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INDEPENDENT COMMISSION AGAINST CORRUPTION

THE HONOURABLE PETER M. HALL QC
CHIEF COMMISSIONER

PUBLIC HEARING

OPERATION PARAGON

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TRANSCRIPT OF PROCEEDINGS

AT SYDNEY

ON MONDAY 21 MARCH, 2022

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. I'll just wait till Mr Browning makes his way back around.

THE COMMISSIONER: Yes, certainly. Yes, yes.

10

MR DOWNING: Just so that we have someone to control the - - -

THE COMMISSIONER: Yes, we're short on numbers today.

MR DOWNING: Mr Alameddine, can I just check again you can see and hear me?---Yes, I can.

Now, just before the break I was asking you some questions, as was the Commissioner, about the initial approach by Mr Dubois, where you say he asked for a management fee, to use the term you say you recall him using. Do you recall that topic was the subject of some questions that I asked and the Commissioner asked just before lunch?---Okay.

20

You do recall that?---You asked me something about – can you just refresh my memory, please?

30

Well, just first of all in terms of the topic, I asked you questions about the way in which it came to be that Mr Dubois raised with you – or you raised with him – this idea of paying some cut to him. Do you recall I asked you about that?---Okay, yes.

And I asked you whether it was something that you, whether you'd approached him about work or whether he had come to you and suggested that you might do the work. Do you recall that?---No. Okay, so what's the question, so I can answer it, sorry?

40

Well, I'm just trying to take you back to the area I was asking. You told me, the transcript will reflect this, that your recollection is he came to you to suggest that you might do some work for the RMS. It wasn't you in effect contacting him and asking for work.---Correct. But I don't remember the actual place and time and the actual where it took place, but I was asked to

do a job, and the job that I was asked to do was in Galston, Galston Gorge, and, you know, I'm, I'm – may I elaborate?

Well, I'm not so much interested in the details of the job. I can indicate to you I will come to that. But it's more a discussion either then or perhaps slightly later about the payment of a management fee that I want to focus on now. Do you understand that?---Okay.

10 So thinking about it, do you – is your recollection that it was before you did any work or perhaps after some jobs that you'd done that he first raised with you the topic of paying him a management fee?---I don't recollect.

So you can't assist now as to whether it was before you did any work or perhaps somewhat later?---That's correct.

All right. But it's the case, isn't it, that in fact you did pay him a management fee for a long period of time of doing work in various companies that you controlled?---Yes.

20 And it's the case, isn't it, that that management fee was something you paid for most if not all of the jobs that you did for Mr Dubois over a period of almost a decade?---Most.

Right. And you've told us that, as best you can recall, that there was a discussion with him about the way in which it would be paid, and that the way it ultimately turned out was that after you costed a job, that it would be split – that is whatever was left – was split 50/50, him getting 50 per cent, you getting 50 per cent?---Yep.

30 All right. And was that the way it worked right from the first request for a management fee or did that change over time?---I don't recall it changing.

All right. So the best of your recollection throughout the period of time in which you were paying him this, call it a cut or a management fee - - -?---It wasn't for all, it wasn't, it wasn't for every job, Mr Downing. It was for most jobs.

40 Yeah, I understand and I'm not - - -?---Some jobs, some jobs there wasn't enough money in there and then he wouldn't, he wouldn't take a, a fee.

Right.---Most jobs, yes.

Okay. But as best you can recall, accepting that as you say it wasn't for every single job but for most, as best you can recall it was always a 50/50 division of the profit that was left after costs that was split between you and Mr Dubois?---Yes.

10 All right. And when he first raised this with you, this idea of you paying him half of the money that was left over after all the costs have been paid on jobs, was that the first time anyone in business had ever asked you to pay something of that nature?---Yes.

And did it come as a shock to you?---I don't remember how I felt but, so I can't answer your question, but it would have been.

Well, you agreed with me earlier on that despite him dressing it up in the language of a management fee, what you understood was it was money to go in his pocket in return for you getting work.---Yeah.

20 So you would have understood that there was an element of dishonesty about it, what he was asking you to pay.---Yeah.

So was that something that you found confronting, that is, that you were being asked to in effect pay a secret commission to him separate to whatever earnings he was getting from his work with the RTA or RMS, but in return for you getting work you're going to have to put something into his pocket? ---Yeah.

30 So something that had never happened before with anyone else you'd dealt with.---No.

So were you shocked by it?---Yeah, and no one wants to part with money so I don't think, I think Mr Dubois and I, we, we didn't see eye to eye on this matter but I toed the line eventually.

Well, just on that, do you mean, let's go back a step. I mean you regarded him as a friend before any of this happened. Correct?---Yeah.

40 And you say that you didn't see eye to eye on this topic. Just pausing there.---I wasn't happy about, I'm, I'm not happy about paying money out, but look, at the end of the day, at the end of the day it is what it is. If I was to continue working I had to pay him.

Right. You said that you weren't happy about it but just when he, as best you can recall when he first asks for it, did you agree to it or did you push back?---I don't remember, but knowing my nature I would have actually, I would have actually, I don't remember the sequence of events but just knowing my, my nature and I would have actually, I would have, you know, I would have spoken to him about it, but I don't remember the sequence of events, to be honest with you.

- 10 But it sounds like you're not telling me this based on actual recollection. It's based on what you think about the way you normally behave. Is that fair to say?---I would have, yeah, that's right.

Well, when - - -?---That's exactly what you're saying is correct.

- 20 All right, well, based on that do you believe that you refused or did you try and haggle with him about how much he was to get? And I'm thinking about when he first approaches you with this prospect of paying a management fee.---Mr Downing, you've just told me I, you can see that I can't recollect, so you want me to tell you an assumption or do you want fact?

Well, I'd like you first of all to see if you can recall it, but if you can't, then as you've just done, you can tell us based on what you know about the way you behave.---I don't have really recollection. I would have, like I don't know, Mr Downing. What would you do if somebody said to you you can do this job and, you know, I'll do bits and pieces of it and then we can share in the proceeds?

- 30 Well, it's not – what I might have done is not really to the point. It's what you did or believe you would have done that I'm interested in. That's why I'm asking you to tell me, either based on actual recollection – and I'll pause there. It sounds like you can't recall that discussion now?---The fact of the matter is, Mr Downing, I ended up paying him a fee which, a management fee, kickback, whatever you want to dress it as, I ended up paying this bloke, okay, on most of these jobs that were completed, yes.

- 40 Do you believe you refused to pay it for a period or do you believe that you paid it but perhaps without being happy about it from the first request?---I don't remember, it was that long ago.

THE COMMISSIONER: Mr Alameddine, I just wondered, you being obviously an intelligent person who's had a good educational background, when he made it clear to you that he was going to use this contracting system for his own benefit, you were, you earlier said I think, just before lunch, that you appreciated that this would more than likely involve a conflict of interest arising. When you became clear that's what he was proposing, that is, that he gets a personal management fee out of these contracts, did it not occur to you then that you might be put at risk yourself to agree to go along with such a scheme?---I didn't ever look at it in that way, Commissioner.

I'm just wondering though, looking at it now, it's pretty obvious, isn't it, that by you going along, I'll use the colloquial expression, you going along for the ride, as it were, with him on this contracting system, whereby he was benefiting through management fees or kickbacks, that in a sense you were being invited to become party to a dishonest arrangement. And didn't that occur to you? And did it also occur to you that if you agreed and went along for the ride, you'd be putting yourself at risk of being discovered or found out?---I just wanted to do the work, to be honest with you, Commissioner, and I just, I think I just wanted to do the work and learn something new in the process and try and broaden my horizons and, you know, sometimes opportunities are hard to come by, and when you've got an opportunity that you could build a future for yourself and learn a new area, and so sometimes you're blinded by that and you don't really see the reality, but I think I was naïve. Having my time over, I would, I would not have chosen this path.

And do you think you would have been influenced or you were in fact influenced by the prospect that he was holding out that this was going to be a pretty lucrative business for you as well as for him?---I'm not complaining about the actual, like, having this type of work and me undertaking this type of work. To me I, for me it's more about learning a new skill and I enjoy that, but I was naïve, Commissioner, and I think having my time over I wouldn't have chosen this path.

But do I understand you correctly, you're not denying that you were also attracted by the potential financial return that it would mean for you, yourself, through your company?---No one leaves their house, Commissioner, to go and work for free, so yes, what you're saying – for me it wasn't about the money per se, it was more about doing something different and I can learn on the job and I've got an opportunity to learn on

the job and that would spark my interest more than just a financial aspect of things.

But you're not denying that apart from those things that you've just mentioned the money itself was an influence or attractive feature so far as you assessed it?---It wasn't money that brought me into this, it was, it was the fact that in order to qualify as a, as a person – I would never be able to on my own merit get this type of work and to learn this field, and that's what attracted me mainly to this line of work.

10

Money had nothing to do with it? Are you going that far?---It wasn't money that was my, money was not what brought me into this job. It was the fact that I was given an opportunity to actually broaden my horizons and that's something that, to anybody whoever knows me, they're, like, they, they would know that that would be my main drive, but everyone needs money to live and so money is part of the equation, Commissioner.

20 But this was being offered to you by Mr Dubois as an opportunity based on improper practice. That was the condition, wasn't it, that you would go along with his improper practice?---That's correct. That's correct. I, I had to do what he requested or else I would not be receiving any work.

Yes. Thank you, Mr Alameddine.

30 MR DOWNING: Just picking up from the Commissioner's questions, Mr Alameddine, and focusing just on the money for a moment. You've told us before that through the other work you were doing before Mr Dubois first raised the idea of doing this work, that is, through the work you were doing with your energy rectification, through your boats, your safes and your coffee cart, that you were doing okay financially. Correct?---Yeah, I, I wasn't, I wasn't broke, by any means.

Well, you also told us that you had plans, particularly in the energy rectification business, where you'd been doing okay already with residential but to expand it into commercial.---Yes.

40 Well, can I just ask, then. Why, in circumstances where you acknowledge that from the outset you knew there was something untoward about what Mr Dubois was proposing, why would you, in effect, turn your back on all that other work you'd been doing legitimately in order to do the work for Mr Dubois?---That's a very good question. I can't answer that 12 years later. I

regret making the decisions that I've made. There's no doubting that. But I can't answer your question as to why.

Could it be that perhaps the money was a more significant factor at the time?---Look, it may have been. I don't remember the state of mind that I was in - - -

Right. Could it be that - - -?--- - - - at that period of time.

10 I'm sorry. I didn't mean to talk over you. Sorry. Please finish.---I'm done.

Right. Could it be that perhaps the financial position in your other businesses wasn't quite as rosy at the time, that perhaps you were a little bit more needing of money?---No. Look, I, I was, I was okay, I, to, I was okay. But I don't know. I don't, I don't know why I, I, I took this, I took this opportunity. I regret taking this opportunity now in hindsight. To me, I, I just wanted to do the work and to learn something new and if, if it worked, it worked and if it didn't work, then I could always get back to energy rectification. Back then, I didn't know it was going to drag out this long. It
20 could have been one or two jobs that you do and then you, you know, it's just something that you put on your portfolio that you've, you've actually got experience in that, so I'm not sure.

Are you able to put any time frame around when it was, from the time of you doing your first job, which you've identified as Galston Gorge, that is, through Areva, that you paid a management fee or a cut to Mr Dubois?---I don't remember.

30 All right. So you couldn't put any months around it, weeks, months, anything like that?---No.

All right. Now, again, to put it into a time frame, can I take you to a document, please, and it's at volume 4.2, page 1, so it should come up on the screen for you in a moment. And do you see that that's a historical search, an ASIC search for Areva?---I can't see it.

You can't? Sorry. Just give us, just tell us if it's now come up?---Yeah.

40 All right. Do you see it's a search for Areva Corp?---Yes.

And you'll see that it starts, in terms of registration, 6 September, 2007, and you'll see it's deregistered on 26 July, 2015.---Yep.

And if we could go over the page, please, you'll see that under the registered or previous registered office, towards the bottom of the page, it actually shows what was your then family home.---Yep.

For the period 2007 to 2013.---Yep.

10 And also in terms of the principal place of business, same thing. It shows that for that period it was your family home.---Yep.

If you go over the page, please. And do you see in terms of directors, it shows that from the company's inception, which is 6 September, 2007 through to 20 June, 2013, it was you?---Yep.

And then do you see above that from 20 June, 2013 through to 26 July, 2015, which is the date of deregistration, that the director becomes Adam Malas?---Yep.

20

And if we go over the page, please, to page 4 of the same document, you'll see with the shareholding that there's one share, and it shows that at various times both you and Mr Malas held the share.---Okay.

So it's correct, isn't it, that when the company was set up, it was set up with you as the director and shareholder?---Yep.

But at a point, and the point being 26, sorry, 20 June, 2013, you dipped out and Mr Malas came in?---Yes.

30

Now, I want you to accept from me that Adam Malas is Hussein Taha, also known as John Goldberg. Accept that from me as an assumption, please. Can you tell us why it was that from June 2013 to July 2015, Mr Goldberg, or Humphrey as you knew him, became the director of Areva?---Because this company had links to a company that Towfik Taha owned that Mr Dubois got us to pay money into. And he didn't want it existing and then - -

Sorry, who didn't want it existing?---Mr Dubois.

40

Right.---He wanted, he wanted it off his, didn't want to use it anymore, so I had no use for it. So I gave it to Humphrey because he had trading history. And so he wanted to use it and I said, "Take it. I don't need it anymore." I set up Seina.

Well, it didn't just have trading history, it had a history of paying money into a third-party account to try and disguise kickbacks to Mr Dubois, didn't it?---I don't know. Yes, it did, it did. But it had, like, trading history in a sense where it's done work. So he thought he can use it to get work, work
10 elsewhere because it's, it's got, it's, it's, it's a company that wasn't formed yesterday, it's got some trading history, and that's why - - -

I'll come to - I'm sorry. I didn't mean to speak over you. I'll come to the details of how it was that Humphrey may have involved himself in these matters, but isn't it the case that the company to which Areva had been paying money was a company that was set up under Towfik Taha's name?
---Sorry?

The company that Areva was paying money to, that is paying it to a third-
20 party company - - -?---Yeah.

- - - it was a company set up under Towfik's name, wasn't it?---Yeah.
Yeah, but I don't remember the company name but, yes.

Well, does MWK Developments ring a bell?---It does ring a bell but I don't know if that - that could have been the name, actually.

All right. Well, I'll take you to some documents about that later. But you say that Hussein Taha wants to take over a company that you're running,
30 which has been paying illicit payments to MWK, his brother's company, because he wants it to have a trading history. Is that what you're telling us?---Yeah, that's exactly what I'm telling you. Because it's got, it's got trading history in a sense where it's existed for many years, okay, and it's, it's done a lot of work, and, and he wanted it. I don't know. I, I just, I just gave it to him and I, and I used Seina.

All right. Well, do you recall him saying what he wanted to do with it?
---He wanted to get work. He wanted to use it 'cause he had trading history.

40 But do you know work with who or doing what?---No, it's none of my business. You know, like, the same type of work. Maybe council work or

something. He wanted to try and do something. But it was – I don't know, how long ago was that?

Well, I'm going to suggest about 2012, but you tell me. So it's nine, 10 years ago.---Nine, 10 years ago.

You don't recall the detail?---No.

All right.---I don't.

10

Okay.---I wish I could. I wish I could to actually, to, you know, to be more help but I don't recall.

That's all right. Can I take you back to the search, please. So if we go back, please, to volume 4.2, page 1, and again it might just be a moment but it'll pop up on the screen in front of you. So back to page 1 if we could. Right. So do you see again just with Areva it shows that the registration date is 6 September, 2007?---Yes.

20

And again accept from me that the employment of Mr Dubois at the RTA doesn't begin until August 2009 and in fact the first Areva work for the RTA/RMS doesn't get paid until November 2011. So just keep those dates in mind. So you've got registration of Areva, 6 September, 2007, Mr Dubois starts at the RTA August 2009, and the first payment by the RTA/RMS to Areva is not till November 2011. Can you just keep them in mind.---Okay.

Looking at that then, can you, seeing the date of registration, can you now recall what it was you set Areva up for?---No.

30

Given what you've told us already about the energy rectification work and your belief that it was being done through Areva, is it likely it was to do the energy rectification work?---I'm not sure.

Can you think of any other reason that you were setting up a company back in September 2007?---Maybe I wanted to do something else and I just, I had that entity ready and, to do whatever it was I was going to plan on doing, because as a proprietary limited you can do whatever you want to do as long as your insurances are in check.

40

Right. Okay. But thinking about the time. September 2007 is around the time, perhaps even just before, you've completed your degree so I think your evidence earlier was you believed you completed it in about 2008/2009. So 2007 puts it - - -?---Mr Downing, I have no idea why that company was formed. We're talking 17 years ago.

All right. So you just can't assist us.---No.

10 All right. Can I take you same volume, please, to page 15. 4.2, page 15. And if we just enlarge that slightly. Do you see that this is a CBA application form for Areva Corp?---Yes.

And it's the case, isn't it, that you do most of your banking through the CBA?---Yes.

And do you recall that you set up two bank accounts for Areva Corp with the CBA?---No, I don't recall that, no.

20 But just look at this for the moment for me, please. You'll see that it's got the name of the account is Areva Corp Pty Ltd. Do you see that?---Yeah, okay.

And ignoring the BSB for the moment do you see there's two account numbers that this form relates to?---Okay.

And just dealing with the last four digits the top one ends in 0-0-4-4.---Yep.

The bottom one 0-0-5-2.---Okay.

30 And you'll see at point 3 or question 3 on the page it notes that any one of the authorised signatories in section 4 can operate the account and it notes, it's handwritten "only 1 to operate". Do you see that?---Yeah.

Go over the page, please.---What year was this set up?

Well, I'm just about to show you that. So do you see, yeah, thank you. If we just enlarge that. So do you see that this is, it's opened in your name? ---Yep.

40 And showing your date of birth.---Yep.

Do you see it's signed 16 October, 2009?---Yep.

And it also refers to an existing CBA account.---Okay.

And that's your signature isn't it?---Which one? Yeah. That's my signature.

And I take it that that was your then mobile number that we see above.

---Yeah. Okay. Yeah, it looks familiar, yep.

10 And I take it at this time you had a personal CBA account that you were already operating.---I don't remember.

Well, you would have though, wouldn't you? Before you ever set up Areva you had your own bank account in your own name.---Yes. Yes.

All right. Now, again, as far as time frame's concerned, so this shows it being set up, this account giving the authority for you to operate the CBA account for Areva, on 16 October, 2009. So, again, putting it in context, that's about - - -?---Yeah.

20

- - - two years after Areva was set up but a couple of months after Mr Dubois began at the RTA.---A couple of months after?

Yes.---Okay.

So, again, just so I've got you in sequence, Areva, according to the search, was registered in September 2007, Mr Dubois - - -?---So, maybe that would have been set up because I was doing the energy rectification stuff?

30 Sorry. The account or the company itself?---The account.

Right, but - - -?---So the, the company may have been open and, to do something and then maybe that didn't eventuate. I'm just giving you hypotheticals here. I don't really remember. And then when the energy rectification stuff would have come around, then the company's ready, it just needs a bank account for, for, for you to start work.

40 Okay. But, again, in terms of time frames, does it sound right, I think your evidence before was that you thought you'd done the energy rectification work for perhaps a couple of years. So could it be that you did it from about

October 2009 when this account gets set up until - - -?---I'm not sure, how, how - - -

Well, just wait till the end of the question, please. It will make it easier. Could it be that the two years that you did work for energy rectification or in the energy rectification field was from about October '09 to about October '11 and that it was then in late '11, that is 2011, that you started doing RTA/RMS work?---It makes sense.

- 10 All right. Now, I want you to just try and keep in mind those two account numbers 'cause I'm going to come back to more documents with respect to them later, the first one ending in 0-0-4-4 and the second ending in 0-0-5-2. Do you recall that from the first page?---Yeah.

Okay. If we could then go back, please, to the second page and, indeed, actually skip onto the third page? Thank you. If we can just enlarge that? And, again, do you see, does that bear your signature there?---Yeah.

- 20 And if we go to the, scan down the page, please? Sorry, over to the next page. And if we go to the bottom. And do you see that this seems to be completed by a bank officer on 16 October, 2009?---Okay.

Now, just thinking then about the reason for opening the account then, could it be that there'd been some discussion with Mr Dubois then about perhaps your company doing some RTA work but - - -?---No.

- - - that is as early as October '09?---No, and then, what, wait two years until I, I start doing work? No.

- 30 So you think that's unlikely?---No, I did energy rectification. Why don't you look at the account?

All right. Well, I'll come to the account in a moment. Can I take you then please to the same volume but back to page 14? And can we just enlarge that? Do you see that again this is a CBA authority form and it's relating on this occasion only to the account 0-0-4-4 that Areva Corp held?---Mmm.

- 40 And you'll see the dates down below are 7 May, 2012, so we're now not in 2009 anymore. We're in 2012. But do you see that it seems on 7 May, your brother Ahmed is added as a signatory on this Areva Corp account?---Yeah.

And are you able to assist us as to why it was you were getting your brother to be a signatory on the account at the time? So bearing in mind this is some years ago, but 7 May, 2012.---Well, just in case something ever happened to me or I needed to withdraw some money and I wasn't available, then Ahmed worked for me and he could do that for me on my behalf, on, upon my request.

Well, in May 2012, your brother Ahmed was, I'm going to suggest, 20 years old.---Yeah.

10

Do you recall what role he had in any of your business interests at that time?---He was just my worker.

And was that for the purposes of RMS work?---No, I think he did some work, like, he always did work for me and I would pay him, ad hoc work. So I've, my relationship with Ahmed, we're very close, and so I would say to him, "Tomorrow you're going to work with me and," or whatever, or he'd go get me stuff or, you know what I mean? He, he was just like a, he would just work for me.

20

All right. But just again to put it into a time frame, I've suggested to you that it was in November 2011 that you first do RMS work, and you indicated your recollection is the first job was Galston Gorge. So this form is not that much later. It's six months later in May 2012. Was Ahmed involved in any of the RMS work you were doing at that time? ---No, he was just an employee. He worked for me directly, he would service my trucks, get the mechanic in or he would fix the tools or he did ad hoc work for me, personally.

30 But on RMS projects?---Even before RMS projects, but yes.

All right. Did he sometimes go and operate your bank account, that is this Areva Corp bank account?---I'm not sure.

Did you - - ?---I don't recall. I don't recall.

Well, I'll come to the detail of this later, but it's the case, isn't it, that really through - - ?---He may have. He may have upon my request. I may say to him, "Can you" – I'm giving you hypotheticals here.

40

Yep.---So I've put his name down in case I'm not available. Then he can do whatever I request of him.

Okay. You've told us already that there were some payments that were made from Areva into a company that Mr Dubois directed you to make the payments into, and I think you've confirmed you believe the name was MWK Developments, correct?---Could have been, yeah. I, I did make payments. I don't recall the name, but it could have been MWK, yes.

10 But they were by cheque, weren't they, into that company?---I don't remember. I don't remember.

I'll take you to the documents later. But what I want to suggest to you is that through most of the decade or so of you, through your companies, doing work for Mr Dubois, when it came to paying him his management fee, it was a cash payment that you made.---Yep.

20 That would typically mean you going around with bags or boxes of cash and giving it to him.---Bags or boxes, I don't know. It was probably just plastic bag or something, just, or just - - -

Well, it was more than, well – sorry, please go on.---I, I know I paid him. How I paid him is irrespective if it was a, if it was a bag or whatever else. But, no, I just, it was, it could have been like a little bank, you know one of those mesh bags, those mesh bags that you get from the bank?

Right. Well, it's more than you can fit in your wallet, wasn't it, on each occasion?---Yeah, yeah.

30 Sometimes it was like Woolworths or Coles shopping bags?---I don't know. I know I paid him but I don't know if it was Woolies or whatever. Could have been a plastic bag at stages, but, yeah, I don't know.

All right. But you say it could have been one of the mesh bags that the banks give you?---Yeah.

All right. But when you, typically when you paid him, it would involve you delivering cash for him, correct?---Oh, either/or, yeah.

40 What do you mean "either/or"? What's the "or"?---Either/or. If I saw him somewhere, I could, I would give him some money, or if I – yeah.

Did he sometimes come to you at your home?---He was, yeah, he frequented me, yes.

And did you sometimes go around to his home and deliver it to him?
---Yeah, whatever was convenient.

10 All right. And the sort of sums you're talking about, on each occasion in which you would make a payment to him, it was typically in the tens of thousands of dollars, wasn't it? Or more?---Yep. Tens, tens of thousands.

THE COMMISSIONER: Why were amounts - - -?---I don't remember, I don't remember, I don't remember amounts, but I know sometimes it was 30,000, sometimes it was 25,000, sometimes it was 10,000. But it was in the tens of thousands. I wouldn't see him for anything under \$10,000.

20 Whether the amounts were 10,000 or 25,000 or some other number, why were these amounts of money being paid in cash and not by way of a bank transfer?---That's what he wanted.

And what did you understand was the reason behind him requesting cash payments of such large amounts to be in cash?---I don't know. Don't know. Didn't faze me.

Pardon?---I don't know. He wanted cash, I gave him cash.

30 Ah hmm. Well, this, I take it, is a very unusual – indeed unprecedented system that you had ever employed before, wasn't it, to pay people large amounts of money in cash?---Other people?

Okay. Was it or was it not an unusual request, so far as your experience of life was concerned at this time, to be asking for payment of large sums not by way of bank transfer but by way of payment of cash in a bag?---Yes, it was unusual, Commissioner.

Mmm.---But that's what he wanted.

And - - -?---I just (not transcribable)

40 - - - it was evident to you surely, I daresay you'll, that he wanted it paid in cash so that there was no paper trail as it were?---That makes sense, yes.

Well, that would have been apparent to you if there's no other reason that he mentioned.---No.

Yeah. So you would assume that his motive - - -?---(not transcribable)

- - - his motive or reason was to in effect disguise these payments so it couldn't be picked up by a paper trail.---I would assume so.

10 Well, that's what you would have assumed at the time I daresay. Is that right?---Yes. Yes.

Thank you.

MR DOWNING: Is your evidence that it was Mr Dubois who suggested that the payments be in the form of cash?---I don't remember how it came about but I know that that's the system that, that we went by. I think it was, yeah, but it just, that was what was requested of me. At the end of the day, Mr Downing, I just, I did what I was told.

20

Is it possible that it was you who in fact suggested that you wanted the payments to be in the form of cash so that they couldn't be easily traced? ---No. I wouldn't mind paying another company.

So is it you deny that it was you who suggested that the payments should be in the form of cash?---I paid him the way he wanted to be paid.

All right. So it was him who made the decision and gave you the direction as to how he was to be paid. Correct?---Yes.

30

All right.

THE COMMISSIONER: Mr Alameddine, I take it you agree that although it was what you're saying his call to have these large amounts paid by way of cash, that was a method or a system that also worked in your favour too, didn't it, because it wouldn't leave any paper trail showing your involvement in any scheme that might be unlawful? Is that a fair statement?---No. No, it's not, Mr Commissioner, because I had already transferred companies, money to a company that was owned by Towfik that was for Mr Dubois, and I think there was even a cheque made for a car

40

purchase as well. So, no, that's not, that's not the right, that's not a right description of it.

All right. Well, Mr Alameddine, I just want to give you another opportunity just to reflect upon it so that we can understand your position. I think you said it was apparent to you that he was asking for these very large sums of money, such as 10 or \$25,000, to be paid to him in a way, that is by cash, so as not to leave any paper trail which would implicate him in any improper scheme. I think we dealt with that a little earlier. That was the position,
10 wasn't it?---Yes.

And what I'm simply putting to you, it's sort of like a night follows day proposition but I'll just spell it out so that you can understand what I'm putting to you. Given that he had invited you, if you like, into this scheme whereby he would receive these so called management fees, payments of these amounts in cash suited you too, didn't it, because it would provide some cover for you? That is to say, there wouldn't be any paper trail linking those payments to you either. Is that a fair statement?

---Mr Commissioner, I've made a cheque out to him for over \$200,000 for a
20 car purchase that he made so, no, it's not a fair assumption. I, if, if he wanted money transferred to a company I would have done that for him or if he wanted it in cash I would have done that for him also.

Did you maintain any records as to the amounts of these cash payments that were being made by you?---No. No.

Well, why would you not keep a record to protect yourself, protect your own interests, so that he couldn't come back and say, "You didn't pay me \$25,000 for the given period," you'd be in a position to say, "Oh, yes, I did.
30 I've got a record here." Why didn't you keep a record?---To be honest, I don't know. That's, I just never did.

You see, what I'm putting to you is that it was neither in your interests nor Mr Dubois' interests to keep any records, any form of paper trail, to make this system work. Is that not the case?---But the paper trail's, but there's already a link, Commissioner. The, the link is already with the first company that was owned by Towfik. So there's already a link that, from a company that's owned by me and there's a second link from another company that went to a car yard in Melbourne, so there's already a (not
40 transcribable) - - -

Yes, but the subject of my questions to you are, subject – sorry to interrupt. The subject of my questions, so that you can apply your mind to my questions, is that we're talking about secret, improper payments, that is to say, the amount that Dubois was receiving in his pocket. And what I'm putting to you is that it seems fairly apparent that it would have been in his interests that there be no paper trail, thank you very much, but it would have also equally been important for you not to have a paper trail 'cause otherwise you could be implicated. Is that not the case?---Well, well, no, there, look, Commissioner, at some stage, everything was written but then
10 when they're obsolete, those documents are then discarded.

All right. Well, Mr Downing, I'll leave it to you.

MR DOWNING: Thank you, Commissioner. Just in terms of order, do you believe that, what started first? Was it the cash payments or was it payments that were made via cheque or EFT to MWK Developments?---I don't know.

You can't recall that now?---No.

20 All right. As far as the cash payments that you've described to us, there were many of them made over a long period of time. Correct?---Yes.

And that involved all three of your companies?---Will it be cash payments, all three of the, I'm not sure. Maybe. I, I, I can't answer that question.

Well, in terms of where the cash would come from in order for you to make each of the payments, isn't it the case that you would withdraw cash from the company account whether it's - - -?---Yeah, but I, I don't know, I don't know if it was all three, that cash was paid, I don't know, you're, you're
30 asking me about intricacies that I don't recall.

Well, I'm asking you - - -?---What I do recall - - -

Just try and focus on the question. What I'm suggesting is that with originally Areva, then Seina, then EPMD, the way in which cash payments would be made is that you or someone on your behalf would go to the bank, get the cash out and then it would be given to Mr Dubois.---Mostly me.

40 Right. But the money would originally come from the company bank account that you had operated for each of those companies. So if it was a \$25,000 payment or a \$40,000 payment that was being made to Mr Dubois,

you'd go to the bank, you'd get out enough cash and you'd then either wrap it up in a bag or stick it in a box or put it in a mesh bag and take it to Mr Dubois. Correct?---Yeah. But, like, I don't have, yeah. Okay. I gave him money, whether, if it was in a, in a, in a, in a, in a plastic bag or a mesh bag, yes, I did give him money. And you keep referencing boxes. And the box that you showed me last time was not my box.

10 All right. Let's not get too caught up about the packaging. But there were multiple, and when I say "multiple", dozens and dozens of payments of tens of thousands of dollars to Mr Dubois that you made over a period of about a decade?---Look, there were, there were heaps of payments. I don't know how much or the quantity or the amount or the frequency but there, there was payments made, yes.

20 All right. And just going back, if we could, to that authority form for Areva's account, if we could go back please to volume 4.2, page 15? You'll see if we again – sorry. Wrong page. So 4.2, page 15. I withdraw that. I apologise. My fault, page 14. So this is the page I took you to, not the original opening form but the form showing that your brother Ahmed is added as a signatory on 7 May, 2012?---Yep.

For the Areva account ending 0-0-4-4.---Yep.

30 Just pausing there. Did you sometimes get Ahmed to go to the bank in order to get cash out for you to then give that cash to Mr Dubois?---I don't know why I put him on. I think it was maybe just as backup for, to pull out some money for me. But most of the money I pulled out myself. I don't recall Ahmed pulling out money for me, but just in case I'm not physically present, then I could get Ahmed to do that, but I don't recall using Ahmed but I had him on the document just in case.

You don't have any recollection of him ever going to the bank and getting out large sums of money for you to then give it to Mr Dubois?---Ahmed did not know I was paying Mr Dubois.

How do you know that?---Because I never discussed it with him.

40 Right.---He would just, he, I toed Mr Dubois' line and Ahmed toed my line. Ahmed doesn't ask questions. He's a very, he's just, he just, he's just a simple guy that just wants to live and earn his day's wage and, and that's it,

and go fishing and stuff like that. So he's, he's not inquisitive in the sense where he's going to say to me, "Why are you pulling out money?" Like - - -

But do your best. Did you ever send him to the bank to get out money that you knew was going to be given to Mr Dubois? That is, the money that was to make up the kickback?---I, I don't know, I don't know, I can't answer that question. I'd be guessing.

All right. Did you ever send him round to Mr Dubois to deliver money?
10 ---No. Didn't know I was paying him.

All right. So whether it was Mr Dubois coming to you or you going to him, you say it was typically you that was doing the handover of cash to Mr Dubois?---Yes.

Can you think of anyone else that did it?---Just me.

All right. Now, you've told us that you also, separate to paying money to Mr Dubois, paid some cash I think for the purposes of obtaining cars? Is
20 that correct?---I paid a cheque. I paid a cheque.

Well, separate to the cheque, did you ever actually go to a car dealership with cash on Mr Dubois' behalf?---Yes. Yes, I did. Yes, I did.

All right.---More than once. I think, I think I went twice, but just off recollection, and I'm guessing that I've been twice.

All right. And was that car dealership in Melbourne?---Yeah.

30 And do you remember what the dealership was?---No, it was just car, car dealership.

Do you remember the name of it?---If there's anything you can tell me to (not transcribable) my memory, I'll, it probably - - -

Well, first of all you say you believe you went twice. Was it to the same dealership?---Yeah.

40 And it was in Melbourne?---Yep.

So did you fly down?---No, I would have driven down.

Why would you have driven down?---That's right. Because I took his money.

All right. Well, does the name Dutton's Garage ring a bell?---Yeah, it does.

Was that the dealership you went to?---Yes.

10 And on those occasions, where did the money come from that you were taking to Dutton's Garage?---From him.

So it's not the case that it was money he told you to go and get out of the bank yourself, it was money that he gave to you?---Yeah.

But I take it that was after a period of you dropping money to him, that is you making the payments to him.---Yes. Yep, yep, yep.

20 Did you understand from him as to whether someone else might be contributing to that money that you were taking to the dealership?---No, Mr Downing, I don't ask questions. I just did what I was told because I just as naïve as it is, I just did what I was told.

And on those two occasions you believe you went to Dutton's Garage, what sort of money were you taking?---I'm not sure how much the amount was.

30 Well, you obviously had a bit of experience in handling cash in the sense that you knew what 10,000 or 20,000 or \$40,000 felt like. I mean, was the bundle of cash you were taking bigger than that, the same size, smaller?---It, look, it could have been, it could have been. And, no, it was larger but I don't know how much it was.

Did you have any discussion with Mr Dubois about how much it was?---I don't recall.

40 When you took it to the dealership, presumably there must have been some discussion or some process whereby they actually opened it up and looked at how much money there was?---No, no, he would have arranged that and for me, I don't, like it's, I've got nothing to do with it, I didn't, I don't look, I don't whatever, I don't want to deal with his headache, I just picked it up, dropped it off and came home.

But is your evidence though that you were taking what you understood to be tens of thousands of dollars, probably more than \$40,000, to a dealership on Mr Dubois' behalf?---I don't know how much the amount was.

Well, I thought you'd agreed with me that while you didn't look at it that you could tell from the dimensions, the physical brick of money - - -?---I would, I would, yeah - - -

10 - - - that what you were dealing with was more than what you were familiar with from your own drops to Mr Dubois?---I would assume it would be more than 80 or 90,000.

All right On each occasion?---Yeah.

And is it the case that the reason that you didn't fly to Melbourne was because you didn't want to be flying with that much cash that someone might ask questions about?---No, I just did what I was told.

20 Well - - -?---See, by this point, by this point Mr Downing, Mr Dubois's got a number of guys that work for him, and I know as naïve as this sounds, we just toe his line because we want to work and we don't ask questions.

Well - - -?---That's the reality of the way we interacted.

30 THE COMMISSIONER: Although you say you didn't ask questions, talking about this delivery of money to the dealer in Melbourne, what you've got is a request to do the money drop by getting in a car and driving all that way from Sydney to Melbourne, knowing it was a large sum of money, although you didn't know the amount, rather than just jumping on a plane. It doesn't make sense, it must have been obviously apparent to you that the reason he was asking you to actually physically drive all that distance and back again was because again, as he had done in other ways, he wanted to keep a disguise, a cover to make it certain that the cash amount was not discovered by somebody. Isn't that, that's what you would have assumed I imagine?---Yes, a hundred per cent, Commissioner, of course.

40 You knew that because his scheme, that's Mr Dubois' scheme, that he devised was all built on this proposition of secrecy because otherwise it would be discovered and it wouldn't work, that's right isn't it?---Correct.

Anyway, that's what you did. You drove to Melbourne to the dealer. Do you remember the name of the dealer?---Mr Downing just told us, he just said that.

Okay. You didn't have any other business to transact in Melbourne, just simply drop the money off and then you returned back to Sydney. Is that right?---Yes, that's right, I went home.

Travelling alone or with somebody?---That's right.

10

Travelling alone?---I went alone.

Thank you.

MR DOWNING: Thank you, Commissioner. Did you get any receipt on the two occasions you took the cash from Mr Dubois to the dealership in Melbourne?---No.

20 So they issued you with no paperwork after you gave them the bundle of cash?---No.

You say that, they didn't count it in front of you?---No.

How did you know who to see at the dealership?---He called him, I would have called him and said, look, where do you want me to drop this off?

30 So, you would have a discussion with him about who it was you were to see and presumably what you were to tell them?---No, I think he went to Melbourne quite a lot so he would already arranged something with them and I was just delivery guy.

So when you got to the dealership, do you recall whether it was the same person you saw each time?---I don't remember who I saw. I think once I saw like an Indian fella and the other time I saw another fella but it was years ago, we're talking years ago.

40 What were you there to, what did you say them in order to let them know on whose behalf this money was being paid?---I would just say, this is from Alex and they'd know about it.

All right. Okay. While you were actually at the dealership, would you actually get Mr Dubois on the phone or was it something that you just knew to do from prior dealings with Mr Dubois?---I don't remember the actual course of events, if I called him, if I didn't call him or if he told me beforehand, before I left.

All right.---I don't really recall. I'm going to be speculating if I answer your question.

10 Okay. But in terms of when these trips to Melbourne occurred, accepting from me that the first record of you getting any payment from RMS work is in November 2011, is your recollection that this is something that happened many years ago or in much more recent times?---I don't know. It was many years ago.

So, what, back around 2012/13/14, something like that?---I don't know. I'd be speculating.

20 All right.---For me, 2013 and 2016 are the same. They're, they're within the same frame.

All right. But is your recollection, though, that these trips weren't something that happened in, say, 2018 or 2019? You think it was earlier in time?---Oh, no, I don't, no, I don't, I don't know. I don't know. I can't answer your question.

All right.---I know I did one or two trips. I think it was two trips I did. Yeah, I think I did two trips, and I don't know when they were but I did two.

30 Okay. Now, separate to the cash that you took to Melbourne on those occasions, you've also described for me the cash that you delivered to Mr Dubois at his home, correct?---Yes.

Did you see at any time, when you made the trip to his home to deliver cash, what he did with it?---No, just give it to him and I'd go.

You didn't see where he put it?---No.

40 Had you ever assisted Mr Dubois in terms of attaining a safe that was to be installed at his house?---You know, you asked me that question last time

and I said to you no, but it's convenient – because I had worked in safes – for him to say that.

Do you mean by that, that you deny that there was any instance that you obtained a safe for Mr Dubois?---I didn't have anything to do with the safes at, like, at his house that you mentioned to me last time.

So you never sold him or gave him a safe?---Why would I give him a safe?

- 10 Please, I'm not asking you to speculate as to what I might understand. I'm asking you as the witness. You ran a safe business for a while, where you sold them. You obtained them, you said, from a business and sold them. Did you ever sell or give Mr Dubois a safe?---No.

Did you ever install a safe into his garage?---No.

Did you ever assist him in having a safe installed under the concrete, that is under the ground in his garage?---No.

- 20 So you had no knowledge of whatever safes were installed in his premises? ---I saw the picture.

Well, no, I mean based on your own trips to his house, you were – or based on anything he told you, you had nothing to do with the installation of safes at his house?---No.

All right. Thank you. Now can I take you now to Areva's first job for Mr Dubois at the RTA/RMS, and you've told us already your recollection is that it was Galston Gorge, correct?---Yeah, that was the first job in that area.

- 30 That's correct.

Okay. And can I take you to some paperwork and see if you recall this. So can I take you first of all to volume 4.2, page 53? Has that come up on the screen in front of you?---Yes.

Now you'll see that this is an IMS vendor details form. It's an internal RTA form. I'm not suggesting it's something you created. But do you see it's for Areva Corp Pty Ltd?---Yep, yep.

- 40 And do you see that it shows a telephone number, mobile number?---Where is that? Yes.

That was yours back as at 2011, correct?---It looks familiar.

Well, familiar as your phone number?---Yeah.

All right. And email address that we see there, was that an email address you'd set up?---Yes.

10 All right. And can I take you then, please, to page 55. And do you see that this is an EFT form that the RTA completed in respect of Areva Corp?---An EFT form. Okay, yep. Okay.

You're familiar, aren't you, that the payments you got from the RTA and RMS were almost always done via electronic fund transfer?---Yeah. Yeah.

And I take it you're familiar with, in order to be paid by an organisation, you need to give them your bank details so they can transfer it in?---Yeah.

20 And do you see below that on this form, it contains a signature?---Yeah.

And it's dated 12 September, 2011?---Yeah.

And that's your signature?---Yeah.

You see it's completed under the name Harry Alam?---Yeah.

Can you – I withdraw that. Was it you that completed the form in the name Harry Alam?---That's my handwriting.

30 Right. Can you think why it was you put your name down as Harry Alam, not Hassan Alameddine?---He didn't want me to use Hassan.

Do you say that that was something you did at his request?---Yeah.

But you were aware because you'd registered the company that Areva was registered with you as Hassan Alameddine not Harry Alam. Correct?--- Sometimes we don't think things through all the way, Mr Downing.

40 But do you say that it didn't cause you any concern that you were requested to put this company under the name of Harry Alam for the purposes of the bank transfer form?---I just did what he wanted me to do.

All right. Did you wonder whether it might be that he was trying to disguise who you were, given that you were a friend of Mr Dubois?---I don't know. You'll have to ask him that question.

Well, you can assume that we will or we have but did it cross your mind at the time or not?---I don't know. I can't answer that.

10 All right. Can I take you then to page - - -?---I just, I, I just toed his line and that was it. I, you know, in hindsight, I would never have gone down this path, nor will I ever but it was probably just, I just did what he wanted and I, I, yeah, that's about it.

Okay. Can I take you to please same volume, page 56? So I'm going to suggest this was a document you provided at the same time as you signed the EFT authorisation form but do you see it's a bank statement for Areva Corp?---Okay.

20 And do you see the number is 0-0-4-4? So that account that I took you earlier with the account opening form and the form authorising Ahmed to operate the account?---Okay.

And do you see that this is a statement that starts on 2 August, 2010?
---Okay.

See that?---Yeah.

30 And that date is more than a year – I withdraw that – almost a year before it seems that you complete the paperwork in order to have the RTA set you up so you can be paid?---Yeah.

But you'll see that there's already a balance of 35,900 in the account?
---Yeah.

As best you can recall, what was the source of that money?---I think the energy rectification work, from what I recall. But it's just a guess. You're talking to me about 2010. It's 12 years ago.

40 No, I understand. Now, can I take you then, please, to volume 18.3, page 26? Sorry. It'll just take a moment and it'll pop up on the screen in front of you. Has that now come up?---Yes.

And do you see that this is an RTA document described as a Contractor's Offer Small Works?---Yes.

And you'll see it's in terms of the work, it's Galston Gorge West VMS fabrication installation and associated civil works?---Yes.

And you'll see that the contractor nominated is you at Areva Corp or when I say "you" it's actually Harry Alam?---Yeah.

10

And then you'll see down below, there's a description of the work that's involved with items listed there?---Yeah.

So just pausing there, I want you to assume that VMS is variable message sign.---Yeah.

And you recall, don't you, that that was the first job that you did for the RTA, that is the installation and associated works around installing variable message signs at the Galston Gorge?---Okay.

20

Are you agreeing with me? You do recall that?---Yes.

All right.---Yes.

And you recall, don't you, that the Galston Gorge is a gorge near Hornsby with a lot of hairpin bends?---Yes.

And do you recall that there was an issue at the time about overlength vehicles going through it and getting stuck?---I don't recall it but, yes, okay.

30

I know trucks get stuck there.

Do you recall that what you were being asked to do was, at in this instance the west end of Galston Gorge, was to do the work involving putting up a steel structure so that the vehicle message sign, sorry, the variable message sign could be installed there and it could give messages to long vehicles?---Okay.

You agree?---Yes.

And do you recall that you actually did another job almost identical at the other end, the eastern end of the Galston Gorge, so that there was an installation at each end?---Okay.

Now, you'll see that when you look at that list of items there's a number of them there, but the last one on the page is manufacturer of structure.---Yep.

And you'll see that in terms of the things that make up the cost that that's the biggest single item.---Yes.

10

And it was a steel structure, wasn't it?---Yes.

A steel structure that had to be manufactured and then installed and then the sign put onto it, correct?---Yes, yes.

And there was associated civil works around the location?---Yes.

And if you go over the page you'll see that there are further items there, including the original conduit supply and installation, et cetera, but ultimately the total price before GST was 44,100, and then inclusive of GST, \$48,510.---Yes.

20

Now, this being the first job you'd ever done, you had no background in doing any of this sort of work before, correct?---No.

That is, no, you agree with me, you didn't have any background in doing it?---I had no prior background.

Okay. And do you recall that, as far as the steel structure was concerned, that it wasn't something you manufactured, but there was a subcontractor that did the work?---Yeah.

30

Can you recall who it was that did the steel fabrication and installation?---Yes. It was a guy that was related to me. His name's Omar.

Surname?---Alameddine.

Right. And so was he the person that you subcontracted to do that aspect of the work?---Yeah.

40

So when you say related, what was the nature of the relationship? Were you cousins?---We just shared the same surname so you say you're related.

But does that mean you weren't in fact related or that you were but it was distant?---No, we, like, we're from the same area overseas, and so we share the same surname, but it's probably a seventh cousin. Just shares the same surname.

10 I mean, Alameddine is a fairly common name in the Lebanese community, isn't it?---Yeah.

All right. But can you recall the name of Omar Alameddine's business? Did he operate under a business name or in his own name?---I think it was -- is there any way you can, do you -- if you say it out, I'll remember it.

Well, I'm not sure I can assist you, but I'll try. Just to skip forward a bit, steel installations ultimately became a bit of a niche area of work for you and your companies for Mr Dubois?---Yeah. Yeah.

20 And you did deal with a number of, at least a couple of different steel fabricators, correct?---Two.

One of them was CT Fabrications.---Yeah. CT. Yeah.

And that was a gentleman named Charlie, wasn't it?---Yeah, that's correct.

Was the other one that you dealt with the business run by Omar Alameddine?---Yeah.

30 How old was Omar? Was he someone the same age as you, younger, older?---He was I think over 55.

So quite a bit older than you?---Yeah, he's, he's very professional.

Well, putting aside how professional he was, he was someone who was quite a bit older than you were?---Yes.

All right. Do you recall another fabrication business that you had any dealings with besides Omar Alameddine's business and CT Fabrications?
40 ---No.

Did you ever have anything to do with a fabrication called Ashflex, Ashflex Holdings?---No.

No.---Not that I remember, no.

Okay.---Omar, Omar and Charlie, Omar and Charlie, just the business name's on the tip of my tongue, I just can't remember it.

- 10 All right. But is it the case that this area that you became quite involved in, that is, the project managing of steel fabrication works and installations, you in effect learnt on the job from Omar and Charlie?---Yeah.

By watching them - - -?---And Martin when he would come and supervise the quality assurance, so I would have extensive conversations with Martin and he would run me through the intricacies.

That is Martin Duchesne from M&M Inspections?---Yes.

- 20 Because by way of actual experience, you'd never had so much as an occasion in your life to try and inspect the quality of weld or steel structures to know if they were sound or not?---Yeah.

All right. Perhaps this might assist, I don't know whether this might be the name of Mr Omar Alameddine's business or perhaps another fabricator you dealt with, but does Travimond T-r-a-v-i-m-o-n-d?---Yes, that's it.

Is that Omar Alameddine's business?---Yes, yes, that's it.

- 30 Now in terms of how you came to use that business on this job dealing with Galston Gorge, was that a connection you made yourself or was it someone Mr Dubois suggested you use?---No, I found him.

Well, how, what was your connection, was he just, did you know Omar and knew that that was his line of work?---No, I would have called around and asked for a reputable fabricator and I would have been led to him.

Right. Just through people you knew?---Yeah.

- 40 All right. Can I take you back then to page 26 in volume 18.3, I just want to remind you to one more aspect, sorry, take you to one more aspect of that

document. So do you see that it's got a tender closing date of 25 August, 2011?---Yes.

It's the case, isn't it, that you ultimately put in a quote for this job and you obtained the job?---Yes.

Did Mr Duchesne, on behalf of M&M Inspections, do the quality checks on this job to your recollection?---I don't remember Martin on this job.

10 As far as the other aspects of the work – separate to the steel fabrication installation – did you subcontract that out as well or did you do some of that yourself?---I'm sorry, can you repeat your question? You lost me.

That's all right. Separate to the steel fabrication and installation part of the job with the other aspects of the work, did you subcontract them out or do them yourself?---I think I had people working for me, I don't remember though the intricacies of that job. I remember Omar made and installed the structure. I did work, I did some work, I don't know how much work I did, I don't recall.

20

Okay. As far as the price that we see, so if you look at the items that make up the elements on that first page, starting with travelling allowance all the way down to manufacturer's structure, and if we go over the page, please, you'll see that it's broken down into about 15 line items that ultimately make up the price of \$44,100?---Yes.

Now, I take it this being your first ever job you would have no experience in costing a job like this?---No.

30 Can you assist us with as to how it was that you came up with the figures that are populating each of the items in that quote?---I don't recall, you're talking to me about something that happened 12 years ago.

All right. Given that you had no experience in doing this – I withdraw that. It's likely, isn't it, that you got some help from someone?---Oh yeah, a hundred per cent.

Well, if we go to the next page, I think it was just flashed up for a moment then, but it does have a signature on it, I just want to confirm that's your signature?---Yes.

40

Dated 25 August, 2011, which is the closing date for tenders to be submitted.---Yes.

But if we go back to those line items, we go back to that page, thank you. It's likely, isn't it, that the someone that gave you some help was Mr Dubois?---Yes.

I don't know if you can recall this first ever job in terms of you coming up with the figures, but you would have had no capacity to know how much to charge for each line item on that quote, would you?---No, but - - -

The likelihood is, isn't it, that - - -?--- - - - but what I can, but what I, look, you can gauge, right, you can gauge, but you're not going to get an exact figure. And another thing that you should know, Mr Downing, is that doing work on a road is different to doing work in a backyard because you need somebody watching, for example, eastbound traffic, somebody watching the westbound traffic and, you know what I mean, so you've got people that are just standing there watching if there's an emergency that's about to occur and, and so, yeah, there's a lot of things, there's a lot of intricacies that working on a road would entail that, different to working on a private property where you're enclosed and you're out of harm's way.

Right. Sure. And if we go back, please, to page 26, you'll see that one of the items there is traffic control?---Yeah.

And the sum of 2,500?---Yeah.

But you'd never done work on a road before this, had you?---No. It's likely, isn't it, that that breakdown and the amount that we see for each item came from Mr Dubois. Correct?---Yeah.

And it's the case, isn't it, that over the years of you doing work for your various companies for Mr Dubois, he was very involved in the preparation of the paperwork?---Yeah.

Would that mean sometimes you sitting with him while he, in effect, dictated to you what to include?---Yeah.

That is, the words to describe the elements of the job and the amounts to put down?---Yeah.

Did you sometimes send him documents that were able to be edited and he would then send them back with what he wanted in them?---I'm not sure but he did assist with documentation.

I'm going to suggest to you that when search warrants were executed on Mr Dubois at the same time as they were executed on you, on 18 June, 2019, that there were a number of computers and storage devices found with Word versions of documents, that being quotes and invoices from your companies.---Yeah.

10

Do you recall ever sending him documents via email or giving him USBs where there were documents that he either completed himself or edited? ---Look, I, I personally don't recall specific events on when this happened or when that happened but that would have occurred.

Why do you say "would have occurred"?---Because when I first started, I didn't know how to price any of this.

20 Right. Is your recollection that over the years you did work, that he was, he kept a close eye on the documents that you submitted for the work, that is the quotes and the invoices?---Yeah.

All right. Can I take you then, please, to the invoice for this job and it's volume 18.3 at page 29? Has that now come up for you?---Yeah.

And you'll see, so the document putting your quote in, even though it was described as a Contractor's Offer Small Works, was dated 25 August and now there's an invoice dated 1 September in respect of that work at Galston West. Do you see that?---Yeah.

30

And it's for the amount that was quoted, the 44,100 plus GST?---Okay.

Just pausing there. Do you believe that you created this letterhead or the template invoice for Areva Corp?---I don't recall.

(not transcribable).---I, I don't recall.

40 In any event, you'll see that the bank details that we see recorded there show that the account ending with the numbers 0-0-4-4?---I think I would have, I think I may have done the, that logo but I don't recall because I was using Areva Corp before I started doing this line of work.

Right. Okay. For the energy rectification work?---Yeah.

Okay. All right. Now, did you understand from your dealings with Mr Dubois that once you'd submitted an invoice, that it couldn't be paid until there was what was known as a purchase order that had been created by the RMS?---Yes.

10 And over time, did you learn that there needed to be a purchase order number that would be generated and then you could submit your invoice and be paid?---Yes.

Can I get you to go, please, to volume 18.3, page 33. Sorry, it'll just take a moment. Has that now come up?---Yeah.

And you'll see it's an RTA purchase order document, and it shows, first of all, the date, 15 September, 2011.---Yep.

20 You see that the supplier is Areva.---Yep.

And you'll see that down under the items, there are in fact two. You'll see that there's Galston West with the fabrication, installation, civil and electrical works at the west. But there's also then below that Galston East. ---Yep.

And describing the same work.---Yep.

30 So, and you've confirmed already that you recall doing that, the similar work with the variable message sign installation at each end of the gorge. ---Yep.

And you'll see the price there, so the ex-GST price of the west is the same amount that we just saw before for the invoice, so 44,100 plus GST.---Yep.

And you'll see that for the east it's a bit less, it's 30,700.---Yep.

So that the all-up price after GST is added is, according to this \$82,240, sorry, \$280.---Yep.

And I'm going to suggest that they were the initial jobs that you did for Mr Dubois. That is, the work at Galston Gorge through Areva at each end of the gorge.---Yes.

Now, can I ask you to then go to same volume, 19.3, and just bear in mind that amount for the Galston East. It's \$30,700 plus GST.---Yep.

10 But can you go, please, to volume 19.3, page 89. Oh, sorry, 18.3, my apologies. 18.3, page 89. Do you see that this is again a Contractor's Offer Small Works document from the RTA?---Yep.

You'll see that it actually describes the work again as actually being Galston Gorge West, even though the one I took you to earlier was for the west as well. Do you see that?---Yeah.

Same closing date. 25 August, 2011.---Yep.

And again the contractor's nominated as Areva.---Yep.

20 Now, looking down, do you see with the line items, if you go all the way down to the bottom, there's similar line items but do you see that the manufacture of the structure here is 10,000 whereas the other one was 12,500?---Yep.

And if you go over the page, you'll see that when all of the line items are added up, it comes to 30,700 plus GST, and that's the amount that, according to the purchase order document, relates to Galston East, not Galston West.---Yep.

30 Can I get you then, please, to go ahead to page - - -

THE COMMISSIONER: Just on that, you prepared this document, did you? With the assistance of someone else, 'cause you've - - -?---I, I don't, I don't recall this document, Commissioner. I don't recall it. But it was, I think it was for the first job, yeah, but I would have had, I would have had input into it, Commissioner, but I wouldn't have prepared the entire document, no.

40 And just on the first page we saw a moment ago it's, records Alam, Harry Alam - - -?---Just short for "Alameddine".

Yeah. And that name was inserted to, as a bit of a disguise, I suppose, was it?---Commissioner, a lot of people of ethnic origin adopt a, a more of a, a Christian name in this country. If you, if you kind of intermingle, you would, you, you see that happens quite often.

All right, okay. Yes, Mr Downing.

MR DOWNING: Just before I move on from it I asked you questions about the other document, that is the Contractor's Offer Small Works, that related
10 to the Galston West. With this one, even though it's labelled as Galston West, I'm going to suggest when I take you to the invoice in a moment that this in fact relates to the work at the east end, the one that was only \$30,700 whereas the west end was slightly more expensive work. But just pausing and looking at this, it's the case, isn't it, that in terms of the makeup of the items, again it's likely that Mr Dubois was the person who told you what to put and what to price?---Because this things says Contractor's Offer Small Works, I, I don't think this is something that a company would write up, but I'm not totally sure to be honest with you.

20 I'm going to suggest to you that it was a document that was provided to you by the RTA. But if you skip ahead, please – go to the next page – you'll see that it comes to the total of \$30,700, but if we go to the next page, again it bears a signature, as the other version that I showed you earlier, it's your signature, isn't it?---That's my signature but you're asking me details about a document that was 12 years ago. I don't know why that document is what it is in that set-up because it's not the usual set-up that was utilised.

I understand. This was your first job, but what I'm suggesting that this was completed, I'm suggesting, and lodged on the same day as the offer that was
30 made for the west end, this is 25 August, that was 25 August, 2011, and I'm suggesting that, as you've told us with the document that was submitted for the west, that this one as well would have reflected costings and breakdown that was determined by Mr Dubois rather than something that you came up with. Do you agree or disagree?---Mr Downing, it's 3.37 and I'm, like, I was, you lost my focus, my concentration wasn't there when you asked that question.

That's all right, I'll go back. Do you remember I took you to the first document in respect of Galston Gorge West and I took you to the
40 breakdown of items, do you remember that about 10 minutes ago?---Yeah, yeah, yeah.

And I suggested to you that ultimately it was the first job that you'd done and that you didn't have the capacity to come up with the breakdown and the costings and you agreed with that proposition. Do you remember that?
---Yes.

I suggested to you that the likelihood was that it was Mr Dubois who told you what to put in, that is, how you would describe the work and what the cost would be for each line item, and you agreed with that.---Yes.

10

I'm now suggesting that even though this document is labelled the west as well, I'm actually suggesting that this relates to the east, that is, the east that was \$30,700 and I'm suggesting - - -?---Yes.

- - - that it's likely that it also reflects a description and breakdown of costs that Mr Dubois suggested to you rather than something that you came up with yourself?---Yes.

20 All right The signatures on each of those documents do appear to be electronic signatures, do you agree with that, rather than a handwritten signature?---I couldn't tell you.

Did you know how to add an electronic signature to a document?---I've forgotten how to do it, I think I used to know but I don't know, I'm not sure.

Are you out of practice now?---You guys have had my computer for a couple of years.

30 All right. Well, you may have had other computers, I don't know, but is it the case that you believe back then you knew how to apply an electronic signature?---I'm not sure, I couldn't tell you.

All right. In any event, can I take you ahead, please, same volume 18.3, page 108. Do you recognise this as a 1 September, 2011 Areva invoice for the Galston East work?---Okay.

40 Okay, I take it, it means, yes, you recognise it as that?---It's a document that I don't recall, but because it says Areva and it says the amounts that you're saying, then I would say to you yes.

Do you also see that when one looks at the cost, the 30,700 is the amount that, according to the purchase order document I took you to before, was supposed to be Areva's invoice for Galston East?---Thirty thousand what?

700.---Yep.

And I took you to the purchase order. That was the amount that Galston East was supposed to be billed at.---Yep, yep.

10 Do you see that there's then, it appears, an error in the GST? Instead of 3,070 it's 3,700?---Yeah, I would have done that, Mr Downing, because I suffer from a lack of concentration.

So you think it's your error?---Yeah, well, sometimes I, I've said yes to you to things I, you've, you lost me half the way through your question.

I very much want you to let me know if you have some difficulty in concentrating long enough to answer the question. If you're not remembering it or you're confused, please tell me. Don't just agree for the
20 sake of making it end more quickly.---Okay.

Can I ask you to go ahead, please, to page 111, same volume. Do you see -- I'm sorry, I'll just wait. 111, same volume. So do you see now that the GST, so this is the invoice for the same job, bearing the same date, but now the GST amount has been corrected to the amount 3,070?---Yeah, that's right.

Do you have any recollection of resubmitting the invoice for this or is it too long ago?---I've got no recollection.
30

Okay. Looking at that, that job now, that is Galston East but also Galston West, and accepting from me that they appear to be the first jobs that Areva ever did, does it assist at all in, in you being able to assist us as to whether there was a kickback paid from these jobs?---I don't know if there was, if there was much in that job for him to receive a kickback. I'm not sure. I couldn't tell you if he received a kickback on that job or not.

In fairness, you did say before that you weren't sure that it started with the first job. You thought that it perhaps may have been a bit later that a
40 kickback was paid.---Yeah, I'm not sure. I'm not sure if he got any money out of that job.

Right. Can I then take you, please, back to volume 4.2, page 66.---Mind you, Mr Downing, he didn't take money from every single job. Like, at the end of the day, if there wasn't enough there, he wouldn't take money out of every single job. But he did take from a majority of the works.

In fairness, you did say that earlier, that you believe that it wasn't every job but most jobs that there was a kickback paid.---That's correct.

10 It's 66 – just before we go, though, I just want to ask, just to finish this topic, do you recall when it came to asking for kickbacks whether there was any process of haggling with him about how much might be paid in a particular job?---Look, I don't really remember, okay, but just knowing I've got a, like, just, you know, maybe an assertive personality, I would have, I would have. But I don't recall the process. I don't recall that far back.

Okay. All right. Can I take you then, please, to volume 4.2, page 66? 66. Now, this is a document created by officers within ICAC, but what it shows is a list of all contracts the RMS or RTA have records of where Areva did
20 works. Can you accept that from me?---Yes.

And you'll see starting across the, starting from the left, you'll see there's an index number. So on this page it goes from 1 to 22.---Yes.

And if we go quickly to the next page, 23 to 48. And then to the next page, 49.---Okay.

If we go back to the first page, so it suggests there were 49 jobs that Areva did for the RTA or RMS between September 2011 and, if we go to the last
30 page, May 2013.---Okay.

And if we go back to the first page, you'll see that there's a posting date. I want you to assume that that relates to the posting of the invoice by the RMS.---Yep. Yep.

There's the amount under Invoice, so there's the actual amount involved. ---Yep.

There's a purchase order number and a contract number?---Yeah.

40 There's a brief description then of the works?---Yeah.

There's a record of the payment?---Yeah.

And you'll see that there's details then of the account name into which the payment was made, the bank account details and the amount that was paid?
---Yes.

10 So you'll see, for instance, that with the first four jobs, that they involved sums of money, so 33,770, 48,510. And you'll see that that's Galston East and Galston West?---Yeah.

You'll see that there's then some further jobs involving TIRTLs, point-to-point, P2P TIRTLs. And just pausing there, you know, P2P stands for point-to-point?---Yes.

The type of camera system that the RTA operated?---Yeah.

20 Do you remember what TIRTL, T-I-R-T-L, stands for?---I don't know what it stands for. I know what it is.

Well, I'm going to suggest it stands for The Infra-Red Traffic Logger. What do you understand that it was or is?---Yeah, The Infra-Red Traffic Logger but what does the first, so that, what's the first T stand for?

The - - -?---The, okay.

- - - Infra-Red Traffic Logger.---Okay. There you go.

30 But it's basically an infrared system of tracking vehicle movements, isn't it?---Yes.

So you'll see that the next item relates to point-to-point TIRTL civil works for Yass, north and south, Picton Road and Bredbo?---Yes.

And you'll see the next item is again the same job, so it looks like it might have been divided up into two parts?---Yeah.

40 But do you see, for instance, that when one looks at the first payment, it seems to be made on 10 October, 2011, so that's item 5?---Yeah.

And it's an amount of \$82,280?---Yeah.

And what I'm going to suggest is that that represented payments across a couple of jobs, so not just the payment for one job, but there were times when you would receive an EFT from the RMS which related to more than one job. Does that sound correct to you?---I don't recall.

And I'm going to suggest that that related to the payment for the two jobs that you did at Galston Gorge, when you added them up, that is the first two jobs with GST added, that the amount you get - - -?---Mr Downing, Mr
10 Downing, you lost me five minutes ago.

That's all right. The first two items you see, Galston East and Galston West, do you see are 33,770 and 48,510?---Yeah.

And I'm going to suggest that when you add those two together, what you get is the amount that corresponds to that first payment, \$82,280, which is made on - - -?---Yeah.

- - - 11 October.---Okay.
20

Now, I want you to just read down through this page for me, please, and just see if these jobs seem familiar to you. They're only brief descriptions but if you look at the various descriptions there - - -?---I'm not going to remember them, but I'm going through them now and they, they seem about right.

So have you had a chance to look down to the end of that page?---Yeah.

You do recall doing TIRTL installation works at a number of point-to-point sites, for instance?---Yeah, yeah, yeah, yeah.
30

And if we go down to the bottom of the page, do you remember looking at item 21, do you remember that it seems that, well, 20 and 21, they seem to be bigger jobs - - -?---Yeah, yeah.

- - - they're 197,450, 197,450?---Yeah, yeah, yeah.

That's STC gantry rectification works - - -?---Yeah.

- - - at Coonabarabran?---Yeah, no, they, they all, that seems, that seems
40 correct. It all seems correct.

You remember going to Coonabarabran and doing the work?---Yeah. Yeah. Yeah.

And STC stands for - - -?---Yeah.

- - - the Safe-T-Cam system, isn't it?---Yeah, yeah. No, that, that, what, what I've read is correct on that document.

And you also recall going to Nyngan and doing a job there?---Yeah.

10

And it's correct, isn't it, that Nyngan involved multiple different elements making up the work?---Yeah.

Right. Go over the page. I want you to again just have a look down from 23 to 48. You'll see again there's reference to multiple jobs, for instance, the first five or six all seem to be referring to point-to-point and TIRTL jobs at different locations.---Yeah, yeah, yeah. Yes, no, they, that, that, that, that document does seem correct, yes.

20 Then if you look down at item number 31, it actually looks like, you'll see the date, September 2012, but it's actually a further job at Galston Gorge removing and relocating an existing TIRTL cabinet?---Yeah.

Then you'll see that there's some jobs. Is it number 35, "ORE signage rollout, Marulan, Twelve Mile Creek and Jones Island"?---Okay.

And do you remember ORE, I'm not quite sure what that acronym is, but it was over-sized vehicle signage that you installed at multiple locations. ---Yeah.

30

And it's the case, isn't it, that you ended up becoming, that that area – that is signage related to over-height vehicles – was again a niche area where you ended up doing quite a bit of work?---Yeah.

And if you go right down the bottom of the page, you'll see item 48 is TIRTL works at Picton Road East and West, Urunga, Woodburn, Mount Ousley.---Yep.

40

You remember doing those jobs?---I, I, the areas they, they do ring a bell.

All right. And then the last one, if we go to the next page, bearing in mind this is Areva, so you see this is a job where the invoice is posted 23 May, and it's for works – I'm sorry, that's a payment, it seems, in relation to earlier works. But you'll see it's a payment that date of \$73,700?---Yeah.

And if you go back to the page before, it seems that it's likely to relate to perhaps part of the payment in relation to those late jobs, the TIRTL works. ---Yep, yep. Yep, okay.

10 Now, looking at that schedule, and if we go back, please, to the first of the pages, so back to the – yep, thank you. Doing your best now, acknowledging that we start with Galston Gorge East and West, at what point do you think it's likely that you get first asked to make some payment of a management fee to Mr Dubois?---I'm not sure but maybe shortly after.

After the Galston Gorge?---Yeah. I don't know when but payments began after that, I think.

Okay. And then - - -?---Just, just off memory.

20

Okay. And you then made them on most jobs that Areva did through to the end of its tenure as a contractor for the RMS?---I would say 80 per cent of work.

30

Okay. Now, I want you to try and just assist me in terms of the mechanics of how the sum would be arrived at when it came to a particular job. So can I just go through an example? And I just want you to think of – this doesn't need to be one particular job you're telling me about. But I want to know whether there was a pattern in the way in which Mr Dubois would go about raising with you the payment of the management fee and coming up with what it would be. So do you recall there was a pattern or a modus operandi on his part in how he would talk to you about that topic?---Like, you mean to quote the work?

40

Well, let's have a theoretical job. Just theoretically say it's a job at Mount White that he rings you about. Is the way in which you would first learn of a job is he would contact you or you'd see him, perhaps, around and he'd say, "Look, there's a job coming up at Mount White"? And you realise I'm just using that as an example, but is that how a first mention of the job would be made? He would just let you know that there's a job coming up at this location?---I did, I did structural steel and I did signage. So if there was

anything that was to be fabricated or to be erected in terms of signage, I would do that.

Right. But in terms of how you would first learn, I mean, would you literally just get an email asking you to submit a quote or would he speak to you? What would normally happen first to let you know that there was a potential job on the horizon?---You're talking about a period of 10 years. Sometimes it was discussed verbally and sometimes just, I'd just receive an email.

10

Right, okay, so both of those things happened from time to time?---Yeah.

All right. And was the thing that you were asked to do, was it typically just submit a quote?---That's correct.

And did you from time to time receive, via email, a document known as an RFQ, or a request for quote?---Yeah.

20 And there might be documents attached to it showing you some description or schematic plans of what was involved?---The scope. The scope of the works that are required.

And was it the case that you would then, you would put together your quote?---Yeah.

And in doing so, would you try and work out all of the actual costs that were going to be involved? So things like transport, accommodation, labour, plant hire, fabrication costs, all of those things that would be making up the job?---Yeah.

30

Would you include in your calculations any profit margin for you, that is for Areva? Or was it literally just the bare bones of what the real costs were? ---It was bare bones.

So no element of profit margin for you at all?---Zero.

All right. Would you then send it through to him as a document or would you call him and tell him, "This is what I've added up and what it comes to"?---I don't really recall but mostly I think it'd be a face-to-face thing.

40

Right. And would he then speak to you about some process of perhaps adjusting or changing what you were proposing to include?---Yeah.

So just say, theoretically, again, you say, look, for this job coming up at Mount White, that you want the steel structure installed, I've done all the costings and the, you know, the no mucking around figure is \$45,000, that's the bare bones costs. What would then typically happen when you spoke to Mr Dubois and told him that?---Is your question, are you asking me, like, who set up the actual price to be invoiced, is that, what, to be, to be quoted, the, the final price?

Well, yeah.---Is that what you're asking?

Yeah. So - - -?---Is that your, is that - - -

- - - you've verbally come up with a price and you've discussed it with him and told him the elements that make up your bare bones cost. Before an invoice actually – I withdraw that. Before a quote actually gets submitted in writing, do you have some discussion with him about what will be included in the written quote?---He would be, yeah, I, well, there'd be, a lot of the work was semi-repetitive, so I'd set up the, the quote and then he would be nominating the final figure.

Right. And when you say “nominating the final figure”, just say, for instance, your bare bones costings for this job at Mount White was 45, that just covers all of the costs and materials. When you say “the final figure”, would he come back with a figure which was higher than your bare bones figures?---Well, of course.

Right. And did that involve, then, what the profit was that was to be divided up between you and him?---I assumed that he would be comparing like for like somewhere and then he would be coming back with a price, but I don't know, I just, I never questioned him because I don't, like I said to you, Mr Downing, every company has a set amount of money, a fixed overhead cost that they need to cover before they start making money. So when you've got drivers, when you've got vehicles, fleet, when you've got machinery, when you've got facility, like a, a, a warehouse or a yard or something, so a lot of companies would have overheads of a \$1 million plus before they start making any money as a company. But the difference in our case where you may look at a figure and say, you know, that's a large figure, it's because the overheads is virtually, virtually nothing. The, the, the overheads are

variable overhead costs rather than fixed overhead costs, hence your, if you have to employ people, then that's a variable overhead cost and you're paying more money but when you don't need them, you're not paying them.

But, say, by comparison between Areva and, say, Downer, you know who Downer is, don't you, one of the big engineering concerns internationally?
---Yeah.

10 You'd have miniscule to nil overheads, because you're operating out of your backyard?---Exactly right. That's exactly right because we don't have that, like, there's no secretary, there's no middle management, there's no supervisors, there's none of that. What we're doing is - - -

Well, there's, I mean, in reality is there's no anything other than you project managing subcontracted work.---Exactly right or when it, and, and, and being part of the actual, you know, like, making sure I'm hands-on.

20 Yeah. Sure. So when you would go to him and tell him, using my theoretical example "my bare bones price is 45,000" would he come back and say something like, and again, this is just theoretical, "All right, I want you to charge \$70,000"?---Yeah.

And you've told us that the split, as you recall, and this didn't really vary, was that it would then be split half/half between you and him?---Yeah.

So, to use my theoretical example, if you said it was 45 bare bones and he said 70, then that's - - -?---Yeah.

30 - - - a difference of 25, so you'd be taking twelve and a half thousand each out of it?---Yeah. Yeah.

And that was the pattern that was then repeated again and again and again with the jobs that Areva did. Correct?---Correct.

And, indeed, the jobs that Seina then did and the jobs at EPMD then did?
---That's correct.

Right. Is that a convenient time, Commissioner?

THE COMMISSIONER: Yes. Well, we'll resume the hearing tomorrow at 10 o'clock. So, Mr Alameddine, if you'd be ready to commence at 10 o'clock tomorrow morning.---Yes.

Thank you. Well, I'll adjourn.---Thank you.

THE WITNESS STOOD DOWN **[4.00pm]**

10

AT 4.00PM THE MATTER WAS ADJOURNED ACCORDINGLY
[4.00pm]