

NOTICE OF FILING AND HEARING

Filing and Hearing Details

Document Lodged:	Interlocutory Application - Form 35 - Rule 17.01(1)(a)
Court of Filing:	FEDERAL COURT OF AUSTRALIA (FCA)
Date of Lodgment:	10/10/2025 1:34:13 PM AEDT
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File Number:	NSD1591/2025
File Title:	BRUCE LEHRMANN v COMMONWEALTH SPECIAL MINISTER OF STATE & ANOR
Registry:	NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA
Reason for Listing:	To Be Advised
Time and date for hearing:	To Be Advised
Place:	To Be Advised

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.

Interlocutory application

No. 1591 of 2025

Federal Court of Australia
District Registry: NSW
Division: General

Mr Bruce Lehmann

Applicant

Commonwealth Special Minister of State

First Respondent

Mr Paul Brereton, Commissioner of the National Anti-Corruption Commission (NACC)

Second Respondent

To the Respondents:

The Applicant applies for the interlocutory orders set out in this application.

The Court will hear this application, or make orders for the conduct of the proceeding, at the time and place stated below. If you or your lawyer do not attend, then the Court may make orders in your absence.

Time and date for hearing:

Place: Law Courts Building, 184 Phillip Street, Queens Square, Sydney NSW 2000

The Court ordered that the time for serving this application be abridged to

Date:

Signed by an officer acting with the authority
of the District Registrar

Filed on behalf of (name & role of party) Bruce Lehmann
Prepared by (name of person/lawyer) Bruce Lehmann
Law firm (if applicable) Self-represented litigant
Tel 02 8815 8182 Fax N/A
Email [REDACTED]
Address for service c/o Zali Burrows at Law, 1/299 Elizabeth Street, Sydney NSW 2000
(include state and postcode)

Interlocutory orders sought

1. Pursuant to rule 16.53 of the *Federal Court Rules 2011 (Cth)*, The Applicant be granted leave to file and rely upon the Amended Originating Application signed by the applicant and sent to the Respondents on 3 October 2025.
2. The Amended Originating Application be taken to be filed and served as at the date of this Courts order.
3. Costs of this Application be in the cause.
4. Any other order the Court considers necessary.

Service on the Respondents

It is intended to serve this application on both Respondents.

Date: *10 October 2025*

A handwritten signature in blue ink, appearing to read 'Bruce Lehrmann', written over a horizontal line.

Signed by Bruce Lehrmann
The Applicant

**Amended Originating application for relief under section 39B
Judiciary Act 1903**

No. 1591 of 2025

Federal Court of Australia
District Registry: NSW
Division: General

Bruce Lehmann

Applicant

Commonwealth Special Minister of State

First Respondent

Mr Paul Brereton, Commissioner of the National Anti-Corruption Commission (NACC)

Second Respondent

To the Respondents:

The Applicant applies for the relief set out in this application.

The Court will hear this application, or make orders for the conduct of the proceeding, at the time and place stated below. If you or your lawyer do not attend, then the Court may make orders in your absence.

You must file a notice of address for service (Form 10) in the Registry before attending Court or taking any other steps in the proceeding.

Time and date for hearing:

Place: Law Courts Building, 184 Phillip Street, Queens Square, Sydney NSW 2000

Date: 3 October 2025

Signed by an officer acting with the authority
of the District Registrar

Filed on behalf of (name & role of party)	Bruce Lehmann		
Prepared by (name of person/lawyer)	Bruce Lehmann		
Law firm (if applicable)	Self – represented litigant/law student		
Tel	02 8815 8182	Fax	N/A
Email	[REDACTED]		
Address for service (include state and postcode)	C/O Zail Burrows at Law, 1/299 Elizabeth Street, Sydney NSW 2000		

Details of claim

1. The Applicant is a former employee under the *Members of Parliament (Staff) Act 1984 (Cth)* ("The MOPS Act").
2. The Second Respondent executed two search warrants on the Applicant on 5 June 2024 in relation to one NACC Investigation, Operation Ivanhoe.
3. Operation Ivanhoe is an investigation into frivolous, 'James Bond' like allegations that the Applicant used 'official' information (being French submarine secrets) gathered on the night of 23 March 2019 for financial, professional and personal purposes, among other things.
4. On 5 June 2024 the Second Respondent and NACC 'officers' representing him confirmed the Applicant would be entitled to funding for legal representation throughout the NACC process.
5. In reliance on that acknowledgment, the Applicant engaged legal representatives and incurred substantial legal costs, including counsel's fees and solicitors' fees, to comply with compulsory processes of the NACC.
6. On 12 September the Applicant received a summons to attend a hearing of the NACC.
7. On the 22nd and 23rd of October 2024 the Applicant appeared in person before a hearing of the NACC in Hobart, Tasmania.
8. The hearing related to Operation Ivanhoe and another investigation, Operation Greenough.
9. Operation Greenough is an investigation by the NACC into the Australian Federal Police (AFP) and whether officers misused 'official' information, being information acquired by them during AFP Operation Covina (being the investigation of an allegation of sexual assault by Ms Brittany Higgins on 23 March 2019).
10. The Applicant was represented by Senior Counsel and a Solicitor at the NACC hearings.
11. The Second Respondent was present at those hearings.
12. It was further acknowledged at the hearings that the Applicant was entitled to legal funding given the compulsory processes of the NACC.
13. The Applicant applied for a grant of legal funding to the Commonwealth under the relevant regulations for complying with the NACC process and has been consistently stified.
14. The Applicant continues to be represented by Senior Counsel and a Solicitor for the NACC matters, as they have not been finalised and active consideration is being given to commencing several actions under the NACC Act in this Court.
15. It is well established publicly that the Applicant is impecunious and in serious financial peril, The Respondents appear recklessly indifferent to the damaging, personal effect

the NACC processes are having on former employees when frivolous allegations are advanced.

16. The continued unexplained and unreasonable delay by the Commonwealth for a grant of funding has exacerbated the situation and resulted in the Applicant applying to this Court for relief and assistance.
17. The Applicant is being denied procedural fairness in the NACC process, is unable to appropriately challenge matters or advance a legitimate complaint that is outstanding with the Inspector-General of the NACC in relation to the conduct of the Commissioner and NACC officials.
18. The Applicant continues to incur costs and is liable for any cost recovery proceedings.
19. Despite the confirmation of eligibility by the Second Respondent, the First Respondent has failed to provide funding and has unreasonably delayed making a decision in accordance with the law and regulations.

Non-disclosure notation:

20. The Second Respondent belatedly decided to issue a non-disclosure notation under subsection 96 (2) of the NACC Act on 12 September 2024 in relation to both Operation Ivanhoe and Operation Greenough.
21. The Applicant submits this was done to stifle his ability to obtain legal representation, deny him procedural fairness, deny the fourth estate (media) from scrutiny in circumstances where the Applicant is a well know public figure and is an ongoing attempt by the Commissioner to 'lock out' the judiciary from proper oversight of his decisions.
22. The Applicant considers that court proceedings are relevantly exempt from such an order of the Second Respondent.
23. The Applicant is supportive of the Court creating an online portal for public access to evidence in relation to these proceedings, it is in the public interest and interest of open justice.

Additional details of claim in support of the amended application

24. The additional relief is brought under s39B(1) of the *Judiciary Act 1903 (Cth)* and/or section 5 of the *Administrative Decisions (Judicial Review) Act 1977*
25. The Applicant challenges certain decisions and actions of the Second Respondent on the basis that they were unlawful, made without proper basis or otherwise affected by bias and judicial error.

The raids of 5 June 2024

26. On or about 5 June 2024, the Second Respondent authorised and caused the execution of raids against the Applicant led by NACC Senior Investigator, Jessica [REDACTED]

27. The raids were not supported by any lawful or proper foundation and were in excess of the Second Respondents power.
28. The raids were conducted over approximately 14hrs on 5 June 2024, with the NACC seizing just two personal, handwritten diaries of The Applicant and a small subset of emails from a personal email address.
29. The conduct of the raids on the part of Ms Jessica [REDACTED] and other NACC officers involved a denial of procedural fairness and natural justice and far exceeded the lawful powers of the Second Respondent.
30. The Australian Federal Police officers involved in assisting the execution of the raid were always professional and considerate of the Applicants rights, going as far as reprimanding Ms Jessica [REDACTED] for exceeding the terms of the warrant as they were unable to find anything of use for the NACC investigations.

The October 'secret' hearings

31. On 12 September 2024 the Applicant was served a summons for Operation Ivanhoe and Greenough compelling him to attend private or 'secret' hearings of the NACC.
32. The hearings were conducted on 22 and 23 October 2024 in Hobart, Tasmania.
33. The summons included a non-disclosure notation effectively gagging the Applicant.
34. In correspondence with the NACC, the Second Respondent was on notice that the Applicant was yet to have confirmation of legal funding and proceeding would be a gross denial of procedural fairness and natural justice. Despite this, the Second Respondent pressed the summons served on the Applicant, threatening arrest.
35. The hearings were conducted unlawfully, without any compliance with rules of evidence, procedural fairness or natural justice.
36. Despite the basis for the warrants executed on 5 June 2024, the October hearing focused primarily and rather bizarrely on the judgement of His Honour Justice Lee in NSD103/2023 and the evidence given by the Applicant in those proceedings, well outside the remit the of the NACC.
37. The Second Respondent and Counsel Assisting Ms Zelig Heger SC confirmed transcripts and recordings of the hearings will be provided to the Applicant.
38. No transcripts have ever been received by the Applicant or his legal representatives.
39. Operation Ivanhoe and Greenough appear to be abandoned by the Second Respondent.

Non-disclosure notation

40. On 12 September 2024 the Second Respondent issued non-publication notations purporting to prohibit disclosure of information relating to the Applicants attendance at hearings.
41. Contrary to NACC policy and guidelines the Second Respondent issued a media release to national media confirming the raids of the 5 June 2024.

42. Contrary to his own non-publication notation on 12 September 2024, Ms Jessica [REDACTED] booked travel to Sydney without notice or consultation with the Applicants legal representatives.
43. The effect meaning a national airline, travel agency and Sydney hotel were given the name of the Applicant, dates and times of arrival as well as the reason for coming to Sydney being 'NACC hearing'.
44. Correspondence from the Applicants legal representatives alerted the Second Respondent to this, no direct reply was received.
45. The non-disclosure notation is therefore invalid, made without proper basis or of no effect.
46. The Applicant contends that the Second Respondent has exceeded his power, used his office for an improper purpose and is infected by bias and conflicts of interest.
47. The Second Respondent has acted legally unreasonably and in breach of procedural fairness and natural justice.
48. Each of the decisions taken by the Second Respondent as outlined are invalid and have no legal effect.

Relief Sought

On the grounds stated in the claim, the Applicant applies for the following relief under section 39B of the *Judiciary Act 1903* and/or section 5 of the *Administrative Decisions (Judicial Review) Act 1977*:

NACC Legal Funding and Representation:

1. A declaration that the Applicant is eligible for legal funding from the First Respondent in relation to legal costs incurred in compulsory compliance with the NACC investigations and ancillary litigation relating to the NACC.
2. An order/writ of mandamus compelling the First Respondent to make final determination or redetermine and provide legal funding lawfully and in compliance with orders of this court.

5 June NACC Raids:

3. A declaration that the decision of the Second Respondent on or about 5 June 2025 to authorise and/or conduct raids upon the Applicant was unlawful, made without proper basis and/or of no legal effect.
4. An order/writ of certiorari setting aside the decision of the Second Respondent.
5. An order for the Second Respondent to return physical items seized during the raid being two personal, handwritten diaries of the Applicant.

October 'Secret' Hearings:

6. A declaration that the requirement imposed by the Second Respondent compelling the Applicant to attend hearings conducted by the NACC on 22 and 23 October 2024 in Hobart, Tasmania was unlawful, without proper basis and/or of no legal effect.
7. An order/writ of certiorari setting aside the summons issued by the Second Respondent to attend the hearings on 22 and 23 October.

Non-publication notation:

8. A declaration that the non-publication notation issued by the Second Respondent on 12 September 2024 was unlawful, invalid or made without proper basis.

9. An order/writ of certiorari setting aside the non-publication notation issued by the Second Respondent on 12 September 2024.

Injunctive relief:

10. An injunction restraining the Second Respondent from relying upon, giving effect to, or otherwise taking steps against the Applicant in Operation Ivanhoe and Greenough based on:
 - a. The 5 June 2024 raids.
 - b. The compelled hearings of 22 and 23 October 2024 in Hobart, Tasmania.
 - c. The non-publication notation issued on 12 September 2024.

Other:

11. Such further or other orders as the Court considers appropriate to prevent prejudice to the Applicant arising from the misconduct of the Second Respondent and conduct of the First Respondent.
12. Costs

Applicant's address

The Applicant's address for service is:

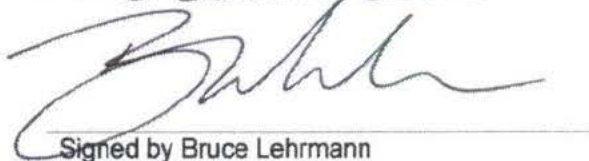
C/O Zali Burrows at Law, 1/299 Elizabeth Street, Sydney NSW 2000

E: [REDACTED]

Service on the Respondent

It is intended to serve this application on all Respondents.

Date: *3 October 2025*



Signed by Bruce Lehrmann
The Applicant

Schedule

No. 1591 of 2025

Federal Court of Australia
District Registry: NSW
Division:

Applicant

Bruce Lehrmann
c/o Zali Burrows at Law
1/299 Elizabeth Street, Sydney NSW 2000

First Respondent

Commonwealth Special Minister of State
c/o The Australian Government Solicitor (AGS)
Level 33 300 George Street, Brisbane QLD 4000
Fiona.dempsey@ags.gov.au

Second Respondent:

Mr Paul Brereton, Commissioner of the National Anti-Corruption Commission (NACC)
c/o The Australian Government Solicitor (AGS)
Level 33 300 George Street, Brisbane QLD 4000
Fiona.dempsey@ags.gov.au

Date: 3 October 2025