \$93,225.
---Yes.

So, again, bearing in mind the invoice number that I just took you to, which
was invoice AA – I withdraw that. 2706-16, if we could go back, please, to
30 the spreadsheet, so volume 11.2, page 51. And again, looking at that entry
for 27 June, 2016, what that reflects, doesn't it, was that Craig's margin on
invoice 2706 was \$46,000 out of \$93,225, inclusive of GST?---Yes.

So again, when you take out GST, it seems that Craig's margin was actually
a bit more than half the total cost.---Yes.

Just pausing there, do you recall that, at times, that was the size of Craig's
margin when it came to him suggesting to you that – I withdraw that. When
it came to you getting emails back from Craig suggesting that there be an
40 increase in the cost?---I don't know.

Can you recall there being any pattern as to the size of his margin or did it
vary from job to job?---I think it would depend on how much work we were
actually carrying out and how much our costing was.

Did he ever ask you about that?---Nothing.

Or did you understand he was speaking to Ashley about that?---Ashley.

And was your understanding that, where you were doing more work and you were perhaps earning a better margin, then Craig's margin would correspondingly increase.---Yep.

If we could then look at the next of the credit items there. So the next one down, 30 June, 2016, shows a \$44,000 credit, and it's marked as invoice 3006. See that?---Yep.

10 And again, that reflects, doesn't it, that Craig's margin, whatever the size of the invoice, was \$44,000?---Yes.

If we could go, please, to volume 11.4, page 118. You'll see that this is an email from AA Steel Piping, so you.---Yep.

To, it would seem, the Invoices section at Transport for NSW.---Yeah.

And CC'd to Craig. Dated 26 July, 2016.---Yep.

20 And it refers to "AA invoice amended, 3006-16."---Yeah.

And you indicate in the body of the email that you're attaching a revised and amended invoice for the particular purchase number that's -- I won't read it out but you see it on the line.---Okay, mmm.

And you seem to be communicating in the email that there was some problem with the previous invoice with an incorrect total.---Mmm.

30 So looking at that, I take it you've submitted it earlier and there was some error with the maths.---I don't know. Probably. I don't recall.

If we could go, please, to the next page, to page 119, and you'll see that it's invoice 3006-16, dated 30 June, 2016, and the total is \$75,900.---Yeah.

And that's inclusive of GST.---Yeah.

40 So just bearing that figure in mind. So you've got, it's either 75,900 inclusive of GST or 69,000 plus GST. If we go back to the spreadsheet, please, to page 51. And going back to that entry, so looking at that, the margin in this case was \$44,000 out of a figure of 75,920 inclusive of GST.--Yeah.

So in this instance, Craig's margin was even larger, in percentage terms.---Yeah. Yeah.

Well over half the total cost of what was actually built.---Yeah.

Now, again just staying with this page of the spreadsheet for the moment, you'll see that one of the items just above those three invoice references is a debit item of \$5,000 Audi.---Yeah.

Was that a cost of buying or – I withdraw that. Was that the cost of a car for either Mr Steyn or someone from his family?---It was a car that we had that he bought for his son.

10 But when you say he bought - - -?---Well, yeah, well, it got deducted off his - - -

So in effect you had a used Audi.---Yep.

You gave it to one of his children.---Yes.

And did you reach some agreement with Mr Steyn that the price to be allocated for that was \$5,000?---We were looking to sell it for \$5,000, out to the public, and, so, yeah.

20 But it was then put on the spreadsheet and deducted from the running tally. ---Yes.

Then going down further in the spreadsheet on this page, you'll see there's various items, blinds, Sydney Tanks, Amuheat, Fantastic Design. Looking at all of those, do they appear to you to be various items in respect of the knock down and rebuild of the house that you organised the payment of? ---Yes.

30 And just going to the bottom of the page, you'll see that the last two items are Muir Electrical, and it shows a debit of \$23,150.---Yeah.

Any recollection as to what that was?---No. Obviously it would be electricals within the home, but I can't recall.

Just bear that figure in mind, \$23,150, for me, please, and Muir Electrical. ---Yep.

40 Can I ask that you be shown volume 10.4(a), page 253. Sorry, also bear in mind the date 12 October, 2016, and the figure 23,150. Do you see again, looking at the account number, this is the account ending in 5-0-8-4, it's the personal account that you and Ashley operate with CBA?---Yep.

And do you see on 12 October and then 13 October, there are three debit payments across those two days, two of 10,000 and one of 3,150, so 23,150 all up?---Yep.

And it seems that it's given a description, Muir Craig.---Yeah.

Now, first of all, that would have been you making that transfer?---Yeah.

And if we could then go, please, to page 262, the same volume. Do you see that this is a 17 October, 2016 sales order payment from The Good Guys, and you'll see that the total is \$23,150?---Okay. Yep.

And you'll see by reference to the line item breakdown that it seems it's six televisions, a couple of sound bars.---Yeah. Yeah.

10 A TV wall mount, and a delivery cost, coming to 23,150.---Yep. Yeah.

Looking at that now, does that assist your recollection that Craig asked you to meet the cost of six televisions and associated sound bars and brackets for the TVs for the house?---Probably at the time.

Did you recall that before seeing this now, or - - -?---I haven't seen this document before, so, to be honest - - -

20 Well, are you sure you didn't see it perhaps in the past for the purposes of making the payments?---I can't recall seeing this. But I, I obviously have made the payment, but I can't recall seeing this document.

And if we could go ahead, please, to the next page – sorry, the next page again, and you'll see that this is a record of sales order payment. Again it shows goods on order to a total of 23,150, and it indicates that there's been a deposit of \$10,000.---Yeah.

30 And if you go over the page you'll see that it refers ultimately to the goods taken and the balance being zero, so indicating it had been paid.---Paid, yep.

If we go back, please, to volume 11.2, page 51, the spreadsheet. The last item there where there's a debit is \$2,100 Ziquailia. Do you know what that relates to?---I can't recall.

If I could ask that you go please to volume 10.4A, page 269.

THE COMMISSIONER: What's the reference again, 10.4?

40 MR DOWNING: It's 10.4A, page 269. And just bear in mind again the date, 12 October, 2016, \$2,100 Ziquailia. Do you see 11 October, 2016, there is a tax invoice from NAPF Electronics?---Yeah.

Made out to Mr Stein – sorry, I withdraw that – Steyn, in the sum of \$2,100 for a – I withdraw that – for two Harman Kardon soundbars.---Yeah.

Does that assist you at all in recalling that that payment for \$2,100 was in fact to NAPF Electronics in respect of this item, or sorry, these items?
---Probably.

If we go, please, to - - -

THE COMMISSIONER: Just you can finish up on this if you like and we'll take the luncheon adjournment then.

MR DOWNING: I will, Commissioner, thank you. If we could go, please, to page, volume, same volume, please, 10.4A, page 266, and you'll see that again this is a bank statement for the joint account you and Ashley operate ending with 5-0-8-4.---Yeah.

It shows 11 October transfer to other bank, Netbank, Ziquailia Craig. ---Yeah.

And that would have been you entering that to indicate that this was a payment in respect to Craig.---Craig, yeah.

And it's the sum of 2,100. I'm going to suggest to you that Ziquailia Pty Ltd is the name of the company that trades as NAPF Electronics. Does that assist at all in your recollection?---Probably. I don't know. I don't recall it, but yeah, it's obviously - - -

All right. Thank you, Commissioner. If that's a convenient time.

THE COMMISSIONER: We'll take the luncheon adjournment. Ms Alexander, we'll resume at 2 o'clock. I'd ask you not to discuss the subject matter of this inquiry over the lunch period with anyone.---Okay.

Do you understand?---Thank you.

I'll adjourn.

LUNCHEON ADJOURNMENT

[1.03pm]