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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 2.00PM

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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. Ms Alexander, I wanted to just take you back to a couple of things I dealt with before lunch, in one instance to correct something that I put to you. But if we could go back first of all to volume 11.2, page 51, which is the spreadsheet. And do you recall
10 I took you to an entry for, you'll see TFO Factory Outlet, \$13,438.92?
---Yes.

And I suggested to you it was a factory outlet. But can I ask you – I withdraw that. I recall your evidence before lunch was that you couldn't now say, looking at that, precisely what it related to.---Yeah.

All right. Just on that front, can I ask that you have a look, please, at volume 10.4A, page 109? Now, you'll see that TFO in fact appears to stand for Tile Factory Outlet.---Okay.
20

And do you see this is a tax invoice made out to Aleesha Steyn?---Yes.

You'll see that there is a description on that first page of certain tiles.---Yes.

And if you go over the page, you'll see that there's a description of further items, and ultimately the total value inclusive of GST is \$13,438.92.---Yes.

And if you go back, please, to the amount in the spreadsheet, you'll see – so back to page 51 – that's the amount, 13,438.92, that your entry, the debit
30 entry in the spreadsheet refers to.---Okay.

And you'll see that it indicates that payment, but no specific date, or the last date recorded there is 9 March, 2016.---Yeah.

If we could then go, please, to page 103, back in volume 10.4A. Now, first of all, you'll recognise from the account number that this is the statement for the AA Steel account.---Yep.

So ending in 5-1-0-5. And you'll see on 22 March, there is a debit item in
40 the amount of \$13,438.92.---Yeah.

You'll see that it says, "Materials for RMS."---Yep.

And that would reflect, wouldn't it, the description that you entered for that EFT transaction?---Yeah.

If you'd go to the next page, please, page 104, and you'll see the bank data in respect of that 22 March, 2016 transaction is that the payment was to the Tile Factory Outlet.---Yeah.

And in the same sum. Having seen the tax invoice that I took you to, and then seen that payment, would you agree that what you were doing was paying for tiles for the Steyn home?---Yes.

10 And then if we go back, please, to volume 10.4A, page 103, the entry "Materials for RMS" would have reflected what Ashley told you to enter. ---Yeah.

And you would have made the payment from this account, I take it, because Ashley told you to.---Yes.

20 But you would have understood, wouldn't you, that in effect what you were trying to do through that description was to try and make what was in reality paying for tiles for the Steyn family home look like a work – sorry, I withdraw that – a business expense for AA Steel?---Yes.

And then if I could take you back, please, to a tax invoice that I took you to before lunch, and that is in volume 11.2A, page 352. Now, you'll recall that I took you to this invoice, AA1705/16, because that is one of the invoices numbers that correlates with a number which is recorded on page 51 of the spreadsheet.---Ah hmm.

30 And indeed the amount that is reflected by reference to that invoice number in the spreadsheet is \$20,000 and you agreed with me before lunch that the \$20,000 would have represented Craig's cut of it out of the total sum of \$37,500 plus GST?---Yes.

Now, just pausing for a moment. I want you to look at what the two items described in that purchase order – I withdraw that – in that tax invoice are. Just read through the two items, please.---Ah hmm. Yeah.

Having read that, looking at the description of the two items there, would you agree that they are somewhat unusual descriptions for activities that AA Steel was doing for the RMS?---I would have no idea.

40 Generally speaking, you agreed with me earlier that your husband has a background in boilermaking?---Yeah.

And that the business was run as a steel fabrication business?---Yeah. However, he did create cameras, he did do works on cameras and stuff that I can recall.

Do you mean, when you say created cameras, do you mean structures for them to be mounted on?---Yeah, yes. But I don't understand all of the

works because, like I said, I don't understand the actual work side of what they do. But even if I read this, I couldn't explain any of it to you.

I understand. But looking at the first item, for instance, it refers to AA Steel doing annual site maintenance inspections, vegetation management, as well as installation of SPD lines on point-to-point enforcement program for certain sites.---Yeah.

10 Now, just looking at that, are you aware, through your discussions with Ashley, of whether AA Steel ever did vegetation management works?
---I've got no idea.

Can you recall ever doing other tax invoices or quotes for that type of work that AA Steel was doing for the RTA or RMS?---I can't recall that at all, sorry.

20 Then down below you will see it makes reference to the delivery of under-body vehicle cameras for vehicle inspectors to RMS business officers.
---Yes.

And there's a reference there to cameras being delivered to a variety of sites.---Yes.

And one taken by Craig.---Yes.

30 And in fairness, if we could go ahead, please, to page 356, which I'll ask you to accept is part of the same tax invoice. They appear to be photos, at least according to the description, of some of the under-body cameras delivered.---Yes.

But do you have any knowledge yourself as to whether AA Steel actually delivered or did anything to do with under-body vehicle cameras?---I've got no idea.

So everything that's reflected in this invoice simply reflects what Ashley told you to include?---That's right.

40 All right. Thank you. Now, I want to come back, if I could, please, to the spreadsheet. So back to volume 11.2, page 51. So you'll recall that just before lunch I took you to the bottom of that page to the entry for Ziquilia.
---Yes.

And after that it shows the running tally figure of 28,556.53.---Yes.

If we go over to the next page, please, page 52, you'll see it follows a similar pattern to the page before where there are some items which are highlighted yellow as plus, which reflects credits.---Yes.

And that is consistent with the way the rest of the document's been prepared I take it, they refer to Craig's cut of various payments made on AA Steel invoices.---Yes.

And then the figures are marked less next to them reflect payments made to or on behalf of Craig or his family.---Yes.

10 Just dealing with that, and I want to see if you can assist me with some of the items there. Would you agree that a number of the items, for instance things like an S&D Alarm, kitchen, Wynstan, would seem to be related to work at the [REDACTED] address of Mr and Mrs Steyn?---Yes, yes.

You'll also see about three-quarters of the way down the page there is an item which is marked less, 6 August, 2017, \$1,089.50, "Brian bday".---Yes.

"Bday" would seem to be short for "birthday", but can you assist us with who Brian is?---Craig's dad.

20 Can you recall Craig asking you to pay for the cost of his father's birthday? ---Yes.

And you did?---Yes.

All right. Then you'll see there's a number of entries below that for Zalda. ---Yes.

So there's a \$7,000 entry on 29 August, 2017, \$3,000 entry on 30 August, 2017, another \$2,000 on 31 August, 2017.---Yes.

30 Who was Zalda?---His mother-in-law.

And do you know whether you paid cash to Zelda or whether you paid the things for her?---I paid an EFT to her.

And was that where Craig had come to you and said, sorry, his mother-in-law needed some money?---Yes.

40 And he would take it I assume – I withdraw that. He would tell you the amount?---Yes.

And you would then make the transfer?---Yes.

And again, you entered it in here because it was being deducted from the running tally figure.---That's right.

If we could then go, please, to page 53, and do you see the first item on that page under the running tally figure of \$107.038.90 is TC school?---That's right.

And it's a figure of \$8,361.---Yes.

And it's dated 21 – sorry, I withdraw that – 24 January, 2018.---Yes.

Can I show you – or I withdraw that. Before I show you anything, can you recall what this relates to?---For his son's school fees.

THE COMMISSIONER: I couldn't hear that.---His son's school fees.

10

MR DOWNING: And do you have a recollection of Craig coming to you and asking you to in effect pick up the tab for his son's school fees?---Yes.

And you did?---Yes.

If we could go, please, to volume 10.4B at page 91. And bear in mind January 24, 2018 and the sum of \$8,361. So do you see on this page there is an entry there, 24 January, this is a transfer from the CBA joint account that you and Ashley maintain ending in 5-0-8-4.---Yes.

20

And it's a figure of \$8,361.---Yes.

On 24 January, 2018.---Yes.

And if we go, please, to page 94. Page 94. You'll see that this is a statement from the [REDACTED] College.---Yes.

And were you aware that – and I don't ask you to name which child, but one of Craig's children attended the [REDACTED] Campus of the [REDACTED] College.---Yes.

30

And you see this is a statement to Mr and Mrs Steyn.---Yes.

And you'll see that against the date 25 January, 2018 there is a receipt for \$8,361.---Yes.

And that was the sum that you paid.---Yes.

40

And if we could go, please, to page 97. Now, if we can go down the page, please. This might actually be 96, so if we could go to 97, please. Do you see of the two – first of all I take it you recognise this is a screenshot.---Yes.

And looking at the lower part of the page you'll see that there is what appears to be an email from Aleesha Steyn to Creative Services.---Yes.

Which you've already indicated in your evidence was an email address that Craig used for personal purposes.---Yes.

And it's forwarding the [REDACTED] College 2019 fee statement.---
Yes.

And you'll see there's records there of the account name, BSB and account
number.---Yes.

Also a reference and description and an amount.---Yes.

Also a due date.---Yes.

10

Do you then see that it appears Craig through the Creative Service – sorry,
creative.service@[REDACTED] email address sends that email which
attaches the statement from the [REDACTED] College to AA Steel
Piping on 25 January, 2019?---Yes.

So he sends it back to you.---Yes.

And the words in the message are, "Please cuz."---Yes.

20 Do you recall receiving that?---Yes.

And then consistent with the bank statement I've taken you to you paid it.
---Yes.

And if you go back, please, to page 96. You send an email on the 31st
confirming that you've done it.---Yes.

And you then, I take it, having paid it, enter it into the spreadsheet.---That's
correct.

30

As a debit item.---Yeah.

So it's been deducted off the running total for Mr Steyn and his cut.---Yes.

Was that the only time they ever asked you to pay school fees?---Yes.

And he's never repaid you for them, has he?---No.

Indeed he's not repaid you for any of the items I've taken you to.---No.

40

Can we then go back to the spreadsheet, please, so volume 11.2, page 53,
and you'll see 22 March, 2018 there's an amount of \$1,977 and next to it
it's "flights Peter".---Yes.

First of all, do you recall Peter is Aleesha's father?---That's right.

So Peter Manuel.---Yes.

And do you recall at some point being asked to pay for flights for him?
---Yes.

And can I ask you, please, to go to volume 10.4B, page 114, and is this part of your credit card statement?---Yes.

I don't ask you to read out the number but I take it you recognise that the Altitude Platinum card is yours.---Yes.

10 And if you look down to the highlighted entry 21 March, 2018 there's a debit item there for Qantas Airways.---Yes.

Showing an Australian dollar debit of \$1,977.08.---Yes.

And it also seems to indicate that there's a figure that's been converted across from ZAR.---Ah hmm.

Which is the code for South African rand, isn't it?---That's right.

20 Showing here 17,373.83 rand.---Ah hmm.

Which seems to come out at \$1,977.08.---Yes.

And if we go, please, to page 118, you'll see that this shows a Qantas itinerary for Mr Manuel, issued 21 March, 2018.---Yes.

And for a rand figure of 17,373.83.---Yes.

30 But it's for flights from Durban to Johannesburg, and then Johannesburg to Sydney in April, 2018.---Yes.

Then from Sydney back to Durban via Johannesburg in November, 2018.
---Yes.

This is a booking that you made for Mr Manuel, and paid for.---Yes, yes.

And did so at Mr Steyn's request.---Yes.

40 If we go back, please, to the spreadsheet at volume 11.2, page 53, you'll see the next entry down is 23 March, 2018, "█████ dinner."---Yes.

And that is a dinner for one of Mr Steyn's children, I take it.---Yes.

And do you recall being asked to pay for a dinner, whether it was for a special occasion or a birthday?---Yes.

Do you know what it was?---His birthday.

Then looking further down the page, you'll see that there are things like, for instance, 6 June, 2018, "Wedding accommodation."---Yes.

Do you recall whose wedding that was?---One of my cousins.

And was Mr Steyn attending?---Yes.

And did he ask you to pay for him, that is, his accommodation?---Yes.

10 And was that accommodation for his family as well?---Yes.

You'll see there are a number of entries there for cleaning. Did you pay for cleaning for the cost – I withdraw that. Did you meet the cost of cleaning for the Steyn family?---Yes.

Again, was that at the request of Mr Steyn?---Yes.

20 Then, if we go down, you'll see the last entry on the page, 4 August, 2018, there's \$5,000 cash.---Yes.

At some point, do you recall Mr Steyn asking you to get the cash for him? ---I can't recall, it was obviously given. Whether it was me or Ashley, I can't recall.

All right. But you do, I take it, recall now that there were times when he requested cash?---Yes.

And either you or Ashley went to the branch in order to get it out.---Yes.

30 And as you've described earlier, either you gave it to him or Ashley gave it to him.---Yes.

And you put it onto this spreadsheet.---Yes.

If we could go over the page from page 53, please, to page 54, you'll see that on this page there are a number of cash entries.---Yeah.

40 And I take it each of those reflect an instance where either you got out cash for Craig or your husband got out cash for Craig.---Yes.

So does what you see in this spreadsheet in terms of the cash accord with your recollection that there were actually quite a few occasions in the second half of 2018 when Craig requested cash?---Yes.

Can you recall him saying anything as to why he wanted the cash?---No.

But would he telephone you and say, "I need \$5,000," or, "I need \$10,000," or something of that nature?---I don't know, that would have been a conversation with him and Ashley.

You don't - - -?---Not with me.

- - - have any recollection of him ever asking you?---Not with me. It would be, he, he saw Ashley most of the time.

- 10 All right. But again, what this page of the spreadsheet reflects, doesn't it, is various entries where there are pluses that reflect the component of an invoice that had been paid for AA Steel, that reflected Craig's cut?---Yes.

And that then being set off against the various things that were being paid for by either AA Steel or you and Ashley.---Yes.

And then the running tally reflects that all the way down to the bottom of the page.---Yes.

- 20 So that at the bottom of this page, the running tally figure is \$174,788. ---Yes.

So by the end of this, which is December 2018, or I should be more correct, 18 December, 2018, it was quite significantly in credit for Craig.---Yes.

And that reflects the fact that there had been quite a number of jobs in the second-half of 2018 where there were significant margins that had to be allowed for in his favour?---Yes.

- 30 Now, you will see also that across on the – I withdraw that. I take it that this page has again been filled in, as you've described before, which was that you completed it to reflect money coming in and money being paid out?---Yes.

So that looking at the totality of the spreadsheet, effectively page 50, which is the page with the table on it, was Craig's creation?---Yes.

And then the balance of it was really filled in by you when it was sent to you to update?---Yes.

40

And indeed if you go back to the email that you sent to Craig, which is on page 49, it's dated 18 December, 2018, and you indicate in that email that you'd updated it with the inclusion of invoice 0608, which had just been paid?---Ah hmm.

And if we go back then to the last page of the spreadsheet that I took you to, which is page 54, so that it is indeed updated right through to 18 December, 2018.---Yeah.

With an inclusion of an amount of \$3,000 in respect of an invoice, 0608.
---Yes.

Now, across to the right there are the words, “November yet to be added in.”
Do you know who added those words?---No. I don’t, I don’t know that.

Do you know whether that’s you, can you assist us at all on whether that’s
something that you added or something that was on the document when you
10 received it from Craig?---I really can’t recall that, especially looking at all
those figures. I really can’t recall that.

All right. Well, just looking at what’s below, it refers to Alex. Do you see
that?---Yeah.

And it’s correct, isn’t it, that Alex Dubois was someone that you knew was
doing – I withdraw that – worked at the RMS with Craig?---Yeah.

And I understood from your evidence earlier that Mr Dubois was also
20 someone that you understood did similar work to Craig and gave out
contract work at the RMS?---Yes.

You’ll see that there are then three figures, \$85,000, \$20,000 and \$65,000.
---Yes.

And underneath the \$85,000, there’s the initials TK.---Yes.

And then under \$20,000, there’s AA.---Yes.

30 And then there’s the word “purchase” and then a number.---Yes.

Just looking at that, would you accept that that seems to be a reference to a
purchase order number?---Probably.

And looking at the dates in the spreadsheet, the reference to November
would seem, would you accept, to be a reference to November 2018?
---Quite possibly. I don’t know.

Just bear in mind for me, the purchase order ending in 5075 and a sum of
40 \$85,000. Can I ask that you go, please, to volume 11.4, page 384. Now, do
you see that this is an AA Steel invoice?---Yes.

I withdraw that, a quote.---Yes.

It’s dated 10 September, 2018. Do you see that?---Yes.

It doesn’t record a purchase order number, it indicates, “To be announced.”
---Yes.

But the quote number is RMS0909-2018. You will see that it refers to, first of all, doing some work as directed by RMS Program Managers at, something to do with line-marking at Safe-T-Cam sites at specifically Jerilderie and Narrandera.---Yes.

And then it refers, on this page, to some Safe-T-Cam works at Albury and Nyngan.---Yes.

10 And then over the page, to some Safe-T-Cam works at Branxton.---Yes.

But the total is \$85,000 plus GST, so 93,500 inclusive of GST.---Yes.

If we could go then, please, to page 386, you'll see that there is a purchase order now for what seems to be this job. You'll see that the sum is again \$85,000 plus GST.---Yes.

And you'll see from the description it seems to correspond with what was on the AA Steel quote that I just took you to.---Yes.

20

You'll also see at the top under Purchase Order the order number ends in 5-0-7-5.---Yes.

And you'll see that it indicates a contact of Alexandre Dubois.---Yes.

Could we please go back to page 54 of the spreadsheet, so volume 11.2, page 54. And looking again at that entry, does it appear to you, noting that the purchase order number corresponds with the purchase order that I just took you to, which in turn seems to correspond with the quote that I took you to, that this seems to be referring to that particular purchase order in respect of an AA Steel Piping job - - -?---Yes.

30

- - - in November 2018?---Yes.

Just in fairness I'll take you back, please, to page – so volume 11.4, page 386, and you'll see that that purchase order, which is the same one I took you to before, shows an order date of 16 November, 2018 - - -?---Yes.

- - - although issued on 25 September, 2019.---Yes.

40

But going back then, please, to the spreadsheet, does that assist you at all as to whether you may have been the author of this part of the document?---I have no recollection of that.

But your evidence is, I take it, that the rest of the document, that is everything else on this page, was created by you?---Yes.

Would you accept, looking at it, that it seems to be reflecting that particular work, corresponding with the purchase order that I took you to?---Ah hmm, yes.

And looking at the figures, do you think that the \$85,000, \$20,000 and \$65,000 might reflect the fact that it was a genuine quoted price of \$65,000, then increased to \$85,000 with a \$20,000 margin?---Quite possibly, looking at it, the way it is.

10 But you can't assist us as to whether that was something that you recorded as part of this spreadsheet or whether it was part of the document Craig sent to you?---It could have been me that done it, based on the purchase order received.

Now, it does refer to Alex though rather than Craig.---I would assume that that's because the purchase order was from that particular person.

20 Now, did Alex ever figure in this arrangement of, in effect, having a running tally and allocating moneys to reflect the margin?---Never, never. I don't, I've never met him, I don't know who he is.

Can you recall Craig ever suggesting to you that there might be jobs where Alex was the responsible person but it was still something that he should get credit for?---No.

Is there anything more you can tell us about what this entry on the spreadsheet refers to?---Nothing other than the fact that there's that purchase order for that amount.

30 Right. Now, having gone through that spreadsheet and the various pages that make it up, it's a document which reflects, doesn't it, an arrangement where Craig was being rewarded for work that AA Steel was receiving and he was being rewarded through either AA Steel or you and Ashley paying for multiple expenses related to either his home or his living expenses?
---Yes.

And this kept track of that.---Yes.

40 Whilst I acknowledge that you have said consistently through your evidence that you made payments in sums and from accounts as directed by Ashley -
- -?---Yes.

- - - nonetheless you must have understood that in what you were arranging here, you were in effect facilitating kickbacks being paid to Craig.---I did realise at the time, but like I said, you know, every time I discussed with Ashley what do I do in this instance he would say, "Pay the invoices, Sandy." So I would pay them.

So from time to time would you raise with him some discomfort on your part about paying it?---Yes.

And would he say things to the effect of or words to the effect of, “Pay it. We want to keep getting the work”?---Yes.

But allowing for that, you did have a sense yourself that what was being paid here was a form of kickback to a public official.---Yes.

10 Now, if we could go, please, to volume 11.2, page 57. You recall that I suggested to you earlier that this spreadsheet and indeed the email that attached it were found on a phone that was located at the Steyn household when a search warrant was executed. This is the metadata for the particular spreadsheet. Do you see it records on this page author is home? Do you see that about two-thirds of the way down the page?---Yes.

Then over the page created 22 May, 2015.---Yes.

20 And then over the page again file accessed 18 December, 2018, file created 18 December, 2018 and file modified 18 December, 2018.---Yes.

And then over the page it records last author as AA Steel Piping.---Yes.

And it's correct, isn't it, that this document was opened by you, edited and then emailed to Craig on 18 December, 2018?---Yes.

Now, you've indicated in your evidence that you recall earlier versions of a spreadsheet of this type being sent by Craig.---Yes.

30 And I take it each time you received it you would go through a similar exercise to what you did with this version of it.---Yes.

Can I take you back, please, to the spreadsheet I took you to earlier, which was the spreadsheet which is located in volume 11.2, page 1. Now, I took you to some of these pages earlier and you identified it as the monthly spreadsheet entry that you would create for the accounts for AA Steel. ---Yes.

40 And you would save these from month to month, I take it, as you were preparing the figures to send through to the accountant.---Yes.

And I take it you would save them onto, was it the laptop that you used in the office?---No, I only ever used the computer. I didn't have a laptop.

Right. Well, what did you create the spreadsheet on?---On my computer.

All right. And do you recall that when Commission officers came to your home and to your work premises in March 2010, they seized a number of items including computers?---Yes.

And it's likely, isn't it, that you had saved versions of your work spreadsheets onto the computer that was in the office at the time?---Not all because I would print up and I had all folders.

Right.---I kept actual - - -

10

Paper folders.---Paper folders.

All right. But what I'm going to suggest to you is the document that appears from pages 1 through to 48 represent a saved spreadsheet on the computer seized at your premises on 17 March, 2010. So I've taken you already to page 1. You've seen that.---Ah hmm.

So figures for July 2012.---Yeah.

20

Could we go through, please, to page 2. I took you to August 2012.---Yes.

And then if we could go to 3, September – I withdraw that. That appears to be further figures for August 2012.---Yes.

And then if we go to page 4, there's figures for September 2012.---Yeah.

30

Now, do you recall that you would from time to time save the various spreadsheets for the financial year, to try and create a document that reflected the income and expenses for the whole year?---Yeah, as I said, I would print them up into, into my folders.

All right, and can I ask that you go, please, to page 43 of the same volume? I'm going to suggest to you this is the metadata of the document that was found on the computer at your premises that was taken on 17 March, 2010. ---Yes.

So looking at that, do you see that it indicates that it's a Microsoft Excel document? That is, under app name?---Yes.

40

That it was created 19 July, 2012.---Yes.

And if we could go over the page, please. I'm sorry, if I indicated that the search warrant was executed in 2010, I did mean 2020. I apologise if I misled you.---That's okay.

So 17 March, 2020. If we could go back then, please, to page 45 in the metadata, you'll see it shows last author AA Steel.---Yep.

Last printed 18 December, 2014.---Yep.

Last saved 18 December, 2014. And then the name, AA Steel July 2012 to July 2013.xlsx. Do you see that?---Yes.

And would you use a name of that type to save the spreadsheets for the whole year in order to have a figure, a set of figures for the entire year for the business?---Yes.

10 I want you to go, please, back to page 41. And I'm going to suggest to you that this is one of the pages that was attached as part of that spreadsheet that was found on the laptop and saved as AA Steel July 2012 to July 2013.
---Ah hmm.

Do you see that document, and do you recognise the format?---Yes.

It's a very similar format to the format of the spreadsheet from Mr Steyn that I took you to in the email that you sent him in December, 2018.---Yes.

20 And you'll see that there are dates here showing that it's referring to events in 2013.---Yes.

And first of all, you'll see at the top of the page, there are a series of figures in black which then add up to 23,626 in red.---Yeah.

And then you'll see 5,000 cash.---Yeah.

And then it is reduced down so that the figure reduces down in the manner of a running tally.---Yeah.

30 It's correct, isn't it, that this looks like an earlier version of the spreadsheet that you later received from Mr Steyn in 2018?---Probably.

Although, not the first page, it looks like the latter pages where you show money coming in to reflect, first of all, Mr Steyn's cut.---Yeah.

And then money going out to reflect payments that are made to him or on his behalf.---Yes.

40 And looking at those entries, do you recognise there that they reflect some things that you were paying for in respect of the house, the work being done on his house in [REDACTED] in 2013?---Yes.

Doing your best now, on how many occasions do you believe that you received spreadsheets of this nature from Mr Steyn?---Hmm.

And I'm not expecting you to be able to give us a precise figure, but as best you can tell us over the period from, say, 2013 to 2019.---Yeah. I'd say, at a

rough guess, perhaps twice a year or so. You know. Once or twice, I can't recall.

And on those occasions, would he let you know that it was about to come, to say, "Look, it's about time we checked where things are at," something of that nature?---Mmm, oh, he would from time to time just send a message saying, "Can you send me an update?"

10 So is that where you had already received a spreadsheet from him, and he wanted you to go through and bring it up to date?---To, to update it. Yes.

So, looking at this, it would suggest, wouldn't it, this page, that Mr Steyn was seeking cash payments as far back as 2013?---Yes.

Do you recall that when he was doing the work on the house, whether it was demolishing the existing house or starting work on the pool, or pool house, or the new house that there were times that he asked for cash?---Yes.

20 Now, you'll see on that page, the one plus is \$13,800 and it's dated 20 July, 2013.---Yes.

Can I ask you, please, to go back to bank statements at volume 11.3, page 20? Now, bearing in mind that the figure you got on 20 July, 2014, is a plus of 13,800. Do you see that, just going backwards a page so that you can see the year, that these are statements for 2013? Do you see the page before, it shows a closing balance of 28 February, 2013?---Yes.

30 And if you go over the page, I'm going to suggest that these are figures then running through to July 2013 and the last entry, do you see, is 15 July, 2013?---Yes.

And it shows that there is a payment then by the RMS and there's an AA reference number but it shows a credit of \$54,780.---Yes.

Looking back then at the spreadsheet, if we can go back to page 41, please. Do you think it's likely, looking at that entry for \$13,800 plus, that that entry for 20 July reflects Mr Steyn's cut based on a payment that was made by the RMS five days earlier?---Yes.

40 In that regard, if we could go, please, to volume 11.4, page 32. Do you see on that page, there are some emails within the RMS but to do with a particular purchase order number for AA Steel?---Yes, yes.

And you'll see the purchase order number ends in 5492/10.- - -Yeah.

And the amount ex GST is \$49,800.---Yes.

And you'll see at the top of the page, it seems on 28 June, 2013, Mr Steyn emails the AA Steel Piping address but it's addressed to you.---Yeah.

And it would seem that there may have been some issue with the purchase order number.---Yeah.

And do you see at the bottom of the page and invoice it says, "Please advise the vendor to put the project manager name and purchase order number on the tax invoices"?---Yeah.

10

And looking at the email from Mr Steyn to you at the top on 28 June, 2013, he's, it would seem, asking you to have another go at correcting the problems with the invoice.---Yes.

And if we go, please, then to page 34, you'll see that it's an RTA – sorry, I withdraw that – RMS purchase order and it records the number ending in 5492 and a total amount, including GST of \$54,780.---Yeah.

20

And dated 20 June, 2013. Do you see that date at the top?---Yeah.

And if we go over the page you'll see that there is a breakdown of how \$49,800 is arrived at by reference to different point-to-point work locations. ---Yeah.

Now, having seen that there was a payment in that amount, \$54,780, made on 15 July, and seeing that according to the spreadsheet, if we could go back to it, please, so volume 11.2, page 41, it's showing that the figure of \$13,800 is added on 20 July.---Ah hmm.

30

Would you agree that it is likely to reflect that out of that invoice of \$54,780 inclusive of GST, that Mr Steyn's cut was 13,800?---Possibly.

Can you think of what else that would reflect in that spreadsheet where that figure's being added before other items like Dural Pool Shop had been deducted?---Yeah, I really can't at this point, I'm sorry.

The likelihood is, would you agree, that it again, it reflects what Mr Steyn had suggested be increased - - -?---Yes.

40

- - - onto the invoice so that it would then be remitted back to him in the form of his cut?---Yes.

And thinking about the way in which either you directly or you through Ashley then communicated with Mr Steyn from 2013 to 2019, this was a pattern that was followed many times over, wasn't it?---Yes.

So that invoices would be submitted, invoices would be increased.---Not at all times.

Not at all times.---Yeah.

I accept that and I've taken you to some examples where the actual invoiced price seems to have reflected the genuine price by AA Steel.---Yeah.

But on many occasions the invoice was increased at the behest of Mr Steyn.---Yes.

10 And that sum was then calculated?---Yes.

Allowed for as his cut?---Yes.

And then set out in a running tally in one of the spreadsheet versions - - -?
---Yes.

- - - against which payments either to him or on his behalf or to his family or on his family's behalf were made.---Yes.

20 And did that continue to be the way things worked right through until mid-2019 when you became aware that Mr Steyn was under investigation?
---Yes.

And at that point is it the case that the AA Steel work stopped being received?---Yes.

All right. I wanted to take you to one other topic, and that's in relation to a car. Do you recall that in about December 2018, that Mr Alexander, your husband, obtained a new car?---Yes.

30 Do you remember what sort of car it was?---A Mercedes.

And colour?---White.

Can I ask you to have a look at a photograph, please, and I'd ask that volume 20.1, page 48 be brought up. I'm not sure if you remember the number plates or not, and perhaps we could have that slightly enlarged if we could.---I can see that, yeah.

40 Do you recall that that's the car?---Yes.

And indeed is that you sitting at the desk behind?---Yes.

And do you recall who else was present that day?---Craig.

Craig Steyn. And your husband?---Yes.

Now, as best you can recall, what happened in the lead-up to you going to the dealership and this car being purchased?---I went with Craig and Ashley to the dealership for which they told me a car was being purchased and registered in my name.

THE COMMISSIONER: Sorry, could you keep your voice up?---And registered in my name. But at the end of it, Craig drove the car home and it was Craig's car, not mine.

10 MR DOWNING: So before this day were you told anything by your husband or Craig about this car?---No.

THE COMMISSIONER: Whose idea was it to register it in your name?---I have no idea. I just know that at a particular time Craig did say to me, "Could you give me your driver's licence?" And I assumed it was for another purpose, and my husband has a habit of, because he loves cars. I just assumed that another car is coming my way. Yeah, but it was put in my name but it wasn't my car.

20 Would this have been the most expensive vehicle your husband had acquired or - - -?---Oh, no, we have had a Mercedes before. We've got a number of cars because he's, he loves cars so he buys and sells.

MR DOWNING: And at this time did you have a car of your own?---Yes.

What sort of car was it?---A Mercedes.

And was that a car you were happy with?---Yes.

30 So is it the case that prior to this day that your husband said nothing to you about getting a new car?---No.

Sorry, no - - -?---No, it was supposedly a surprise on the day as a Christmas present for me.

But then Craig accompanied you and your husband to the dealership.---Yes.

And do you recall where the dealership was?---Oh, no, I'm sorry. I know it was quite a way from where I live but I can't remember the actual area.

40 Do you recall if it may have been Mercedes-Benz Sydney in Alexandria?
---Yeah, that's about, sounds right.

Near the airport.---Yes. It was quite a drive.

So you go there. Correct?---Yeah.

Did your husband drive you?---Yes.

And did Craig come in the same car?---Yes.

When you got there did you sign the paperwork in respect of it?---I just signed my name at the bottom of the paperwork. That was it.

And at the time did Ashley say to you that this was to be your car?---Yes.

But then Craig drove it away.---Yes.

10

And in fact it was never your car in the sense that it was yours for day-to-day use, was it?---No.

Did you subsequently see either Craig or Aleesha Steyn driving it?---No, I never saw them much after. Sorry, yes, we did go away one weekend over Christmas. Just recalling we went down to The Entrance and they were driving it.

So to the Central Coast?---Yeah.

20

Just excuse me one moment, Commissioner.

THE COMMISSIONER: Yes, certainly.

MR DOWNING: If you just bear with me for a moment, Ms Alexander, I will try and have brought up a photograph and I'll ask you some questions about that.---Okay.

30

Just while we're waiting for that, did your husband say to you that he had paid for the car?---Yes, he did.

Did you ever see any record of any payment?---No. He has his own private banking account from which he operates where he buys and sells and does up cars so - - -

He does have a passion for cars.---Yeah, absolutely.

And over the years he's had a number of - - -?---Yeah, he still does. He's - - -

40

- - - recent high-performance cars.---Yes.

But also some classic cars.---Yes.

But as far as this is concerned you don't know yourself where the money ultimately came from.---No.

Did you at some point speak to him about what was going on with the car?
---I never do about his cars because I go into his workshop and I'll suddenly see a car in there that he'll buy and do up and sell, and it's just something when it comes to him and his cars that I don't, I don't get involved with him and cars because it's just, it's been my fight with him my whole married life, of me not liking cars and his passion.

But in this instance at least for a short period it was suggested that this was to be your car.---Yeah.

10

But as it turned out Craig took it away.---Yep.

Did it occur to you at the time that perhaps this might have something to do with Craig receiving something in return for the flow of work that was being directed by Craig to AA Steel?---Well, I really don't. As I said, he said to me he had paid for it at - - -

Ashely?---Yes.

20

Right.---And I did ask the question as in why does Craig then have it and he said, you know, "Well, you don't really like it. We're going to see what we're going to do about it. We might sell it or whatever if you don't like it." So I never bothered about it after that.

I'll now have you shown a photograph. And you gave some evidence before that you could recall that not long after the car was obtained and Craig took it away going on a trip up to The Entrance.---Yeah.

30

Is this to the best of your recollection a photo taken that day?---Yeah, that, that could be right.

And is your recollection that you and your husband drove up in your own car?---Yes.

But you saw Craig and Aleesha that day driving in the Mercedes-Benz C63?
---In their car, in that car, yeah. That's right.

THE COMMISSIONER: So that's your husband sitting next to you in the photograph?---Yes.

40

And Mr and Mrs Steyn.---Yes.

MR DOWNING: And I'll just show you one other photograph. I'm going to suggest that's a photo taken on the same day in the Mercedes.---Yeah.

Have you seen this before?---No.

Did you ever see the car at the Steyns' house?---No.

From time to time you do go there for family visits, et cetera.---Yeah, they do have a, a garage, so I never actually saw it parked at their home.

Thank you, Ms Alexander. Subject just to confirming instructions, they're the matters I had for Ms Alexander, Commissioner. Just one last matter. Do you know Martin Duchesne or Duchesne?---Yes.

10 And he is a man of, from the South African community in Sydney?---Yes.

And are you aware of whether he – first of all, are you aware of his company, M&M Inspections?---Yes.

And are you aware of whether Mr Duchesne, through that company, does any work for Craig?---I've got no idea.

20 Has he ever done - - -?---I know that he did work with Ashley, so I'm assuming that he was part and parcel of contracting, you know, with RMS because from my knowledge he is, I think, an inspector of some kind, yeah.

And has he done some inspection type work for AA Steel?---Yes, he has. For other companies, yes, he has.

But do you know Mr Duchesne – is it “Duchesne” or “Duchaine”? ---Duchesne.

Duchesne. I apologise.---Yeah, that's all right.

30 Do you know him personally?---Yes.

And is he someone that you know as a friend from the community?---Yes.

All right. But as far as any business relationship is concerned, do you have one with him? That is, in relation to the work that he does for AA Steel? ---Right now? Right now, you're talking?

Oh, sorry, back in - - -?---Back then?

40 - - - 2013 to 2018.---Yes. We did have a relationship with him. Yes.

Do you have any knowledge of whether Mr Steyn might have sought things in the nature of payments either to him or on his behalf from Mr Duchesne? ---I wouldn't know.

You're not aware.---I would not be aware of that, no.

Thank you, Commissioner.

THE COMMISSIONER: Mrs Alexander, have you had occasion to speak to Mr Steyn about the subject matter of this inquiry?---I haven't seen him since last year. Today is the first time I'm seeing him.

You haven't seen him since when?---Sorry? I haven't - - -

You previously hadn't – seen him last when?---I haven't seen him since last year, June or July, I haven't seen him.

10 Have you last year spoken to him about the subject matter of this inquiry?
---Yes, we did, after he had his house - - -

Sorry?---After they visited his house, is when he came to, to tell me what had happened.

Well, when was that occasion?---I think it was in June or July, somewhere around there.

20 June. And this was at your home?---Not last year, the year before, sorry.
Year before last. Last year March was – he was the June before.

So when did you last speak to him, if you did at all, about the subject matter of this inquiry?---The June of 2019. 20 - - -

Since 2019?---2019, yes.

And what was the occasion?---Well, we were at a family function together, unbeknownst to me what had happened, and then he explained to me that his house was raided.

30 He's explained what?---He, that his house was raided or whatever, yeah, by ICAC.

Oh, I see. And what did he say to you on that occasion about the matter?
---He did say to me at the time that if I got questioned about any moneys, it's considered a loan, and he was going to pay it back.

40 So, I'm sorry, you say, trying to put it in his words, what did he say on that?
---That's what he said to me.

Just tell me again, what did he say?---Yeah, that he said any moneys that we've done anything for him would be considered a loan that he would one way, one day give back.

So, are you saying that he was suggesting to you that that would be the explanation you would give if asked, is that right?---Yes, yes, yes.

What else did he say?---That was it.

Have you spoken to him on the telephone about this matter?---No, no. Not at all.

Or by email?---I have not seen him. No, not at all.

And what you say he said as to what you might say if questioned about the transactions concerning you or your husband on your evidence here today did not accord with your understanding of the arrangement, is that right?

10 ---Yes.

So, did you understand, from what he said to you, he was asking you, in effect, to put forward a false account?---Yes.

And did you entertain the thought of doing that?---I did.

And at some stage have you suggested that that was the arrangement, that it was a loan?---Suggested as in?

20 Well, perhaps I'll put it in another way. You've clearly stated in the course of this public inquiry that it was not a loan at all.---No.

And do you know - - -?---I've just come today because I just feel that I just wanted to tell the truth.

30 So when did you determine to reject his suggestion of this loan explanation and tell the truth?---Well, I've been thinking about it for a while. You know, I lost my mum last year, which affected me a lot. My dad lives with me and we are Christian people and every day he just says to me, we talk about it and I say, "Dad, I'm worried about my future and my life." And he said, "Just go in and tell the truth and so be it." And so - - -

So, you say that the evidence you have given in this public inquiry is the absolutely truth so far as you are concerned?---Is the truth. From, absolutely, from me.

Thank you. Yes, now, is there any application – sorry. Mr Downing, is there anything else you wanted to deal with?

40 MR DOWNING: No, Commissioner.

THE COMMISSIONER: Is there any application for cross-examination of Mrs Alexander? Cross-examination is, as I'm sure the practitioners understand, is by leave. Very well. No, application. Mr Orr, is there anything you wanted to ask Mrs Alexander?

MR ORR: No, Commissioner. No further questions.

THE COMMISSIONER: No questions. Thank you. Is there any reason why Ms Alexander should not be excused?

MR DOWNING: No, Commissioner,

THE COMMISSIONER: Thank you. Ms Alexander, thank you your attendance. You are excused.---Thank you very much.

10 **THE WITNESS EXCUSED** **[3.13pm]**

THE COMMISSIONER: Thank you. Yes.

MR DOWNING: Commissioner, it's a rare occasion that we've actually run slightly ahead of what I expected today.

THE COMMISSIONER: That's always pleasing to see that.

20 MR DOWNING: Despite a slightly later start.

MS ALEXANDER: Can I leave?

MR DOWNING: You're welcome to go. Thank you, Ms Alexander.

THE COMMISSIONER: You may step down, Ms Alexander.

MS ALEXANDER: Thank you.

30 THE COMMISSIONER: Thank you.

MR DOWNING: In the circumstances, I would actually ask that we defer starting Mr Steyn until tomorrow morning at 10 o'clock, if that's convenient.

THE COMMISSIONER: Yes, certainly. All right. Very well. Is there anything else to be dealt with?

40 MR DOWNING: Not unless – no, there isn't, Commissioner. Whatever we need to deal with in terms of housekeeping we can do tomorrow.

THE COMMISSIONER: Very well. I will adjourn and resume tomorrow at 10.00am. I'll adjourn.

AT 3.13PM THE MATTER WAS ADJOURNED ACCORDINGLY
[3.13pm]