

NOTICE OF FILING

Details of Filing

Document Lodged:	Affidavit - Form 59 - Rule 29.02(1)
Court of Filing	FEDERAL COURT OF AUSTRALIA (FCA)
Date of Lodgment:	15/03/2023 4:23:29 PM AEDT
Date Accepted for Filing:	15/03/2023 4:23:35 PM AEDT
File Number:	NSD103/2023
File Title:	BRUCE LEHRMANN v NETWORK TEN PTY LIMITED ACN 052 515 250 & ANOR
Registry:	NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA



A handwritten signature in blue ink that reads "Sia Lagos".

Registrar

Important Information

This Notice has been inserted as the first page of the document which has been accepted for electronic filing. It is now taken to be part of that document for the purposes of the proceeding in the Court and contains important information for all parties to that proceeding. It must be included in the document served on each of those parties.

The date of the filing of the document is determined pursuant to the Court's Rules.



Form 59
Rule 29.02(1)

Supplementary Affidavit

No. NSD 103 of 2023

Federal Court of Australia
District Registry: New South Wales
Division: General

BRUCE LEHRMANN

Applicant

NETWORK TEN PTY LIMITED (ACN 052 515 250) and another
Respondents

Affidavit of: **Marlia Ruth Saunders**
Address: Level 14, 60 Martin Place, Sydney NSW 2000
Occupation: Lawyer
Date: 15 March 2023

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13	Annexure "MRS-13", being a handwritten copy of the Applicant's online email and social media account usernames and passwords provided to the AFP	7(a)	6
14	Annexure "MRS-14", being a statement of an AFP officer, James Ross Brown, dated 27 April 2022 attaching nine photographs extracted from the Applicant's iPhone on 19 April 2021	7(b)	8-19
15	Annexure "MRS-15", being unredacted copy of messages and other mobile telephone data from the Applicant's iPhone	7(c)	21-36
16	Annexure "MRS-16", being a chain of emails exchanged with the Applicant's solicitor on 15 March 2023	7(c)	38-39

Filed on behalf of (name & role of party) First Respondent being Network Ten Pty Limited
Prepared by (name of person/lawyer) Marlia Saunders, Partner
Law firm (if applicable) Thomson Geer Lawyers
Tel 02 8248 5836 Fax _____
Email msaunders@tglaw.com.au
Address for service Thomson Geer Lawyers, Level 14, 60 Martin Place, Sydney NSW 2000
(include state and postcode)

Ref MSA:5263490
Legal/82194976_2

[Version 3 form approved 02/05/2019]

Document number	Details	Paragraph	Page
17	Annexure " MRS-17 ", being the statement of facts prepared by the AFP in the Criminal Trial	7(d)	41-59
18	Annexure " MRS-18 ", being a bundle of emails exchanged between the Applicant and Brittany Higgins and subsequently tendered in evidence at the Criminal Trial (Exhibit L)	8	61-80
19	Annexure " MRS-19 ", being excerpts from Days 11 and 12 of the transcript of the Criminal Trial	9	82-97

I Marlia Ruth Saunders, Lawyer, affirm:

1. I am a Partner of law firm Thomson Geer, solicitors for the First Respondent.
2. I am authorised to make this affidavit on the First Respondent's behalf.
3. I make this supplementary affidavit in addition to the affidavit I affirmed in these proceedings on 10 March 2023 (**First Saunders Affidavit**). To the extent the First Saunders Affidavit uses definitions, I adopt those same definitions in this supplementary affidavit (**Second Saunders Affidavit**).
4. I make the Second Saunders Affidavit in opposition to the Application.
5. I make this affidavit from my own knowledge, except where I have stated otherwise. Where I depose to matters on information given to me, I believe that information to be true and correct.

Notice to produce issued 2 March 2023

6. I deposed to various matters relating to the Notice to Produce served on the Applicant on 3 March 2023 at paragraphs [16] - [18] of the First Saunders Affidavit.
7. Since affirming the First Saunders Affidavit, I have reviewed additional material produced by the Applicant including:
 - (a) a handwritten copy of what I understand to be the Applicant's online email and social media account usernames and passwords. I understand this document was provided by the Applicant during the execution of a search warrant by the Australian Federal Police (**AFP**). This exchange is captured at pages 235-236 of the First Saunders Affidavit. Annexed to this affidavit and marked "**MRS-13**" is a copy of the usernames and passwords provided by the Applicant to the AFP;
 - (b) a statement of an AFP officer, James Ross Brown, dated 27 April 2022 attaching what I understand to be nine photographs extracted from the Applicant's Apple iPhone Xs Max on 19 April 2021. I understand the photographs were located in a sub-folder on the Applicant's Apple iPhone Xs Max titled "Higgins matter blue




notebook". Annexed to this affidavit and marked "**MRS-14**" is a copy of the statement dated 27 April 2022 and its annexures;

- (c) an unredacted copy of messages and other mobile telephone data which were previously annexed (in part) to the First Saunders Affidavit and marked annexure MRS-11. Based on my review of that document, it appears that a substantial number of entries are missing. On 15 March 2023, I exchanged correspondence with the Applicant's solicitors about this issue. Annexed to this affidavit and marked:
 - i. "**MRS-15**" is an unredacted copy of the messages and mobile telephone data previously produced by the Applicant in redacted form; and
 - ii. "**MRS-16**" is a copy of the emails I exchanged with the Applicant's solicitor about the missing entries on 15 March 2023; and
- (d) the statement of facts prepared by the AFP in the Criminal Trial. Annexed to this affidavit and marked "**MRS-17**" is a copy of the statement of facts.

Exhibit in the Criminal Trial

- 8. I am aware from my reading of the transcript in the Criminal Trial that a bundle of emails exchanged between the Applicant and Brittany Higgins was tendered as Exhibit L in the Criminal Trial on 6 October 2022. I understand from the AFP's statement of facts (Exhibit MRS-16) that these emails were identified by the AFP following a search of the Applicant's phone and the AFP subsequently obtained copies of the emails from the Department of Defence and the Department of Parliamentary Services. Annexed to this affidavit and marked "**MRS-18**" is a copy of Exhibit L from the Criminal Trial.
- 9. Annexed to this affidavit and marked "**MRS-19**" are excerpts from Days 11 and 12 of the transcript of the Criminal Trial.

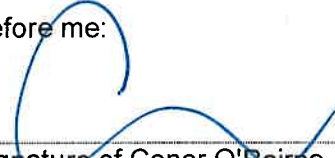
Applicant's concerns notice

- 10. At paragraphs 58 and 60 of the Second Respondent's written submissions filed on 10 March 2023, she submits that she was not sent a concerns notice by the Applicant and was denied an initial opportunity to respond to the Applicant.
- 11. I am informed by Ms Tasha Smithies, Senior Legal Counsel at Network Ten, and verily believe that she:
 - (a) received a copy of the Applicant's concerns notice dated 16 December 2022 (and contained at pages 19-26 of the Affidavit of Paul Svilans sworn 1 March 2023) (**Concerns Notice**) on the day it was sent;



- (b) identified the Concerns Notice was addressed only to the First Respondent, Ms Beverley McGarvey and Mr Christopher Bendall and not the Second Respondent;
- (c) forwarded a copy of the Concerns Notice to the Second Respondent on 16 December 2022 as a courtesy to the Second Respondent given her previous involvement with Ms Higgins and the matters complained of;
- (d) did not seek any instructions or input from the Second Respondent in preparing any response to the Concerns Notice because it was not addressed nor otherwise directed to her;
- (e) did not seek any instructions or input from the Second Respondent in seeking an extension of time for responding to the Concerns Notice because the Concerns Notice was not addressed nor otherwise directed to her; and
- (f) did not provide the Second Respondent with a draft of the First Respondent's response (or any proposed response) to the Concerns Notice because the Concerns Notice was not addressed nor otherwise directed to her.

Affirmed by the deponent
at Sydney
in New South Wales
on 15 March 2023
Before me:



Signature of Conor O'Beirne
Thomson Geer
Level 14, 60 Martin Place
Sydney NSW 2000

An Australian Legal Practitioner within the meaning of the Legal Profession Uniform Law

)
)
)
)
)

Signature of Marlia Ruth Saunders

Federal Court of Australia
District Registry: New South Wales
Division: General

BRUCE LEHRMANN

Applicant

NETWORK TEN PTY LIMITED (ACN 052 515 250) and another
Respondents

CERTIFICATE IDENTIFYING ANNEXURE

This is the annexure marked "**MRS-13**" now produced and shown to Marlia Ruth Saunders at the time of affirming her affidavit on 15 March 2023:



Signature of Conor O'Beirne
Thomson Geer
Level 14, 60 Martin Place
Sydney NSW 2000

An Australian Legal Practitioner within the meaning of the Legal Profession Uniform Law

b. lehrmann@hotmail.com
 9514 phone
 hotmail: Attorney 95
 12/1995
 Cricket 18
 FB: Attorney 95
 Instagram: @lehrmann6
 Cricket 18

Federal Court of Australia
District Registry: New South Wales
Division: General

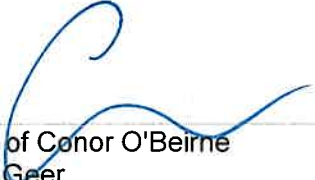
BRUCE LEHRMANN

Applicant

NETWORK TEN PTY LIMITED (ACN 052 515 250) and another
Respondents

CERTIFICATE IDENTIFYING ANNEXURE

This is the annexure marked "**MRS-14**" now produced and shown to Marlia Ruth Saunders at the time of affirming her affidavit on 15 March 2023:



Signature of Conor O'Beirne
Thomson Geer
Level 14, 60 Martin Place
Sydney NSW 2000

An Australian Legal Practitioner within the meaning of the Legal Profession Uniform Law



Police Statement


Statement in the matter of R v Bruce Emery LEHRMANN

Name James Ross BROWN
Occupation Police Officer
Date Wednesday 27 April 2022

STATES:


1. This statement made by me accurately sets out the evidence that I would be prepared, if necessary, to give in court as a witness. The statement is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I will be liable to prosecution if I have wilfully stated in it anything that I know to be false or do not believe to be true.
2. My full name is James Ross BROWN. I am an Acting Sergeant (A/Sgt) of Police with the Australian Federal Police (AFP) currently attached to the Australian Capital Territory (ACT) Joint Anti Child Exploitation Team (JACET), located at Winchester Police Centre, Belconnen, in the ACT.
3. On Monday 19 April 2021, I conducted a preview of an Apple iPhone Xs Max that was provided to me by Bruce Emery LEHRMANN. During the preview of the device, a screen recording was taken, capturing the process. This process captured navigation of the 'Photos' application and the subfolder titled "Higgins matter blue notebook".
4. On Thursday 22 July 2021, I provided a police statement in relation to the matter.
5. On Wednesday 27 April 2022, I was requested by Senior Constable (SC) Emma FRIZZELL to provided further information.
6. At the request of SC FRIZZELL, I took a number of screenshots from the screen recording taken of the Apple iPhone Xs Max that depicted the folder 'Photos' application, the subfolder titled "Higgins matter blue notebook" and the contents.

DOCUMENT: SCREENSHOTS OF PHOTOS APPLICATION AND SPECIFIC CONTENTS



 Police Initials

7. I read this statement before I signed it.



(Signature)

James Ross BROWN
Acting Sergeant AFP21883
CI-JACET
Wednesday 27 April 2022


.....
Police initials

Police v Bruce Emery LEHRMANN
Wednesday, 27 April 2022
Court case number: CC2021/8143

PHOTOGRAPHS

Table of contents

1. 'Photos' application – Albums;
2. Contents of "Higgins matter blue notebook";
3. Contents of "Higgins matter blue notebook";
4. Contents of "Higgins matter blue notebook";
5. Contents of "Higgins matter blue notebook";
6. Contents of "Higgins matter blue notebook";
7. Contents of "Higgins matter blue notebook";
8. Contents of "Higgins matter blue notebook"; and
9. Contents of "Higgins matter blue notebook"

Number of photographs 9 taken by James Ross BROWN, A/Sgt AFP21883.



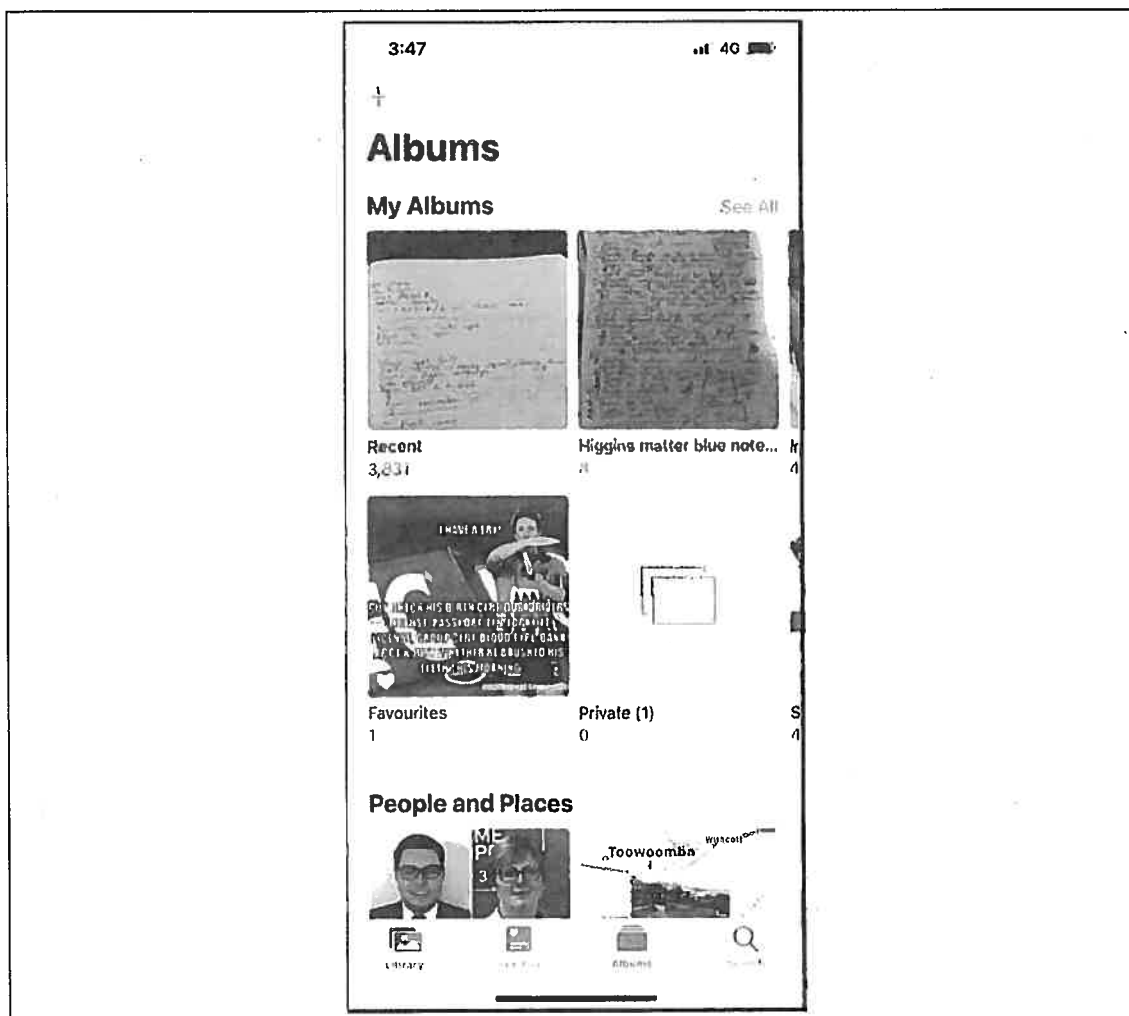
Date 27/04/2022



AFP

AUSTRALIAN FEDERAL POLICE

PHOTOGRAPH

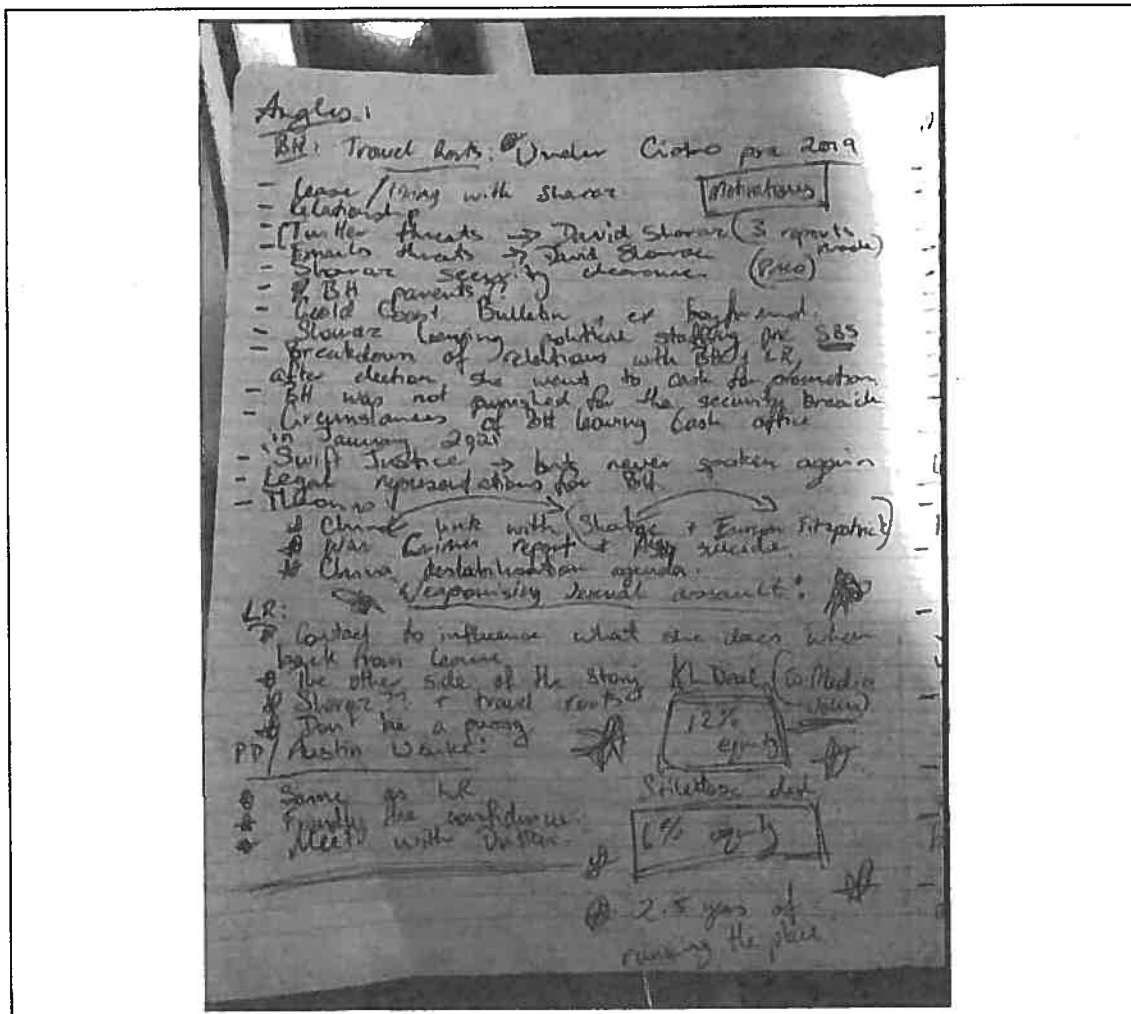


Photograph 1

Description 'Photos' application - Albums

Photographed by A/Sgt James Ross BROWN

27/04/2022



Photograph 2

Description Contents of "Higgins matter blue notebook"

Photographed by A/Sgt James Ross BROWN

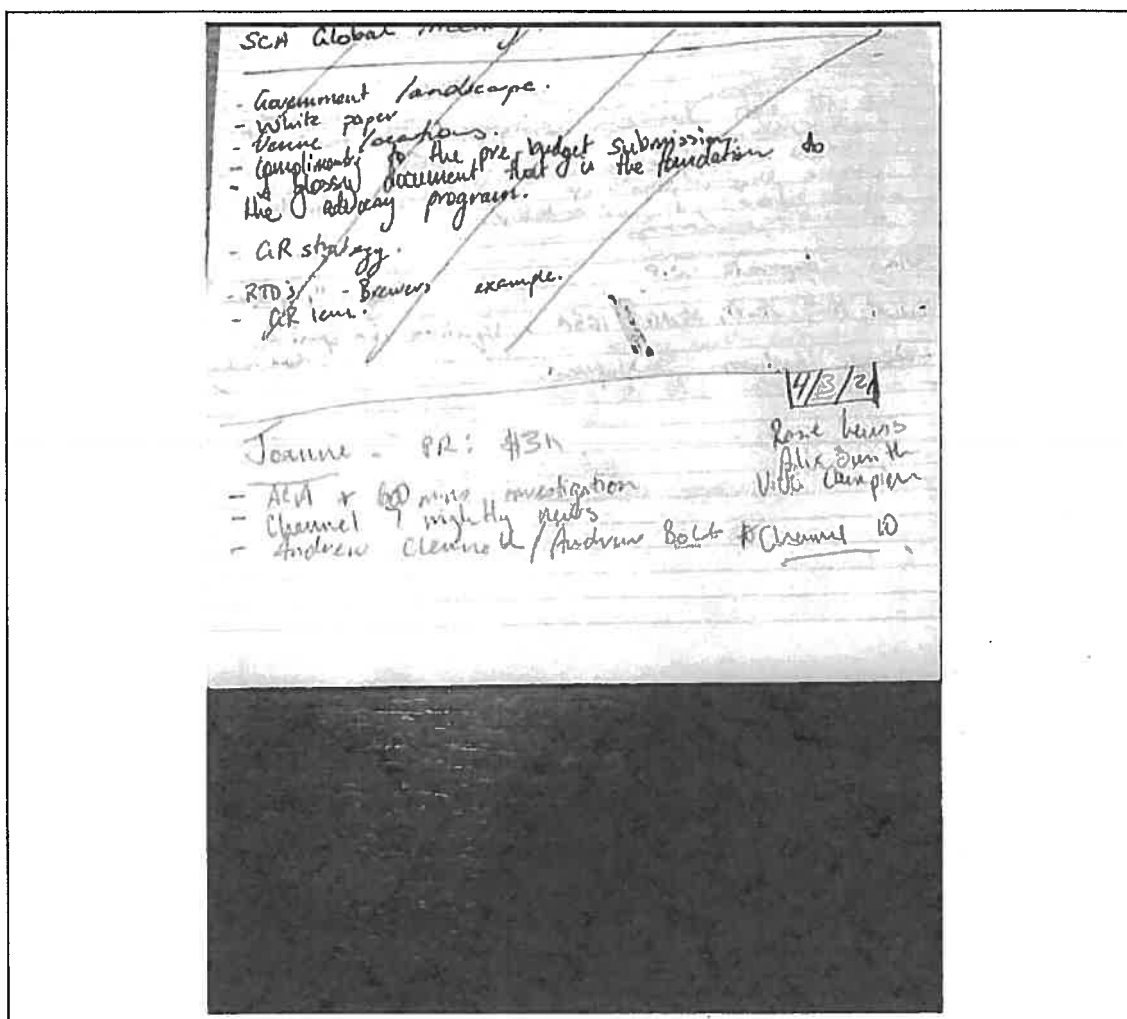
27/04/2022



AFP

AUSTRALIAN FEDERAL POLICE

PHOTOGRAPH



Photograph 3

Description Contents of "Higgins matter blue notebook"

Photographed by A/Sgt James Ross BROWN

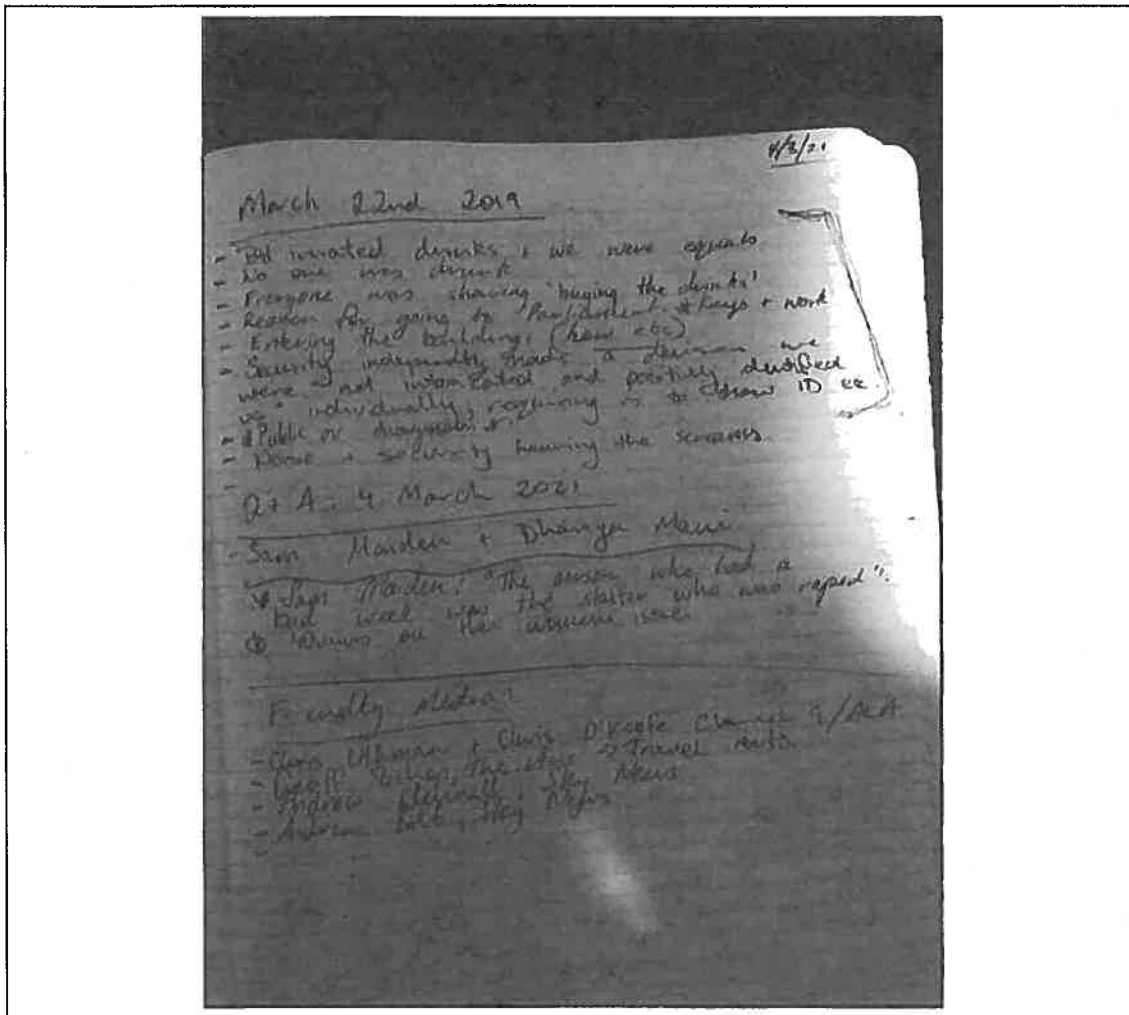
27/04/2022



AFP

AUSTRALIAN FEDERAL POLICE

PHOTOGRAPH



Photograph 4

Description Contents of "Higgins matter blue notebook"

Photographed by A/Sgt James Ross BROWN

27/04/2022

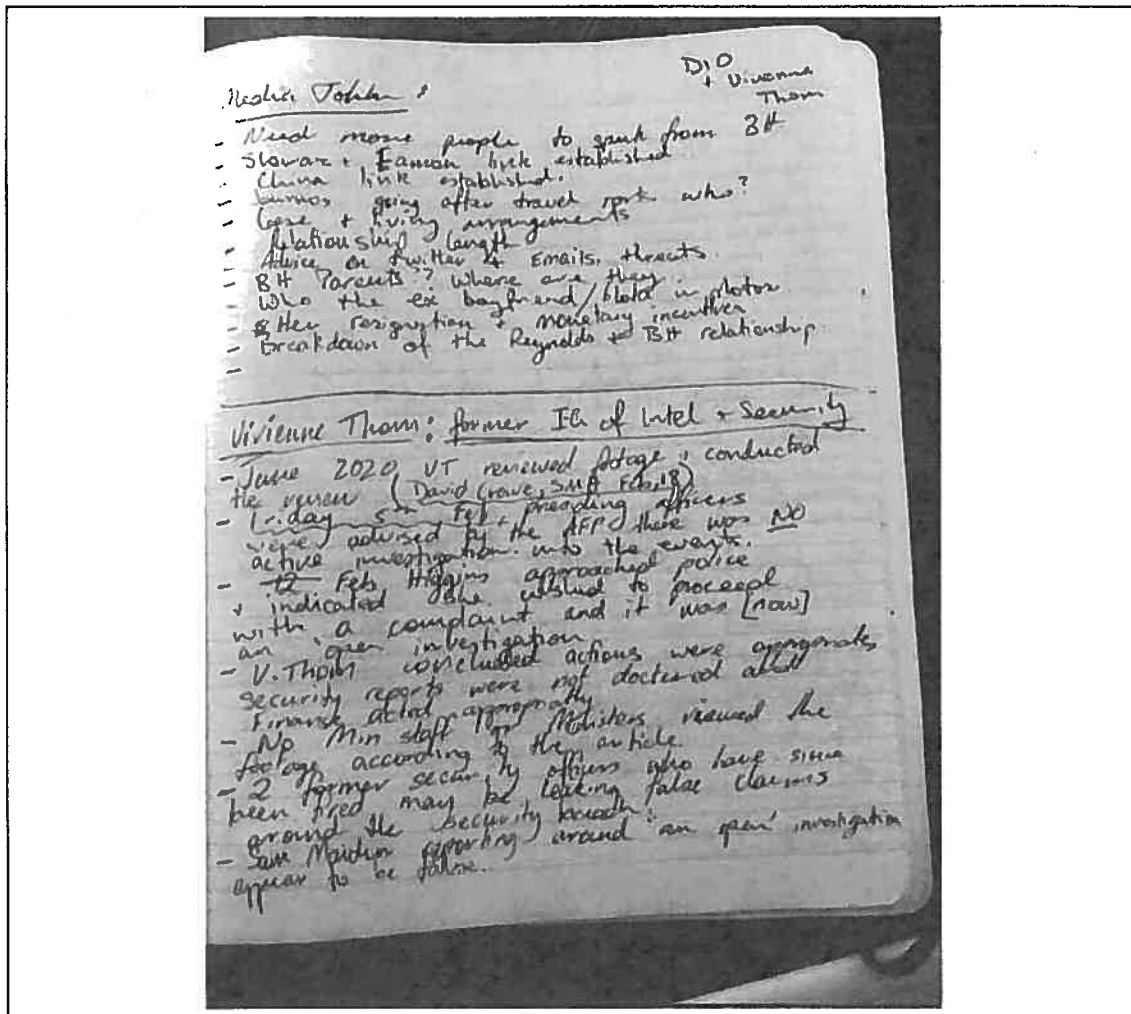
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AFP

AUSTRALIAN FEDERAL POLICE

PHOTOGRAPH



Photograph 5

Description Contents of "Higgins matter blue notebook"

Photographed by A/Sgt James Ross BROWN

27/04/2022

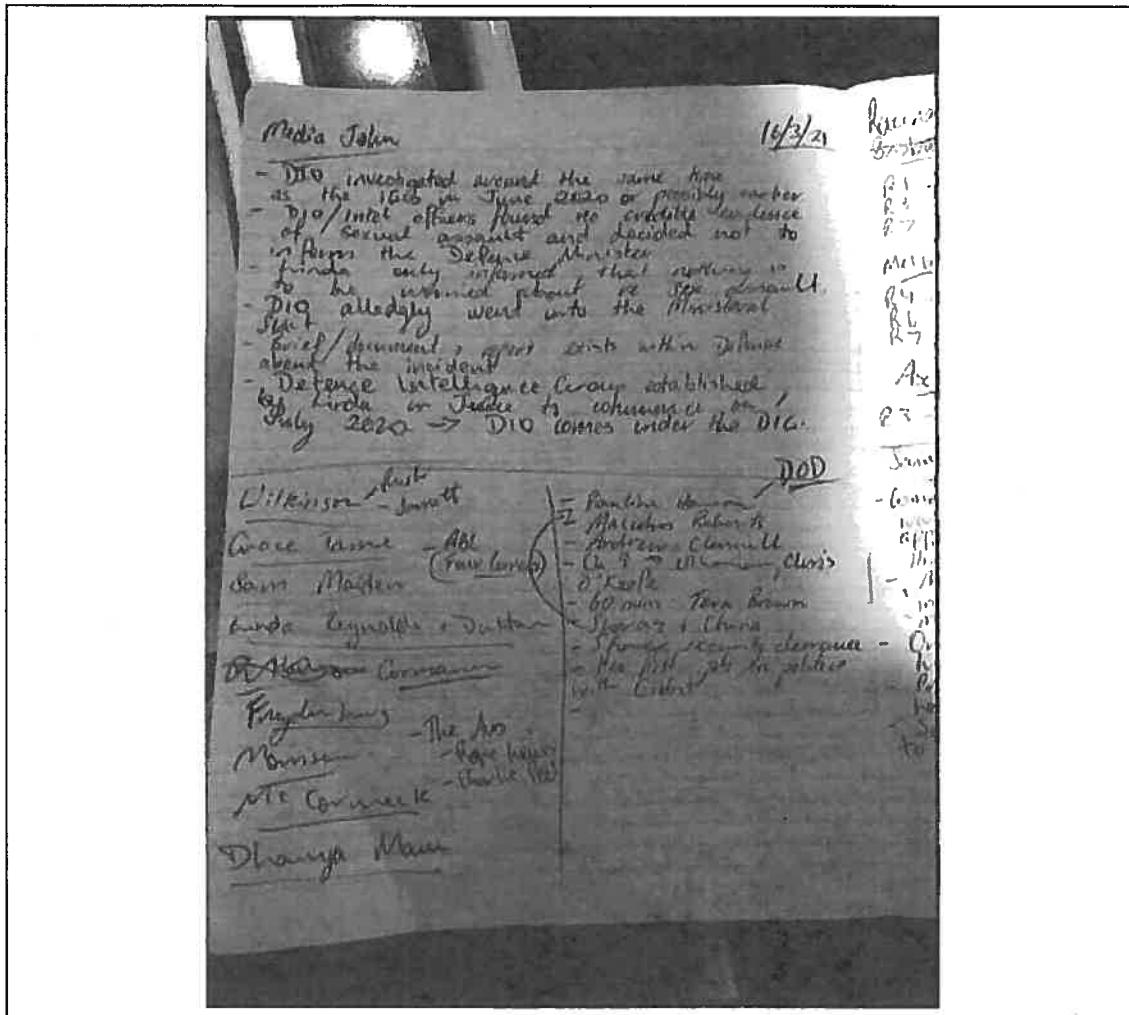
Page 5



AFP

AUSTRALIAN FEDERAL POLICE

PHOTOGRAPH



Photograph 6

Description Contents of "Higgins matter blue notebook"

Photographed by A/Sgt James Ross BROWN

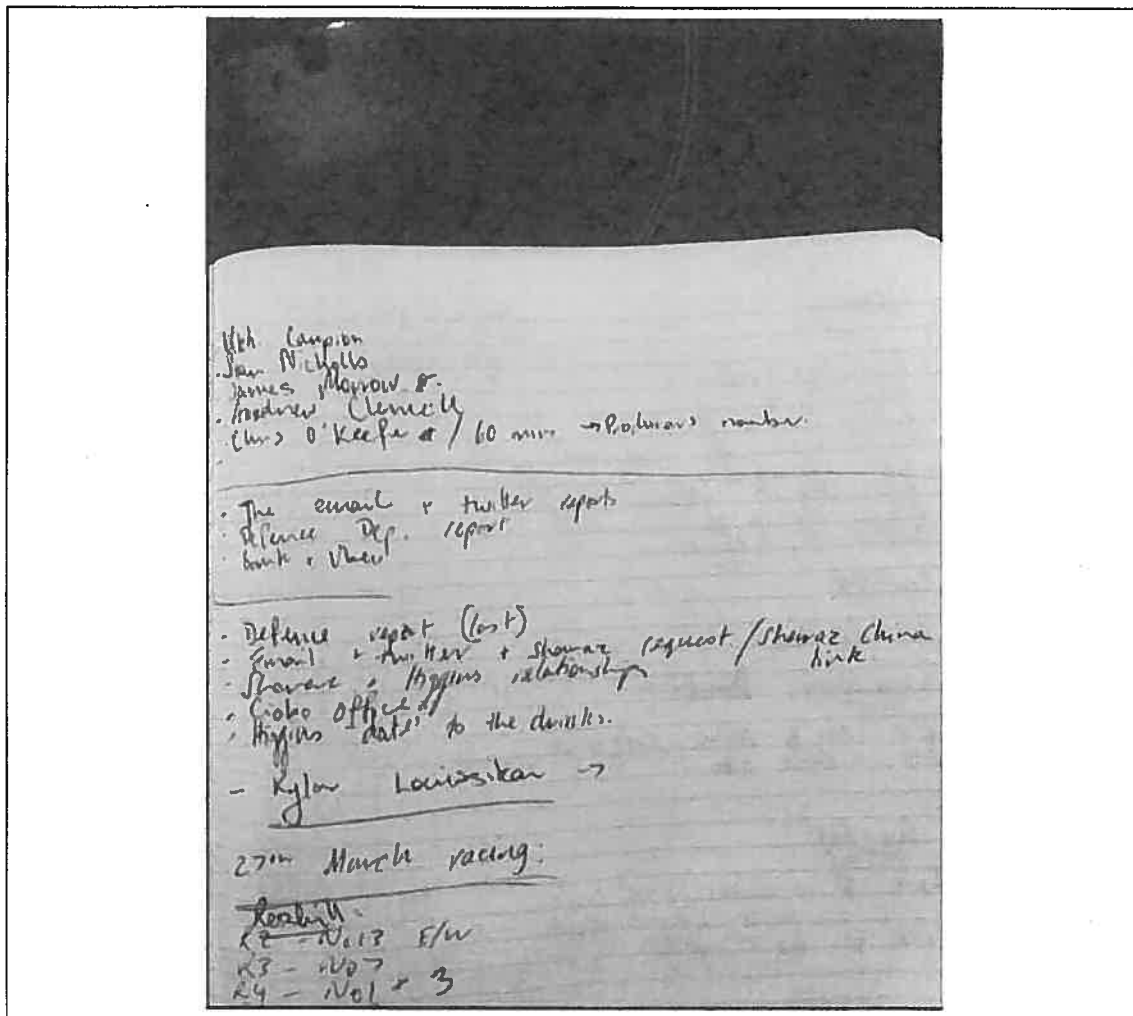
27/04/2022



AFP

AUSTRALIAN FEDERAL POLICE

PHOTOGRAPH



Photograph 7

Description Contents of "Higgins matter blue notebook"

Photographed by A/Sgt James Ross BROWN

27/04/2022

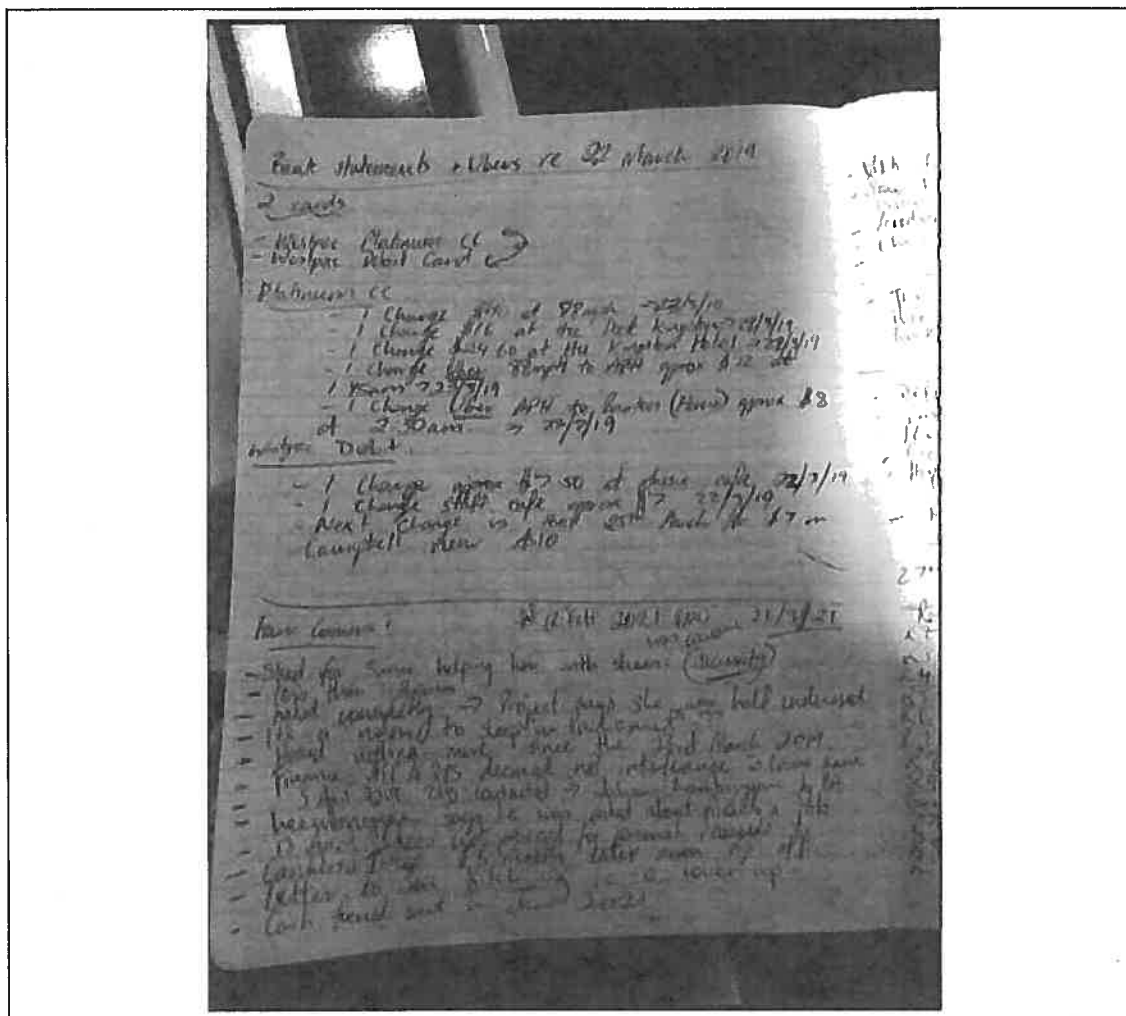
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AFP

AUSTRALIAN FEDERAL POLICE

PHOTOGRAPH



Photograph 8

Description Contents of "Higgins matter blue notebook"

Photographed by A/Sgt James Ross BROWN

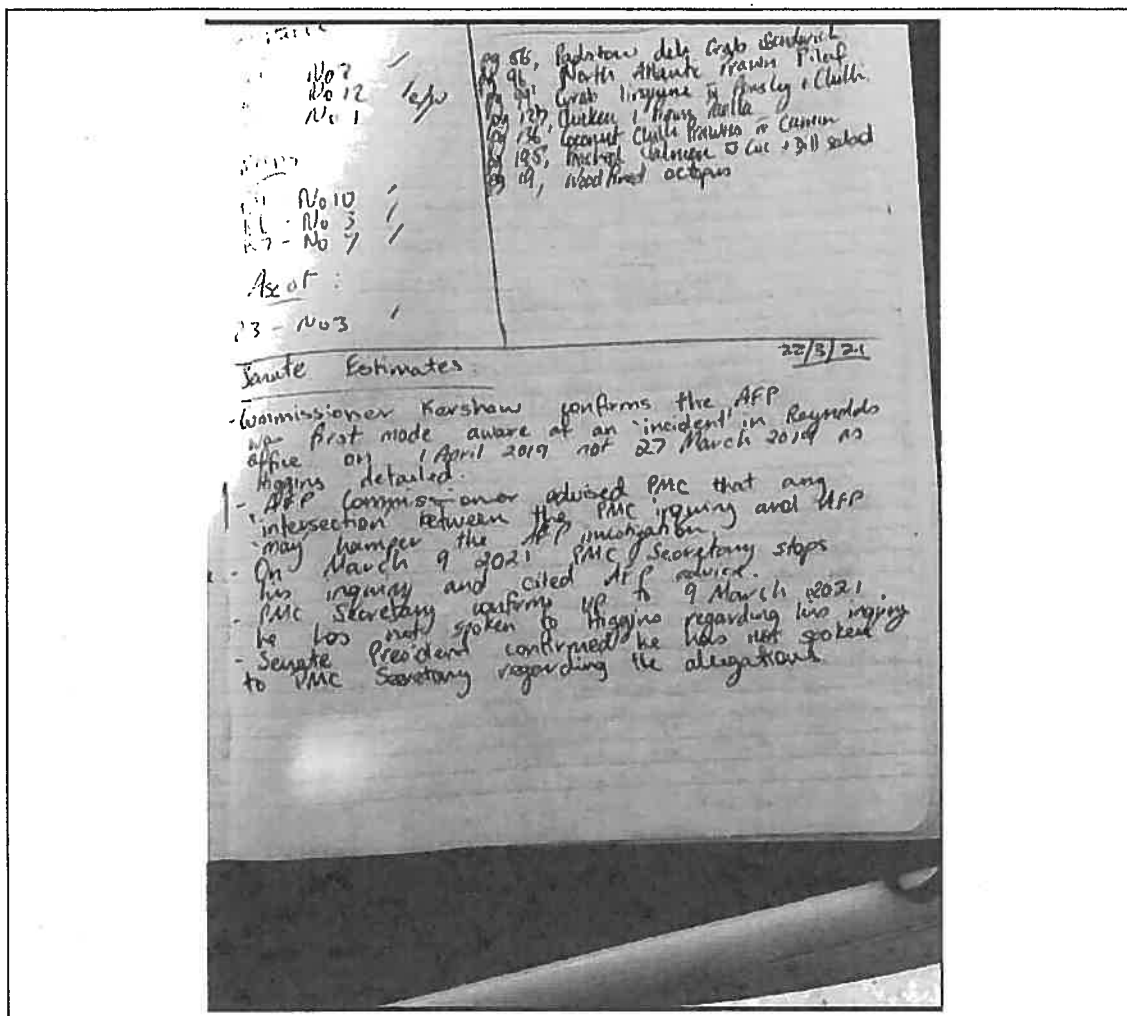
27/04/2022



AFP

AUSTRALIAN FEDERAL POLICE

PHOTOGRAPH



Photograph 9

Description Contents of "Higgins matter blue notebook"

Photographed by A/Sgt James Ross BROWN

27/04/2022

Federal Court of Australia
District Registry: New South Wales
Division: General

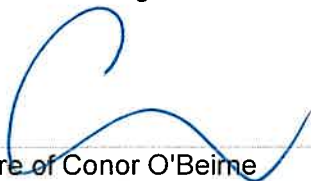
BRUCE LEHRMANN

Applicant

NETWORK TEN PTY LIMITED (ACN 052 515 250) and another
Respondents

CERTIFICATE IDENTIFYING ANNEXURE

This is the annexure marked "**MRS-15**" now produced and shown to Marlia Ruth Saunders at the time of affirming her affidavit on 15 March 2023:



Signature of Conor O'Beirne
Thomson Geer
Level 14, 60 Martin Place
Sydney NSW 2000

An Australian Legal Practitioner within the meaning of the Legal Profession Uniform Law

ID	Type	Direction	Date/Time	From	To	Details
94526	Activity Sensor Data		15/02/2021 12:00:00 AM [Start time]			Source: Health Source file: Bruce's iPhone/mobile/Library/Health/healthdb_secure.sqlite : 0x40D5DA (Table: objects, samples, Size: 18513920 bytes)
94527	Contacts		15/02/2021 10:24:11 AM(UTC+10) [Created]			Source: InteractionC Source file: Bruce's iPhone/mobile/Library/CoreDuet/People/InteractionC.db : 0x3EB40 (Table: ZCONTACTS, Size: 7942144 bytes)
94528	Instant Messages	Incoming	15/02/2021 10:29:41 AM(UTC+10)	[Redacted] Harry Hughes NEW Participants: [Redacted] Harry Hughes NEW [Redacted] Bruce L (owner)	[Redacted]	https://amp.news.com.au/national/politics/parliament-house-rocked-by-brittany-higgins-alleged-rape/news-story/fb02a5e95767ac306c51894fe2d63635?_twitter_impression=true Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share.d/ChatStorage.sqlite : 0x79724F (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes)
94529	Instant Messages	Incoming	15/02/2021 10:29:45 AM(UTC+10)	[Redacted] Harry Hughes NEW Participants: [Redacted] Harry Hughes NEW [Redacted] Bruce L (owner)	[Redacted]	Know this chick? Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share.d/ChatStorage.sqlite : 0x7971B7 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes)
94530	Instant Messages	Outgoing	15/02/2021 10:39:01 AM(UTC+10)	[Redacted] Bruce L (owner) To: [Redacted] Harry Hughes NEW To: [Redacted] Harry Hughes NEW	[Redacted]	Yeah worked with her briefly Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share.d/ChatStorage.sqlite : 0x79711C (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share.d/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)
94531	Instant Messages	Outgoing	15/02/2021 10:39:08 AM(UTC+10)	[Redacted] Bruce L (owner) To: [Redacted] Harry Hughes NEW To: [Redacted] Harry Hughes NEW	[Redacted]	Was at team drinks etc Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share.d/ChatStorage.sqlite : 0x797086 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share.d/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)
94532	Activity Sensor Data		15/02/2021 1:00:00 AM [End time]			Source: Health Source file: Bruce's iPhone/mobile/Library/Health/healthdb_secure.sqlite : 0x40D5DA (Table: objects, samples, Size: 18513920 bytes)
94533	Activity Sensor Data		15/02/2021 1:00:00 AM [Start time]			Source: Health Source file: Bruce's iPhone/mobile/Library/Health/healthdb_secure.sqlite : 0x40D508 (Table: objects, samples, Size: 18513920 bytes)
94534	Instant Messages	Incoming	15/02/2021 11:02:39 AM(UTC+10)	[Redacted] Greta Sinclair To: [Redacted] Bruce Lehmann (owner) To: [Redacted] Bruce Lehmann (owner) To: [Redacted] Bruce Lehmann (owner)	[Redacted]	Dinner just spent \$20 on food! Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70C07F7 (Table: message, handle, chat, Size: 161562624 bytes)
94535	Instant Messages	Outgoing	15/02/2021 11:07:15 AM(UTC+10)	[Redacted] Greta Sinclair To: [Redacted] Bruce Lehmann (owner) To: [Redacted] Greta Sinclair To: [Redacted] Bruce Lehmann (owner)	[Redacted]	On what? Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70C05A3 (Table: message, handle, chat, Size: 161562624 bytes)

94536	Instant Messages	Outgoing	15/02/2021 11:07:19 AM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehrmann (owner)	What did you have? Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70C0346 (Table: message, handle, chat, Size: 161562624 bytes)
94537	Instant Messages	Incoming	15/02/2021 11:08:04 AM(UTC+10)	From: [REDACTED] Greta Sinclair To: [REDACTED] (owner), To: [REDACTED] m Bruce Lehrmann (owner) To: [REDACTED] (owner), To: [REDACTED] Bruce Lehrmann (owner)	I ordered a BLAT Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70C1F3F (Table: message, handle, chat, Size: 161562624 bytes)
94538	Instant Messages	Outgoing	15/02/2021 11:08:16 AM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehrmann (owner)	Oh they are yummy Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70C1D05 (Table: message, handle, chat, Size: 161562624 bytes)
94539	Instant Messages	Incoming	15/02/2021 11:08:38 AM(UTC+10)	From: [REDACTED] Greta Sinclair To: [REDACTED] (owner), To: [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] (owner), To: [REDACTED] Bruce Lehrmann (owner)	Omg just got soooo scared!! I had a huge bump on my younger and it was brown!!! I then washed my tongue and it was a popcorn cornell!! Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70C1A8E (Table: message, handle, chat, Size: 161562624 bytes)
94540	Instant Messages	Outgoing	15/02/2021 11:08:50 AM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehrmann (owner)	HAHAHAHA Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70C1761 (Table: message, handle, chat, Size: 161562624 bytes)
94541	Instant Messages	Incoming	15/02/2021 11:09:03 AM(UTC+10)	From: [REDACTED] Greta Sinclair To: [REDACTED] (owner), To: [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] (owner), To: [REDACTED] Bruce Lehrmann (owner)	I was so scared!!! Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70C14FE (Table: message, handle, chat, Size: 161562624 bytes)
94542	Instant Messages	Incoming	15/02/2021 11:09:10 AM(UTC+10)	From: [REDACTED] Greta Sinclair To: [REDACTED] (owner), To: [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] (owner), To: [REDACTED] Bruce Lehrmann (owner)	It didn't come off at first! Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70C12B4 (Table: message, handle, chat, Size: 161562624 bytes)
94543	Instant Messages	Incoming	15/02/2021 11:13:28 AM(UTC+10)	From: [REDACTED] Greta Sinclair To: [REDACTED] (owner), To: [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] (owner), To: [REDACTED] Bruce Lehrmann (owner)	Fuck I was so scared Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70C2F3F (Table: message, handle, chat, Size: 161562624 bytes)

94544	Instant Messages	Incoming	15/02/2021 11:17:05 AM(UTC+10)	<p>From: [REDACTED] Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x798DE2 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes)</p>
94545	Instant Messages	Incoming	15/02/2021 AM(UTC+10)	<p>From: [REDACTED] Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x798D4C (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes)</p>
94546	Instant Messages	Outgoing	15/02/2021 11:17:41 AM(UTC+10)	<p>From: [REDACTED] Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x798C91 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes)</p>
94547	Instant Messages	Incoming	15/02/2021 11:18:02 AM(UTC+10)	<p>From: [REDACTED] Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x798BFA (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes)</p>
94548	Instant Messages	Outgoing	15/02/2021 11:18:19 AM(UTC+10)	<p>From: [REDACTED] Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x798B6E (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes)</p>
94549	Instant Messages	Incoming	15/02/2021 11:18:21 AM(UTC+10)	<p>From: [REDACTED] Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x798A71 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes)</p>
94550	Instant Messages	Outgoing	15/02/2021 11:18:31 AM(UTC+10)	<p>From: [REDACTED] Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x7989E2 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes)</p>
94551	Instant Messages	Incoming	15/02/2021 11:18:39 AM(UTC+10)	<p>From: [REDACTED] Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x798923 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes)</p>

94552 Instant Messages Incoming

15/02/2021
11:16:44
AM(UTC+10)

From: [REDACTED]
Source: WhatsApp
Source file: Bruce's
iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x798891 (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes)

94553 Instant Messages Outgoing

15/02/2021
11:19:07
AM(UTC+10)

From: [REDACTED]
Source: WhatsApp
Source file: Bruce's
iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x7987E4 (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes)
Bruce's
iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)

94554 Instant Messages Incoming

15/02/2021
11:19:22
AM(UTC+10)

From: [REDACTED]
Source: WhatsApp
Source file: Bruce's
iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x79873D (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes)

94555 Instant Messages Incoming

15/02/2021
11:19:28
AM(UTC+10)

From: [REDACTED]
Source: WhatsApp
Source file: Bruce's
iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x79869B (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes)

94556 Instant Messages Outgoing

15/02/2021
11:19:29
AM(UTC+10)

From: [REDACTED]
Source: WhatsApp
Source file: Bruce's
iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x798617 (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes)
Bruce's
iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)

94557 Instant Messages Outgoing

15/02/2021
11:19:35
AM(UTC+10)

From: [REDACTED]
Source: WhatsApp
Source file: Bruce's
iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x79857F (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes)
Bruce's
iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)

94558 Instant Messages Incoming

15/02/2021
11:19:45
AM(UTC+10)

From: [REDACTED]
Source: WhatsApp
Source file: Bruce's
iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x7984ED (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes)

94559 Instant Messages Incoming

15/02/2021
11:19:47
AM(UTC+10)

From: [REDACTED]
Source: WhatsApp
Source file: Bruce's
iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x798464 (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes)

94568	Instant Messages	Incoming	15/02/2021 11:28:48 AM(UTC+10)	From: [REDACTED] Greta Sinclair To: [REDACTED] (owner), To: [REDACTED] [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] (owner), To: [REDACTED] [REDACTED] Bruce Lehrmann (owner)	And I was like fuck what is it what am I going to tell Bruce Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70C3A9C (Table: message, handle, chat, Size: 161562624 bytes)
94569	Instant Messages	Incoming	15/02/2021 11:31:19 AM(UTC+10)	From: [REDACTED] Greta Sinclair To: [REDACTED] (owner), To: [REDACTED] [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] (owner), To: [REDACTED] [REDACTED] Bruce Lehrmann (owner)	Have you done an estimate for leave to see if you can take off the 19th March? Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70C37FD (Table: message, handle, chat, Size: 161562624 bytes)
94570	Instant Messages	Outgoing	15/02/2021 11:31:38 AM(UTC+10)	From: [REDACTED] (owner) Greta Sinclair, To: [REDACTED] [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] [REDACTED] Bruce Lehrmann (owner)	Oh yeah I'll check when back in the office Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70C4F49 (Table: message, handle, chat, Size: 161562624 bytes)
94571	Instant Messages	Incoming	15/02/2021 11:32:08 AM(UTC+10)	From: [REDACTED] Greta Sinclair To: [REDACTED] (owner), To: [REDACTED] [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] (owner), To: [REDACTED] [REDACTED] Bruce Lehrmann (owner)	Thanks baby all good if you can't I'll find something to do Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70C4C9C (Table: message, handle, chat, Size: 161562624 bytes)
94572	Instant Messages	Incoming	15/02/2021 11:33:45 AM(UTC+10)	From: [REDACTED] Greta Sinclair To: [REDACTED] (owner), To: [REDACTED] [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] (owner), To: [REDACTED] [REDACTED] Bruce Lehrmann (owner)	I'm thinking Catalina if you can take it off and I'll pay for most of it you can do ubers Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70C49F9 (Table: message, handle, chat, Size: 161562624 bytes)
94573	Instant Messages	Incoming	15/02/2021 11:34:04 AM(UTC+10)	From: [REDACTED] Greta Sinclair To: [REDACTED] (owner), To: [REDACTED] [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] (owner), To: [REDACTED] [REDACTED] Bruce Lehrmann (owner)	They have a 12pm or a 2 30pm Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70C5F3F (Table: message, handle, chat, Size: 161562624 bytes)
94574	Instant Messages	Incoming	15/02/2021 11:41:52 AM(UTC+10)	From: [REDACTED] John McGowan Participants: [REDACTED] [REDACTED] John McGowan, [REDACTED] Bruce L (owner)	You got on any god on who the Canberra rape guy is, the yarn says "rising star" so that rules out our males but who else? Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net whatsapp WhatsApp.share d/ChatStorage.sqlite : 0x7982DA (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes)
94575	Instant Messages	Incoming	15/02/2021 11:42:04 AM(UTC+10)	From: [REDACTED] John McGowan Participants: [REDACTED] [REDACTED] John McGowan, [REDACTED] Bruce L (owner)	*gossip Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net whatsapp WhatsApp.share d/ChatStorage.sqlite : 0x798256 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes)

94576	Instant Messages	Outgoing	15/02/2021 11:42:29 AM(UTC+10)	<p>From: [REDACTED] To: Bruce L (owner) [REDACTED] John McGowan [REDACTED] John McGowan</p> <p>No idea mate in the slightest Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x7981BA (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)</p>
94577	Instant Messages	Outgoing	15/02/2021 11:42:35 AM(UTC+10)	<p>From: [REDACTED] To: Bruce L (owner) [REDACTED] John McGowan [REDACTED] John McGowan</p> <p>I haven't been approached Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x79811E (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)</p>
94578	Instant Messages	Incoming	15/02/2021 11:43:06 AM(UTC+10)	<p>From: [REDACTED] To: John McGowan Participants: [REDACTED] [REDACTED] John McGowan [REDACTED] Bruce L (owner)</p> <p>Be funny if it was Mitch Cutting Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x798081 (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes)</p>
94579	Instant Messages	Outgoing	15/02/2021 11:43:19 AM(UTC+10)	<p>From: [REDACTED] To: Bruce L (owner) [REDACTED] John McGowan [REDACTED] John McGowan</p> <p>Who's that? Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x799FAD (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)</p>
94580	Instant Messages	Incoming	15/02/2021 11:43:41 AM(UTC+10)	<p>From: [REDACTED] To: John McGowan Participants: [REDACTED] [REDACTED] John McGowan [REDACTED] Bruce L (owner)</p> <p>That fat bloke who worked for Bragg and touched up a girl at a Premier State party Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x799EDE (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes)</p>
94581	Instant Messages	Outgoing	15/02/2021 11:44:00 AM(UTC+10)	<p>From: [REDACTED] To: Bruce L (owner) [REDACTED] John McGowan [REDACTED] John McGowan</p> <p>Interesting Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x799E52 (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)</p>
94582	Instant Messages	Outgoing	15/02/2021 11:44:23 AM(UTC+10)	<p>From: [REDACTED] To: Bruce L (owner) [REDACTED] John McGowan [REDACTED] John McGowan</p> <p>I haven't had any approaches despite still being around then Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x799D93 (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)</p>

94583	Instant Messages	Incoming	15/02/2021 11:48:18 AM(UTC+10)	<p>From: [REDACTED] John McGowan</p> <p>Participants: [REDACTED] John McGowan, Bruce L (owner)</p>	<p>Yarn didn't make it clear bloke was in that office</p> <p>Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x799CE1 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes)</p>
94584	Instant Messages	Outgoing	15/02/2021 11:48:32 AM(UTC+10)	<p>From: [REDACTED] Bruce L (owner)</p> <p>To: [REDACTED] John McGowan</p> <p>To: [REDACTED] John McGowan</p>	<p>Oh right</p> <p>Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x799C59 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes)</p> <p>Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)</p>
94585	Instant Messages	Outgoing	15/02/2021 11:48:38 AM(UTC+10)	<p>From: [REDACTED] Bruce L (owner)</p> <p>To: [REDACTED] John McGowan</p> <p>To: [REDACTED] John McGowan</p>	<p>I haven't really gone through it</p> <p>Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x799BB6 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes)</p> <p>Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)</p>
94586	Instant Messages	Outgoing	15/02/2021 11:49:09 AM(UTC+10)	<p>From: [REDACTED] Bruce L (owner)</p> <p>To: [REDACTED] John McGowan</p> <p>To: [REDACTED] John McGowan</p>	<p>You would have thought a proper process took place with PMO etc</p> <p>Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x799AF6 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes)</p> <p>Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)</p>
94587	Instant Messages	Outgoing	15/02/2021 11:49:31 AM(UTC+10)	<p>From: [REDACTED] Bruce L (owner)</p> <p>To: [REDACTED] John McGowan</p> <p>To: [REDACTED] John McGowan</p>	<p>To stop it from getting to this, which appears to very slanderous and defamatory</p> <p>Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x799A24 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes)</p> <p>Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)</p>
94588	Instant Messages	Incoming	15/02/2021 11:50:15 AM(UTC+10)	<p>From: [REDACTED] John McGowan</p> <p>Participants: [REDACTED] John McGowan, Bruce L (owner)</p>	<p>This isn't the first time it's happened like this, see - Rachel Miller, Danya Mami etc</p> <p>Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x79994B (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes)</p>
94589	Instant Messages	Outgoing	15/02/2021 11:52:23 AM(UTC+10)	<p>From: [REDACTED] Bruce L (owner)</p> <p>To: [REDACTED] John McGowan</p> <p>To: [REDACTED] John McGowan</p>	<p>Yeah exactly</p> <p>Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x7998BE (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes)</p> <p>Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)</p>

94590	Instant Messages	Outgoing	15/02/2021 11:52:38 AM(UTC+10)	From: [REDACTED] To: [REDACTED] Bruce L (owner) [REDACTED] John McGowan [REDACTED] John McGowan	I assume it will fizzle Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x799826 (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)
94591	Instant Messages	Outgoing	15/02/2021 11:52:56 AM(UTC+10)	From: [REDACTED] To: [REDACTED] Bruce L (owner) [REDACTED] John McGowan [REDACTED] John McGowan	Surprised they haven't contact people in the office at that time Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x799763 (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)
94592	Activity Sensor Data		15/02/2021 2:00:00 AM [End time]		Source: Health Source file: Bruce's iPhone/mobile/Library/Health/healthdb_secure.sqlite : 0x40D508 (Table: objects, samples, Size: 18513920 bytes)
94593	Activity Sensor Data		15/02/2021 2:00:00 AM [Start time]		Source: Health Source file: Bruce's iPhone/mobile/Library/Health/healthdb_secure.sqlite : 0x40D24C (Table: objects, samples, Size: 18513920 bytes)
94594	Cookies		15/02/2021 12:08:46 PM(UTC+10) [Accessed]		.linkedin.com Source: NotificationServiceExtension Source file: Bruce's iPhone/mobile/Containers/Data/PluginKitPlugin/com.linkedin.LinkedIn.NotificationServiceExtension/Library/Cookies/Cookies.binarycookies : 0x3E4 (Size: 2029 bytes)
94595	Instant Messages	Incoming	15/02/2021 12:35:57 PM(UTC+10)	From: [REDACTED] Participants: [REDACTED] John McGowan, [REDACTED] John McGowan, [REDACTED] Bruce L (owner)	She's on the Project tonight which isn't exactly prime time stuff Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x7998A0 (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes)
94596	Instant Messages	Outgoing	15/02/2021 12:39:03 PM(UTC+10)	From: [REDACTED] To: [REDACTED] Bruce L (owner) [REDACTED] John McGowan [REDACTED] John McGowan	They wouldn't name would they? Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x7995FF (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)
94597	Instant Messages	Outgoing	15/02/2021 12:39:07 PM(UTC+10)	From: [REDACTED] To: [REDACTED] Bruce L (owner) [REDACTED] John McGowan [REDACTED] John McGowan	Pretty slanderous Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x79956D (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)
94598	Instant Messages	Incoming	15/02/2021 12:49:30 PM(UTC+10)	From: [REDACTED] Participants: [REDACTED] John McGowan, [REDACTED] John McGowan, [REDACTED] Bruce L (owner)	Well it's defamatory Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x7994DA (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes)

94599	Instant Messages	Outgoing	15/02/2021 12:49:59 PM(UTC+10)	From: [REDACTED] To: Bruce L (owner) [REDACTED] whats app.net John McGowan [REDACTED] John McGowan	Completely Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x799450 (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17826 bytes)
94600	Instant Messages	Incoming	15/02/2021 12:58:37 PM(UTC+10)	From: [REDACTED] To: Greta Sinclair [REDACTED] (owner), To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: [REDACTED] [REDACTED] (owner), To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	Going for a walk xx Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70C5254 (Table: message, handle, chat, Size: 16156264 bytes)
94601	Instant Messages	Outgoing	15/02/2021 12:58:59 PM(UTC+10)	From: [REDACTED] To: [REDACTED] (owner) Greta Sinclair, To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	Chabe enjoy xx Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70C6F49 (Table: message, handle, chat, Size: 161562624 bytes)
94602	Activity Sensor Data		15/02/2021 3:00:00 AM [End time]		Source: Health Source file: Bruce's iPhone/mobile/Library/Health/healthdb_secure.sqlite : 0x40D24C (Table: objects, samples, Size: 18513920 bytes)
94603	Activity Sensor Data		15/02/2021 3:00:00 AM [Start time]		Source: Health Source file: Bruce's iPhone/mobile/Library/Health/healthdb_secure.sqlite : 0x40EEBD (Table: objects, samples, Size: 18513920 bytes)
94604	Instant Messages	Incoming	15/02/2021 1:57:03 PM(UTC+10)	From: [REDACTED] To: Greta Sinclair [REDACTED] (owner), To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: [REDACTED] [REDACTED] (owner), To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	You must be busy today! Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70C6CD6 (Table: message, handle, chat, Size: 161562624 bytes)
94605	Instant Messages	Incoming	15/02/2021 1:59:45 PM(UTC+10)	From: [REDACTED] To: Greta Sinclair [REDACTED] (owner), To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: [REDACTED] [REDACTED] (owner), To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	Not messaging much haha Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70C676B (Table: message, handle, chat, Size: 161562624 bytes)
94606	Activity Sensor Data		15/02/2021 4:00:00 AM [End time]		Source: Health Source file: Bruce's iPhone/mobile/Library/Health/healthdb_secure.sqlite : 0x40EEBD (Table: objects, samples, Size: 18513920 bytes)
94607	Activity Sensor Data		15/02/2021 4:00:00 AM [Start time]		Source: Health Source file: Bruce's iPhone/mobile/Library/Health/healthdb_secure.sqlite : 0x40EE31 (Table: objects, samples, Size: 18513920 bytes)
94608	Instant Messages	Incoming	15/02/2021 2:11:36 PM(UTC+10)	From: [REDACTED] To: Greta Sinclair [REDACTED] (owner), To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: [REDACTED] [REDACTED] (owner), To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	Hope everything is ok Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70C6617 (Table: message, handle, chat, Size: 161562624 bytes)

94609	Instant Messages	Incoming		15/02/2021 2:14:41 PM(UTC+10)	From: + [REDACTED] Greta Sinclair To: + [REDACTED] (owner), To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: [REDACTED] (owner), To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	I love you Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70C7B3E (Table: message, handle, chat, Size: 161562624 bytes)		
94610	Contacts			15/02/2021 2:16:18 PM(UTC+10) [Created]		Source: InteractionC Source file: Bruce's iPhone/mobile/Library/CoreDuet/People/i nteractionC.db : 0x3EAE1 (Table: ZCONTACTS, Size: 7942144 bytes)		
94611	Instant Messages	Incoming		15/02/2021 2:28:33 PM(UTC+10)	From: [REDACTED] John McGowan Participants: [REDACTED] John McGowan, [REDACTED] Bruce L (owner)	I've got a guy just will take me an hour or so to pin him down I'll let you know Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGr oup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x79937F (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes)		
94612	Instant Messages	Outgoing		15/02/2021 2:28:47 PM(UTC+10)	From: [REDACTED] Bruce L (owner) To: [REDACTED] John McGowan To: [REDACTED] John McGowan	Thanks really appreciate, need ASAP Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGr oup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x7992DB (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGr oup/group.net.whatsapp.WhatsApp.share d/Library/Preferences/group.net.whatsap p.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)		
94613	Contacts			15/02/2021 2:33:32 PM(UTC+10) [Modified]		Andy Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGr oup/group.net.whatsapp.WhatsApp.share d/ContactsV2.sqlite : 0x15FA2 (Table: ZWAADDRESSBOOKCONTACT, Size: 245760 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGr oup/group.net.whatsapp.WhatsApp.share d/Media/Profile [REDACTED] 1605159924.thumb : 0x0 (Size: 3015 bytes)		
94614	Instant Messages	Incoming		15/02/2021 2:33:51 PM(UTC+10)	From: + [REDACTED] Greta Sinclair To: + [REDACTED] (owner), To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: [REDACTED] (owner), To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	Your money came through thank you! Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70C8F3F (Table: message, handle, chat, Size: 161562624 bytes)		
94615	Instant Messages	Incoming		15/02/2021 2:45:18 PM(UTC+10)	From: System Message System Message Participants: [REDACTED] [REDACTED] Harry Hughes NEW, [REDACTED] whats app.net Bruce L (owner)	Missed Voice Call Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGr oup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x799248 (Table: ZWMESSAGE, Size: 17633280 bytes)		
94616	Instant Messages	Incoming		15/02/2021 2:46:35 PM(UTC+10)	From: [REDACTED] John McGowan Participants: [REDACTED] John McGowan, [REDACTED] Bruce L (owner)	Harry knows a guy, Rick Corn, best of the best, he's done this stuff before and helped Harry on the boat thing, going to send you a number he's expecting a call. Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGr oup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x79912A (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes)		

94617	Instant Messages	Incoming		15/02/2021 2:47:15 PM(UTC+10)	From: [REDACTED] Harry F NEW Participants: [REDACTED] Harry Hughes NEW [REDACTED] Bruce L (owner)	I have spoken to John. A very close friend of mine is a specialist in these matters, Rick Korn. This is his field of expertise. I've just spoken to Rick and hes expecting your call ASAP - he needs you to call him right this second as theyre is the whole issue of her going on The Project tonight. His number is [REDACTED] Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x79AE7A (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes)		
94618	Instant Messages	Incoming		15/02/2021 2:47:41 PM(UTC+10)	From: [REDACTED] Harry Hughes NEW Participants: [REDACTED] Harry Hughes NEW [REDACTED] Bruce L (owner)	I trust him with my life, and he has gotten me out of numerous fuck ups. Hes also well known to the family. But you need to call him right now mate. Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x79AD6A (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes)		
94619	Contacts			15/02/2021 2:58:53 PM(UTC+10) [Created]		Rick Korn Source: Source file: Bruce's iPhone/mobile/Library/AddressBook/AddressBook.sqlitedb : 0xEE5E7 (Table: ABPerson, ABMultiValue, Size: 1536000 bytes) Bruce's iPhone/mobile/Library/CoreDuet/People/interactionC.db : 0x3EA63 (Table: ZCONTACTS, Size: 7942144 bytes)		
94620	Contacts			15/02/2021 2:58:57 PM(UTC+10) [Modified]		Rick Korn Source: Source file: Bruce's iPhone/mobile/Library/AddressBook/AddressBook.sqlitedb : 0xEE5E7 (Table: ABPerson, ABMultiValue, Size: 1536000 bytes) Bruce's iPhone/mobile/Library/CoreDuet/People/interactionC.db : 0x3EA63 (Table: ZCONTACTS, Size: 7942144 bytes)		
94621	Activity Sensor Data			15/02/2021 5:00:00 AM [End time]		Source: Health Source file: Bruce's iPhone/mobile/Library/Health/healthdb_secure.sqlite : 0x40EE31 (Table: objects, samples, Size: 18513920 bytes)		
94622	Activity Sensor Data			15/02/2021 5:00:00 AM [Start time]		Source: Health Source file: Bruce's iPhone/mobile/Library/Health/healthdb_secure.sqlite : 0x40ECD3 (Table: objects, samples, Size: 18513920 bytes)		
94623	Instant Messages	Outgoing		15/02/2021 3:01:23 PM(UTC+10)	From: [REDACTED] Bruce L (owner) To: [REDACTED] Harry Hughes NEW To: [REDACTED] Harry Hughes NEW	Heading to him now mate, he's cleared his arvo for me Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x79ACB3 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)		
94624	Instant Messages	Outgoing		15/02/2021 3:01:37 PM(UTC+10)	From: [REDACTED] Bruce L (owner) To: [REDACTED] Harry Hughes NEW To: [REDACTED] Harry Hughes NEW	Appreciate it mate, I'll need heaps of support Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x79AC03 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)		

94643	Instant Messages	Incoming		15/02/2021 4:56:34 PM(UTC+10)	From: + [REDACTED] Greta Sinclair To: + [REDACTED] (owner), To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: + [REDACTED] (owner), To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	What do you mean? Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70CAF3F (Table: message, handle, chat, Size: 161562624 bytes)		
94644	Instant Messages	Outgoing		15/02/2021 4:56:44 PM(UTC+10)	From: + [REDACTED] (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	I'm still with Warwick Korn who has accepted to be my lawyer Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70CAD01 (Table: message, handle, chat, Size: 161562624 bytes)		
94645	Instant Messages	Incoming		15/02/2021 4:56:44 PM(UTC+10)	From: + [REDACTED] Greta Sinclair (owner), To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: + [REDACTED] (owner), To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	Are you in an uber? Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70CAA2F (Table: message, handle, chat, Size: 161562624 bytes)		
94646	Instant Messages	Outgoing		15/02/2021 4:56:50 PM(UTC+10)	From: + [REDACTED] (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	Having a scotch now Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70CA7EF (Table: message, handle, chat, Size: 161562624 bytes)		
94647	Instant Messages	Outgoing		15/02/2021 4:56:58 PM(UTC+10)	From: + [REDACTED] (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	He's very good Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70CA57E (Table: message, handle, chat, Size: 161562624 bytes)		
94648	Instant Messages	Incoming		15/02/2021 4:57:15 PM(UTC+10)	From: + [REDACTED] Greta Sinclair (owner), To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: + [REDACTED] (owner), To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	Ok good to hear Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70CA309 (Table: message, handle, chat, Size: 161562624 bytes)		
94649	Instant Messages	Outgoing		15/02/2021 4:57:46 PM(UTC+10)	From: + [REDACTED] (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	I've been pretty upset Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70CBF49 (Table: message, handle, chat, Size: 161562624 bytes)		
94650	Instant Messages	Outgoing		15/02/2021 4:57:58 PM(UTC+10)	From: + [REDACTED] (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	You can Google him he seems good Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70CBCCE (Table: message, handle, chat, Size: 161562624 bytes)		

94651	Instant Messages	Outgoing		15/02/2021 4:58:03 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner)	Doesn't want any money Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70CBA43 (Table: message, handle, chat, Size: 161562624 bytes)		
94652	Instant Messages	Outgoing		15/02/2021 4:58:17 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner)	Reckons defamation is a definite Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70CB7C8 (Table: message, handle, chat, Size: 161562624 bytes)		
94653	Instant Messages	Outgoing		15/02/2021 4:58:24 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner)	But we need to keep a close circle Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70CB53D (Table: message, handle, chat, Size: 161562624 bytes)		
94654	Instant Messages	Outgoing		15/02/2021 4:58:40 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner)	So I can't speak very much Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70CB2AE (Table: message, handle, chat, Size: 161562624 bytes)		
94655	Instant Messages	Outgoing		15/02/2021 4:58:46 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner)	But I trust you with my life Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70CCF49 (Table: message, handle, chat, Size: 161562624 bytes)		
94656	Activity Sensor Data			15/02/2021 7:00:00 AM [End time]		Source: Health Source file: Bruce's iPhone/mobile/Library/Health/healthdb_secure.sqlite : 0x40EC47 (Table: objects, samples, Size: 18513920 bytes)		
94657	Activity Sensor Data			15/02/2021 7:00:00 AM [Start time]		Source: Health Source file: Bruce's iPhone/mobile/Library/Health/healthdb_secure.sqlite : 0x40EB98 (Table: objects, samples, Size: 18513920 bytes)		
94658	Instant Messages	Incoming		15/02/2021 5:01:35 PM(UTC+10)	From: [REDACTED] Greta Sinclair To: [REDACTED] (owner), To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] (owner), To: [REDACTED] Bruce Lehmann (owner)	That's ok Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70CCCBC (Table: message, handle, chat, Size: 161562624 bytes)		
94659	Instant Messages	Incoming		15/02/2021 5:02:00 PM(UTC+10)	From: [REDACTED] Greta Sinclair To: [REDACTED] (owner), To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] (owner), To: [REDACTED] Bruce Lehmann (owner)	And no worries can keep a close circle Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70CCA80 (Table: message, handle, chat, Size: 161562624 bytes)		

94668	Instant Messages	Incoming	15/02/2021 5:06:38 PM(UTC+10)	From: [REDACTED] Greta Sinclair To: [REDACTED] (owner) To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] (owner) To: [REDACTED] Bruce Lehmann (owner)	It is scary Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db 0x70CD356 (Table: message, handle, chat, Size: 161562624 bytes)
94669	Instant Messages	Incoming	15/02/2021 5:06:44 PM(UTC+10)	From: [REDACTED] Greta Sinclair To: [REDACTED] (owner) To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] (owner) To: [REDACTED] Bruce Lehmann (owner)	I ordered Chinese if you are hungry later Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db 0x70CEF3F (Table: message, handle, chat, Size: 161562624 bytes)
94670	Instant Messages	Outgoing	15/02/2021 5:06:50 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner)	If I am named tonight then he says I'm up for millions as defamation Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db 0x70CECD1 (Table: message, handle, chat, Size: 161562624 bytes)
94671	Instant Messages	Outgoing	15/02/2021 5:06:57 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner)	Harry may join us as well Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db 0x70CE6F0 (Table: message, handle, chat, Size: 161562624 bytes)
94672	Instant Messages	Incoming	15/02/2021 5:07:05 PM(UTC+10)	From: [REDACTED] Greta Sinclair To: [REDACTED] (owner) To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] (owner) To: [REDACTED] Bruce Lehmann (owner)	I'm drinking wine also Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db 0x70CE469 (Table: message, handle, chat, Size: 161562624 bytes)
94673	Instant Messages	Outgoing	15/02/2021 5:07:07 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner)	I just can't be alone tonight Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db 0x70CFF49 (Table: message, handle, chat, Size: 161562624 bytes)
94674	Instant Messages	Incoming	15/02/2021 5:07:13 PM(UTC+10)	From: [REDACTED] Greta Sinclair To: [REDACTED] (owner) To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] (owner) To: [REDACTED] Bruce Lehmann (owner)	And I've taken the day off tomorrow Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db 0x70C99EA (Table: message, handle, chat, Size: 161562624 bytes)
94675	Instant Messages	Outgoing	15/02/2021 5:16:15 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] m Bruce Lehmann (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner)	Awww babe you didn't need to do that Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db 0x70CF46D (Table: message, handle, chat, Size: 161562624 bytes)

94732 Instant Messages Incoming

15/02/2021
5:37:07
PM(UTC+10)

From: [REDACTED]
Greta Sinclair
To: [REDACTED]
(owner), To: [REDACTED]
[REDACTED] Bruce Lehmann
(owner)
To: [REDACTED]
(owner), To: [REDACTED]
[REDACTED] Bruce Lehmann
(owner)

I guess the project has started by now
Source: Native Messages
Source file: Bruce's
iPhone/mobile/Library/SMS/sms.db :
0x70D9CFD (Table: message, handle,
chat, Size: 161562624 bytes)

94733 Instant Messages Outgoing

15/02/2021
5:37:20
PM(UTC+10)

From: [REDACTED]
(owner)
To: [REDACTED]
Greta Sinclair, To: [REDACTED]
[REDACTED] Bruce Lehmann
(owner)
To: [REDACTED]
Greta Sinclair, To: [REDACTED]
[REDACTED] Bruce Lehmann
(owner)

Yeah
Source: Native Messages
Source file: Bruce's
iPhone/mobile/Library/SMS/sms.db :
0x70D9A95 (Table: message, handle,
chat, Size: 161562624 bytes)

94734 Instant Messages Outgoing

15/02/2021
5:37:32
PM(UTC+10)

From: [REDACTED]
(owner)
To: [REDACTED]
Greta Sinclair, To: [REDACTED]
[REDACTED] Bruce Lehmann
(owner)
To: [REDACTED]
Greta Sinclair, To: [REDACTED]
[REDACTED] Bruce Lehmann
(owner)

We aren't watching yet
Source: Native Messages
Source file: Bruce's
iPhone/mobile/Library/SMS/sms.db :
0x70D9842 (Table: message, handle,
chat, Size: 161562624 bytes)

94735 Instant Messages Outgoing

15/02/2021
5:37:44
PM(UTC+10)

From: [REDACTED]
(owner)
To: [REDACTED]
Greta Sinclair, To: [REDACTED]
[REDACTED] Bruce Lehmann
(owner)
To: [REDACTED]
Greta Sinclair, To: [REDACTED]
[REDACTED] Bruce Lehmann
(owner)

Warwick doesn't think I will be named
Source: Native Messages
Source file: Bruce's
iPhone/mobile/Library/SMS/sms.db :
0x70D95C9 (Table: message, handle,
chat, Size: 161562624 bytes)

94736 Instant Messages Incoming

15/02/2021
5:37:53
PM(UTC+10)

From: [REDACTED]
Greta Sinclair
To: [REDACTED]
(owner), To: [REDACTED]
[REDACTED] Bruce Lehmann
(owner)
To: [REDACTED]
(owner), To: [REDACTED]
[REDACTED] Bruce Lehmann
(owner)

I don't think you will
Source: Native Messages
Source file: Bruce's
iPhone/mobile/Library/SMS/sms.db :
0x70D932F (Table: message, handle,
chat, Size: 161562624 bytes)

94737 Instant Messages Outgoing

15/02/2021
5:38:19
PM(UTC+10)

From: [REDACTED]
(owner)
To: [REDACTED]
Greta Sinclair, To: [REDACTED]
[REDACTED] Bruce Lehmann
(owner)
To: [REDACTED]
Greta Sinclair, To: [REDACTED]
[REDACTED] Bruce Lehmann
(owner)

If I am then he channel 10 as well as the
government/department of finance are up
for a lot of money
Source: Native Messages
Source file: Bruce's
iPhone/mobile/Library/SMS/sms.db :
0x70DAF49 (Table: message, handle,
chat, Size: 161562624 bytes)

94738 Instant Messages Incoming

15/02/2021
5:38:31
PM(UTC+10)

From: [REDACTED]
Greta Sinclair
To: [REDACTED]
(owner), To: [REDACTED]
[REDACTED] Bruce Lehmann
(owner)
To: [REDACTED]
(owner), To: [REDACTED]
[REDACTED] Bruce Lehmann
(owner)

Yep!
Source: Native Messages
Source file: Bruce's
iPhone/mobile/Library/SMS/sms.db :
0x70DAC2B (Table: message, handle,
chat, Size: 161562624 bytes)

94739 Instant Messages Incoming

15/02/2021
5:40:33
PM(UTC+10)

From: [REDACTED]
Greta Sinclair
To: [REDACTED]
(owner), To: [REDACTED]
[REDACTED] Bruce Lehmann
(owner)
To: [REDACTED]
(owner), To: [REDACTED]
[REDACTED] Bruce Lehmann
(owner)

I give you and we will get through this
Source: Native Messages
Source file: Bruce's
iPhone/mobile/Library/SMS/sms.db :
0x70DA9FD (Table: message, handle,
chat, Size: 161562624 bytes)

94765	Instant Messages	Outgoing		15/02/2021 6:39:00 PM(UTC+10)	From: + [REDACTED] (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehrmann (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehrmann (owner)	And nothing see Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70DEAAA (Table: message, handle, chat, Size: 161562624 bytes)		
94766	Instant Messages	Outgoing		15/02/2021 6:39:29 PM(UTC+10)	From: + [REDACTED] (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehrmann (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehrmann (owner)	I'm a pawn Rick says as part of a bigger political hatchet job Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70DE841 (Table: message, handle, chat, Size: 161562624 bytes)		
94767	Instant Messages	Incoming		15/02/2021 6:39:39 PM(UTC+10)	From: [REDACTED] Greta Sinclair To: + [REDACTED] (owner), To: [REDACTED] Bruce Lehrmann (owner) To: + [REDACTED] (owner), To: [REDACTED] Bruce Lehrmann (owner)	What about the CCTV? Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70DE56B (Table: message, handle, chat, Size: 161562624 bytes)		
94768	Instant Messages	Outgoing		15/02/2021 6:40:26 PM(UTC+10)	From: + [REDACTED] (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehrmann (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehrmann (owner)	Well as I said I went in got my stuff and she stayed and I left to go back to Alex at my apartment which we both rented together Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70DE329 (Table: message, handle, chat, Size: 161562624 bytes)		
94769	Instant Messages	Incoming		15/02/2021 6:40:43 PM(UTC+10)	From: + [REDACTED] Greta Sinclair To: + [REDACTED] (owner), To: [REDACTED] Bruce Lehrmann (owner) To: + [REDACTED] (owner), To: [REDACTED] Bruce Lehrmann (owner)	Ok goodn Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70DFF3F (Table: message, handle, chat, Size: 161562624 bytes)		
94770	Instant Messages	Incoming		15/02/2021 6:40:45 PM(UTC+10)	From: [REDACTED] Greta Sinclair To: + [REDACTED] (owner), To: [REDACTED] Bruce Lehrmann (owner) To: + [REDACTED] (owner), To: [REDACTED] Bruce Lehrmann (owner)	Good* Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70DFD0B (Table: message, handle, chat, Size: 161562624 bytes)		
94771	Instant Messages	Incoming		15/02/2021 6:42:32 PM(UTC+10)	From: [REDACTED] Greta Sinclair To: + [REDACTED] (owner), To: [REDACTED] Bruce Lehrmann (owner) To: + [REDACTED] (owner), To: [REDACTED] Bruce Lehrmann (owner)	Is Harry with youV Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70DFADB (Table: message, handle, chat, Size: 161562624 bytes)		
94772	Instant Messages	Outgoing		15/02/2021 6:51:30 PM(UTC+10)	From: + [REDACTED] (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehrmann (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehrmann (owner)	He's on his way now the story has finished Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70DF89D (Table: message, handle, chat, Size: 161562624 bytes)		

94813	Instant Messages	Outgoing	15/02/2021 7:55:18 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner)	I'm just getting reassurances Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70E6CCC (Table: message, handle, chat, Size: 161562624 bytes)
94814	Instant Messages	Incoming	15/02/2021 7:55:24 PM(UTC+10)	From: [REDACTED] Greta Sinclair To: [REDACTED] (owner) To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] (owner) To: [REDACTED] Bruce Lehmann (owner)	Ok baby Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70E6A39 (Table: message, handle, chat, Size: 161562624 bytes)
94815	Instant Messages	Outgoing	15/02/2021 7:55:29 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner)	I want to be sure about things Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70E680F (Table: message, handle, chat, Size: 161562624 bytes)
94816	Instant Messages	Incoming	15/02/2021 7:55:37 PM(UTC+10)	From: [REDACTED] Greta Sinclair To: [REDACTED] (owner) To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] (owner) To: [REDACTED] Bruce Lehmann (owner)	Yeah totally okay Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70E657E (Table: message, handle, chat, Size: 161562624 bytes)
94817	Instant Messages	Outgoing	15/02/2021 7:55:49 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner)	Criminal he says is off the cards completely Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70E6340 (Table: message, handle, chat, Size: 161562624 bytes)
94818	Instant Messages	Outgoing	15/02/2021 7:56:02 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] b [REDACTED] hotmail.co m Bruce Lehmann (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner)	One it's false and second they have nothing Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70E7F49 (Table: message, handle, chat, Size: 161562624 bytes)
94819	Instant Messages	Outgoing	15/02/2021 7:56:09 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner)	But we may have civil Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70E7CA4 (Table: message, handle, chat, Size: 161562624 bytes)
94820	Instant Messages	Outgoing	15/02/2021 7:56:14 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner)	*have Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70E7A2D (Table: message, handle, chat, Size: 161562624 bytes)

94829	Instant Messages	Incoming	15/02/2021 7:58:47 PM(UTC+10)	From: [REDACTED] Greta Sinclair To: [REDACTED] (owner), To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] (owner), To: [REDACTED] Bruce Lehmann (owner)	I have the day off tomorrow Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70E9F3F (Table: message, handle, chat, Size: 161562624 bytes)
94830	Instant Messages	Outgoing	15/02/2021 7:59:06 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner)	I want to wake up tomorrow feeling ok Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70E99D6 (Table: message, handle, chat, Size: 161562624 bytes)
94831	Instant Messages	Outgoing	15/02/2021 7:59:16 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner)	I'll still be shit Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70E943C (Table: message, handle, chat, Size: 161562624 bytes)
94832	Instant Messages	Outgoing	15/02/2021 7:59:34 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner)	But I want to know if someone calls me I refer them to Rick Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70EAF49 (Table: message, handle, chat, Size: 161562624 bytes)
94833	Activity Sensor Data		15/02/2021 10:00:00 AM [End time]		Source: Health Source file: Bruce's iPhone/mobile/Library/Health/healthdb_s ecure.sqlite : 0x40E968 (Table: objects, samples, Size: 18513920 bytes)
94834	Activity Sensor Data		15/02/2021 10:00:00 AM [Start time]		Source: Health Source file: Bruce's iPhone/mobile/Library/Health/healthdb_s ecure.sqlite : 0x40E8DC (Table: objects, samples, Size: 18513920 bytes)
94835	Instant Messages	Outgoing	15/02/2021 8:00:09 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner)	And he said tonight I won't see the light of a courtroom this is that outrageous Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70EAC87 (Table: message, handle, chat, Size: 161562624 bytes)
94836	Instant Messages	Outgoing	15/02/2021 8:00:23 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner)	But I'm glad I told you anyway Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70EA68E (Table: message, handle, chat, Size: 161562624 bytes)
94837	Instant Messages	Outgoing	15/02/2021 8:00:35 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner)	He wanted me to keep it locked down Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70EA403 (Table: message, handle, chat, Size: 161562624 bytes)

94878	Instant Messages	Outgoing		15/02/2021 9:01:15 PM(UTC+10)	From: + [REDACTED] (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner)	Having a scotch Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70F2F49 (Table: message, handle, chat, Size: 161562624 bytes)		
94879	Instant Messages	Outgoing		15/02/2021 9:01:28 PM(UTC+10)	From: + [REDACTED] (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner)	Going through it all Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70F2CE0 (Table: message, handle, chat, Size: 161562624 bytes)		
94880	Instant Messages	Incoming		15/02/2021 9:01:34 PM(UTC+10)	From: + [REDACTED] Greta Sinclair To: + [REDACTED] (owner), To: [REDACTED] Bruce Lehmann (owner) To: + [REDACTED] (owner), To: [REDACTED] Bruce Lehmann (owner)	Ok Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70F2A63 (Table: message, handle, chat, Size: 161562624 bytes)		
94881	Instant Messages	Outgoing		15/02/2021 9:02:05 PM(UTC+10)	From: + [REDACTED] (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner)	Rick keeps taking notes though Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70F2843 (Table: message, handle, chat, Size: 161562624 bytes)		
94882	Instant Messages	Outgoing		15/02/2021 9:02:12 PM(UTC+10)	From: + [REDACTED] (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner)	Very professional Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70F25BC (Table: message, handle, chat, Size: 161562624 bytes)		
94883	Instant Messages	Outgoing		15/02/2021 9:02:29 PM(UTC+10)	From: + [REDACTED] (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner)	Bit I feel comfortable knowing it's confidential Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70F234F (Table: message, handle, chat, Size: 161562624 bytes)		
94884	Instant Messages	Incoming		15/02/2021 9:02:40 PM(UTC+10)	From: + [REDACTED] Greta Sinclair To: + [REDACTED] (owner), To: [REDACTED] Bruce Lehmann (owner) To: + [REDACTED] (owner), To: [REDACTED] Bruce Lehmann (owner)	That's good Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70F3F3F (Table: message, handle, chat, Size: 161562624 bytes)		
94885	Instant Messages	Outgoing		15/02/2021 9:02:40 PM(UTC+10)	From: + [REDACTED] (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehmann (owner)	The same as I told you babe Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70F3D09 (Table: message, handle, chat, Size: 161562624 bytes)		

94926	Instant Messages	Outgoing		15/02/2021 9:38:08 PM(UTC+10)	From: + [REDACTED] (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehrmann (owner) To: + [REDACTED] Greta Sinclair, To: [REDACTED] Bruce Lehrmann (owner)	Easy babe xx Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70F7840 (Table: message, handle, chat, Size: 161562624 bytes)		
94927	Instant Messages	Outgoing		15/02/2021 9:38:20 PM(UTC+10)	From: [REDACTED] Bruce L (owner) To: [REDACTED] John McGowan To: [REDACTED] John McGowan	Huntley's cove Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGr oup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x79B811 (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGr oup/group.net.whatsapp.WhatsApp.share d/Library/Preferences/group.net.whatsap p.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)		
94928	Instant Messages	Outgoing		15/02/2021 9:42:07 PM(UTC+10)	From: [REDACTED] (owner) To: + [REDACTED] Tahlia Work Mobile, To: [REDACTED] Bruce Lehrmann (owner) To: + [REDACTED] Tahlia Work Mobile, To: [REDACTED] Bruce Lehrmann (owner)	Anything happening? Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70F75DF (Table: message, handle, chat, Size: 161562624 bytes)		
94929	Instant Messages	Incoming		15/02/2021 9:42:40 PM(UTC+10)	From: + [REDACTED] Tahlia Work Mobile To: [REDACTED] (owner), To: [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] (owner), To: [REDACTED] Bruce Lehrmann (owner)	Nothing on news... Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70F7366 (Table: message, handle, chat, Size: 161562624 bytes)		
94930	Instant Messages	Outgoing		15/02/2021 9:43:05 PM(UTC+10)	From: + [REDACTED] (owner) To: [REDACTED] Tahlia Work Mobile, To: [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] Tahlia Work Mobile, To: [REDACTED] Bruce Lehrmann (owner)	Yeah no naming Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70F8F49 (Table: message, handle, chat, Size: 161562624 bytes)		
94931	Instant Messages	Incoming		15/02/2021 9:43:29 PM(UTC+10)	From: + [REDACTED] Tahlia Work Mobile To: [REDACTED] (owner), To: [REDACTED] Bruce Lehrmann (owner) To: + [REDACTED] (owner), To: [REDACTED] Bruce Lehrmann (owner)	Nothing yet.. Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70F8CD8 (Table: message, handle, chat, Size: 161562624 bytes)		
94932	Instant Messages	Outgoing		15/02/2021 9:48:02 PM(UTC+10)	From: + [REDACTED] (owner) To: [REDACTED] Tahlia Work Mobile, To: [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] Tahlia Work Mobile, To: [REDACTED] Bruce Lehrmann (owner)	Yeah this Rick is good Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70F8AA4 (Table: message, handle, chat, Size: 161562624 bytes)		
94933	Instant Messages	Outgoing		15/02/2021 9:48:16 PM(UTC+10)	From: + [REDACTED] (owner) To: + [REDACTED] Tahlia Work Mobile, To: [REDACTED] Bruce Lehrmann (owner) To: + [REDACTED] Tahlia Work Mobile, To: [REDACTED] Bruce Lehrmann (owner)	Said any contact now about goes through him Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70F882D (Table: message, handle, chat, Size: 161562624 bytes)		

94934	Instant Messages	Incoming		15/02/2021 9:52:10 PM(UTC+10)	From: [REDACTED] Tahlia Work Mobile To: [REDACTED] (owner), To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] (owner), To: [REDACTED] Bruce Lehmann (owner)	Do whatever your lawyer says to do.... Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70F8582 (Table: message, handle, chat, Size: 161562624 bytes)		
94935	Instant Messages	Outgoing		15/02/2021 9:52:30 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Tahlia Work Mobile , To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Tahlia Work Mobile , To: [REDACTED] Bruce Lehmann (owner)	Yep Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70F831C (Table: message, handle, chat, Size: 161562624 bytes)		
94936	Instant Messages	Outgoing		15/02/2021 9:52:45 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Tahlia Work Mobile , To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Tahlia Work Mobile , To: [REDACTED] Bruce Lehmann (owner)	He's very good Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70F9F49 (Table: message, handle, chat, Size: 161562624 bytes)		
94937	Instant Messages	Outgoing		15/02/2021 9:52:55 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Tahlia Work Mobile , To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Tahlia Work Mobile , To: [REDACTED] Bruce Lehmann (owner)	Are you working from home tomorrow? Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70F9CDE (Table: message, handle, chat, Size: 161562624 bytes)		
94938	Instant Messages	Incoming		15/02/2021 9:53:20 PM(UTC+10)	From: [REDACTED] Tahlia Work Mobile To: [REDACTED] (owner), To: [REDACTED] Bruce Lehmann (owner) [REDACTED] (owner), To: [REDACTED] Bruce Lehmann (owner)	I have to be in town...but on the blower Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70F976E (Table: message, handle, chat, Size: 161562624 bytes)		
94939	Instant Messages	Incoming		15/02/2021 9:53:41 PM(UTC+10)	From: [REDACTED] Tahlia Work Mobile To: [REDACTED] (owner), To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] (owner), To: [REDACTED] Bruce Lehmann (owner)	As know as the phone for gen z's Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70F94FA (Table: message, handle, chat, Size: 161562624 bytes)		
94940	Activity Sensor Data			15/02/2021 12:00:00 PM [End time]		Source: Health Source file: Bruce's iPhone/mobile/Library/Health/healthdb_s ecure.sqlite : 0x40E896 (Table: objects, samples, Size: 18513920 bytes)		
94941	Activity Sensor Data			15/02/2021 12:00:00 PM [Start time]		Source: Health Source file: Bruce's iPhone/mobile/Library/Health/healthdb_s ecure.sqlite : 0x40E75B (Table: objects, samples, Size: 18513920 bytes)		
94942	Instant Messages	Outgoing		15/02/2021 10:03:43 PM(UTC+10)	From: [REDACTED] Bruce L (owner) To: [REDACTED] John McGowan To: [REDACTED] John McGowan	You far? Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGr oup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x79B788 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGr oup/group.net.whatsapp.WhatsApp.share d/Library/Preferences/group.net.whatsap p.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)		

94943	Instant Messages	Incoming		15/02/2021 10:09:52 PM(UTC+10)	From: [REDACTED] Participants: [REDACTED] John McGowan [REDACTED] Bruce L (owner)	Ah yeah just gotta finish one beer Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x79B6E9 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes)		
94944	Instant Messages	Outgoing		15/02/2021 10:11:10 PM(UTC+10)	From: [REDACTED] Bruce L (owner) To: [REDACTED] et John McGowan To: [REDACTED] John McGowan	Yeah get here Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x79B65C (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)		
94945	Instant Messages	Outgoing		15/02/2021 10:11:13 PM(UTC+10)	From: [REDACTED] Bruce L (owner) To: [REDACTED] s.whatsapp.net John McGowan To: [REDACTED] app.net John McGowan	Need bags Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x79B5D2 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)		
94946	Instant Messages	Outgoing		15/02/2021 10:11:19 PM(UTC+10)	From: [REDACTED] Bruce L (owner) To: [REDACTED] John McGowan To: [REDACTED] John McGowan	Let's get it done Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x79B53E (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)		
94947	Instant Messages	Outgoing		15/02/2021 10:11:30 PM(UTC+10)	From: [REDACTED] Bruce L (owner) To: [REDACTED] John McGowan To: [REDACTED] John McGowan	No one has work tomorrow Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x79B4A5 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)		
94948	Instant Messages	Incoming		15/02/2021 10:11:58 PM(UTC+10)	From: [REDACTED] John McGowan Participants: [REDACTED] John McGowan [REDACTED] Bruce L (owner)	I gave Harry cracka's number text him Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x79B401 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes)		
94949	Instant Messages	Outgoing		15/02/2021 10:12:19 PM(UTC+10)	From: [REDACTED] Bruce L (owner) To: [REDACTED] John McGowan To: [REDACTED] John McGowan	Phone dead he's not available Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x79B362 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)		

94950	Instant Messages	Outgoing		15/02/2021 10:12:25 PM(UTC+10)	From: [REDACTED] Bruce L (owner) To: [REDACTED] John McGowan To: [REDACTED] John McGowan	I've messaged Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x79B2D2 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)		
94951	Instant Messages	Incoming		15/02/2021 10:12:40 PM(UTC+10)	From: [REDACTED] John McGowan Participants: [REDACTED] John McGowan, [REDACTED] Bruce L (owner)	Try chico Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x79B24C (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes)		
94952	Instant Messages	Outgoing		15/02/2021 10:12:48 PM(UTC+10)	From: [REDACTED] Bruce L (owner) To: [REDACTED] John McGowan To: [REDACTED] John McGowan	Need number Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x79B1C1 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)		
94953	Instant Messages	Outgoing		15/02/2021 10:12:57 PM(UTC+10)	From: [REDACTED] Bruce L (owner) To: [REDACTED] John McGowan To: [REDACTED] John McGowan	Harry paying apparently as he's staying here Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x79B112 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)		
94954	Instant Messages	Outgoing		15/02/2021 10:13:02 PM(UTC+10)	From: [REDACTED] Bruce L (owner) To: [REDACTED] John McGowan To: [REDACTED] John McGowan	Lol so let's get lit Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x79B07B (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)		
94955	Contacts			15/02/2021 10:17:06 PM(UTC+10) [Modified]		Keetha Wilkinson Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ContactsV2.sqlite : 0xE409 (Table: ZWAADDRESSBOOKCONTACT, Size: 245760 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/Media/Profile [REDACTED] 1549263987.thumb : 0x0 (Size: 4808 bytes)		
94956	Contacts			15/02/2021 10:17:06 PM(UTC+10) [Modified]		Keetha Wilkinson Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ContactsV2.sqlite : 0x1942F (Table: ZWAADDRESSBOOKCONTACT, Size: 245760 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/Media/Profile [REDACTED] 1549263987.thumb : 0x0 (Size: 4808 bytes)		

94957	Instant Messages	Outgoing		15/02/2021 10:31:30 PM(UTC+10)	From: [REDACTED] [REDACTED] Bruce L (owner) To: [REDACTED] [REDACTED] John McGowan To: [REDACTED] [REDACTED] John McGowan	How far? Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x79CFB2 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)		
94958	Instant Messages	Incoming		15/02/2021 10:32:25 PM(UTC+10)	From: [REDACTED] Tahlia Work Mobile To: [REDACTED] (owner), [REDACTED] [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] (owner), [REDACTED] [REDACTED] Bruce Lehrmann (owner)	Send me Harry's new number... Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70FB9A8 (Table: message, handle, chat, Size: 161562624 bytes)		
94959	Instant Messages	Outgoing		15/02/2021 10:33:24 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Tahlia Work Mobile, [REDACTED] [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] Tahlia Work Mobile, [REDACTED] [REDACTED] m Bruce Lehrmann (owner)	You got any gear? Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70FB74E (Table: message, handle, chat, Size: 161562624 bytes)		
94960	Instant Messages	Outgoing		15/02/2021 10:33:43 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Tahlia Work Mobile, [REDACTED] [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] Tahlia Work Mobile, [REDACTED] [REDACTED] m Bruce Lehrmann (owner)	Harry and John here Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70FB4E1 (Table: message, handle, chat, Size: 161562624 bytes)		
94961	Instant Messages	Incoming		15/02/2021 10:34:24 PM(UTC+10)	From: [REDACTED] Tahlia Work Mobile To: [REDACTED] (owner), [REDACTED] [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] (owner), [REDACTED] [REDACTED] m Bruce Lehrmann (owner)	No I am at home. And you guys need to keep it clean. Enough!!! Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70FB266 (Table: message, handle, chat, Size: 161562624 bytes)		
94962	Instant Messages	Incoming		15/02/2021 10:34:29 PM(UTC+10)	From: [REDACTED] app.net John McGowan Participants: [REDACTED] [REDACTED] John McGowan, [REDACTED] Bruce L (owner)	30 Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x79CF33 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes)		
94963	Instant Messages	Incoming		15/02/2021 10:34:40 PM(UTC+10)	From: [REDACTED] [REDACTED] John McGowan Participants: [REDACTED] [REDACTED] John McGowan, [REDACTED] Bruce L (owner)	Lots of kids around Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x79CEA5 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes)		
94964	Instant Messages	Outgoing		15/02/2021 10:34:59 PM(UTC+10)	From: [REDACTED] [REDACTED] Bruce L (owner) To: [REDACTED] [REDACTED] John McGowan To: [REDACTED] [REDACTED] John McGowan	Nah ditch them or bring them Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x79CE09 (Table: ZWAMESSAGE, ZWAGROUPMEMBER, ZWACHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)		

94965	Instant Messages	Outgoing	15/02/2021 10:35:03 PM(UTC+10)	From: [REDACTED] To: [REDACTED] Bruce L (owner) [REDACTED] John McGowan To: [REDACTED] John McGowan	Get here Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x79CD80 (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)
94966	Instant Messages	Outgoing	15/02/2021 10:35:05 PM(UTC+10)	From: [REDACTED] To: [REDACTED] Bruce L (owner) [REDACTED] John McGowan To: [REDACTED] John McGowan	It's good Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x79CCF4 (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)
94967	Instant Messages	Outgoing	15/02/2021 10:35:13 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Tablia Work Mobile, To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Tablia Work Mobile, To: [REDACTED] Bruce Lehmann (owner)	Yeah true Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70FCF49 (Table: message, handle, chat, Size: 161562624 bytes)
94968	Instant Messages	Incoming	15/02/2021 10:35:30 PM(UTC+10)	From: [REDACTED] John McGowan Participants: [REDACTED] John McGowan, [REDACTED] Bruce L (owner)	Leaving in 5 Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share d/ChatStorage.sqlite : 0x79CC6B (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes)
94969	Instant Messages	Incoming	15/02/2021 10:36:08 PM(UTC+10)	From: [REDACTED] Tablia Work Mobile To: [REDACTED] (owner), To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] (owner), To: [REDACTED] Bruce Lehmann (owner)	Tomorrow won't be good...Rein the shit in. Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70FCCE2 (Table: message, handle, chat, Size: 161562624 bytes)
94970	Instant Messages	Outgoing	15/02/2021 10:36:59 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Tablia Work Mobile, To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Tablia Work Mobile, To: [REDACTED] Bruce Lehmann (owner)	Yeah true Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70FC75B (Table: message, handle, chat, Size: 161562624 bytes)
94971	Instant Messages	Outgoing	15/02/2021 10:37:08 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Tablia Work Mobile, To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Tablia Work Mobile, To: [REDACTED] Bruce Lehmann (owner)	I've got two lawyers now Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70FC4FE (Table: message, handle, chat, Size: 161562624 bytes)
94972	Instant Messages	Outgoing	15/02/2021 10:37:14 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Tablia Work Mobile, To: [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Tablia Work Mobile, To: [REDACTED] Bruce Lehmann (owner)	Criminal Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70FC27F (Table: message, handle, chat, Size: 161562624 bytes)

94973	Instant Messages	Outgoing	15/02/2021 10:37:27 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Tahlia Work Mobile, To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Tahlia Work Mobile, To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	Who says it's joy his realm yet Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70FDF49 (Table: message, handle, chat, Size: 161562624 bytes)
94974	Instant Messages	Outgoing	15/02/2021 10:37:47 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Tahlia Work Mobile, To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Tahlia Work Mobile, To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	And another who's says I'm up for a 'bit' of money Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70FDCBC (Table: message, handle, chat, Size: 161562624 bytes)
94975	Instant Messages	Outgoing	15/02/2021 10:37:56 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Tahlia Work Mobile, To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Tahlia Work Mobile, To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	*not his Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70FD9FC (Table: message, handle, chat, Size: 161562624 bytes)
94976	Instant Messages	Outgoing	15/02/2021 10:38:34 PM(UTC+10)	From: [REDACTED] [REDACTED] Bruce L (owner) To: [REDACTED] [REDACTED] John McGowan To: [REDACTED] [REDACTED] s.whats [REDACTED] John McGowan	Ok hurry up Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x79CBE0 (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)
94977	Instant Messages	Outgoing	15/02/2021 10:38:40 PM(UTC+10)	From: [REDACTED] [REDACTED] Bruce L (owner) To: [REDACTED] [REDACTED] John McGowan To: [REDACTED] [REDACTED] John McGowan	How many bags? Source: WhatsApp Source file: Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/ChatStorage.sqlite : 0x79CB51 (Table: ZWMESSAGE, ZWAGROUPMEMBER, ZWCHATSESSION, Size: 17633280 bytes) Bruce's iPhone/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.share/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist : 0x67F (Size: 17828 bytes)
94978	Instant Messages	Incoming	15/02/2021 10:38:49 PM(UTC+10)	From: [REDACTED] Tahlia Work Mobile To: [REDACTED] (owner) [REDACTED] Bruce Lehmann (owner) To: [REDACTED] (owner) [REDACTED] Bruce Lehmann (owner)	Clear your name mate that's all that matters - you only have your name and one name. Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70FD797 (Table: message, handle, chat, Size: 161562624 bytes)
94979	Instant Messages	Outgoing	15/02/2021 10:40:17 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Tahlia Work Mobile, To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Tahlia Work Mobile, To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	Yeah exactly Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70FD4D0 (Table: message, handle, chat, Size: 161562624 bytes)
94980	Instant Messages	Outgoing	15/02/2021 10:40:36 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Tahlia Work Mobile, To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Tahlia Work Mobile, To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	He said I'm clear from criminal completely Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70FD26D (Table: message, handle, chat, Size: 161562624 bytes)

94981	Instant Messages	Incoming	15/02/2021 10:43:12 PM(UTC+10)	From: [REDACTED] Tahla Work Mobile To: [REDACTED] (owner) To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: [REDACTED] (owner) To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	You need to take this seriously mate. Go home and don't leave your apartment... Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70FEF3F (Table: message, handle, chat, Size: 161562624 bytes)
94982	Instant Messages	Outgoing	15/02/2021 10:45:28 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Tahla Work Mobile To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Tahla Work Mobile To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	Yeah I have Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70FEC82 (Table: message, handle, chat, Size: 161562624 bytes)
94983	Instant Messages	Outgoing	15/02/2021 10:45:42 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Tahla Work Mobile To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Tahla Work Mobile To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	I've got criminal and a defamation Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70FEA21 (Table: message, handle, chat, Size: 161562624 bytes)
94984	Instant Messages	Outgoing	15/02/2021 10:45:59 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Tahla Work Mobile To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Tahla Work Mobile To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	Haven't spoken to anyone as you advised which was amazing Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70FE78E (Table: message, handle, chat, Size: 161562624 bytes)
94985	Instant Messages	Outgoing	15/02/2021 10:46:11 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Tahla Work Mobile To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Tahla Work Mobile To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	Anyone who does they go through my lawyers Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70FE4CC (Table: message, handle, chat, Size: 161562624 bytes)
94986	Instant Messages	Outgoing	15/02/2021 10:46:28 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Tahla Work Mobile To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Tahla Work Mobile To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	Retained formerly Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70FE22D (Table: message, handle, chat, Size: 161562624 bytes)
94987	Instant Messages	Incoming	15/02/2021 10:47:50 PM(UTC+10)	From: [REDACTED] Tahla Work Mobile To: [REDACTED] (owner) To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: [REDACTED] (owner) To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	Bet your lawyer is thanking me now.... Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70FFF3F (Table: message, handle, chat, Size: 161562624 bytes)
94988	Instant Messages	Outgoing	15/02/2021 10:48:14 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Tahla Work Mobile To: [REDACTED] [REDACTED] Bruce Lehmann (owner) To: [REDACTED] Tahla Work Mobile To: [REDACTED] [REDACTED] Bruce Lehmann (owner)	You have know idea Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70FFCD9 (Table: message, handle, chat, Size: 161562624 bytes)

95006	Instant Messages	Outgoing			15/02/2021 11:22:08 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Tahlia Work Mobile To: [REDACTED] [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] Tahlia Work Mobile To: [REDACTED] [REDACTED] Bruce Lehrmann (owner)	He seems good Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x71004AF (Table: message, handle, chat, Size: 161562624 bytes)		
95007	Instant Messages	Outgoing			15/02/2021 11:22:15 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Tahlia Work Mobile To: [REDACTED] [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] Tahlia Work Mobile To: [REDACTED] [REDACTED] Bruce Lehrmann (owner)	I'll sleep for as much as I can Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x710024A (Table: message, handle, chat, Size: 161562624 bytes)		
95008	Instant Messages	Outgoing			15/02/2021 11:22:24 PM(UTC+10)	From: [REDACTED] (owner) To: + [REDACTED] Tahlia Work Mobile To: [REDACTED] [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] Tahlia Work Mobile To: [REDACTED] [REDACTED] Bruce Lehrmann (owner)	And give you a bell tomorrow Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x7101F49 (Table: message, handle, chat, Size: 161562624 bytes)		
95009	Instant Messages	Outgoing			15/02/2021 11:22:34 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Tahlia Work Mobile To: [REDACTED] [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] Tahlia Work Mobile To: [REDACTED] [REDACTED] Bruce Lehrmann (owner)	Greta sleeping and standing by me Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x71019CE (Table: message, handle, chat, Size: 161562624 bytes)		
95010	Instant Messages	Incoming			15/02/2021 11:24:52 PM(UTC+10)	From: [REDACTED] Tahlia Work Mobile To: [REDACTED] (owner) To: [REDACTED] [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] (owner) To: [REDACTED] [REDACTED] Bruce Lehrmann (owner)	That's good. No more of shit partying.... Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x7101737 (Table: message, handle, chat, Size: 161562624 bytes)		
95011	Instant Messages	Incoming			15/02/2021 11:25:56 PM(UTC+10)	From: [REDACTED] Tahlia Work Mobile To: [REDACTED] (owner) To: [REDACTED] [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] (owner) To: [REDACTED] [REDACTED] Bruce Lehrmann (owner)	John and Harry should know better Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x71014BD (Table: message, handle, chat, Size: 161562624 bytes)		
95012	Instant Messages	Outgoing			15/02/2021 11:26:40 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Tahlia Work Mobile To: [REDACTED] [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] Tahlia Work Mobile To: [REDACTED] [REDACTED] Bruce Lehrmann (owner)	Exactly although to Harry's credit he has provided a good lawyer Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x710125F (Table: message, handle, chat, Size: 161562624 bytes)		
95013	Instant Messages	Outgoing			15/02/2021 11:27:05 PM(UTC+10)	From: [REDACTED] (owner) To: [REDACTED] Tahlia Work Mobile To: [REDACTED] [REDACTED] Bruce Lehrmann (owner) To: [REDACTED] Tahlia Work Mobile To: [REDACTED] [REDACTED] Bruce Lehrmann (owner)	I won't be going to prison and we have 2 lined up for civil Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x7102F49 (Table: message, handle, chat, Size: 161562624 bytes)		

Federal Court of Australia
District Registry: New South Wales
Division: General


BRUCE LEHRMANN

Applicant

NETWORK TEN PTY LIMITED (ACN 052 515 250) and another
Respondents

CERTIFICATE IDENTIFYING ANNEXURE

This is the annexure marked "**MRS-16**" now produced and shown to Marlia Ruth Saunders at the time of affirming her affidavit on 15 March 2023:



Signature of Conor O'Beirne
Thomson Geer
Level 14, 60 Martin Place
Sydney NSW 2000

An Australian Legal Practitioner within the meaning of the Legal Profession Uniform Law

O'Beirne, Conor

From: Monica Allen <Monica.Allen@markobrienlegal.com.au>
Sent: Wednesday, 15 March 2023 3:18 PM
To: Saunders, Marlia; Paul Svilans; David Collinge
Cc: Anthony Jefferies; Nicola Sanchez; McAvaney, Grant; O'Beirne, Conor; Antonia Rosen
Subject: RE: (NSD103/2023) Bruce Lehrmann v Network Ten Pty Limited ACN 052 515 250 & Anor [TGLAW-Legal.FID3782978]

Dear Colleagues

We refer to your email below.

On 8 March 2023, our client produced pages of text messages responsive to the Respondents' Notices to Produce dated 2 and 3 March 2023. Our client redacted material which was not relevant to any category in the Notices. Following objection by the Second Respondent to the redactions, our client produced unredacted versions of the same documents yesterday.

The entries to which you were refer in your email, were not produced by our client (redacted or unredacted), because they are not captured by any category in either Notice to Produce.

Kind regards

Monica Allen

Special Counsel | Mark O'Brien Legal

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O'BRIEN
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From: Saunders, Marlia <msaunders@tglaw.com.au>
Sent: Wednesday, March 15, 2023 9:27 AM
To: Paul Svilans <Paul.Svilans@markobrienlegal.com.au>; David Collinge <dec@gdlaw.com.au>
Cc: Anthony Jefferies <ajj@gdlaw.com.au>; Nicola Sanchez <nrs@gdlaw.com.au>; Monica Allen <Monica.Allen@markobrienlegal.com.au>; McAvaney, Grant <grant.mcavaney@news.com.au>; O'Beirne, Conor <cobeirne@tglaw.com.au>; Antonia Rosen <antonia.rosen@news.com.au>
Subject: RE: (NSD103/2023) Bruce Lehrmann v Network Ten Pty Limited ACN 052 515 250 & Anor [TGLAW-Legal.FID3782978]
Importance: High

Dear Colleagues

We refer to your email yesterday and to the unredacted messages produced.

We note that there are pages missing from the bundle – including the entries numbered 94560 to 94567, 94609 to 94667, 94676 to 94731, 94740 to 94812, 94821 to 94828 and 94838 to 94964.

Please attend to providing these missing pages at your earliest convenience.

Kind regards

Marlia Saunders | Partner
THOMSON GEER
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Level 14, 60 Martin Place, Sydney NSW 2000 Australia
msaunders@tglaw.com.au | tglaw.com.au

Advice | Transactions | Disputes

From: Paul Svilans <Paul.Svilans@markobrienlegal.com.au>
Sent: Tuesday, 14 March 2023 11:55 AM
To: David Collinge <dec@gdlaw.com.au>
Cc: Anthony Jefferies <ajj@gdlaw.com.au>; Nicola Sanchez <nrs@gdlaw.com.au>; Monica Allen <Monica.Allen@markobrienlegal.com.au>; McAvaney, Grant <grant.mcavaney@news.com.au>; Saunders, Marlia <msaunders@tglaw.com.au>; O'Beirne, Conor <cobeirne@tglaw.com.au>; Antonia Rosen <antonia.rosen@news.com.au>
Subject: (NSD103/2023) Bruce Lehrmann v Network Ten Pty Limited ACN 052 515 250 & Anor

Dear Sir

Please find attached letter and copies of documents referred to therein.

Regards

Paul Svilans
Principal | Mark O'Brien Legal

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#####

Federal Court of Australia
District Registry: New South Wales
Division: General

BRUCE LEHRMANN

Applicant

NETWORK TEN PTY LIMITED (ACN 052 515 250) and another
Respondents

CERTIFICATE IDENTIFYING ANNEXURE

This is the annexure marked "**MRS-17**" now produced and shown to Marlia Ruth Saunders at the time of affirming her affidavit on 15 March 2023:



Signature of Conor O'Beirne
Thomson Geer
Level 14, 60 Martin Place
Sydney NSW 2000

An Australian Legal Practitioner within the meaning of the Legal Profession Uniform Law



Australian Federal Police
STATEMENT OF
FACTS

DEFENDANT BRUCE LEHRMANN
 DATE OF BIRTH 14/06/1995
 ADDRESS 49 KARA VIEW COURT RANGEVILLE QLD 4350
 NATIONALITY AUSTRALIA
 OCCUPATION

	ARRESTED		CHARGED		OFFENCE		
	DATE	TIME	DATE	TIME	DATE	CODE	TYPE
1					23/03/2019	CAY54(1)	SEXUAL/INDECENT ASSAULT

VALUE OF PROPERTY(\$) 0
 COMPENSATION SOUGHT NO

AMOUNT(\$) 0

ARRESTING OFFICER

NAME : MOLLER, Scott Joseph
 LOCATION : ACT-CRIMINAL INVESTIGATIONS

INFORMANT

NAME : MOLLER, Scott Joseph
 LOCATION : ACT-CRIMINAL INVESTIGATIONS

COURT

COURT NAME : A.C.T. MAGISTRATES COURT
 COURT DATE : 16/09/2021

VICTIM IMPACT STATEMENT

Not Required

BAIL

BAIL TYPE : NONE
 CONDITIONS :

STATEMENT OF FACTS

CHARGE 1
 OFFENCE : A.C.T. - SEXUAL INTERCOURSE WITHOUT CONSENT - RECKLESS
 ACT : A.C.T. - CRIMES ACT 1900
 SECTION : Section 54(1)
 COURT CODE : CC2021/8143

GENERAL INFORMATION

About 7.19pm on Friday 22 March 2019 Ms Brittany HIGGINS attended The Dock Pub, Kingston Foreshore in the Australian Capital Territory (ACT). She attended the location for an after work function with fellow employees. Ms HIGGINS was employed by the Australian Government as a staff member for Defence Minister Linda REYNOLDS and she worked at Australian Parliament House, Parliament Drive, Canberra in the ACT.

When Ms HIGGINS attended the location she joined a main group of employees and drank vodka/lime alcoholic drinks. She had arranged to meet a male at the location via a phone application called 'Bumble'. About 8.02pm on the same date the male arrived and Ms HIGGINS introduced him to the main group. About 8.39pm on the same date Mr Bruce Emery LEHRMANN, born 14 June 1995, now referred to as the defendant before the Court arrived at the location. He was in the company of Mr Austin WENKE and both were also employed by the Australian Government. The defendant was also a staff member for Defence Minister REYNOLDS.

The defendant and Mr WENKE sat away from the main group while drinking beers. A short time later Ms HIGGINS left the main group and sat with the defendant and Mr WENKE. About forty (40) minutes later the male Ms HIGGINS met through 'Bumble' left the location when she did not return to the main group.

Throughout the night Ms HIGGINS and the defendant talked to each other and the rest of the group. They both continue to drink alcohol throughout the night and by the time Ms Higgins left, she felt quite intoxicated. About 11.51pm on the same date Ms HIGGINS, the defendant, Mr WENKE and Ms Lauren GAIN left the location and headed to the 88mph bar, Hobart Circuit, City in the ACT.

At that location Ms HIGGINS consumes more alcoholic drinks including doing 'shots'. A shot is approximately 30 millilitres of straight spirits drunk quickly. During her time at this location she started to feel highly intoxicated and when the group were leaving she fell over on the stairs. The defendant assisted her to her feet and out of the bar.

About 1.23am on Saturday 23 March 2019 Mr WENKE and Ms GAIN got into an Uber vehicle and left. Ms HIGGINS and the defendant then got into an Uber and left the City. She got into the vehicle as the defendant lived in the same general direction. Ms HIGGINS was highly intoxicated and could not remember speaking to the driver or any conversations.

After some time Ms HIGGINS realised that the vehicle had stopped at Australian Parliament House. She got out of the vehicle and the defendant said to her "Play along" or "Don't say anything". He then went into the building through the Ministers entrance and she decided to follow instead of staying outside.

About 1.41am on the same date Ms HIGGINS and the defendant enter the security checkpoint. She cannot recall interacting with the security guards, due to her intoxication, and was stumbling. As neither she nor the defendant had their work passes they had to be signed in by the security guards after showing photographic identification. After signing in they were let into the Defence Ministers' suite, M1-23, by a security guard.

Charge CC2021/8143 - Sexual intercourse without consent

Ms HIGGINS sat on a small ledge in the Ministers' office looking out onto a court yard. At some point she moved to a lounge in the office and lay down. She then fell asleep but was woken by a pressure feeling on her right leg.

At that time she opened her eyes to see the defendant above her with his hands on either side of her head. Her head was facing the door that allows entry into the office and she could feel the defendant engaging in penile/vaginal intercourse. She said "No" to the defendant a number of times, while she was crying, but he continued to engage in intercourse.

After an unknown amount of time the defendant has stopped and got off Ms HIGGINS. He did not say anything to her and left the room. Ms HIGGINS has then fallen back to sleep or passed out.

About 2.35am on the same date Mr Mark FAIRWEATHER, Parliament Security Services (PSS), saw the defendant leave the building and noticed that he was alone. They determined that Ms HIGGINS had not left the suite and decided to check her welfare. The purpose was to ensure whether she had left the building via a different entrance or if she was still in the suite.

About 4.15am on the same date Ms Nikola ANDERSON, PSS, entered the suite and found the door to the minister's office unlocked. She knocked and entered the office. Upon entry she saw Ms HIGGINS lying on the lounge naked, with her legs up. Ms Higgins' dress and shoes were next to the couch and her feet were facing the door. She stated that Ms HIGGINS looked at her and rolled over to go back to sleep.

Ms ANDERSON noticed that Ms HIGGINS did not appear distressed and her make-up was not smudged. She left Ms HIGGINS in the room asleep as she had no concerns for her welfare. She contacted Mr CALLAN and it was decided that if Ms HIGGINS had not left at the change of shifts the day shift would be notified. When Ms ANDERSON finished her shift around 7.00am on the same day Ms HIGGINS had not left and the day shift were notified.

About 7.45am on the same date Ms HIGGINS received a Short-Message-Service (SMS) from Mr Benjamin DILLAWAY, a former intimate relationship partner. The message stated:

"Morning! Let me know when you up and I'll call you back. I was asleep when you called haha"

About 8.00am on the same date Ms HIGGINS woke up and noticed that her dress was bunched up around her waist. She had not been wearing underwear on the night, she was naked from the waist down and her head was facing the door. She sat up and fixed her dress before leaving the office into the suite area. She then ate some food before returning to the office to vomit in the toilet.

About 8.17am on the same date Ms HIGGINS replied to the SMS from Mr DILLAWAY. Her reply was:

"Hahah all good. I truly have zero recall on what I was calling about (smiling face emoji)"

About 9.20am on the same date Mr Allan TYLER and Ms Kristine BRENTON, PSS, attended the suite as they had been made aware that Ms HIGGINS was still in suite. They entered the suite and Ms BRENTON knocked on the door of the Ministers office, which was unlocked. She called out and Ms HIGGINS replied that she was fine. They then left the room.

About 10.08am on the same date Ms HIGGINS left the building through the same entrance she had entered through. She spoke to the PSS guard on duty and then caught an Uber home. When she arrived home she spoke briefly to her flatmate Ms Alex HUMPHREYS but she was distressed and went to her room.

During the day Ms HIGGINS had a phone conversation with Mr DILLAWAY. He called her after missing a call from her the night before. She told him that she had been out for drinks then people had gone back to Australian Parliament House. When he asked more questions about this she didn't answer.

At Australian Parliament House the PSS notified their management about two (2) staff members being in the office after hours and that Ms HIGGINS had slept in the office. As result of this information it was determined that the office may require to be cleaned.

About 4.00pm on the same date Mr Carlos RAMOS, Dimeo Cleaning, attended the suite to ensure it was cleaned. He noticed that the suite and office were clean. As a result of this he did a light cleaning which included emptying bins, wiping down the desks and giving the lounge a wipe down. He did not notice any liquids, marks or excessive rubbish.

About 6.59pm on the same date Ms HIGGINS had another SMS conversation with Mr DILLAWAY. The conversation was as follows:

DILLAWAY: "How's the hangover?"

HIGGINS: "Pretty rough"

DILLAWAY: "Haha. You must have been in fine form"

HIGGINS: "Yeah. I need to slow down a bit. It's probably gotten a little out of hand recently haha"

DILLAWAY: "Haha oh dear. I want to party with you. And see you in full flight"

HIGGINS: "I just get myself into trouble. Need to keep that shit locked down"

DILLAWAY: "Haha do tell"

HIGGINS: "Just the standard shenanigans"

About 8.39pm on Sunday 24 March 2019 Ms HIGGINS and Mr DILLAWAY had a number of SMS conversations. The conversations were:

DILLAWAY: Haha. I lashed out and got an ice cream. How was your day? The drive down here was actually a lot of fun. I love a big drive and road trip"

HIGGINS: "Fair call - ice cream helps most situations. Ehh, just uni stuff all day.

DILLAWAY: "That does not sound like a Sunday funday"

HIGGINS: "Hahah oh well. My inner nerd is digging it."

DILLAWAY: "Your weekend touched both ends of the spectrum, passing out in parliament and then studying haha. What assignments/subjects you crush today?"

HIGGINS: "Hahah I really had to balance it out. Mostly hooked into economic policy analysis and media law"

Over the course of the weekend Ms HIGGINS did not interact with any person and mainly stayed in her room. She was upset and crying.

On Monday 25 March 2019 Ms HIGGINS went to work and saw the defendant. She did not interact with him but he did buy her a cup of coffee and she was cordial. Ms HIGGINS believed that she would be spoken about being in the Ministers office, after hours, but she was not spoken to about the incident.

On Tuesday 26 March 2019 Ms HIGGINS went to work and during the morning she was made aware that Ms Fiona BROWN, Chief of Staff for Defence Minister REYNOLDS, wanted to speak to her and the defendant. She believed that she was going to be disciplined for being in the Ministers office after hours. Ms HIGGINS saw the defendant go into the office to speak to Ms BROWN prior to her being called in.

About forty (40) minutes later she saw the defendant leave the office and start to pack up his belongings. She believed that his employment had been terminated.

About 1.30pm on the same date she was called into the meeting with Ms BROWN. During the meeting she was advised that Ms BROWN was aware she had accessed the Ministers' office after hours. She was asked what time she arrived but stated she couldn't remember due to intoxication. She further stated that she remembered going through the security check point, being woken up and then woke up semi-naked the next morning.

Ms BROWN asked her if she was all right and she replied yes. She further stated that she could not recall anything else and she was responsible for how much she drank and her actions. After the meeting Ms HIGGINS went home.

About 1.57pm on the same date Ms HIGGINS has a Short-Messaging-Service (SMS) conversation with Mr DILLAWAY:

Ms HIGGINS - "So, I think I may not continue to be employed with Linda."

Mr DILLAWAY - "What? Did something happen?"

Ms HIGGINS - "Yeah, it's pretty bad. I genuinely don't know how it's going to play out/how I want it to play out."

Mr DILLAWAY - "If you made a mistake/stuffed up. Just be honest to her and COS so it can be fixed. I've made some huge fuck ups but owned them, said sorry etc. Can I call you? I realise you might be office so can't take call"

Ms HIGGINS - "So on Friday night how I ended up in the Ministerial office it didn't play out how I made out. I don't remember getting there at all, vaguely remember Bruce being there and then I woke up in the morning half-dressed by myself in the Ministers office on Saturday morning. I've spoken with dad and he is flying down on Friday. Was pretty upset over the weekend so he's headed her to just hang out."

Mr DILLAWAY - "That's good he's coming down. Was it just you and Bruce who went back there or a group of people? Did you hook up in there or did someone take advantage of you?"

Ms HIGGINS - "Yeah, it was just Bruce and I from what I recall. I was barely lucid. I really don't feel like it was consensual at all. I just think if he thought it was okay, why would he just leave me there like that."

On 28 March 2019 Ms HIGGINS went to work and during the day was asked to complete some paperwork regarding her employment. The paperwork had not been signed when she commenced in the Ministers office. After signing the paperwork Ms HIGGINS was with Ms BROWN, in her office, and she was again offered support. As she was leaving the office she said to Ms BROWN "I recall him being on top of me".

Ms BROWN was shocked by this comment and told her if something had happened that she didn't want to happen she should report it. Ms HIGGINS was asked if she wanted to go home but declined the offer. Later that evening she sent Ms BROWN a SMS stating she would not be in for work the next day as she had a doctor's appointment.

On 01 April 2019 Ms HIGGINS met with Ms BROWN and Minister REYNOLDS. During that meeting the Minister suggested that Ms HIGGINS meet with Australian Federal Police (AFP) Liaison Officers stationed at Australian Parliament House. Ms BROWN then walked with Ms HIGGINS to the AFP office and returned to her office. During the meeting with AFP-LO she provided them with a version of events and they later provided statements regarding the conversation.

On 08 April 2019 Ms HIGGINS met with members of the Sexual Assault and Child Abuse Team (SACAT), ACTP and provided them with a version of events. At that stage Ms HIGGINS was unsure if she wanted the investigation to progress but was happy for the SACAT members to collect Closed Circuit Television (CCTV) footage from The Dock Pub, Kingston. The footage was seized and exhibited (E449129).

On 14 April 2019 Ms HIGGINS contacted Police stating she did not wish the investigation to progress at that time. Police arranged for the CCTV from Australian Parliament House to be saved in case Ms Higgins wished to have the allegation investigated.

On 05 February 2021 Ms HIGGINS attended Belconnen Police Station, Belconnen, and stated she wished the investigation to be recommenced. On 06 February 2021 members from SACAT conducted a meet/greet information session with Ms HIGGINS.

During this meeting they were informed that she had been in contact with members of the media and she had participated in an interview for the television show The Project. She further stated that she did not wish to participate in an Evidence-In-Chief-Interview (EICI) until the media interview had aired on commercial television.

At the conclusion of the meeting she provided Police with a white dress and a Universal-Serial-Bus (USB). Ms HIGGINS stated that the dress was what she wore on the night of the incident, but that it had been washed, and the USB contained conversations she had recorded.

About 1.31pm on Wednesday 24 February 2021 members of SACAT conducted an EICI with Ms HIGGINS at the Gold Coast Airport, Bilinga, Queensland. During the EICI she disclosed the above version of events.

About 11.20am on Thursday 25 February 2021 Mr David SHARAZ, partner of Ms HIGGINS, participated in a Record of Conversation (ROC) about her disclosures to him.

About 1.56pm on the same date Mr DILLAWAY participated in a ROC and later supplied Police with a SMS conversation thread between himself and Ms HIGGINS.

On 26 February 2021 Ms HIGGINS provided Police with consent to obtain her medical records. Police were unable to locate any medical records, relating to the allegation of sexual assault, for Ms HIGGINS at any of the medical practices she nominated. Police were also provided with the CCTV footage from Australian Parliament House, which was seized and exhibited (E484784).

The white dress that was supplied by Ms HIGGINS was subjected to forensic examination but did not reveal any forensic material or any marks/stains.

On 02 March 2021 the USB containing the CCTV from The Dock Pub was accessed and a review of the footage was conducted. The footage shows:

- Ms HIGGINS is greeted by a number of people at a table in the court yard area before she heads to the bar area;
- She buys a drink and returns to the group;
- She interacts with the group at the table and is bought another drink by one of the group;
- About 8.02pm she leaves the group and returns with an unknown male person;
- She had arranged to meet this male through the phone application 'Bumble';
- Ms HIGGINS and the male enter the bar area and buy drinks;

- They return to the main group and at one point the male heads to the bar and returns with a drink for Ms HIGGINS;
- About 8.39pm the defendant and Mr Austin WENKE arrive;
- They interact with the main group before heading to the bar area and then return a short time later to sit away from the group;
- Ms HIGGINS enters the bar area and upon returning with a drink she sits with the defendant and Mr WENKE;
- About 9.32pm Ms HIGGINS and the defendant enter the bar area;
- Once they exit the court yard the male who Ms HIGGINS had met through 'Bumble' leaves the location;
- A short time later Ms HIGGINS and the defendant return to the court yard with drinks and sit at the table away from the main group and sit down;
- About 10.07pm Ms HIGGINS heads back to the bar area and returns shortly with a drink;
- About half an hour later Ms HIGGINS and the other people, from the other table, re-join the main group; and
- About 11.36pm Ms HIGGINS and the defendant leave the bar and the other members of the group follow behind them.

A review of the CCTV footage from Australian Parliament House was conducted which showed:

- About 1.50am on 23 March 2019 Ms HIGGINS and the defendant enter the security checkpoint at the Ministerial Wing of Australian Parliament House;
- They interact with the security guards and sign the temporary pass register;
- The defendant walks through the screening point but Ms HIGGINS walks through several times before taking her shoes off;
- Her shoes are black coloured high heels;
- After walking through bare foot she attempts to put on one of the shoes but stops after about thirty (30) seconds;
- She picks up her shoes and jogs along the hallway towards where the defendant and a security guard is standing;
- Ms HIGGINS and the defendant are standing outside the door to the Ministers suite with the security guard;
- After a short time the door is opened and they enter the suite with the security guard closing the door and leaving;
- About 2.35am on the same date the defendant is seen to leave through the security checkpoint and he does not appear to interact with the security guard; and
- About 10.01am Ms HIGGINS is seen to walk through the security checkpoint where she hands in her pass to the security guards before leaving.

Police obtained multiple ROCs and statements from identified witnesses.

On 12 March 2021 Police had arranged to meet with Ms HIGGINS to obtain her mobile phone for Cellebrite data extraction (Cellebrite) and to speak to Canberra Rape Crisis Service (CRCS) in person. She contacted Police stating she would not be able to attend due to a legal issue that was being resolved and disclosed in the media.

On 15 March 2021 Police had arranged to meet with Ms HIGGINS to obtain her mobile phone for Cellebrite and to have her speak to CRCS. When she did not attend at the appointed time Police contacted her with no answer to either a phone call or SMS. When Police attempted again she did answer but the phone disconnected and she did not answer when she was called back. Ms HIGGINS did not contact Police or attend the appointment.

During the afternoon on the same date Police observed Ms HIGGINS on the commercial television at the March4Justice.march at Australian Parliament House. She attended the location and gave a speech to the persons present.

About 1.03pm on the same date Mr Mark FAIRWEATHER participated in a ROC. Mr FAIRWEATHER was the security guard who signed in Ms HIGGINS and the defendant. He stated that he believed that she was slightly intoxicated and the defendant was also only slightly intoxicated. He stated that neither of them were slurring their words, they didn't smell of alcohol and they weren't unsteady on their feet. He did note that Ms HIGGINS stumbled to her left once when she was walking on in shoes and her eyes were a bit glassy.

About 6.11pm on the same date Ms GAIN participated in a ROC and stated that whilst at 88mph Ms HIGGINS and the defendant were sitting close together. She stated that they were rubbing each others' legs and then kissed on the mouth in what she described as a 'pash'. She further stated that did see Ms HIGGINS slip over once but it was on the way to where they were sitting and she believe everyone in the group were quite intoxicated.

On 28 March 2021 Mr WENKE participated in a ROC but stated that he had little recollection of his interactions with either Ms HIGGINS or the defendant.

On 02 April 2021 Ms Nikita IRVINE, former Aide-De-Camp to Minister REYNOLDS, participated in a ROC. She stated that on 28 March 2019 she had a conversation with Ms HIGGINS while they were walking to the passport office at Australian Parliament House. During that conversation Ms HIGGINS told her she had been at 88mph and that they had come back to Australian Parliament House so the defendant could show her some whiskey or to drink some whiskey. She further stated that she remembered the defendant being on top of her and when asked if it was rape said absolutely but she had not spoken to Police.

On 16 April 2021 Police attended an address in Toowoomba, Queensland to execute a Section 3E Crimes Act 1914 search warrant on the defendant. Upon arrival Police were advised, by a family friend, that the defendant had recently returned to Sydney, New South Wales (NSW). Police then made arrangements through a legal representative to meet the defendant in Sydney.

On Monday 19 April 2021 the defendant attended the AFP Headquarters, Sydney, NSW and participated in a ROI. During the ROI the defendant stated the following:

- He rejected the allegation of sexual intercourse without consent;
- He worked for Minister REYNOLDS for about six (6) months prior to the alleged incident;
- He was the most senior member due to time not due to his position;
- He was leaving the portfolio which was common knowledge;
- He attended the drinks at The Dock Pub, Kingston;
- He can't recall who organised the drinks but was invited by either Ms HIGGINS or Mr WENKE;
- He had dinner with Mr WENKE prior to attending The Dock Pub;
- There were a number of Aide-De-Camp to Ministers present and he was introduced by Ms GAIN to them;
- He brought one (1) or two (2) rounds of drinks;
- He was not intoxicated;
- They decided to keep going and he suggested they go to 88mph in the City;
- He, Ms HIGGINS, Mr WENKE and Ms GAIN went to 88mph;
- He doesn't recall how they got there and he spent about forty (40) dollars at the venue;
- He danced but doesn't recall Ms HIGGINS dancing;
- They sat in a booth;
- Ms GAIN and Mr WENKE were close and 'handsy';
- He told the group that he had to return to Australian Parliament House to obtain his keys to his apartment;
- Ms HIGGINS told him she also had to go to Australian Parliament House;
- He offered she travel with him as he ordered an Uber;
- He does not recall anyone falling over;
- They caught an Uber to the Ministerial entrance;
- They discussed the night's events including Ms GAIN and Mr WENKE being close;
- They didn't have their passes (his was left in the office);
- He never planned on a big night and planned on returning to the office;
- He would often leave stuff at work and return by 10pm;
- They signed in at the security check point and they signed themselves in;
- He was 7/10 intoxicated, as was Ms HIGGINS;
- He thought his intoxication level to be moderate explaining he could still hold conversations;
- Ms HIGGINS had trouble putting her shoes back on at the security check point;
- He wasn't too intoxicated that he couldn't sign in and neither was Ms HIGGINS by his observations;
- Under the belief that if a person was 10/10 intoxicated the security staff would deny entry;
- They were escorted to the Ministerial Suite and he and Ms HIGGINS entered;

- He went left and went to his desk, Higgins went right towards the Minister's office;
- He collected his belongings and did work on files he had on his desk for Question Time;
- The notes were in relation to 'Submarines' based on conversations he had earlier that night while out with the personnel from the Department of Defence;
- He is unsure if he utilised his work computer or not;
- There was no alcohol in the Minister's Suite and he had no alcohol at his desk;
- He ordered an Uber about 2:22-2:25am and left the building;
- He did not see Ms HIGGINS once they entered and he did not check on her or speak to her;
- He was called into a meeting by Ms BROWN on the Monday in relation to a security breach;
- Ms BROWN was informed by security that he and Ms HIGGINS had entered Australian Parliament House after hours which is a security breach and against the Ministerial Code of Conduct;
- He was due to cease his employment on the Friday and she told him it was probably best to pack his belongings and leave now;
- He returned to his desk, gathered his belongings and left, leaving his pass at security;
- In January 2021, Mr SHARAZ friended him on Twitter and sent him a message introducing himself and he may remember him from working in Minister Reynolds office;
- He went to reply the following day and Sharaz had deleted and blocked him; and
- Shortly after he started receiving emails from 'brucetherapist' and 'yourearapist', which he reported and blocked.

The defendant denied the following points:

- He denied 'pashing' Ms HIGGINS, however accepted they were all close and that he could not recall whether they kissed or not;
- He denied in engaging in sexual intercourse with Higgins;
- He denied entering the Minister's Office; and
- He denied telling Ms BROWN that he and Higgins returned to the office to drink whiskey as there was no alcohol in the office.

About 7.15pm on the same date a Section 3E Crimes Act 1914 search warrant was executed on the defendant and his mobile phone was seized (E484541). The phone was later provided to AFP Digital Forensics Team (DFT), Canberra for examination.

An examination of the defendant's mobile phone reveals messages to friends about the allegation. The messages commence on 15 February 2021 until his phone was seized. In one message, via Whatsapp, the defendant stated:

"Well as I said I went in got my stuff and she stayed and I left to go back to Alex at my apartment which we both rented together"

During the examination Police located an email sent to Ms HIGGINS personal email address on 23 March 2021. Due to the email being stored on the cloud the contents were not readable. A request was made to the defendant, through his legal representative, for consent to access the cloud so the email could be reviewed.

Police also located emails sent to the Defence and Australian Parliament House email addresses of Ms HIGGINS. Enquiries were made with both the Department of Defence and the Department of Parliamentary Services to obtain any emails between the defendant and Ms HIGGINS. As a result of these enquiries Police were provided with emails that were of a work related nature.

On 28 April 2021 Mr Peter BUTLER, PSS Director, participated in a ROC. He provided information regarding the cleaning of the suite.

On 10 May 2021 Police were supplied with a USB containing the audio recordings of phone calls and radio transmissions made by PSS employees on 23 March 2019. The USB was seized E509903.

On Date 2021 Minister REYNOLDS supplied a statement to Police. She stated that during the 01 April 2019 meeting with Ms HIGGINS at no time Ms HIGGINS did not mention the words 'sexual assault' or 'rape'. She stated that Ms HIGGINS said she had no recollection of what happened other than that she woke up in the morning, got dressed and left.

On 21 May 2021 Attorney-General (AG) Michealia CASH participated in a ROC. She employed Ms HIGGINS after she worked for Minister REYNOLDS. During the conversation she spoke about a conversation Ms HIGGINS had with her on 05 February 2021, which was recorded by Ms HIGGINS.

On 26 May 2021 Ms HIGGINS participated in a second EICI. During the EICI she clarified the following points:

- She never received medical treatment for the alleged sexual assault;
- She never obtained a morning after pill;
- She did not drink water while she was drinking alcohol on this night;
- You would know by looking at her, given her level of intoxication, that she was heavily intoxicated;
- She doesn't recall kissing the defendant;
- She did send the messages to Mr DILLAWAY;
- She was told by Ms GAINS that they had gone to 88mph about two (2) or three (3) days later.

Ms HIGGINS provided her mobile phone to Police and it was subjected to a Cellebrite examination. The examination confirmed the messages mentioned above. Police also recovered a SMS message thread between Ms HIGGINS and Mr DILLAWAY, dated 07 February 2019 which stated:

DILLAWAY: "Scotty B hugging. The Defence Department declined to outline exactly what behaviour triggered the complaint. However. The New Daily has been told it believed to have involved "hugging". Scotty is a big hugger, a colleague said"

HIGGINS: "Hahahahahahahahaha. The bar for what counts as a political sex scandal nowadays is REALLY low. Between the hug and the non-sex of Broad. I'd be stoked just to hear about one of them getting laid again"

DILLAWAY: "It really is a sad state of affairs"

HIGGINS: "It honestly is"

DILLAWAY: "I want a sex scandal I can be like woah. Impressive. Didn't think he had it in him. That's actually amazing. What a way to go haha"

HIGGINS: "Exactly! A sex scandal the party can be proud of. Another Barnaby but without the baby haha"

DILLAWAY: "His was typical. I want to see on with Russian hookers or something of similar"

HIGGINS: "Like a Jane Prentice or something having a hot secret affair haha"

DILLAWAY: "Haha WTF. How could your mind go to a grandmother figure getting smashed"

HIGGINS: "Everyone deserves a little bit of love. Don't be so ageist Ben haha"

DILLAWAY: "A better female scandal would be JBish banging young male staffers or journos - perhaps at the same time"

Police also recovered a Whatsapp message thread between Ms HIGGINS and Mr SHARAZ, dated 21 May 2021 which stated:

SHARAZ: "What's this?" (Referring to an audio attachment)

HIGGINS: "Old audio. I'm clearing out my phone ahead of the police"

SHARAZ: "Ah, fair. Send it all to me. I'll download and email myself? But I also don't think you need to worry about it from a legal point of view. You recorded for your own protection which under ACT law is allowed. I think in Brisbane you're actually in the clear anyway. But If you're worried from the point of view of not trusting the police. I get that x"

HIGGINS: "Agreed!"

Ms HIGGINS supplied Police with two (2) further mobile phones that she stated were used during 2019. Police were unable to access the phones after multiple attempts but were able to access her iCloud account and Google Drive. Police reviewed the images and located two (2) images of that Ms HIGGINS stated were of her leg with an injury. Police were unable to locate any metadata on either image.

The defendant was polite and co-operative towards Police.

EVIDENCE

POLICE WITNESSES

NAME : SAUNDERS, Gareth
LOCATION : ACT-WINCHESTER CENTRE BELCONNEN
UNAVAIL. DATES :
SUMMARY

Team Leader

- Participated in meet/greet with Ms HIGGINS in February 2021;
- Performed role of team leader for investigation.

NAME : ROSE, Robert David
LOCATION : ACT-CRIMINAL INVESTIGATIONS
UNAVAIL. DATES :
SUMMARY

Team Leader

- Performed role of team leader for investigation.

NAME : HARMAN, Sarah Elizabeth
LOCATION : ACT-CRIMINAL INVESTIGATIONS
UNAVAIL. DATES :
SUMMARY

Assisting Police Officer

- Conducted meet/greet with Ms HIGGINS in April 2019;
- Obtained CCTV footage from The Dock Pub;
- Arranged for CCTV from Australian Parliament House to be secured;
- Spoke to Ms HIGGINS about ceasing the investigation in 2019.

NAME : MCDEVITT, Jason Luke
LOCATION : ACT-CRIMINAL INVESTIGATIONS
UNAVAIL. DATES :
SUMMARY

Team Leader

- Performed duty of team leader for investigation.

NAME : MOLLER, Scott Joseph
LOCATION : ACT-CRIMINAL INVESTIGATIONS
UNAVAIL. DATES :
SUMMARY

Informant

- Oversaw investigation.

NAME : FRIZZELL, Emma Louise
LOCATION : ACT-CRIMINAL INVESTIGATIONS
UNAVAIL. DATES :
SUMMARY

Corroborator

- Conducted meet/greet with Ms HIGGINS in February 2021;
- Participated in EICI with Ms HIGGINS on 24 February 2021;
- Conducted ROCs with multiple witnesses;

- Participated in ROI with the defendant;
- Participated in second EICI with Ms HIGGINS on 26 May 2021;
- Reviewed data from phones belonging to Ms HIGGINS and the defendant.

NAME : BOORMAN, Marcus Colin
 LOCATION : ACT-CRIMINAL INVESTIGATIONS
 UNAVAIL. DATES :
 SUMMARY :

Police witness

- Conducted ROI with the defendant;
- Liasied with Australian Parliament House, High Office Holders and the Australian Defence Force;
- Conducted ROCs with High Office Holders.

NAME : MADDERS, Trent Robert
 LOCATION : ACT-CRIMINAL INVESTIGATIONS
 UNAVAIL. DATES :
 SUMMARY :

Corroborator

- Conducted EICI with Ms HIGGINS on 24 February 2021;
- Conducted ROCs with multiple witnesses;
- Conducted second EICI with Ms HIGGINS on 26 May 2021;
- Reviewed data from mobile phones of Ms HIGGINS and the defendant.

CIVILIAN WITNESSES

NAME : ANDERSON, Nikola
 UNAVAIL. DATES :
 SUMMARY :

Parliamentary Security Service

- On duty on 23 March 2019;
- Present when Ms HIGGINS and the defendant entered Australian Parliament House;
- Escorted Ms HIGGINS and the defendant to suite M23;
- At 4.15am conducted a welfare check on Ms HIGGINS;
- Observed Ms HIGGINS lying on the lounge, with her legs up and naked;
- Observed her dress and shoes were next to the couch and her feet were facing the door;
- Ms HIGGINS looked at her and rolled over to go back to sleep;
- Observed that Ms HIGGINS did not appear distressed and her make-up was not smudged;
- Left the office as she had no concerns for Ms HIGGINS welfare.

NAME : BIERNOFF, Lyndon
 UNAVAIL. DATES :
 SUMMARY :

Friend of the defendant

- The defendant spoke to him about the allegation;
- The defendant stated that he never had sexual intercourse with Ms HIGGINS;
- The defendant stated that he never went into the Ministers' office.

NAME : BOWER, Robert
UNAVAIL. DATES :
SUMMARY

Friend of Ms HIGGINS

- Ms HIGGINS disclosed to him in November 2019;
- She asked him if he knew the defendant;
- She stated that the defendant had assaulted but did not elaborate any further;
- Ms HIGGINS appeared to be concerned about a possible media story being published.

NAME : BRENTON, Kristine
UNAVAIL. DATES :
SUMMARY

Parliamentary Security Service

- On duty during day of 23 March 2019;
- Requested to conduct a check of Ministerial suite M23;
- A female person was believed to have slept in the suite during the night;
- Entered the suite with another guard and called out;
- A female voice called out that she was fine and the security left the suite.

NAME : BROWN, Fiona
UNAVAIL. DATES :
SUMMARY

Chief of Staff for Minister REYNOLDS

- On 26 March 2019 made aware that two staff members had accessed the Ministers' suite whilst intoxicated;
- Spoke to the defendant and obtained his version of events;
- Informed the defendant that his employment would not be continued;
- Spoke to Ms HIGGINS and obtained her version of events;
- On 28 March 2019 spoke to Ms HIGGINS and she stated 'I recall him being on top of me';
- Arranged for Ms HIGGINS to speak to Minister REYNOLDS on 01 April 2019;
- Was present when Minister REYNOLDS spoke to Ms HIGGINS;
- Walked with Ms HIGGINS to speak to AFP members at Australian Parliament House.

NAME : BURLAND, Drew
UNAVAIL. DATES :
SUMMARY

Worked with Ms HIGGINS and the defendant

- Provided information regarding the office environment and his interactions.

NAME : BUTLER, Peter
UNAVAIL. DATES :
SUMMARY

Parliamentary Security Services Director

- Assisted with arranging the cleaning of the Ministerial suite on 23 March 2019.

NAME : CALLAN, Kevin

UNAVAIL. DATES :
SUMMARY

Parliamentary Security Services Team Leader

- Team leader of security on 23 March 2019;
- Was briefed by security guards about two staff members accessing the Ministerial suite.

NAME :
UNAVAIL. DATES :
SUMMARY

CAMARA, Regina

Former work mate of Ms HIGGINS

- Ms HIGGINS disclosed to her in November 2019;
- Ms HIGGINS told her she had been assaulted by an adviser to the Minister
- That she had been drinking and she went back to Parliament House with him;
- She went into the Ministers' office and she woke up alone
- Ms HIGGINS stated that her clothes were in disarray and she realised something had happened to her;
- They did not discuss the incident again.

NAME :
UNAVAIL. DATES :
SUMMARY

CASH, Michaelia

Attorney General of Australia

- Was the employer of Ms HIGGINS in 2019 and 2020;
- Became aware of an incident in November 2019 but was not aware of the details;
- She believed there was a potential media story about the incident that would be embarrassing to Ms HIGGINS;
- Had a conversation with Ms HIGGINS in February 2021, when Ms HIGGINS had resigned;
- This conversation was the first time Ms HIGGINS stated that she had been sexually assaulted;
- Ms HIGGINS told her she struggled with the offender.

NAME :
UNAVAIL. DATES :
SUMMARY

DILLAWAY, Benjamin

Friend of Ms HIGGINS

- Was in a intimate relationship with Ms HIGGINS;
- Spoke to Ms HIGGINS on 23 March 2019;
- Sent SMS messages by Ms HIGGINS on 26 March 2019;
- Ms HIGGINS disclosed the incident to Mr DILLAWAY on 26 March 2019.

NAME :
UNAVAIL. DATES :
SUMMARY

FAIRWEATHER, Mark

Parliamentary Security Service

- On duty on the morning of 23 March 2019;
- Signed Ms HIGGINS and the defendant into Australian Parliament House;
- Observed that Ms HIGGINS was slightly affected by intoxicating liquor;
- Observed the defendant to leave Australian Parliament House without Ms HIGGINS;
- Reported the incident to his team leader.

NAME : FISK, Martin
 UNAVAIL. DATES :
 SUMMARY

Friend of Ms HIGGINS

- Ms HIGGINS disclosed to him and his wife in August 2020;
- She told them that she had been raped about two (2) years prior;
- She told them she had been drinking with work mates and she got a lift to Australian Parliament House;
- She told them that she could not sign herself in and woke up on the couch in the Ministers' office being raped;
- She told them that a security guard came in later;
- Over the following months they discussed the implications of her going to the media and Police;
- In January 2021 Ms HIGGINS told him that she was going to the Police and the media.

NAME : FISK, Sandra
 UNAVAIL. DATES :
 SUMMARY

Friend of Ms HIGGINS and Mr SHARAZ

- She was at Fyshwick in July or August 2020 with her husband, Ms HIGGINS and Mr SHARAZ;
- Mr SHARAZ told them that Ms HIGGINS had been sexually assaulted whilst at Australian Parliament House;
- He told them that she had been out drinking with work mates and a male had taken her back to Australian Parliament House;
- The male had assaulted her whilst at Australian Parliament House;
- Ms FISK knew prior to Ms HIGGINS going to the media that Ms HIGGINS was unable to sign her name, that she was in the Ministers' office and she woke up in the morning in a bad position.

NAME : FROST, Stephen
 UNAVAIL. DATES :
 SUMMARY

Department of Finance

- Mr FROST arranged the cleaning of the suite on 23 March 2019;
- He had been made aware that two (2) staff members had entered the suite after hours;
- He believed that a party had occurred and they needed to clean the suite prior to Monday.

NAME : GAIN, Lauren
 UNAVAIL. DATES :
 SUMMARY

Work mate of Ms HIGGINS

- Was at The Dock Pub on 22 March 2019;
- Went to 88mph with Ms HIGGINS, the defendant and Mr Austin WENKE;
- She saw that Ms HIGGINS and the defendant were sitting close together;
- She saw them rubbing each others' legs and then kiss on the mouth (pash);

- She did see Ms HIGGINS slip over once but it was near where they were sitting;
- She believes that everyone in the group were quite intoxicated;
- She sent a SMS to Ms Nikita IRVINE the next day saying that Ms HIGGINS and the defendnat 'hooked up'.

NAME : GREEN, Clare
UNAVAIL. DATES :
SUMMARY

Friend of Ms HIGGINS

- Cannot recall exactly what Ms HIGGINS told her from what she has heard in the media.

NAME : HAMER, Nicky
UNAVAIL. DATES :
SUMMARY

Work mate of Ms HIGGINS and the defendant

- Provided information regarding the interactions between Ms HIGGINS and the defendant in the work place;
- Spoke about an incident in which she emailed Minister REYNOLDS that she was going to resign due to the defendants behaviour.

NAME : HIGGINS, Brittany
UNAVAIL. DATES :
SUMMARY

Complainant

- Was at work drinks at The Dock Pub on 22 March 2019;
- Was at 88mph with the defendant, Ms GAIN and Mr WENKE;
- Went to Australian Parliament House with the defendant;
- Entered the Ministers' suite with the defendant;
- Entered the Ministers' office;
- Fell asleep on the couch in the Ministers' office;
- Woke up to the defendant having sexual intercourse with her;
- Fell back to sleep after a short time;
- Woke up the next morning and heard a security guard;
- Left Australian Parliament House and returned home;
- Had SMS and conversations with Mr DILLAWAY on 23/24 March 2019;
- Was called into a meeting on 26 March 2019 with Ms BROWN;
- Told Ms BROWN that she was intoxicated and remembered waking up semi-naked;
- She said she was responsible for what she drank and for her actions;
- After the meeting sent SMS to Mr DILLAWAY;
- During a meeting on 28 June 2019 she told Ms BROWN that she recalled the defendant being on top of her;
- Had a meeting with Minister REYNOLDS and Ms BROWN on 01 April 2019;
- Met with AFP members at Australian Parliament House on 01 April 2019;
- Met with SACAT members on 08 April 2019;
- On 14 April 2019 informed SACAT that she did not wish to continue with the allegation;
- On 05 February 2021 re-engaged with SACAT and informed them that she had been in contact with media outlets including conducting a television interview;
- Participated in a EICI on 24 February 2021;
- Participated in a second EICI on 26 May 2021.

NAME : HIGGINS, Kelly

UNAVAIL. DATES :

SUMMARY

Mother of Ms HIGGINS

- Noticed that Ms HIGGINS was becoming less communicative when she went to Western Australia;
- In November 2019 Ms HIGGINS disclosed to her mother while at dinner in Brisbane;
- Her partner, Mr Isaac GENC was present;
- Ms HIGGINS told her that she was sexually assaulted by a work colleague whilst at Australian Parliament House;
- She remembered waking up to the male raping her;
- They have discussed the allegation numerous times since.

NAME : HIGGINS, Matthew

UNAVAIL. DATES :

SUMMARY

Father of Ms HIGGINS

- He is aware of an incident that occurred in March 2019;
- Ms HIGGINS did not disclose what occurred and he did not ask her.

NAME : HUMPHREYS, Alex

UNAVAIL. DATES :

SUMMARY

Former flatmate of Ms HIGGINS

- Was at home on 23 March 2019 when Ms HIGGINS returned home from Australian Parliament House;
- Does not recall Ms HIGGINS being upset or appearing distraught;
- Ms HIGGINS disclosed to her in January 2021.

NAME : IRVINE, Nikita

UNAVAIL. DATES :

SUMMARY

Aide de Camp to Minister REYNOLDS

- Was at The Dock Pub on 22 March 2019;
- Did not attend 88mph;
- Received a SMS from Ms GAIN saying that Ms HIGGINS and the defendant had 'hooked up';
- Around 28 March 2019 she was walking with Ms HIGGINS at Australian Parliament House;
- Ms HIGGINS told her that she had been at 88mph and returned to Australian Parliament House with the defendant;
- Ms HIGGINS told her that the defendant wanted to drink whiskey or show her whiskey;
- Ms HIGGINS recalled that the the defendant was on top of her;
- Ms IRVINE asked if it was rape and Ms HIGGINS replied yes but that she had not reported to Police;
- In further conversations Ms HIGGINS stated that she did not want to speak about the incident.

NAME : KNIGHT, Fiona

UNAVAIL. DATES :

SUMMARY

Department of Finance

- Assisted in arranging the cleaning of the suite on 23 March 2019.

NAME :
UNAVAIL. DATES :
SUMMARY :

LEWIS, Michelle

Former work mate of Ms HIGGINS and the defendant

- Was made aware of an incident on 02 March 2019 in which Ms HAMER tendered her resignation;
- Provided the resignation letter to Police.

NAME :
UNAVAIL. DATES :
SUMMARY :

MACGOWAN, John

Friend of the defendant

- Became aware of the allegation in February 2021 through national media stories;
- The defendant disclosed to him that he never had intercourse with Ms HIGGINS and that he did not enter the Ministers' office.

NAME :
UNAVAIL. DATES :
SUMMARY :

PAYNE, Christopher

Former Department Liaison Officer to Minister REYNOLDS

- Worked with Ms HIGGINS and the defendant in March 2019;
- Sometime in the week after 23 March 2019 he was made aware of an incident;
- He was told that Ms HIGGINS had been found by a security guard in the Ministers' office in a state of undress;
- Ms HIGGINS came into his office after he was made aware of the incident;
- She was distraught and said she had been drinking with the defendant;
- She stated that she returned to Australian Parliament House with the defendant but couldn't remember much after that;
- She stated that she recalled the defendant had been on top of her and Mr PAYNE asked her directly if she had been raped and she replied yes;
- He did not take notes of this conversation
- He has heard about the incident through media reporting.

NAME :
UNAVAIL. DATES :
SUMMARY :

RAMOS, Carlos

Contracted cleaner for Australian Parliament House

- Cleaned the Ministers' suite/office on 23 March 2019;
- Checked with his supervisor that he had the correct suite/office as it did not appear to be messy or in need of a clean;
- Gave the suite/office a light clean;
- Supplied SMS conversations with his supervisor about the suite/office (In Spanish and translated using a open source translator).

NAME :
UNAVAIL. DATES :

REYNOLDS, Linda

SUMMARY

Minister of Defence Industries

- Employer of Ms HIGGINS and the defendant;
- Was made aware of an incident involving the defendant, Ms HIGGINS, Mr WOOTON and Ms HAMER on 02 March 2019;
- On 26 March 2019 she was made aware by Ms BROWN that two (2) staff members had accessed the suite/office after hours whilst intoxicated;
- The defendant had not been re-employed due to a deferral period and was informed his employment would not be continued;
- On 28 March 2019 she was contacted by Ms BROWN regarding concerns relating to Ms HIGGINS emotional state;
- On 01 April 2019 conducted a meeting with Ms HIGGINS and Ms BROWN;
- She does not recall Ms HIGGINS stating that she had been sexually assaulted except to say that she woke up, could not recall what had happened other than she woke up in the morning and got dressed before leaving;
- Minister REYNOLDS believed that Ms HIGGINS may have been concerned that a sexual act had occurred while she and the defendant were in the suite;
- Minister REYNOLDS suggested that Ms HIGGINS speak to Police about the incident and Ms HIGGINS agreed to;
- Ms HIGGINS did not speak to Minister REYNOLDS again about the incident.

NAME :
UNAVAIL. DATES :
SUMMARY :

SHARAZ, David

Partner of Ms HIGGINS

- Started a relationship with Ms HIGGINS in May 2020;
- Ms HIGGINS disclosed to him her version of events multiple times during 2020.

NAME :
UNAVAIL. DATES :
SUMMARY :

STARK, Simone

Friend of Ms HIGGINS

- Had a conversation with Ms HIGGINS in 2019;
- She remembers there had been a media enquiry that made Ms HIGGINS upset;
- She remembers that Ms HIGGINS told her that she had returned to Australian Parliament House with the defendant;
- Ms HIGGINS said that the defendant did something, which Ms STARK took to mean that he was looking at something he shouldn't have or something that would get him in trouble later;
- She asked Ms HIGGINS if he knew what he was doing and she replied he did;
- She later saw the media reporting about the incident.

NAME :
UNAVAIL. DATES :
SUMMARY :

TRY, Daniel

Chief of Staff to Minister CASH

- Was made aware of a media enquiry regarding Ms HIGGINS in October 2019;
- He was informed it had been a security incident;
- He believed that she had been found in a dishevelled state by the security;
- The minister was briefed after he had been informed;
- He believed that Ms HIGGINS was upset due to the embarrassment of situation;
- He received a letter from Ms HIGGINS in 2021 stating she wanted to resign;

- He was involved in a phone call with Ms HIGGINS and Minister CASH in February 2021 talking about her resignation;
- Ms HIGGINS disclosed the incident to him and the minister during that conversation.

NAME : TYLER, Allan
 UNAVAIL. DATES :
 SUMMARY

Team Leader Parliamentary Security Service

- Was the dayshift team leader on 23 March 2019;
- Was briefed about two (2) staff members attending the Ministers' suite during the night and that a female may still be present;
- Arranged for his security team to conduct a check at Minister suite M23;
- Received briefing from security team that the female was not needing assistance.

NAME : WENKE, Austin
 UNAVAIL. DATES :
 SUMMARY

Works at Australian Parliament House

- Was present at The Dock Pub on 22 March 2019;
- Was present at 88mph on 22 March 2019 with Ms HIGGINS, Ms GAIN and the defendant;
- Left 88mph with Ms GAIN,
- Cannot recall much from the night;
- Cannot remember any conversations with the defendant regarding the night.


RECORD OF INTERVIEW

YES :

SUMMARY

19 April 2021
 AFP Headquarters, Sydney, NSW
 D/Inspector Marcus BOORMAN
 SC Emma FRIZZELL
 Mr Bruce LEHRMANN

- He denied having sexual intercourse with Ms HIGGINS;
- He denied that he had sexual intercourse without consent;
- He did not believe that Ms HIGGINS was highly intoxicated;
- When they entered the Ministers' suite he went to the left and Ms HIGGINS went to the right;
- He did not see her again while they were in the suite and he never entered the Ministers' office.


 MOLLER, Scott Joseph
 ACT-CRIMINAL INVESTIGATIONS

-- END OF STATEMENT OF FACTS --

Federal Court of Australia
District Registry: New South Wales
Division: General


BRUCE LEHRMANN

Applicant

NETWORK TEN PTY LIMITED (ACN 052 515 250) and another
Respondents

CERTIFICATE IDENTIFYING ANNEXURE

This is the annexure marked "**MRS-18**" now produced and shown to Marlia Ruth Saunders at the time of affirming her affidavit on 15 March 2023:



Signature of Conor O'Beirne
Thomson Geer
Level 14, 60 Martin Place
Sydney NSW 2000

An Australian Legal Practitioner within the meaning of the Legal Profession Uniform Law

From: Lehrmann, Bruce MR
Sent: Wednesday, 20 March 2019 1:09 PM
To: Higgins, Brittany MS
Subject: FW: Population plan [SEC=UNCLASSIFIED]
Attachments: Planning for Australia's future population.pdf

Categories: UNCLASSIFIED

UNCLASSIFIED

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From: Lehrmann, Bruce MR
Sent: Wednesday, 20 March 2019 1:06 PM
To: 'brittany.higgins@aph.gov.au'
Subject: Population plan [SEC=UNCLASSIFIED]

UNCLASSIFIED

THE HON SCOTT MORRISON MP

Prime Minister

THE HON ALAN TUDGE MP

Minister for Cities, Urban Infrastructure and Population

THE HON DAVID COLEMAN MP

Minister for Immigration, Citizenship and Multicultural Affairs

SENATOR THE HON BRIDGET MCKENZIE

Deputy Leader of the Nationals

Minister for Regional Services, Sport, Local Government and Decentralisation

THE HON DAN TEHAN MP

Minister for Education

JOINT MEDIA RELEASE

Wednesday, 20 March 2019

A PLAN FOR AUSTRALIA'S FUTURE POPULATION

The Morrison Government will tackle the impact of increasing population in congested cities and back smaller cities and regions looking for greater growth to secure their economic future and the key public services they rely on.

We will reduce the cap on our migration program, build the infrastructure and deliver the services Australians need, and plan for a more evenly distributed population growth. These changes are about easing population pressures in our biggest cities, while ensuring regional communities are given a much needed boost.

Australia has thrived from a steady population growth and is the most successful immigration nation in the world and our plan will ensure our country continues to lead the way. But over the last two decades, the infrastructure and services have not kept pace, causing congestion on our roads and public transport particularly in Melbourne, Sydney and South East Queensland.

At the same time, many of our smaller cities and regional areas are crying out for more people. Some regional areas simply cannot fill the jobs available. There are an estimated 47,000 job vacancies in regional Australia today.

The Morrison Government's plan for Australia's future population will ease the pressure on the big capitals while supporting the growth of those smaller cities and regions that want more people.

Last year, we brought the permanent migration rate down to its lowest level in a decade by focusing on the integrity of the visa system and prioritising Australians for Australian jobs. Part of our population policy will include stronger incentives for new people to our country to settle outside the big capitals in areas that will welcome their skills and expertise.

New measures will be introduced that will better match migration to regional needs, ease the pressure on big cities and ensure Australia remains an attractive destination to live and work for highly skilled and talented people from around the globe.

We will continue to deliver a record \$75 billion investment in infrastructure, underway right now across the country.

The Government's population policy includes:

1. Reducing the migration cap by 15% and incentivising more new migrants to settle outside the big cities where there are jobs and services;

- Reducing the migration ceiling from 190,000 to 160,000 places.
- Introducing two new regional visas for skilled workers requiring them to live and work in regional Australia for three years before being able to access permanent residence. 23,000 places will be set aside for these regional visas.
- Introducing new tertiary scholarships to attract Australian and international students to study in regional Australia (\$15,000 scholarships will be available to more than 1000 domestic and international students each year).
- Giving international students studying at regional universities access to an additional year in Australia on a post-study work visa.

2. Busting congestion on our roads and trains.

- Plan to better connect regional centres with fast rail.
- Investing \$75 billion in road, rail and air infrastructure across the country.
- Investing more in congestion-busting infrastructure through the \$1 billion Urban Congestion Fund.

3. Planning for the future by working more closely with state and territory governments to match infrastructure with local population need

- Population management as a fixture of future COAG discussions with the adoption of a bottom-up approach
- Continuing to deliver new City Deals and Regional Deals to ensure three levels of government working together
- Establishing a Centre for Population, ensuring there is a central, consistent and expert perspective on population growth. The Centre will pursue opportunities to improve data

and research on population and facilitate collaboration on population planning across Commonwealth, State, Territory and Local governments.

We will also build on the work our government is doing to support grassroots initiatives that foster belonging and break down barriers to social and economic participation.

These changes also enhance the Government's focus on skilled migration, with the number of Employer Sponsored skilled visa places increasing from 35,528 in 2017-18 to 39,000 places in 2019-20. There is no change to the Family stream of the program, with 47,732 places available in 2019-20.

Under the two new regional visa categories, skilled migrants will be priority processed and will have access to a larger pool of jobs on the eligible occupation lists compared to those who live in our major cities. Migrants on these visas must demonstrate they have lived and worked in regional Australia for three years before being becoming eligible to apply for permanent residence.

The changes will mean migrants will stay in regional Australia longer-term, as they will build ties to a particular location through workforce participation and community involvement, easing the pressure off our congested cities.

Labor's failure to plan for the impact of record migration on our cities and infrastructure has meant we have been forced to play catch-up.

Full details of the Morrison Government's plan for Australia's future population is attached.

ENDS

IMPORTANT: This email remains the property of the Department of Defence and is subject to the jurisdiction of section 70 of the Crimes Act 1914. If you have received this email in error, you are requested to contact the sender and delete the email.

From: Lehrmann, Bruce MR
Sent: Friday, 22 March 2019 9:40 AM
To: Higgins, Brittany MS
Subject: FW: News Summary [SEC=UNCLASSIFIED]

Categories: UNCLASSIFIED

UNCLASSIFIED

Do you get these?

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Sent: Friday, 22 March 2019 5:51 AM
To: David Allender
Subject: News Summary

News Summary

New Zealand

New Zealand will observe 2 minutes of silence at 1.32pm local time (11.32am AEDT).

Other News

The Herald Sun (p1) says a 200kmh bullet train halving travel times between Melbourne and Geelong will form the centrepiece of a \$2 billion Budget commitment from the federal government.

The nation's first high-speed rail project would cut the journey between Southern Cross Station and Geelong to 32 minutes, and would connect to the Melbourne Metro now being built and the planned Airport Rail Link.

Construction is likely to begin within 18 months.

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Mr Morrison will announce five new business cases nationwide, costing \$40 million, as part of the Government's wider vision to take pressure off cities and keep dying regional centres alive.

The AFR says a future Shorten Labor government will consider calling an inquiry into the \$10 billion Melbourne to Brisbane inland railway which could result in an overhaul of the landmark project.

The SMH says Scott Morrison has confirmed he raised the subject of anti-Muslim sentiment at a highly controversial Coalition meeting in 2011, but vehemently denied ever suggesting such sentiment should be exploited for votes.

The Australian says in the interview with Waleed Aly the Prime Minister accused Aly of trying to dismiss the threat posed by nearly 60 individuals identified as having "serious character concerns".

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The SMH says Australians are being told they are "not to blame" for the terror attack in Christchurch after airing their grief and guilt to New Zealand's top diplomat in Canberra over the actions of the Australian gunman accused of the massacres.

A spokesman for the Turkish president says his remarks were "taken out of context" and were aimed at those who threatened Turkey, given the terrorist's manifesto targeted the Turkish state.

Telecommunications companies are hoping a summit with the Morrison government and social media giants next week will lead to a new national approach to blocking websites and responding digitally to crises like the Christchurch terrorist attack.

The SMH says the political staffer accused of writing Fraser Anning's infamous "final solution" speech and holding an obsession with Nazi Germany is employed by the federal government agency managing Australia's immigration program.

The staffer, Richard Howard, has previously denied writing the speech or holding extremist views.

The Australian says up to 65,000 families in regional areas are the most likely to be targeted under Labor's plans to scrap private health insurance rebates for so-called "junk" policies.

The SMH says a pre-election interest rate cut by the RBA appears off the agenda after the nation's unemployment rate slipped to its lowest level in eight years.

The Australian says home builders say it is "not the right time" to put the brakes on permanent migration because it could exacerbate a slowdown in construction.

The SMH says Bill Shorten faces calls to abolish a multi-billion dollar subsidy to the private health insurance industry, which critics describe as a "privatisation of Medicare" by stealth.

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Comment

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Front Pages

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Press Clips

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From: Higgins, Brittany MS
Sent: Friday, 22 March 2019 10:05 AM
To: Lehrmann, Bruce MR
Subject: RE: News Summary [SEC=UNCLASSIFIED]

UNCLASSIFIED

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From: Lehrmann, Bruce MR
Sent: Friday, 22 March 2019 10:13 AM
To: Higgins, Brittany MS
Subject: Re: News Summary [SEC=UNCLASSIFIED]

Will do! :)

Sent from my iPhone

On 22 Mar 2019, at 10:04 am, Higgins, Brittany MS <brittany.higgins@defence.gov.au> wrote:

UNCLASSIFIED

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Press Clips

<http://report.mediaportal.com/a0eecb7681ff1b89f6fde33b15a85460/MonitorReport-94426311-3ae6-4.pdf>

From: Lehmann, Bruce MR
Sent: Saturday, 23 March 2019 10:53 AM
To: Higgins, Brittany MS
Subject: Fwd: daclips Saturday 23 March 2019
Attachments: DACLIPS 23 March 2019.docx; ATT00001.htm

Sent from my iPhone

Begin forwarded message:

From: David Allender <dpallender@gmail.com>
Date: 23 March 2019 at 5:50:22 am AEDT
To: David Allender <dpallender@gmail.com>
Subject: daclips Saturday 23 March 2019

Good morning, early news clips for Saturday 23 March 2019 attached.

David.

From: Lehrmann, Bruce MR
Sent: Saturday, 23 March 2019 10:53 AM
To: Higgins, Brittany MS
Subject: Fwd: News Summary

Might see about getting you on this list! :)

Sent from my iPhone

Begin forwarded message:

From: David Allender <dpallender@gmail.com>
Date: 23 March 2019 at 5:59:34 am AEDT
To: David Allender <dpallender@gmail.com>
Subject: News Summary

News Summary

Cyclone threat

The destructive core of severe Tropical Cyclone Trevor, packing wind gusts up to 275km/h, is expected to make landfall at **10am** between Borrooloola and the NT/QLD border as a Category 4 system.

Emergency services have not ruled out the possibility of the cyclone ratcheting up to a Category 5 system as the cyclone intensifies in the Gulf of Carpentaria.

The eye of the cyclone is estimated between 30-50km wide.

In the West category 4 cyclone Veronica is currently sitting 355km northwest of Port Hedland.

Other News

Gladys Berejiklian appears poised to become the first popularly elected female premier in NSW history after the Coalition seized a 51-49 per cent two-party-preferred lead on the eve of Saturday's election in a special NSW Newspann for The Weekend Australian.

The Australian says Bill Shorten has promised to work co-operatively and constructively with business, pledging that he will not be a "handmaiden" for trade unions if Labor wins the election.

The SMH says Josh Frydenberg has vowed to "drive wages higher" using new policy measures to be unveiled in the April 2 budget, tackling concerns over sluggish income growth ahead of an election battle with Labor over the cost of living.

The AFR says the budget will contain large tax cuts expected to be skewed towards those on low and medium incomes and will be on top of tax cuts legislated last year and there is growing speculation about one-off cash handouts for pensioners and other low-income people who don't pay tax.

The SMH says federal regulators will be given a \$585 million boost to investigate corporate crime and fund new lawsuits in a budget package that acts on the royal commission into banking misconduct.

The SMH says community groups are calling on all political leaders to put One Nation last on how-to-vote cards at the federal election as pressure builds on all sides to take a tougher stand against the minor party.

The Herald Sun says far-right extremists using internet chat rooms to call for the New Zealand mosques shooter to be nominated for Australian of the Year have been slammed as abhorrent and an appalling manipulation of the system.

The AGE says Scott Morrison's promise to build 200km/h fast rail services between Melbourne and Geelong will not be possible without new trains according to rail think tank Rail Futures.

The SMH says a scandal engulfing industry super funds over excessive pay could prompt a split with Labor after Bill Shorten called for greater transparency on executive bonuses.

The Age says an Australian Government contractor on Manus Island was asked by a senior Papua New Guinea official in 2017 for a multi-million-dollar donation to the ruling party of Prime Minister Peter O'Neill.

The Australian says the agency in charge of the NDIS has been cutting funding for remote participants who cannot find the care they need, undermining services in disadvantaged areas and pushing the scheme towards collapse, providers say.

The Telegraph says an exotic bird, an LCD TV and a stint at the pokies are among some of the purchases low-income families have been making as a result of a glitch in government child care subsidies.

The glitch is seeing lump sums of up to \$10,000 of back paid taxpayer-funded Additional Child Care Subsidies paid directly into private accounts rather than to providers.

The Australian says a high-calibre advisory council backed by \$10 million in federal funding is leading a four-year effort to develop Australia's new "nation brand" and make the country perform better on the global stage.

The SMH says the novelty cheque handed to a local bowling club by Georgina Downer has prompted the national auditor to review the federal government's entire grants program for community sports infrastructure.

The SMH says a group of prominent Australians including Tom Keneally, Richard Flanagan and Carmen Laurence has united in calling for a stop to the national war memorial's planned expansion, saying the \$498 million project is unjustified.

Comment

Tim Colebatch - Morrison, Shorten will pay heed to close-fought NSW election.

Malcolm Turnbull - The Gladys I know is a real liberal.

Adam Creighton - Labor enters arena with its own wrecking ball.

David Speers - PM needs to tackle One Nation preferences issue.

Anthony Mundine - Muslims deserve our PM's respect.

Shane Wright - The pressure on Josh Frydenberg for an election-winning budget.

Paul Kelly - Industry super funds an elemental threat to Liberal Party.

Troy Bramston - New era ambition of wannabe PM.

Chris Kenny - Safety bollards no barrier to ugly vitriol of political Left.

Laura Tingle - Making Australians feel safe doesn't mean all of us.

Peter Van Onselen - Survivor Shorten defies bad press to close in on the Lodge.

Judith Sloan - We're the big losers in this immigration numbers game.

Tom Switzer - A tectonic shift to the left in the Australian political landscape.

Ebony Bennett - The reason women were locked out of the budget.

Editorials

SMH - Morrison has failed to call out Islamophobia.

Australian - Labor leader is winding clock back to the future.

Australian - Defining our national brand.

Front Pages

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Press Clips

<http://report.mediaportal.com/2361d9427491ced6e4407475493318cb/MonitorReport-7e3150db-d4b6-4.pdf>

From: Lehrmann, Bruce MR
Sent: Monday, 25 March 2019 7:34 AM
To: Higgins, Brittany MS
Subject: Fwd: News Summary

Not letting me send to private email! Will email David and get your gmail on the mail list!

BL

Sent from my iPhone

Begin forwarded message:

From: David Allender <dpallender@gmail.com>
Date: 25 March 2019 at 5:58:43 am AEDT
To: David Allender <dpallender@gmail.com>
Subject: News Summary

News Summary

The Australian says an infrastructure boon for regional and rural Australia will form a centrepiece of Scott Morrison's quest to win back the bush as Liberal strategists prepare for a May 11 federal election to be called on the Sunday immediately following the April 2 budget.

With the Nationals now in crisis talks following the loss of two key seats at the weekend's NSW election, senior federal government sources have confirmed that a "significant" economic package for the bush has already been locked into the federal budget.

The SMH says the Shooters, Fishers and Farmers Party is preparing to launch a Federal election campaign targeting National seats.

The Australian says Gladys Berejiklian faces a difficult cabinet reshuffle as deputy leader of the Nationals Niall Blair announced yesterday he was quitting parliament a day after he was returned for an eight-year term in the upper house.

The Australian says anger over the axing of Malcolm Turnbull appears to be easing with a special Newspoll taken before the NSW election showing his replacement did not appear to be a major factor.

The Australian says Labor is positioning for a Mediscare 2.0 election campaign, vowing to unfreeze rebates on 100 GP items a year ahead of schedule as it kicks off a new marginal seats offensive over claimed Coalition "cuts" to health spending.

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The AFR says Scott Morrison and Michael McCormack are working on a peace deal over coal fired power to prevent another outbreak of hostilities within the Coalition before the federal election.

The Australian says two major trade deals, with Indonesia and Peru, are in danger of collapsing or being delayed if Labor wins government at the next election.

The SMH says a re-elected Morrison government would spend \$2.5 billion bolstering Australia's capacity to intercept enemy aircraft through the purchase of a new short-range air defence system.

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The SMH says Centrelink has threatened to charge daily compounding interest, garnish wages or seize funds from the bank accounts of former welfare recipients who fail to pay 'robo-debts' issued by the government's automated recovery scheme.

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Press Clips

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From: Higgins, Brittany MS
Sent: Monday, 25 March 2019 1:16 PM
To: Lehrmann, Bruce MR
Subject: RE: News Summary [SEC=UNCLASSIFIED]

UNCLASSIFIED

So weird!

Honestly, that would be the best if you could.

IMPORTANT: This email remains the property of the Department of Defence and is subject to the jurisdiction of section 70 of the Crimes Act 1914. If you have received this email in error, you are requested to contact the sender and delete the email.

From: Lehrmann, Bruce MR
Sent: Monday, 25 March 2019 7:34 AM
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No. NSD 103 of 2023

Federal Court of Australia
District Registry: New South Wales
Division: General

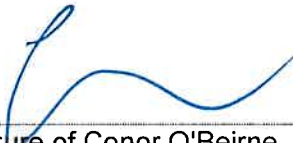
BRUCE LEHRMANN

Applicant

NETWORK TEN PTY LIMITED (ACN 052 515 250) and another
Respondents

CERTIFICATE IDENTIFYING ANNEXURE

This is the annexure marked "**MRS-19**" now produced and shown to Marlia Ruth Saunders at the time of affirming her affidavit on 15 March 2023:



Signature of Conor O'Beirne
Thomson Geer
Level 14, 60 Martin Place
Sydney NSW 2000

An Australian Legal Practitioner within the meaning of the Legal Profession Uniform Law

TRANSCRIPT OF PROCEEDINGS



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**SUPREME COURT OF
THE AUSTRALIAN CAPITAL TERRITORY**

**THE HONOURABLE CHIEF JUSTICE MCCALLUM
AND A JURY OF SIXTEEN**

SCC 264 of 2021

DAY 11

**DIRECTOR OF PUBLIC PROSECUTIONS
and
BRUCE LEHRMANN**

CANBERRA

10.21 AM, TUESDAY, 18 OCTOBER 2022

MR S. DRUMGOLD SC with MS S. JEROME appeared on behalf of the Office of the Director of Public Prosecutions.

MR S. WHYBROW with MS K. MUSGROVE and MR B. JULLIENNE appeared on behalf of the Accused.

.Lehrmann 18/10/2022
SCC 264/2021
Epiq

750

Consequently, to establish a lack of consent we must establish beyond reasonable doubt that the complainant did not freely and voluntarily agree to the act of sexual intercourse that is subject to the charge. In determining the complainant's state of mind it is necessary to consider all of the surrounding circumstances. For example, we say a female who was passed out, asleep or unconscious at the time of the initial sexual penetration of her vagina cannot freely and voluntarily provide consent to that sex. The prosecution submits that Ms Higgins was incapable of giving her consent freely and voluntarily because she was not conscious when it commenced.

As her Honour said at the start and will say again, you start with the presumption that the offence was not committed. This presumption needs to be overcome by you finding beyond reasonable doubt that it did and that is that the evidence removes reasonably held doubt. We will ultimately say that the evidence clearly removes any reasonably held doubt that the accused had sex with the complainant just as she said she did. Now you may recall in my opening I said to you that each of you brought to this courtroom many'ed(sic) and varied life experiences and I also said that you were entitled to use those life's experiences.

Using your common sense and life experiences you may recall that I suggested you have some very useful tools in determining whether or not accept or reject evidence. These included, firstly standing back and objectively asking yourself – looking at it and asking yourself does that sound right. For example, we say firstly that the accused's motive for taking a very clearly intoxicated and vulnerable complainant back to Parliament House and signing her in and then taking her to a room where they would be alone at 1.40 am is a central and very important issue in this case and the accused advances a number of innocent reasons for this and you need to examine those reasons and I will now invite you, walking through this, to stand back and look objectively at some things.

Stand back and ask yourself on the back of the complainant's huge night and clear intoxication, so intoxicated that she fell over at 88mph is corroborated by Ms Gain with the accused helping her up that the accused would firstly take her to Parliament House because she supposedly had some work to do, then left, leaving her there, apparently turning the lights out as he left. Is it likely that the accused would leave work on Friday, 22 March 2019 and leave both of his – both his apartment keys and his pass in the office forcing him to go back through all the sign ins, through security rigmarole to collect them before going home as he suggested at question 85?

He added at 319 to 321 of record of interview that this was normal practice. Is it likely that in the closing days of his employment, after a long night out, the accused would suddenly need to go back to Parliament House out of hours to put some tabs on a question time brief at 1.40 am on a Saturday

morning? Particularly when it is accepted and you have got the admissions that Parliament, and by extension question time, was not even occurring in the whole next week that followed. Stand back and you may want to ask yourself why not just make a note and address it on Monday?

5

There was no rush for these question time briefs to be dealt with at 1.40 am on a Saturday morning. Further, look at the flip flopping suggestions about Ms Higgins' dream job and ask yourself does any of that make sense? It was actually advanced that she made a false complaint in 2019 to save her job with Senator Reynolds. Yet then it is not disputed that she did not proceed with the complainant – with the complaint and did not even apply for her job with Senator Reynolds. The job that she was so desperate to get that she would make up a false allegation to keep it, she did not even apply for.

15

We know she then got a job with Senator Cash, one of three offers was on her evidence, and it appears undisputed that a couple of years later she resigned the job to recommence the complaint she had supposedly originally made to save her job. One minute they suggest that she wanted a job bad enough to make a false and extremely serious complaint and the next accept that she actually resigned her dream job so she could make a complaint. Secondly, you need to look at where a particular witness fits into a picture. You will recall I invited you to do that.

20

Are they likely to give evidence that is totally impartial or possibly approach the case from a particular interest point or, indeed, has their evidence been influenced? What is clear, members of the jury, is that there are strong political and emotional interests in this case and you need to incorporate this when you are assessing the various witnesses. Fiona Brown, for example, was clearly emotionally invested as a witness to the point that her emotions got the better of her. Remember just stand back. Brittany Higgins was just one of many low level staff members that she had managed for less than two months over three and a half years ago.

25

30

You may then ask why would she be so emotionally invested in a SMS thanking her. I guess we do not know why she was clearly emotionally invested to one question but we know that she was not clearly emotionally invested to the other questions that she was asked. Again, we do not know but it is something that you need to consider in assessing her evidence. Further, you have seen the evidence of Fiona Brown's boss, Senator Linda Reynolds, who was dealing with this issue in the run up to an election back in 2019.

35

40

She then initially handed(sic) a media inquiry about it later in October 2019 after Brittany Higgins had moved on to Senator Cash and you have also heard from Senator Michaelia Cash and her chief of staff, Daniel Try, who the complainant worked for at the time of the media inquiry, and from who she resigned to re-instigate the report. Now I am not going to tell you what

45

5 Thirdly, the third thing that I invited you to use, the third tool, is that anybody can say anything, so I urge you to compare things people said in the witness box or during the interview to objective evidence that cannot be made up. That is evidence set in concrete such as letters exchanged, CCTV evidence, or Uber records.

10 For example, look at the recording now at Exhibit B of the accused asking to be let into the ministerial wing without his pass, 'Oh hi, mate. Bruce Lehrmann here, with Minister Reynolds. We've been requested to pick up some documents. I've forgotten my pass. We're just at the ministerial entrance.'

15 Now, compare that to the email exchange that the accused sent at 9.28 am on Friday 5 April 2019, 'I accept that entering the office after hours is a breach no matter what. I refute the claim that I informed security it was for official purposes.' So that letter is completely inconsistent with what he said.

20 Look at the timing of him leaving the office. As I said in my opening, what the accused said about the sequence and timing of him leaving Parliament House is important. We know from the phone records just admitted a little while ago that his then girlfriend of five months called him six times between 2.16.12 and 2.18.25, each going to message bank because he did not answer his phone. We know he said in his interview with police that this was probably because he always had his phone on silent. That is at questions 739 to 743.

25 Then look at the objective evidence that shows the accused clearly accessing his phone 13 minutes after the last missed call from his girlfriend to order an Uber at 2.31.17 at Exhibit X. As I said, the timing of the Uber call and his departure from Parliament House are very important in this case. He says at question 104 of his interview with police that he ordered an Uber and says that he left the minister's suite because he noticed the Uber had indicated that it was there.

30 As you see from the objective evidence however at Exhibit Y, the door through which he left the suite was the rear door which was opened at 2.31.46, 29 seconds after he actually called the Uber. In fact, both the Uber records at Exhibit X and the CCTV from outside Parliament House at Exhibit E show the Uber did not arrive for another three minutes, at 2.34.44. So he did not leave because the Uber had arrived at all because he left just after he called the Uber.

35 As I have said, that is important because as you heard at question 36 of her first evidence-in-chief interview, Brittany Higgins says that when she woke up, the accused was having sex with her. She said no at least half a dozen times and says he just stopped, looked at her and left.

...and this was in no way the case. I certainly did not make that inference.

5 So you now know what he's saying in, 'We've been requested.' He's implying that he was requested by Senator Reynolds and he says, 'I certainly did not make that inference.' Well, members of the jury, he most certainly did not make reference. He most certainly expressed it clearly. That's reason 1.

10 So let's move to reason 2, to drink alcohol. He quite clearly told Fiona Brown on Tuesday, 26 March 2019, that he came back to drink whiskey and he had about two glasses. That's at page 233, line 6 of Fiona Brown's evidence. That appears undisputed. The claim was of course repeated in a subsequent phone conversation on 5 April with both Ms Brown and Mr Chamberlain present.

15 Now, the accused mentions times phone call at question 897 of his record of interview. In that he says that Ms Brown 'just confirmed by version of events' in this phone call with Mr Chamberlain which again, for the purposes of the record of interview, he said this in was to get his keys and put tabs on
20 Question Time folders. And you've also heard from Mr Chamberlain himself the actual version. He confirmed that it was to drink whiskey. As I say, this is clearly corroborated by Exhibit W in his response to the show cause letter.

25 Now, on the topic of alcohol in the office he's also inconsistent with other evidence. At question 615 of his record of interview he says he did not have alcohol at the office, repeating this at question 854, that to the best of his knowledge, there was no alcohol in the office at all. At questions 762 to 767 it was put to him by police that he told Fiona Brown that he went there to drink whiskey and he denied this, adding at question 764, and this is a quote from
30 his words, 'I never drank in the office. I never did that. There's no alcohol.'

Then you have the evidence of Ms Hamer at page 268 that shows otherwise. She says, 'He had quite a big range of alcohol. There was spirits, there was whiskey, there was wine. So it was - yes, like it was quite a substantial
35 amount of alcohol.' Now, although this was a reference to the previous office occupied before Linda Reynolds moved to M123 with the accused, I remind you again that his previous office was also with Senator Reynolds and they both moved from that office to M123. So it's highly unlikely, in our submission, that given it was the same boss and the same portfolio that he's
40 going to throw out a substantial amount of alcohol purely because of the geographic change in office location. So that's the second reason he advances.

45 Reason 3, to attend to Question Time folders. At question 101 of his record of interview he says he attended to some Question Time folders, adding that through the course of the evening he had discussions with defence officials and said that while it was on his mind, he stopped by Parliament House and

attended to some Question Time folders, again bearing in mind there is no Question Time the whole week that followed. This is Saturday morning. Monday, Tuesday, Wednesday, Thursday, Friday there is no Question Time.

5 At question 582 of the record of interview, he elaborates that he was, and these are his words, sticking tabs to certain topics that he recalled from discussing with the guys at The Dock, adding at question 587 that they were theorising about what Labor might ask Reynolds at Question Time, so he was writing notes on the submarine issue and ensuring that the folder was, in his words, in a way that the minister was happy it was readily accessible to her, again assuming that was meaning it would be readily accessible to her not the next week but potentially the week after, but we go in at 1.40 am on a Saturday.

15 At question 602 he was clear that he was doing a lot of writing so it was possible, he says, he didn't access the computer because he was just writing notes on the folder while he was thinking about it. So again stand back, remembering this is 1.40 am on a Saturday morning, he's in his last weeks if not days of a job, and as I've said, the evidence from - I should particularise, the evidence from Christopher Payne reveals that the Question Time folders were only used when parliament was sitting, that's at page 283, line 46, and it's agreed that parliament was not sitting the entire the week that followed.

25 So as I pose to you, why not just make a note and come and do it on a Monday? This was clearly not true. The Question Time was clearly not true. As I say, we say the real motive of going back to Parliament House and sign in the very drunk complainant in the middle of the night was to be there alone.

30 I'm about to move to reason 4, your Honour, if it's a convenient time.

HER HONOUR: Yes. Members of the jury, we'll take a break now. If you would go please with the sheriff's officer.

35

JURY RETIRED

[11.18 am]

40 HER HONOUR: Mr Whybrow, did you have anything to raise at this point?

MR WHYBROW: Only in relation to what my friend said about something we raised earlier didn't address the vice that I identified, but it's a matter for my friend - I'll talk to him at morning tea - whether he wants to clarify that.

45 MR DRUMGOLD: I'll get what my friend is talking about and address it.

MR WHYBROW: Especially when my friend keeps referring to questions in my client's record of interview, they should have that with them.

5 MR DRUMGOLD: I'm content to proceed with it.

HER HONOUR: Yes. Well, I would normally have given it to them before now and we raised it yesterday and I omitted to go back to it this morning but I think they should have it, Mr Prosecutor.

10 MR DRUMGOLD: I'm happy for them to have it.

HER HONOUR: So do we have copies?

15 MR DRUMGOLD: Yes, we have copies of the two EICIs and the record of conversation.

HER HONOUR: Yes. Is there anything else so far as you are aware, Mr Prosecutor, that they don't have from you apart from the electronic stuff which is all on the - - -

20 MR DRUMGOLD: That's the only matters outstanding, I think. Everything is on the USB but the only thing that they don't have in physical form are electronic things on the USB.

25 HER HONOUR: Yes, all right.

MR WHYBROW: We can get hard copies of those, your Honour.

30 MR DRUMGOLD: Yes, I just want to - - -

HER HONOUR: I'm just wondering whether there is any point giving Exhibit 3, whether we tell them that the relevance of that has gone away or - - -

35 MR WHYBROW: Well, it's diminished. They can see where the door is and things of that nature but they don't need 16 separate copies of that, your Honour.

40 HER HONOUR: All right, yes. Ready for the jury?

MR WHYBROW: Yes, your Honour.

45 MR DRUMGOLD: Yes, your Honour.

JURY RETURNED

[11.43 am]

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Jury Absent

5 HER HONOUR: Thank you, members of the jury. I have your note expressing a concern about the fact that you don't have all of the exhibits and you've said particularly items from the defence. We're wondering whether part of your concern is that you don't have transcripts of the record of interview and the recorded interview with the complainant because there have only been four defence exhibits and of those I think they're all photographs or the text messages which you received this morning.

10 One of the exhibits is a series of photographs of the suite and the approach in Parliament House but I think you won't get multiple copies of that because, to some extent, that has sort of become a fairly limited issue. But what we will do now is give you the transcripts of the records of interview so that you have those and Mr Whybrow will otherwise get multiple copies of the other documents that you've referred to.

15 MR DRUMGOLD: The first document being circulated is the transcript of the record of interview with the accused.

20 HER HONOUR: And can I just explain while that's coming, members of the jury, that the transcript itself - as I think the prosecutor explained to you himself, the transcript of the record of interview with the accused is really given to you as an aid memoir. It's not a formal exhibit. The exhibit is the recording which you heard and to the extent that there's any difference between the transcript and what you heard on the recording, you should
25 prefer the recording but it's given to you as an aid.

MR DRUMGOLD: I don't want to flood the jury but the next transcript that will be circulated is the first evidence-in-chief interview with Ms Higgins.

30 HER HONOUR: And again, members of the jury, that transcript is given to you as an aid. You will recall that the interview that was recorded between Brittany Higgins and police and played to you constitutes her evidence-in-chief. So this is not an exhibit. The evidence is what you saw and heard on the video but this is given to you as an aid.

35 MR DRUMGOLD: And the final circulation is the second evidence-in-chief interview with Ms Higgins.

40 HER HONOUR: And I'll just mark the note. That will be jury note number 7.

MR DRUMGOLD: Is your Honour content for me to continue?

45 HER HONOUR: Yes.

MR DRUMGOLD: Members of the jury, just before I go on, I just want to clarify one thing. I said that it's clear that there are strong political forces at

5 play here, particularly with a number of the witnesses, particularly the senators and their chiefs of staff. I just want to be abundantly clear that I am not suggesting for a moment that defence counsel are part of those political forces. It's relevant to the credibility of the witnesses, not to the way in which defence case was conducted. So I think that is clear but I just want to express it.

10 So we just finished with reason three that I said was the to go and attend to the question time folders. I just want to get to the fourth and final reason that was offered by Mr Lehrmann and that was the house key excuse. So at questions 319 to 321 of his record of interview, he says he had to go back to Parliament House to get his keys which apparently was, in his words, normal practice. At question 322 of his record of interview, he added that he would just leave them on his desk so he wouldn't have a lot of things in his pocket, adding that his briefcase would be shoved under the desk somewhere. Again, 15 as I've invited, ask yourself how would he then grab his keys if he left his pass there.

20 At question 642 to 643 of his record of interview, he agrees that he didn't have his pass on him to get them. As I've said, this would force him to undergo the whole sign in rigmarole just to get his keys to go home. Again, bearing in mind Exhibit W - I said I would return to it - Exhibit W, the email sent Friday, 5 April 2019, 'I offer no excuse and I accept that entering the office after hours is a breach no matter what the reason'.

25 So I don't know where we're at with the keys. It's a breach to go back there to get the keys but we're going to leave the keys and we're going to leave the pass so that we're going to have to sign in to get the keys to go out and go home again. So they are the four reasons he gave for going to Parliament House with an intoxicated complainant in the middle of the night. As I say, we say three were not true, one was possibly part of the reason, being to drink alcohol. Again, we say he had already unsuccessfully attempted to kiss her. She was drunk. She was vulnerable. We've been out partying. It was the middle of the night and we say this was the most convenient place to get her alone. Not a sudden need to do some work in the middle of the night. 30 35

40 So the third question, did the accused engage in sexual intercourse with the complainant? I would submit to you that this is a central question that you will have to answer in the jury room. The evidence of sexual intercourse comes quite clearly from the complainant and she is very clear in her evidence in her first evidence-in-chief interview that you now have there at question 36 and again at question 268 to 270.

45 She describes further in her evidence-in-chief in the witness box and the best reference to that we visited a couple of times and is probably page 44, around line 24, that she was sound asleep, she was awoken by the sharp pain of the

or Senator Cash, it is asked of her, suggested of her, put to her, there were political ramifications to all of this and she goes:

No, absolutely not. I deny that.

'I was not wearing a red shirt'. Does not make the opposite true and similarly with Linda Reynolds yesterday, the proposition is put:

There are political ramifications here. You were suppressing this. You wanted to hide this. It did not want to – would not played out well for the election.

And they say:

No. No, that's not what it was.

They have denied it. Have you heard any other evidence suggesting there were political forces at play other than from Ms Higgins? Other than from Ms Higgins and as much as the prosecutor sort of did not really have a close look at her evidence because a close look at her evidence makes this case totally untenable, in my submission, totally untenable. Now a suggestion, you might recall early in his summing up, all of this stuff that happens in 2020 and 2021, how can that logically connect to whether what happened in 2019 happened? Well that is what is called the presumption of innocence.

We presume he is innocent. We have a look at the evidence and assess the evidence, cumulatively, separately, some you might accept, some you might not, some are essential facts, some may not be. Against that background the prosecution has to prove it. Now at the end of the day, everything in this case turns on you accepting beyond a reasonable doubt that you can believe, that you accept, that you do not have any doubt, about the genuineness, the reliability, the truth, the accuracy of what Brittany Higgins told you in her evidence and for reasons that I will hopefully demonstrate and persuade you, you might not be able to count on one hand statements she has made that you could find reliable, honest, genuine, beyond a reasonable doubt.

And that is what I submit is why the prosecutor did not want to go into detail about what she said and focused instead on a whole lot of things that the accused said in his record of interview. Noting that he does not have an onus of proof. He does not have to persuade you he is innocent. Even if – and her Honour, I expect, will direct you more carefully about this, noting that the prosecution has to prove this case, that means when I suggest to you looks like you might be satisfied that there was a motive to make up a false case, you might have – for example, there is a motive to put a false claim sort of in to save her job because she was worried that her dream job, and her dream job was not to work for Linda Reynolds for the rest of her life, as the prosecutor seemed to suggest. Her dream job was working in Parliament.

Her dream job, she – as I am going to suggest to you, this is an explanation for what she did and it all fits in and you might, at the end of the day, go 'You know, I don't know about that. I reject that. I'm not satisfied that she's done this because of that reason.' That doesn't change the starting point of where you then have to go, because I didn't have to establish a reason. I don't have an obligation to provide an explanation. And it's wrong to ask yourself, 'But why should she?'

I am offering you a possible explanation of what I would suggest is a plausible explanation, what you might find to be a compelling, on the evidence, explanation. But if you reject that, then the prosecution is no further advanced. You are still at step one. You still are, 'Have they satisfied me beyond a reasonable doubt that what's she saying is accurate, truthful and reliable. And the fact that I offer you an explanation, and you may not accept it, does not advance the prosecution's case.

Similarly, the accused gave an interview to the police and we're all familiar with the right to silence and things like that and you see indeed in the interview that you now finally have the transcript in front of you, he's cautioned. He does not have to say anything. He does not have to do anything but he sat down, he answered all the questions with the police, he provided bank records, Uber records, access to his phone, receipts. He did his best giving answers and the prosecutor has focused on what I would suggest is minutiae in his answers two years after an event to say effectively you would reject his denials, you would reject his explanations.

Now, again, you may well - I would submit that you wouldn't, that you shouldn't - that you would have a reasonable doubt as to whether what he told you might be true and if you do have a reasonable doubt about what he told you might be true, then your obligation will be to find him not guilty because you will have a reasonable doubt as to whether or not he committed this offence.

But even if you like the explanation for why would she make it up, if you reject it, if you reject what he said to the police, absent some lies that we'll come to allegedly, again, if you reject what he says, well, you put that aside. It doesn't advance the prosecution case either because he didn't have to convince you of his innocence. He didn't have to raise a reasonable doubt with you by giving an explanation to the police. It is for the prosecution - at all times the prosecution – to satisfy you beyond a reasonable doubt about the honesty, reliability and accuracy of the evidence given by Brittany Higgins and not by focusing on well, all of these things that Mr Lehrmann it's suggested was unreliable on but not focusing on – now, if we're going to do it, it might be two to 37 in terms of alleged lies. It does not focus on what she said, what she's done and the learned prosecutor kept referring to evidence as corroborative of what she says.

handwriting is the same is what is known as evidence from the Bar table. We have not had any evidence from a handwriting expert to say it is the same or not. Does it matter? Mr Fairweather says, 'Hey look, he's an authorised person. He can sign for her.' It was not a big deal in that sense.

5

In my submission, nothing turns on whether they said, 'You sign for her,' or whether she signed herself. What is important is she is not falling around drunk. She is not some unwilling, as you will see in the interview, 'No, I was being dragged up there.' We do not see Mr Lehrmann – to the extent that
10 body language tells anything, the prosecutor wants you to give a lot of weight to body language in terms of 10 months later, or eight months later, how she has presented to her mum or the fact that she is not as tidy a housemate six months later is somehow proof that she has been sexually assaulted.

15 Do not see anything, in my submission, at The Dock or coming into Parliament House indicative of some sort of flirtatious, amorous interaction, intent, by either. Mr Lehrmann in his interview said, 'Brittany told me she needed to come back and do something.' Okay. You know, they had been out, same age, she is a full pass holder, she works in the office, he works in
20 the office, share an Uber. This sort of assumption and presumption that he was her keeper, that he was responsible for her, is where we are starting to get into, again, a presumption of guilt.

25 Have a look at Exhibit C, look at the photographs and the other evidence - - -

HER HONOUR: Mr Whybrow, sorry. You are moving away from the microphone again.

MR WHYBROW: I am sorry. Thank you, your Honour.

30

HER HONOUR: I really need to be able to take notes.

MR WHYBROW: No, no. I keep going up and down. Excuse me.

35 Have a look at Exhibit C and have a look at what we know from the evidence. I think it might be Ms Hamer who was asked questions by Ms Musgrove about the set up and where offices were and where her office was. She was I think then the media person and had been asked or suggested to somebody that Ms Higgins might mentor or talk to, because she has
40 ambitions of getting into that space, and as I recall the evidence her office was around the back end there.

But the evidence we have is they came in, they came through the main door. Mr Lehrmann tells you he went left and she went right. Going right gives
45 you a few options. You will see at one point in his record of interview he says, 'No, I can't tell you where she went.' There was the media office there. There's the Chief of Staff's office. There's the minister's suite,' that he says he

5 would not dream of going into. He goes left and he has his own little fiefdom down in the bottom corner next to the lift. You heard her say, 'Yes, he had partition and he had three desks and it was a six foot partition,' and you have Ms Higgins saying he disappeared for some time. You might recall when she came back to evidence and I asked some more questions, 'Yes, I can't tell you if I went into the suite by myself. Yes, he was off doing something.' He was off doing something and seemed to be gone for a while.

10 Now again, applying a presumption of innocence, he has come in, he has gone down to his area, he sat down, he started to some notes on the submarine question time files after having spoken to people from Navy. He orders an Uber – sorry. He, it would appear, has his phone on silent. He has missed six calls from his girlfriend. He picks up his phone, presumably at some time, probably says some version of a four letter word, orders an Uber and leaves.

20 Now, how is he to know, again, it does not work so well if we presume he is guilty but if we proceed on the basis that there is a presumption of innocence, how is he to know that Ms Higgins has not already left out of the same unlocked doors just around the corner? Why is it the only reasonable rational inference that he knows that she is in the minister's suite passed out asleep? In my submission, it is not. In any event, he orders an Uber.

25 Now you can have a bit of fun going through the records and checking the Uber record with the CCTV and following it all through, which you might want to do because the learned prosecutor makes a big deal out of this. A big deal. The Uber was not there immediately. He lied about the Uber being there. Two years later he has ordered an Uber for 2.30 in the morning and it comes up as three minutes away. You might think he has probably walked out there on a few occasions and knows it is about a three minute walk, so going back two years later and saying to the police what happened:

35 Oh, I ordered an Uber and it was there straightaway so I left straightaway.

40 Is that a big lie? Sometimes – I do not know if any of you use Uber but you might say, '10 minutes away' or 'I have got to get to this point, it is there already'. Is the only rational inference that if it is three minutes and you are in the middle of Parliament House that you might say, 'It is there already'? Because what we do know is he orders it. As the prosecutor said, he left. The back door opens 29 seconds later. We have the evidence from the security man who says the door codes and the door records and the CCTV are synchronised so when you come to look at the CCTV you can see the – takes about 90 seconds from the point that that door is opened to the point that the lift opens and he walks into view in the lobby or the security point 8 leaving.

said she was sexually assaulted, my friend said you couldn't be satisfied beyond reasonable doubt she said that,' inferring that that was subject to a Shepherd direction. I would ask that that be addressed.

5 HER HONOUR: Yes, I picked up that point. Do you accept - - -

MR WHYBROW: Yes, your Honour. It's not an essential fact that they have to find beyond a reasonable doubt.

10 MR DRUMGOLD: And the second is regarding the job, my friend said, suggestive that Brittany Higgins said this, 'I would die if I gave up this opportunity.' Now, I accept that there is a degree of poetic license in paraphrasing but that places it way too high. It was her dream job but to suggest that at some point she said, 'I would die if I gave up this opportunity,'
15 simply places it far too high and it is not supported by the evidence. Those are the only two points I have.

MR WHYBROW: Yes, I will check that and withdraw it if it is not accurate, your Honour.

20 HER HONOUR: I'm sorry?

MR WHYBROW: I said I will check that and I will withdraw it if it is not accurate.

25 HER HONOUR: The only other thing I would say, Mr Whybrow, is that I think the convention is that when you are reading evidence, especially if you are reading your own cross-examination, it is preferable to avoid intonation that gives it a flavour.

30 MR WHYBROW: I will not do that then, your Honour. I take on board what your Honour says.

35 HER HONOUR: I will adjourn until 10 o'clock tomorrow.

ADJOURNED TO 19 OCTOBER 2022 AT 10AM

[4.00 pm]

Project. She films. She goes back to the police. You heard that chronology. She got a book deal for \$325,000. This is a big story.

5 I'm not here again to tell you or to prove why she goes back to the police and initiates this again in 2021. It's a trite line but there are 325,000 reasons at least now why this case is important from her perspective. Do you accept what happened in 2019 beyond a reasonable doubt?

10 Finally, ladies and gentlemen, I made some comments about demeanour. I made a comment about her father not being called. You'll recall she gave evidence at the beginning about having spoken to her father shortly after this. The learned prosecutor asked her at an early stage:

15 MR DRUMGOLD: And then you say, 'Besides my parents' - this is in a message she sent to Mr Dillaway - 'Besides my parents, you're the only person who knows. Had you said anything to your parents at this stage?---I'd have alluded to something to my dad, so I felt like that was a true statement, but I hadn't disclosed it yet to my mum in full and they didn't know the intricacies or the depth of it. They just
20 knew that something bad had happened and someone was fired. They kind of pieced together naturally that someone didn't punch me, that they knew it was sexual in nature.

25 Now, in my submission, there's another example of her asserting onto other people what they knew but, 'I'd have alluded to something to my dad, so I felt like that was a true statement.' When she said to Ben Dillaway, 'Besides my parents, you're the only person that knows,' well, you might think as an objective fact it wasn't a true statement because she hadn't told them at the time she sent that to Mr Dillaway.

30 Now, I would urge you not to place too much weight on demeanour of witnesses or how they react or not react for the reasons I've said, but if you were to take account of two demeanours that were very telling in this case and very powerful you might recall when Mr Lehrmann's record of interview
35 was played and you, as we all were, were watching closely the way he answered the questions. The way he described how his life came crashing down out of the blue, about a night that he never thought of since except that that was the day he ended up losing his job not because of any sexual misconduct, and I suggest that that was powerful and compelling and genuine
40 statements consistent with what he told the police at the start of his interview, 'This did not happen.'

45 And my learned friend asked you some rhetorical questions about, in the context of demeanour, Fiona Brown. He said she was okay giving evidence all the time until that last question. Well, I suggest to you she had been thrown to the wolves by this woman. She had been thrown to the wolves by Ms Higgins. Ms Higgins had alleged and continued to allege in evidence in