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INDEPENDENT COMMISSION AGAINST CORRUPTION

THE HONOURABLE PETER M. HALL QC
CHIEF COMMISSIONER

PUBLIC HEARING

OPERATION PARAGON

Reference: Operation E18/0736

TRANSCRIPT OF PROCEEDINGS

AT SYDNEY

ON TUESDAY 25 MAY, 2021

AT 2.00PM

Any person who publishes any part of this transcript in any way and to any person contrary to a Commission direction against publication commits an offence against section 112(2) of the Independent Commission Against Corruption Act 1988.

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

THE COMMISSIONER: You're still on the oath you took this morning.
---Yes, sir.

Yes, Mr Downing.

10 MR DOWNING: Thank you, Commissioner. Mr Alexander, it's the case, isn't it, that over the luncheon adjournment you took two documents provided to you and reviewed them?---Yes, sir.

And it's correct, isn't it, that one of them is a document headed Schedule of Evidence, Alexander Contribution to Steyn?---Yes, sir.

And that listed various items that were recorded by date, by description and a sum of money that reflected payments to or on behalf of the, or Mr Steyn?
---Yes, sir.

20 And is it the case that you have gone through and highlighted in blue items that you recognise as items that you ultimately organised to be paid?---Yes, sir.

I'll have that document brought up, please. And is that the document that you received and physically marked with blue highlighter?---Yes, sir.

So if we go through to the next page?---Yes, sir.

30 And the next?---Yes, sir.

For instance, there, there's no marking of The Good Guys, so I take it where you haven't marked something it's where you just don't recognise it?---I don't, yeah.

But you're not suggesting where there is a record of payment that it wasn't paid, you're saying, aren't you, through the markings you've made, that they are items that you confirm that you recognise as having been paid?
---That I recognise, yes, sir.

40 I won't go to the end of the document, it's 12 pages, but you went through the entirety, that is you went through the entire 12 pages and marked up as best you could everything you recognise as having been paid either by you or by direction to Sandy to pay?---Yes, sir.

I tender that document in its electronic form, Commissioner, consistent with the COVID requirements.

THE COMMISSIONER: Yes. The Schedule of Evidence Alexander Contributions to Steyn, 12 pages, with blue markings made by Mr Alexander will be admitted and become Exhibit 168.

#EXH-168 – SCHEDULE EVIDENCE ALEXANDER CONTRIBUTIONS

10 MR DOWNING: Thank you. Now, you received a second document which was a document headed Schedule of RMS Payments to AA Steel Pty Ltd.---Yes, sir.

And I'll just have that brought up on the screen as well, if we could. And you'll see that this was a document of eight pages.---Yes, sir.

And it set out, I take it from your review you satisfied yourself dates of payments – I withdraw that – posting dates, invoice dates, sums and purchase order number as well as the description of works in most
20 instances?---Yes, sir.

And also a record of the amount of the payment and the record of the account it went into.---Yes, sir.

And I take it that you went through that document and as best as you could, tried to identify those where you recognised a particular invoice as being one where there had been some bumping up of the quote by Mr Steyn.
---Yes, sir.

30 And if we could go, please, to the second page, you'll see there items 34 and 48. I take it the question mark that you've put there in blue is an indication that it's possible but you're not sure?---Not sure, yeah.

And similarly if we go to the next page - - -?---Yes, sir.

- - - you'll see items 52 and 64. I take it they fall into the same category?
---Yes, sir.

40 If we go to the next page, please, you'll see there are a number of items there with purchase order numbers where you've highlighted those in blue but there is also still a question mark?---Yes, sir.

What does that denote, where there is a marking of the purchase order number and a question mark?---The majority of them have got the same purchase order number there.

Right. But are you indicating that you believe these are – I withdraw that. Is your query there about the purchase order number or is it something else

that you're querying?---Oh, well, they've all got the same sort of purchase order number so we (not transcribable) could be, couldn't be.

Is it the case that the question mark again indicates that it could be - - -?
---Could be.

- - - one of the matters, one of the jobs where there was an increase in the quote, but you are not able to say now?---Yes, sir.

10 All right. And then I take it we should interpret your markings on the next page.---Yes, sir.

Go down to item 108 in the same way, and indeed through the entirety of the document.---Yes, sir.

So is it the case that you can't be 100 per cent certain there that any item reflects an invoice where there was a bump up, but you believe that it may have been?---Yes, sir.

20 Subject to reviewing the actual quotes and invoices more carefully?---Yes, sir.

And I took you through some of those earlier today.---Yes, sir.

I tender that document, Commissioner.

30 THE COMMISSIONER: The schedule entitled Schedule of RMS Payments to AA Steel, 12 pages, sorry, eight pages with blue markings, blue question marks inserted by Mr Alexander will become Exhibit 169.

#EXH-169 – SCHEDULE OF RMS PAYMENTS TO AA STEEL PTY LTD WITH BLUE MARKINGS AND BLUE QUESTION MARKS

40 MR DOWNING: Thank you, Commissioner. Now, to move to a different topic, Mr Alexander. I've taken you through some of the records for different jobs that you worked on.---Yes, sir.

And you've also confirmed that the work that you did for the RMS included, as part of it, doing a number of jobs where there was steel structures that would be fabricated.---Yes, sir.

Now, in the course of the works I also took you to some bills that related to doing maintenance, vegetarian clearing, line-marking et cetera.---Yes, sir.

And can I just take you to one example of that, please. If we could we go, please, to volume 11.2A, page 289. Now, first of all you recognise that as an invoice from 3 March, 2016, relating to vegetation control at various sites?---Yes, sir.

And if we could move ahead, please, to page – well first of all, I’m sorry – to page 290, you will see that you’ve attached various photos showing the work that was done.---Yes, sir.

10 If you go ahead, please, to page 302. You’ll see that there are photos there which seems that you have marked as Eumungerie.---Yes, sir.

Do you see that?---Yes.

And do you recognise that as one of the gantry structures that was located around the state on which camera systems were located?---Yes, sir.

20 And if you go over, please, to page 303, you’ll see similar photographs but this time a gantry structure in Gilgandra.---Yes, sir.

Now, looking at those gantry structures, was AA Steel capable of doing the fabrication of the entire steel structure?---Yes.

That is both the vertical and the horizontal?---Yes, sir.

Did in fact you ever get a job where you fabricated the entire structure?
---No, sir.

30 So that was, that was never done as part of any job?---No.

If I could take you to a different document, please. If we could go to volume, same volume, 11.2A, to page 70. This is an invoice dated 9 March, 2015, and one of the items that it refers to, and I actually took you to this earlier in your evidence today, is item 1, “Fabricate and installation of handrail.”---Yes, sir.

40 And if you go back, please, to page 63, you will see that the description in the quote, and it’s a 19 February, 2015 quote, item 1 is, “Additional safety rail for Mount Victoria at 1.2 metre height.”---Yes, sir.

And you’ll see that’s the same item that’s referred to in the bill, that is \$9,800 for a fabrication and installation of handrail?---Yes, sir.

Just pausing there. Can you recall what it was that the handrail was for that you had galvanised and installed?---This one was both, both sides of the rail, of, of the road, we installed handrails around the, the cameras.

So it's railing around the edge of the road, is it?---Edge of the road and around the cameras so that people don't fall off.

And it's the case, isn't it, that there were a number of jobs you did which involved putting in safety rails at that time?---Yes, sir.

But again, it's not actually the creation, that is doing steel work to create the gantry structure itself?---No. We never - - -

- 10 Thank you. Now, I want to take you to a different subject matter now and that is a car that was acquired in late 2018. Now, do you recall in late 2018 Craig Steyn approaching you and asking you about whether it might be possible to put a car in your name or your wife's name?---Yes, sir.

And what can you recall of that discussion? Tell us what you can recall in terms of what he said and what you said.---First he wanted to put it in the company's name and I said, "No, I've got too many cars in the company's name."

- 20 So he approached you about a car?---Yes. That he is, that he is getting car.

Did he indicate what sort of car it was?---A Mercedes.

And did he indicate who the car was for?---I think for himself.

Did he say anything as to how the car purchase was going to be funded?
---No.

- 30 So, best you can recall, what, he came and asked whether this car that was going to be acquired could be put into your company name?---Yes. And I said no, I can't because of the - - -

Did he then make another request?---Yes, to put it in my wife's name.

And did he explain why he wanted it to be in either your company name or your wife's name?---No, I can't recall.

Did you ask - - -?---I never asked any questions.

- 40 Well, I mean, this is the first such request you'd had from him about, in this instance, the car that was going to be acquired for him, it seemed, but not put in his name but put in your company's name or your wife's name?
---Yeah, I never asked too many questions.

Did you have some concern about what might be involved in this?---First thing I asked him, is it paid for in cash? Is it paid for in full? He said yes.

And so is it the case that you agreed to it being put in your wife's name?
---Yep.

And did you speak to your wife about that?---No.

All right. Did he give you any more detail about the type of car it was and what it was going to cost?---No. Said it was a, it was a Mercedes.

10 THE COMMISSIONER: Just pausing for a moment. You said that you didn't know why he wanted the car put in your wife's name.---No, sir.

But when you were thinking through whether to go ahead with this proposition, you no doubt had your suspicion as to why he didn't want it in his name.---I had my suspicion, sir.

What was your suspicion?---Well, he's been doing a lot of shady things, sir.

20 You couldn't think of any other reason than that for him wanting to disguise - - -?---Not at that time.

- - - the true ownership or registration details of the car?---Not at that time, sir.

No. Right.

MR DOWNING: Did he say anything to you as to where the car was to be sourced from?---No.

30 Did you then, after that discussion, have some further contact from Mr Steyn about perhaps going to a dealership?---Yes.

And as best you can recall, how much later than that initial discussion was it when he contacted you about going to the dealership?---I think we were having our Christmas party in the workshop.

All right. Well - - -?---And he came to the shop.

40 Without a phone call? Like, literally unannounced or - - -?---I don't think so he phoned, don't recall.

But you believe you were in your workshop.---We were in our workshop having our Christmas party.

And what did he ask you to do then?---He says the car's in Alexandria and we take Sandy and we'll get the, pick up this car. I said the wife - - -

So was he actually at the Christmas party or - - -?---No, he, he rocked up there.

So he indicated to you that you needed to go to the dealership in Alexandria.---Yes.

And that your wife would need to come as well.---Yes.

Did you at that point speak to your wife?---Yes.

10 Presumably you had to then explain to her why it was she was going to Alexandria.---I said you've got to pick up a car there. There's a car.

Did you explain to her that the car was to be not just picked up but to be bought in her name?---Yes.

And can you recall what her response to that was?---"Oh, you bought another car."

20 But did you explain to her that, by contrast to other cars, this wasn't actually one that was for her or for you?---No, I never explained that to her.

So did you then travel to Alexandria?---Went home first, picked up my wife, and then we went to Alexandria.

So did you drive, the three of you?---I think I did.

30 And if you could go, please, to volume 20.1, page 25. You'll see that that's a record for Mercedes-Benz Sydney in Alexandria, showing a customer entering into a contract for the purchase of a diamond-white C63 AMG Sedan on 21 December, 2018.---Yes, sir.

And you'll see, I take it, that that's your wife's signature at the bottom. ---Yes.

And did you find out at the time of your wife signing this that the purchase price was \$124,000?---I saw that then.

40 Did you make any enquiry of Mr Steyn then as to where the money was coming from and whether it had in fact already been paid?---As soon as I saw the total purchase price and that was paid, I said put it in her name.

Sorry, put it - - -?---Put it in my wife's name. It's just in the, well, it was in her name already.

THE COMMISSIONER: As soon as you saw what?---Paid in full, the purchase price paid in full.

MR DOWNING: So that was as far as your enquiry went at the time?---Yes, sir.

If you go, please, to same volume, 20.1, page 48. Do you recognise that as the car?---Same car, sir.

And your wife sitting down at the desk at - - -?---Yes, sir.

- - - the dealership about to sign it.---(No Audible Reply)

Correct?---Yes, sir.

10

And is that Craig standing up in the orange shirt?---No, that's me.

Oh, I'm sorry, I apologise. The head was cut off so I couldn't quite see. That's you.---That's me, sir.

Thank you. Did Craig take some photos?---Yes, sir.

All right. Go to the next page, please, page 49. And do you recall that was a photo taken of your wife next to the car at the time?---Yes, sir.

20

Now, after it was purchased that day, and that is your wife signed the contract, who drove it out of there?---I think the salesman drove it out and then Craig drove it from there.

And did he take it to his home?---Yes, sir.

All right.---No, we went to the workshop first.

So back to where you - - -?---To my workshop, yeah.

30

Was that to resume a Christmas party?---Yes.

And did Craig then depart from the workshop and take it with him?---No, I think the car stayed there.

Are you sure he didn't take it home with him?---Can't recall, because he had his ute there too.

40 Is your recollection that either on that day or shortly afterwards that he took the car with him?---Went home, yeah.

And do you recall that you then saw him from time to time using it? ---A couple of times, yeah.

And do you recall doing one trip just before Christmas in 2018 up to the Central Coast where he and Aleesha came up in that car?---Yes.

And do you have a recollection that at some point Mr Steyn came back to you and spoke to you about the car?---In what manner, sir?

Well, at some point did he bring it to your house?---I think after he got raided.

In terms of dates, do you mean by raided being the time when the search warrant was executed at his house?---Search warrant, yes, sir. I think before that.

10

Do you recall him saying anything about why he was bringing the car to you?---Ah, not really. I think he said he didn't want it.

Did he say anything at the time about perhaps being aware of some investigation into either his conduct or someone else's conduct at the RTA? ---I think he did say, mention something like that, he did.

And do you recall whose conduct it was that he indicated that there had been some investigation into?---No, I can't recall, sir.

20

Did he make any reference for instance to Mr Dubois?---I think he said, "Alex is in trouble," but I, I, I'll be lying if I tell you.

Could it be – and you may or may not recall, but tell me if you can – that he said anything about perhaps there being an investigation into his supervisor, a Mr Soliman?---He had a supervisor.

He did, at the RTA.---Don't know him.

30 You don't recall any mention of him?---No.

But your recollection is that he said something at the time of bringing the car to you about some concern about an investigation?---Yes, sir.

And did he leave the car and the keys with you?---It was left there the Sunday morning. We woke up, the car was left in the driveway and the keys were in the letterbox.

40

And what then happened to the car?---I sold it.

And what happened to the funds?---Put it in my banking account.

So you retained the funds?---Yes, sir.

And have they ever been – I withdraw that. Do you recall how much you sold it for?---100,000.

THE COMMISSIONER: Sorry, how much?---100,000, sir.

And that went into which account?---My account.

Personal account?---Personal banking account.

And what happened to the moneys?---I used it to buy other cars and I've got some still in my account.

10 Over time the money was used by you - - -?---By me, sir.

- - - for general expenses and so on?---General expenses, buying and selling other cars.

And over time was there some accounting for that money between you and Steyn?---No, sir. The car was in my wife's name.

Huh?---The car was in my wife's name so I sold it.

20 MR DOWNING: Did Mr Steyn ever ask you about returning the funds to him or perhaps paying them on to anyone else?---Never said a thing.

As best you can recall, when did you sell the car?---Maybe a year ago.

So it sat at your house for some time?---Yeah, I used to drive it. I drove it, yeah.

Oh, so you did use it in the interim?---I, I used it.

30 So if you accept from me that the search warrant on Mr Steyn was executed in June 2019, is your best estimate that you sold it about a year ago? So mid-2020?---2020, about that, yeah. About, yeah, easy, easy a year. I'm sure about a year.

And what's your best recollection as to how long you used it for after Mr Steyn left it in the driveway?---I used it for quite some time.

40 Now, do you recall that at some point in 2019 Mr Steyn came and had a conversation with you about what you might say if you were ever asked questions about the payments that had been made to or on his behalf?---Yes, sir.

As best you can recall, is that at a time after you had learnt that he had been raided, as you've used the term?---Yes, sir.

What's the best recollection as to where you were and what he said?---Oh, I don't know where we were, but he said if they ever ask me, I'm going to say that I bought it from one of the boys. What's his name?

THE COMMISSIONER: Sorry, just get that again. If it was put that if - - -
?---If they ask me where did you get, who did you buy the car from, I'm
supposed to have said that I bought it from one of the, the boys, ah, not
Harry - - -

MR DOWNING: Baz or Hoody?---Baz, Baz.

So he told you something that you should say if you were ever asked about
the car and where you got it from?---Yes, sir. Yes, sir.

10

Did he also say something to you at the time about what you should say if
you were ever asked about the various payments you'd made to him or on
his behalf?---As a loan.

Well, sorry - - -?---As a loan.

He told you that you should say that?---Yeah. Yes, sir.

20

Did he say anything else to you as to what you might say if you were ever
asked questions about either the contracts that AA Steel had received from
the RMS or the payments that had been made to or on his behalf?---No, I
can't recall. No.

THE COMMISSIONER: So you don't remember where you were when
you had this conversation with him or do you?---Must be in the workshop,
sir, as he used to come - - -

30

I'm sorry?---Must be in my workshop. He used to come constantly to my
workshop.

So probably in your workshop?---Could be.

And in relation to the payments and questions of loaning, can you say, as
best you can, exactly what he said?---Payments of what, sir?

Hmm?---Payments of what?

40

You said before he said to say, in relation to payments, that they were just a
loan.---A loan, yeah.

How did he put it? How did he express that? What did he say?---Just, just
like that. He said whatever was paid, you know, it's a loan. I'll pay you
back.

So he was saying that if you're investigated, you are to say that? Is that it?
---Yes, sir.

The payments of any kind were by way of a loan?---Yes, sir.

And how did you respond to that?---I just said yes.

And have you since then acted as he asked you to?---In which way, sir?

Well, I'll leave it to you, Mr Downing. You're coming to that, I think.

10 MR DOWNING: Just on that topic of the suggestion by Mr Steyn that you should say it was a loan, that was the first time he'd ever made any suggestion to you that any of the moneys he'd given to you or paid on your behalf - - -?---Yes, sir.

I'm sorry. I withdraw that. That's the first suggestion that he'd ever made that of any of the moneys you'd given to him or paid on his behalf that he was intending to repay them?---Repay, yeah, when he sold that house.

That was the first time he ever suggested that?---No, that's the first time.

20 Sorry, just I think I'm confusing you with my questions.---Sorry.

I apologise. The time when he spoke to you after he'd been raided and suggested what you would say if you were ever asked questions, that was the first mention that he'd ever made of any idea that the moneys that you had paid to him or paid on his behalf should be treated as a loan?---As a loan, yes, sir.

THE COMMISSIONER: Just to interrupt again, when approximately was that conversation?---No idea, sir.

30 Well, you'll have to do better than that. We'll have to start with at least the year and then work backwards to get more precise. You know the search warrants were executed in June 2019.---Well, then it must have been - - -

Was it before or after that event?---I think before.

Before the search warrants were executed?---Before, I think so. Yes, sir.

So it was before June 2019?---Could be.

40 Was there something that you can recall that would seem to have prompted this conversation, something that had happened or you feared was about to happen?---I think he said Alex, Alex got, well a search warrant.

So, a search warrant had been, you understood, been executed on Alex Dubois?---Alex he said, yeah.

Now, the conversation just referred to a moment ago, that is to say when he said to say any payments made were paid by way of a loan - - -?---Yes, sir.

- - - to you. In relation to the time the search warrant you heard had been executed on Dubois' premises.---Premises.

Was it before or after that event that he said those words to you, to say it was a loan?---I can't recall. Could be before.

And how long before? Are you talking weeks, months, days, years, what?
---Oh, I wasn't interested because I, because I was too busy.

10

You must have some idea. Was it the same year that the search warrants were executed, 2019?---Could have been, sir.

When you say it could have been, well, what on the probabilities is your recollection as to when the conversation took place?---I wouldn't know, sir. if I tell you a day I would be lying.

20

Did you discuss it with your wife that he had propositioned you, that is to say he proposed to you that should you be asked any questions about it, you were to say the payments had been made by way of a loan from him? Do you remember discussing that with your wife?---I think I must have told her that.

Well, does it help you to recollect approximately when the conversation took place?---No, sir. I work every day of my life, sir.

All right.

30

MR DOWNING: Was it only you and Mr Steyn present when he spoke to you about this topic of what you might say if you were asked questions?
---Yes, sir.

And you've described an event where he drops the car off, where you understood, from a discussion with him that something had happened that was making him concerned about an investigation.---Yes.

40

And you've also indicated now that when it came to this discussion about what you might say, you understood from him that he had some concern about an investigation?---Yes.

You say that, as best you can recall, you thought that something, Alex had been raided or something of that nature at the time?---Something like that, yeah.

Could it be that he said to you that he had received a summons to give evidence in a particular ICAC investigation?---No, he didn't, he never said anything like that. He never mentioned that.

But he said something about an investigation?---Yes.

Do you know whether Mr Steyn spoke directly to your wife about what she might say in the event that she was asked - - -?---No idea, sir.

She never reported to you that Mr Steyn had approached her and asked her to say certain things?---No, sir.

10 Commissioner, the next matter I want to raise with Mr Alexander relates to evidence he gave in his compulsory examination, and in order for me to put the questions it will require that there be some alteration to the existing order that was made under section 112.

THE COMMISSIONER: In preparation for that, and I was aware that you would be raising this matter, I have in fact made a variation to the original section 112 direction. Do you have that available?

20 MR DOWNING: I do. Or I can have it made available. And I can indicate first of all that Mr Alexander gave evidence in compulsory examination on the afternoon of 20 August, 2020, and then on the second occasion, on 13 October, 2020. So it's those two dates but only his evidence that I am seeking the variation in respect of.

THE COMMISSIONER: Yes.

MR DOWNING: Mr Ishak is just locating the form of order. We're going to put it on the screen so that it's available to all in the Commission.

30 THE COMMISSIONER: Yes, very well. I confirm the making of the variation to the section 112 direction as applicable to the compulsory examinations conducted by the Commission on 20 August, 2020, 13 October, 2020, being compulsory examinations involving the witness, Mr Alexander. Accordingly, in accordance with the terms of the variation, the original direction is varied so as to permit the transcript of the evidence given in those compulsory examinations to be made available by way of upload to the restricted website for Operation Paragon for the purposes of examination to the parties with leave to appear and be represented in the public inquiry, but not otherwise to publish or communicate the evidence.

40

VARIATION OF SUPPRESSION ORDER: I CONFIRM THE MAKING OF THE VARIATION TO THE SECTION 112 DIRECTION AS APPLICABLE TO THE COMPULSORY EXAMINATIONS CONDUCTED BY THE COMMISSION ON 20 AUGUST, 2020, 13 OCTOBER, 2020, THE COMPULSORY EXAMINATIONS INVOLVING THE WITNESS, MR ALEXANDER. ACCORDINGLY, IN ACCORDANCE WITH THE TERMS OF THE VARIATION, THE ORIGINAL DIRECTION IS VARIED SO AS TO

PERMIT THE TRANSCRIPT OF THE EVIDENCE GIVEN IN THOSE COMPULSORY EXAMINATIONS TO BE MADE AVAILABLE BY WAY OF UPLOAD TO THE RESTRICTED WEBSITE FOR OPERATION PARAGON FOR THE PURPOSES OF EXAMINATION TO THE PARTIES WITH LEAVE TO APPEAR AND BE REPRESENTED IN THE PUBLIC INQUIRY, BUT NOT OTHERWISE TO PUBLISH OR COMMUNICATE THE EVIDENCE.

10 THE COMMISSIONER: Yes, thank you, Mr Downing.

MR DOWNING: Thank you, Commissioner. Now, Mr Alexander, it's the case, isn't it, that after Mr Steyn asked you to give a certain version of events about, first of all, the car and what you might say if you were asked about the car, and you came to the Commission and gave evidence in a compulsory examination, you did what he asked?---Yes, sir.

And that is that you indicated that it had been bought from Baz.---Baz, yes, sir.

20

And also you gave further evidence, consistent with what Mr Steyn had asked you to do, about the nature of the payments that you'd made to him or on his behalf.---Yes, sir.

That is that you said that wherever there had been payments made, that they were made in the form of a loan with the understanding that when the house was completed, it would be sold and you'd be repaid.---Yes, sir.

30 Do you also recall that you gave some evidence, in answer to questions about whether you ever gave him sums of money, and you denied that you'd ever given him sums of money?---Yes, sir.

Now, did he ask you about giving that evidence or was that something you just decided to say at the time?---No, just decided to say that at the time, sir.

But as you've indicated today, you in fact had given him cash on a number of occasions?---I'd given him cash, yes, sir.

40 Was there any reason other than that Mr Steyn had asked you to give that evidence about the car and the payments made to or on his behalf for you giving evidence in the compulsory examination that wasn't truthful?---Yes, sir.

Sorry, was there any other reason besides that Mr Steyn had asked you? ---Mr Steyn had asked me.

THE COMMISSIONER: When you say he asked you, is that the same conversation you spoke about a few minutes ago when you said he, possibly

at your workshop, said to say that any payments were made by way of a loan?---Yes, sir.

It's the same conversation.---Same conversation. Same.

So it was pursuant, it was following that conversation, some time later, that the compulsory examinations were conducted with you.---Yes, sir.

10 And you decided to give those accounts knowing they were false but at the request of Mr Steyn?---Yes, sir.

Is that right?---Yes, sir.

MR DOWNING: Just one final matter, subject to just conferring with Mr Ishak, but with the car, you've told us that when Mr Steyn spoke to you about that, as to what you would say, that you were to say that you'd bought it from Baz?---Baz, yes.

20 Did you have any further conversation with Mr Steyn then about whether in fact Baz had put up the money for the car?---No, nothing at all.

So even then there was no discussion about who the actual source of the funds for the car was?---Nothing at all, sir.

Thank you, Commissioner. They're the matters that I had for Mr Alexander, so subject to whether there's any other interested party that has - -

30 THE COMMISSIONER: Yes. Just one other matter. Mr Alexander, you said you gave false evidence which has just been referred to, because Mr Steyn asked you - - ?---Yes, sir.

- - - to give that false account. Is that right?---Yes, sir.

Do I take it that you were also motivated by a desire to protect yourself? ---I don't know what to say there, sir.

I'm sorry?---I don't know what to say there, sir.

40 What I'm saying is that were you induced to give false evidence because you were fearful of the consequences to you for having been involved in these dealings with Mr Steyn?---Yes, sir.

You have now given extensive evidence as to the transactions that you entered into with Mr Steyn.---Yes, sir.

And do you say on your oath that the evidence you've given in this public inquiry is the truth?---Is the truth, sir.

And looking back now at the evidence that you did give in the compulsory examinations which was not the truth, how do you feel about having given false evidence?---I feel bad. I feel ashamed that I done that.

Yes, thank you, Mr Alexander. Now, is there any application to cross-examine Mr Alexander? I take silence as being an indication there's no application. Very well. Now, it does seem that I should excuse Mr Alexander from further attendance today, but - - -

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MR DOWNING: Well, unless Mr Tyler-Stott seeks to ask any questions, I wasn't sure of that, Commissioner.

THE COMMISSIONER: I'm sorry?

MR DOWNING: Whether Mr Tyler-Stott, his counsel, might wish to ask him any questions. I don't - - -

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THE COMMISSIONER: Well, I've called for applications to cross-examine, there was no response, so I'm taking that there's no desire to do that, but I think that in the circumstances the summons that brings you here, Mr Alexander, I will leave open, that is it's still operating, in case there is a need to have you return. That may not be necessary. I will determine at the earliest possible date as to whether or not you are discharged from your summons or whether there may be some requirement for you to return. Do you understand?---Understand, sir.

But you are free to go today.---Thank you, sir.

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Thank you for your attendance. Yes. Anything else, Mr Downing?

MR DOWNING: No, no. Other than to indicate that subject to travel arrangements having come to fruition we think we will resume in the morning with Mr Dubois.

THE COMMISSIONER: All right. Very good.

MR DOWNING: And I assume - - -

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THE COMMISSIONER: You may step down, Mr Alexander, thank you. ---Thank you, sir.

THE WITNESS WITHDREW

[2.53pm]

MR DOWNING: I assume it's a 10.00am start in the morning?

THE COMMISSIONER: Very well, 10 o'clock tomorrow.

MR DOWNING: Thank you, Commissioner.

THE COMMISSIONER: Yes, I'll adjourn.

AT 2.53PM THE MATTER WAS ADJOURNED ACCORDINGLY
[2.53pm]

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