

Form 59  
Rule 29.02(1)

## Affidavit

No. NSD103 of 2023

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

**BRUCE LEHRMANN**

Applicant

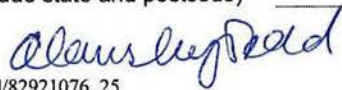
**NETWORK TEN PTY LIMITED (ACN 052 515 250)** and another  
Respondents

Affidavit of: **Angus Llewellyn**  
Address: 1 Saunders Street, Pyrmont NSW 2009  
Occupation: Producer  
Date: 21 September 2023

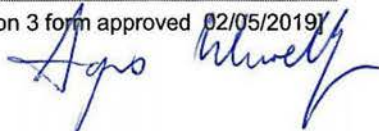
I Angus Llewellyn of 1 Saunders Street, Pyrmont NSW 2009, producer, affirm:

1. I am a Producer for The Project.
2. The Project is a nightly current affairs program broadcast by Network Ten Pty Limited and its affiliates (**Network Ten**).
3. The matters set out in this affidavit are based on my own knowledge, except where I have stated or qualified otherwise. Where I have set out my recollection of conversations in this affidavit I have included the effect of the words spoken as I recall them.
4. Where I refer to a document in this affidavit, that document was produced to me at the time of affirming this affidavit and verified by me as a true copy of the relevant document.

Filed on behalf of (name & role of party) The First Respondent, being Network Ten Pty Limited  
Prepared by (name of person/lawyer) Marlia Saunders  
Law firm (if applicable) Thomson Geer  
Tel +61 2 8248 5836 Fax \_\_\_\_\_  
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(include state and postcode)

  
Legal/82921076\_25

[Version 3 form approved 02/05/2019]



5. Where I refer to the fact of provision of legal advice in this affidavit, I am not authorised to and do not waive privilege in respect of its content.

### **Background**


6. I am employed by 7PM Company Pty Ltd (**7PM**).
7. My understanding of the arrangement between Network Ten and 7PM is that Network Ten is the producer of The Project and 7PM provides Network Ten with production services.
8. I have worked as a Producer for The Project since June 2019.

### *Education*

9. In 1996, I was awarded a Bachelor of Music Education by the Sydney Conservatorium of Music.
10. In 2000, I was awarded a Graduate Diploma in Communication (Journalism) by the University of Technology Sydney.

### *Work history*

11. I have worked in the following roles:
- (a) December 2001 to December 2003: Casual Radio Producer at 702ABC;
  - (b) September 2002 to July 2004: Producer for Weekends (Radio 2UE);
  - (c) July 2004 to March 2006: Producer for Mike Carlton Breakfast Show (Radio 2UE);
  - (d) March 2006 to December 2007: Executive Producer for Mike Carlton and Peter FitzSimons (Radio 2UE);
  - (e) January 2008 to November 2008: Associate Producer for Enough Rope with Andrew Denton (produced by Zapruder's Other Films, broadcast on the ABC);
  - (f) November 2008 to July 2010: Producer for Sunday Night (broadcast on Channel Seven);
  - (g) August 2010 to February 2011: Supervising Producer for Dateline (broadcast on SBS);
  - (h) February 2011 to October 2015: Executive Producer for Insight (broadcast on SBS);
  - (i) September 2016 to December 2016: Producer for Lateline (broadcast on the ABC);
  - (j) December 2016 to December 2017: Series Producer for The Link (with Stan Grant) (broadcast on the ABC);
  - (k) February 2018 to August 2018: Senior Producer for Andrew Denton's Interview (produced by Legacy Media, broadcast on Channel Seven); and



- (l) September 2018 to March 2019: Executive Producer for Dr Michael Mosley's Reset (broadcast on SBS).

### **Roles and responsibilities**

12. In a television context, the role of a current affairs television producer is to:

- (a) determine what the story or angle is, including determining whether information received is a story worth pursuing before taking any further steps. The large majority of ideas that people put forward do not become stories;
- (b) conduct fact checking. As a current affairs television producer, I need to assess the reliability of claims made by the source of a story and be confident that the allegations being made stack up and make sense. I approach everyone who tells me a story with a question that one of my best journalism teachers always told me to keep in mind: "Is this person a fantasist?" This approach means that I do not believe anything any potential source tells me right away. I approach all stories with a degree of scepticism. I will take note of and act on any suspicions as to the reliability of a source after speaking to that source, including checking with my colleagues to see if they share the same suspicions or have any of their own;
- (c) work out how the story can be filmed and best conveyed to the audience. Television audiences need to be able to clearly follow what happened, why it happened and what is next. If you cannot tell a story clearly, reveal the story's depth and capture that on camera, it might not be a story suited for a long form television current affairs program and it may be better suited to other news mediums;
- (d) write the story. A current affairs television producer takes the story from first contact with the source all the way through to broadcast, including by writing the questions for interviews, writing the script and writing requests for comment;
- (e) work with the editor to edit the video of a story into a package for broadcast. In my view, the editor's job is a craft in that they have to create something compelling, well-paced and respectful that engages the audience. As a current affairs television producer, you need to give the editor everything he or she needs to do their best work. This may involve working in a collaborative way to re-arrange, cut or extend sections of a story a number of times without removing the context or reducing its accuracy to find the best way to tell the story within the timeframe; and
- (f) liaising with other stakeholders to finalise the story for broadcast. The legal team, fact checking team and heads of department at Network Ten also review the stories, and a current affairs television producer who works in the current affairs field is

*Michael Mosley*

*Agnes Hewitt*

responsible for liaising with these other stakeholders to obtain and implement any feedback.

13. Often a key part of the job of a current affairs television producer is to figure out whether a person is sufficiently able to tell their story on television. For example, the story may be too traumatic to recount on camera or the person may not be well enough to be interviewed on camera, in which case it may be better to tell the story in a print format. A current affairs television producer also needs to consider how the source or subject of a story (known within the television industry as the "talent") speaks and presents, and whether that person can convey his or her story clearly and coherently.
14. As a current affairs television producer, I also check on whether people have support and understand the consequences of telling their story publicly. In current affairs we frequently deal with people who have experienced trauma and frequently they do not have much support around them. After an interview, I will usually enquire about where the person may be going next, who can they talk to, and whether they have someone to lean on when needed. Sometimes I outline to a person how their GP can assist with a mental health plan if they ever need psychological help. Talking to a television producer is often a difficult task for the person telling their story and so I do my best when speaking to someone with a particularly traumatic story to make sure my work is not re-traumatising. I refer to this as being my 'duty of care'. I do not mean this to be a 'duty of care' in the legal sense, but I consider it to be part of the ethical responsibilities of a journalist.

#### **General practice on The Project**

15. Feature story segments on The Project are usually around 4 to 5 minutes in duration. To the best of my recollection, there has only been one segment on The Project longer than 12 minutes: the live interview between Scott Morrison and Waleed Aly in 2019 which went for 30 minutes.
16. In relation to feature story segments for The Project, raw footage is usually uploaded to the Ardome system, which is a centralised server that can be accessed by any Network Ten or 7PM employee in any State or Territory.
17. Segments are edited in an editing suite using editing software on the AVID server. An editing suite is a separate room that is set up for sight and sound video editing. For The Project, the editing suites are in the Network Ten offices in Melbourne.
18. My understanding is that only the editors, edit managers and the librarians at 7PM can access the editing software on the AVID server. Other people can move files from the Ardome system to the AVID server but cannot do anything else.
19. There are several teams that work within The Project. They are:







- (a) the daily team, who produce all of the daily news;
  - (b) the entertainment team, who look after entertainment guests;
  - (c) the comedy writers team;
  - (d) the features team, sometimes called the long form team, of which I am a member;
  - (e) the post-production team, which includes the editors;
  - (f) the production team; and
  - (g) the heads of department and managers.
20. On each particular story, the organisation of the team is fairly structured and consistent.
21. An executive producer will generally commission a story, which involves considering and approving proposed stories.
22. The producer works in consultation with middle management (at The Project this includes Laura Binnie, the head of field, and Peter Meakin, an editorial consultant) to oversee the video production of a story from the initial planning stage to the final broadcast, including working on the scripting and filming process.
23. An editor is assigned to a story in due course during the production process. Which editor is assigned depends on the type of story: some editors are better suited to certain content or a certain format.
24. The length of time I work on a story before it is broadcast depends on the particular story.
25. Some stories are ready to film or "shoot" fairly quickly so I can start shooting the day after the story comes in and have it ready to air in a few days' time. Other stories take longer. For example, I recently worked on a story that took six months to set up. I am working on a story later this year that has taken eighteen months to come together. On average, it takes me a week or two to investigate an idea, confirm it is a worthwhile story to pursue, set up one or more shoots, and prepare the story to air. I usually work on multiple stories at once.
26. The set-up of shoots can vary a lot. Approximately half the time it is a "producer shoot", which means there is a camera operator, a sound operator and me, as the producer, without a reporter or "host". On other shoots it is just me, as the producer, and the camera operator. A lot of the time, there is a reporter, one or two camera operators, a sound operator and me, as the producer, on a shoot.
27. My duty of care, my professionalism, and my experience all come into play when I am on a shoot.



28. I need to make sure the talent is as comfortable as possible, although most people are never completely comfortable about being on camera unless it is their job.
29. I try to explain to the talent what a shoot will involve so that they understand the process. In my experience, this brings them a level of comfort in speaking on camera.
30. When I am working with a reporter or a host on a shoot, I prepare a detailed "brief" about the interview and the broader story we are working on together in advance of the shoot.
31. When working with Lisa Wilkinson, I usually start with a draft list of questions for the talent and we go through and rework these questions together. Even though we have these pre-prepared questions ahead of a shoot, interviews can go down different paths on the day and, as a producer, you have to follow your instincts, and the reporter's instincts, by sometimes allowing an interview to deviate from the pre-prepared questions.
32. While on a shoot, I also juggle how the camera operator(s) and sound operator are going.
33. We usually all set up together and discuss the framing (the placement and positioning of what the camera sees) of the shots for the interview and how they will work together. We also discuss time frames and lighting, which can change, particularly in long interviews, and we need to plan for breaks – both planned breaks for people to have a coffee or food, and for unplanned breaks because often emotions are brought to the fore.
34. It is a producer's duty of care to ethically discuss with the talent how revealing an allegation on national television might affect them and the issue they are discussing once it has been broadcast.
35. I consider my duty of care as a producer starts from the first contact with the person and continues after broadcast.
36. In my view, the reputation of The Project and Network Ten is affected by how well I care for someone who has reached out to the show, whether or not we decide to pursue their story. Even though I talk to people and get them to assess how they will handle being heard in a public forum, many of the people I speak with are coming to us because they are determined that they want to speak out. For example, they may have experienced or witnessed unfairness, such as discrimination, or health problems that are not being regulated well enough in their industry, that they want to speak out about.
37. As a producer, I am present for all filming in relation to a story, where possible, so that I am across the content of what has been discussed and how each part has been filmed.
38. I then arrange for transcripts of the footage to be prepared, and go through the transcripts while watching the raw camera tapes.
39. I highlight what I initially consider to be key topic areas in the transcript.



40. I then set out what I consider to be the themes of the story which I use to frame the script that I write.
41. In the context of long form television current affairs, "script" is a jargon term that means the arrangement of "grabs" from the interview(s) with written sections to occasionally link these "grabs" together. In television, a "grab" is a section of footage. The written sections can be done either as voiceovers or as piece-to-cameras (known as PTCs). PTCs are when the reporter speaks directly to the camera.
42. Once I have finished the draft script, I submit it for sub-editing, usually to Laura Binnie and Peter Meakin.
43. At the same time, I usually submit scripts to Network Ten's legal team for early review.
44. Once I have received the first lot of edits, the editor can then start putting together the first work-in-progress (known as WIP) edit of the video for a segment.
45. Typically, camera operators will either drop off their cards or hard drives with footage to Network Ten's various "tape" bureaus where the footage will be added to the Ardome system, or upload the footage to a shared drive from which the post-production team will download and store it on the Ardome system.
46. Once the footage is on the Ardome system, the post-production team will move it from the Ardome system to the AVID server where the footage can be accessed and edited from an editing suite.
47. I usually work closely with the Network Ten legal team. My practice is to seek legal advice on my stories as early as possible and, where appropriate, during the production process to avoid any legal issues arising for the first time with the legal team, Network Ten or the talent late in the process. If I suspect that there will or may be legal issues arising from a story that I am considering, I speak to the lawyers at Network Ten before I record anything. In the long form team, we are not under a daily news deadline like others at The Project, which means that I am able to consult with the legal team early on and throughout the production of a story. I consult with the legal team to ensure that I am careful with what is produced and how we present our features. Legal checks of stories are an important part of the production process right up until broadcast.
48. While I have seen statutory declarations sought from talent in other producers' stories, I had never sought a statutory declaration from talent in a story that I have produced before the statutory declaration I sought and obtained from Ms Higgins for the purposes of the story that is the subject of this proceeding (discussed further below).



49. My approach to seeking comment is that if the story makes an accusation against someone, I will seek their comment before it goes to air. I consider that seeking comment is necessary for feature stories.

**Involvement with the Brittany Higgins segment**

50. I carried out the responsibilities set out in paragraphs 12 to 49 in respect of The Project segment containing the interview with Brittany Higgins which aired on 15 February 2021 (**Higgins Segment**).
51. I worked on the Higgins Segment for approximately four weeks.
52. I worked very long hours and only really left my desk if I was going out on a shoot for the Higgins Segment.
53. Between 18 January 2023 and 15 February 2023 (inclusive) I sent and received many emails, text messages and WhatsApp messages in relation to the Higgins Segment, some but not all of which are identified specifically in this affidavit. I also made and received numerous telephone calls in relation to the Higgins Segment, some but not all of which are identified specifically in this affidavit.
54. In preparing the Higgins Segment, it was important to have regular contact with Ms Higgins and her partner, David Sharaz. They were both in their twenties and from my observations during the production process, Ms Higgins was very traumatised and to a lesser degree so was Mr Sharaz.
55. I sought to prepare them as well as possible for the impact the broadcast of the Higgins Segment may have on them, and to look after and provide support for their mental health and wellbeing.
56. There was a great deal of anxiety amongst the production team about the details of the story getting out before the Higgins Segment went to air, given that it could have adverse repercussions for Ms Higgins.
57. We took care not to alert anyone outside the production team to what we knew, which made establishing corroborating or alternative versions of events more difficult than usual. The closer we got to broadcast, the more I could seek clarification from various people.
58. Network Ten's legal team were more involved in the Higgins Segment than other stories I had produced for The Project, but in my view, this was appropriate because the segment was longer in length and it contained serious accusations, namely that Ms Higgins had been sexual assaulted and that the assault had occurred inside Parliament House. Because the legal team were involved from the start and throughout the production of the Higgins Segment, they were copied into some of the emails that passed between

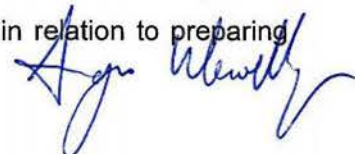


members of the production team. Often this was for the purposes of keeping them up-to-date with the progress of the segment, rather than seeking legal advice. Any reference to such communications in this affidavit is not intended to constitute a waiver of any privilege in respect of the provision of legal advice, and if the Court concludes that any such reference constitutes a waiver, I wish to withdraw the reference and to place no reliance on it.

59. The production of the Higgins Segment differed from my general practice at The Project in that, given its seriousness and sensitivity, we took precautions within Network Ten and 7PM to ensure that the story did not get out prior to broadcast, including by:
- (a) limiting the number of people at 7PM who knew about the story and what the story was about;
  - (b) giving the story the codename "ENVIRO"; and
  - (c) not putting any documents, including the footage and scripts, on the Ardome system.

**Lisa Wilkinson**

60. I first met Ms Wilkinson in about 2006 when I worked with her husband, Peter FitzSimons at Radio2UE.
61. Ms Wilkinson filled in for Mr FitzSimons on the radio for a period.
62. I have frequently worked with Ms Wilkinson on stories for The Project from around October 2019. We are both Sydney based and work well together. In addition, Ms Wilkinson's schedule allowed her to be available to work on long form stories, which is not the case for all of the hosts on The Project.
63. I think Ms Wilkinson and I work very well together to get the best out of an interview and to create the best story we can create. Having someone come to you to help you tell their story is a huge responsibility, and Ms Wilkinson and I are good checks on one another to make sure that we pursue all avenues of enquiry that we discover in the process of investigating and producing a story.
64. Ms Wilkinson is wholeheartedly professional at all times and it is an absolute pleasure to watch her work and collaborate with her. She has incredibly good instincts with talent and is always genuine with people she interviews.
65. From about 18 or 19 January 2021 until 15 February 2021, Ms Wilkinson and I spoke on the telephone almost every day, sometimes multiple times a day. I do not recall the specifics of each telephone call, but in each call we discussed where I was up to in investigating and researching the Higgins Segment, the logistics in relation to preparing



the Higgins Segment and/or how the Higgins Segment was coming together from an editorial perspective.

### Introduction to Brittany Higgins

66. On 19 January 2021, I received an iMessage from Ms Wilkinson which stated [FRD.006.00000046]:

*"I have an explosive political story for Sunday Project. Rang Craig and Sarah and we're going huge with it. March release. I have told Craig I only want to work with you on it. He agrees. Call me when you can."*

67. On 20 January 2021, I sent an iMessage to Ms Wilkinson which stated [FRD.006.00000046]:

*"Hi Lisa*

*Sounds intriguing!...I can jump on it from Friday if needed? Is it for this Sunday? If it's not then I'm back from leave on Monday and can hit it then."*

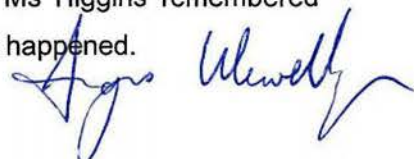
68. On 20 January 2021, I received the following iMessage from Ms Wilkinson [FRD.006.00000046]:

*"It is an extraordinary coverup involving Linda Reynolds, Michaelia Cash and the PMO. Sarah thinks it is so explosive we should do it over three segments from 7pm. It's for March. Enjoy your holiday. The woman at the centre of it all is ready to talk. She is based in Canberra. We can fly her up. Would you be good for a meeting with her on Monday?"*

69. On 20 January 2021, I received an email and two attachments from Ms Wilkinson (**First Wilkinson Email**) [FRD.001.00000925].
70. The First Wilkinson Email attached a document entitled "Brittany Higgins – Timeline" (**Timeline**) [FRD.001.00000926].
71. On the same day, I read the First Wilkinson Email and the Timeline. My initial thought was that if anything in it was true, it was interesting.
72. As stated above, I approach all potential stories with a degree of scepticism until I have conducted sufficient research and fact checking to confirm their accuracy. On the basis of the First Wilkinson Email and the Timeline, I thought the story was worth exploring.

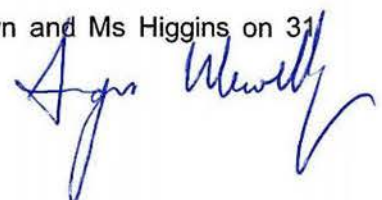
### The Timeline

73. I found the Timeline attached to the First Wilkinson Email intriguing. It contained what I perceived to be a carefully thought through timeline of what Ms Higgins remembered happening and a list of people who she said were aware of what happened.



74. Given the number of people who allegedly knew about the incident, I was amazed at Ms Higgins' claim that there had been a lack of investigation. There was clearly a police investigation which had progressed somewhat, but Ms Higgins had decided not to pursue it further. This was one of the reasons I thought the case was worth finding out more about.
75. I had previously worked in a managerial role multiple times, with over twenty direct reports, so I was aware that an allegation of sexual assault in a workplace would require a human resources investigation and incredible care to be taken for the complainant. The documents which had been provided to Ms Wilkinson suggested that Ms Higgins had received a few emails and some WhatsApp messages from her workplace, but not much else by way of support.
76. I thought that if that part was true, it was a most egregious act. I thought: "*How hard is it to look after someone who you work with? Where was the duty of care?*"
77. I believed at the time I read the Timeline that there must be a paper trail with human resources and workplace investigations and police investigations, and that that was worth investigating.
78. I noticed at the time I read the Timeline, that it contained the following documents:
- (a) a screenshot of an email from Federal Agent Katie Thelning from the Australian Federal Police to Ms Higgins on 2 April 2019;
  - (b) a screenshot of an email from Federal Agent Rebecca Cleaves from the Australian Federal Police to Ms Higgins on 8 April 2019;
  - (c) a screenshot of an email from Kathryn Cripps from Canberra Rape Crisis Centre to Ms Higgins on 4 June 2019;
  - (d) a screenshot of an email from Ms Higgins to Detective Senior Constable Sarah Harman from the Australian Federal Police on 13 April 2019;
  - (e) a screenshot of a letter from Senator Linda Reynolds to Ms Higgins following the Federal Election in 2019;
  - (f) a photograph of the Minister for Defence Industry office contact details and structure;
  - (g) a screenshot of a text message from Ms Higgins to Mr Try regarding taking a personal leave day and engaging with the Employee Assistance Program;
  - (h) a screenshot of WhatsApp messages between Ms Brown and Ms Higgins on 31 March 2019;

- (i) a screenshot of text messages exchanged between Ms Higgins and Ben Dillaway in which she says:

*"...haven't had anyone do any follow up from the party since my incident..."; and*

- (j) a screenshot of text messages exchanged between Ms Higgins and Mr Dillaway in which she says:

*"I'm not sure why but I just feel super angry at the moment. It's probably misdirected and should be aimed at Bruce but I feel so pissed at the people in the party."*

and

*"I was literally assaulted in your office and I collectively maybe took 4 days off/was offered jack shit in terms of help."*

79. After reading the First Wilkinson Email, the Timeline and the documents contained in the Timeline, I thought that, if we were to pursue this story, we would need to look closer at the question of how far this allegation was followed by Ms Higgins' workplace and the police, and whether it was done properly. I asked myself at the time *"If Parliament House did not handle the allegation like any other workplaces around Australia, why not?"*
80. While reading the First Wilkinson Email, I noticed that it contained a screenshot which purported to be from the ACT Policing website.
81. I went to the ACT Policing website at <https://www.policenews.act.gov.au/crime-statistics-and-data/crime-statistics> and confirmed that the screenshot in the First Wilkinson Email accurately reflected the ACT Policing website as it appeared at that time. The screenshot was from a webpage showing ACT Policing crime statistics and reports of sexual assaults made in April to June 2019 including an incident at Parliament House.
82. I have checked the ACT Policing website and confirm that the relevant webpage still appears the same at the time of finalising this affidavit.

#### *The Production Team*

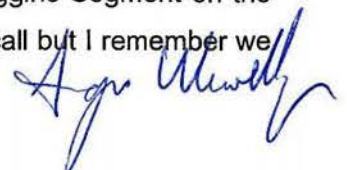
83. The First Wilkinson Email was also sent by Ms Wilkinson to the following people:
- (a) Craig Campbell, who was the Co-Executive Producer of The Project at the time;
  - (b) Peter Meakin, Executive Consultant, News and Current Affairs. Mr Meakin is one of the most experienced and respected commercial current affairs producers in Australia. He provides guidance and input into stories for The Project, based on his over 50 years' experience;
  - (c) Laura Binnie, Head of Field; and
  - (d) Sarah Thornton, Network Executive Producer.

*Alansley*

*Agnes Mewell*



84. I do not recall telling Ms Wilkinson who to send the First Wilkinson Email to, but its recipients made sense to me: Mr Campbell (along with Christopher Bendall) had the ultimate sign off on what stories went to air on The Project, Ms Thornton is the Network Executive Producer for Network Ten who acts as the conduit between 7PM and Network Ten for The Project, and Ms Binnie and Mr Meakin look after all of the long form stories for The Project.
85. Christopher Bendall, who was initially the Co-Executive Producer of The Project with Mr Campbell and then became the sole Executive Producer of The Project, was not directly involved in the story at first but became involved soon after I received the First Wilkinson Email. Once this occurred, Mr Bendall's role was to supervise the production of the story, ensure that all necessary journalistic steps had been taken and give the story final sign off.
86. At a very early stage, I decided that given the seriousness and sensitive nature of the subject matter it would be best to keep the production team for this story very small and to not disclose the details more broadly to other staff at 7PM or Network Ten. I felt that I needed to be sure that the story was accurate before it was shared more widely given it involved an allegation of rape. I was also worried that those people who may not have done the best job in looking after their employee – even though they may well have done precisely what was required of them at Parliament House – would not want Ms Higgins' experience to be made public. Importantly, this was not just a story about an allegation of sexual assault. It was also a story about how that allegation had been handled, and my first reaction was that Ms Higgins' allegation appeared to have been handled quite poorly by the Government.
87. As the production of the Higgins Segment progressed, we added some additional people to the production team on an "as needs basis", as set out below. On each occasion, I spoke to the person and told them how confidential the story was.
88. After reading the First Wilkinson Email, I had a conversation by telephone with Mr Meakin about the story to the following effect:
- Mr Meakin: *Do you think there's something there?*
- Me: *If this is to be believed, it looks like it'll be a major story but I'm going to have to spend a lot of time with them to work out whether it's true.*
89. At 7:04pm on 20 January 2021, I received a further email from Ms Wilkinson attaching photographs of Bruce Lehrmann [FRD.001.00002207].
90. On 25 January 2021, I spoke to Ms Wilkinson in relation to the Higgins Segment on the telephone. I do not recall exactly what was said on this telephone call but I remember we

spoke about potential things to investigate and logistics in relation to the story. I took handwritten notes of this conversation [FRD.001.00002205]. A copy of my telephone records between 19 January 2021 and 15 February 2021 is [FRD.009.00000001].

91. On 25 January 2021, I created a group WhatsApp chat with Ms Wilkinson and Ms Thornton for the purpose of preparing the Higgins Segment [FRD.004.00000358]. We exchanged WhatsApp messages in this group chat until about 15 February 2021.
92. On 25 January 2021, I sent Ms Wilkinson a message on WhatsApp [FRD.005.00000187]. We messaged and called each other on WhatsApp in relation to the Higgins Segment on numerous occasions after that time.
93. On 25 January 2021 at 10:12pm, I sent an email to Network Ten's internal lawyers in preparation for the First Meeting referred to below [FRD.001.00001605].
94. On the morning of 26 January 2021, I spoke to Myles Farley by telephone. Mr Farley is one of Network Ten's internal lawyers who is the main point of contact for The Project.
95. I took handwritten notes during this meeting, over which privilege is claimed [FRD.001.00002205]. Between about 26 January 2021 and 15 February 2021, I spoke to Mr Farley almost every day for the purposes of obtaining his legal advice in relation to the Higgins Segment.
96. I coordinated with Ms Thornton, Rowena Barreira and Bree Valvo, Senior Production Coordinator, by email to book flights and accommodation for Ms Higgins and Mr Sharaz to come to Sydney so that we could meet [FRD.001.00000930, FRD.001.00000003].
97. On 26 January 2021 at 11:47am, I received an email from Ms Valvo [FRD.001.00000011].

*Meeting with Ms Wilkinson*

98. On 26 January 2021, I attended a lunch with Ms Wilkinson on her boat. We sat separately from the other guests and had a private conversation. I do not now recall what exactly was said and by whom, but the conversation included the following matters, in respect of which Ms Wilkinson and I were in furious agreement:
  - (a) that the story needed a lot more investigation as it was a hugely disturbing story;
  - (b) that it would create a lot of attention if it was broadcast because of those involved, namely a Federal Minister and an allegation that an assault had taken place on her office couch;
  - (c) that we needed to have a face-to-face meeting with Ms Higgins and Mr Sharaz so that we could get more information from Ms Higgins and assess her demeanour;





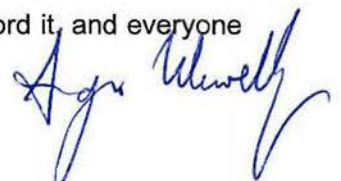

- (d) that more details from Ms Higgins would either give us more confidence or less confidence in her believability so that we could make an informed decision as to whether to take the story further; and
- (e) that it was important from a duty of care perspective to be face-to-face when meeting with Ms Higgins since there was going to be a lot to cover and that it would be uncomfortable to discuss.

99. Later that day, Ms Wilkinson provided me with Mr Sharaz's telephone number by iMessage [FRD.006.00000005]. Ms Wilkinson and I exchanged a number of iMessages in relation to the Higgins Segment prior to its broadcast.
100. I then sent a WhatsApp message to Mr Sharaz.
101. We exchanged some messages to organise the logistics for our meeting. A copy of my WhatsApp conversation with Mr Sharaz is [FRD.001.00002393]. From this date, I exchanged a number of WhatsApp messages and WhatsApp calls with Mr Sharaz.
102. On 26 January 2021, I spoke to Ms Higgins on the telephone. I do not recall what we spoke about, but I recall that it was a bit awkward, brief and introductory in nature. I remember thinking that it would be better to talk face-to-face with her.

### **First meeting with Ms Higgins**

103. Prior to the first meeting with Ms Higgins, Ms Wilkinson and I discussed how we would approach it.
104. We needed to go through the chronology of the alleged sexual assault with Ms Higgins and ask a whole heap of difficult questions.
105. I considered at the time that having the meeting in the private but informal environment of a hotel room was a good way to look after Ms Higgins given how difficult the discussion was likely to be. The alternative would have been sitting in a glass walled meeting room at the Network Ten office in Pyrmont and walking past a newsroom full of journalists, some of whom may have known Ms Higgins and Mr Sharaz.
106. I was also conscious that it was likely to be a long meeting, so having the meeting in a hotel room meant that Ms Higgins could have a rest if she needed, and we could get drinks and lunch delivered to the room when everyone needed a break, and privacy would be respected.
107. On 27 January 2021, I attended the meeting at The Darling Hotel in Pyrmont, Sydney with Ms Wilkinson, Ms Higgins and Mr Sharaz (**First Meeting**).
108. The purpose of the First Meeting was:

- (a) for Ms Higgins to tell us what had happened to her, and for us to determine whether her story was worth pursuing;
  - (b) to assess Ms Higgins as a source, including her reliability and her credibility; and
  - (c) to build rapport with Ms Higgins so that she felt comfortable working with me and Ms Wilkinson in the future.
109. At no time during the First Meeting did I attempt to influence what Ms Higgins was saying. That would have just undermined the purpose of the First Meeting.
110. Throughout the course of the First Meeting, I listened to what Ms Higgins said and sought to direct the conversation back to the facts and asked questions to get the corroboration needed to substantiate the story.
111. It is part of my usual practice to meet someone informally face to face before filming. Getting people to understand the filming process and ramifications of doing a television interview is an important part of my role and it is in my and Network Ten's interests, as well as the talent's interests, that they are comfortable talking to me and know what the process is before starting.
112. It was more unusual for Ms Wilkinson to be with me in that kind of meeting, but Ms Wilkinson was the person who had been contacted for the story and given the sensitivities of it we both agreed that we should be at the First Meeting to make sure we covered all the things we needed to and to build rapport with Ms Higgins.
113. It also made sense that Mr Sharaz was present at that meeting. He was Ms Higgins' supportive partner. Ms Higgins was going to discuss a hugely traumatic few years with two total strangers in more depth than she had ever really discussed it with anyone.
114. When I meet informally with talent, they more often than not have someone supporting them there with them.
115. Part of my duty of care towards Ms Higgins at that stage was to determine during the First Meeting whether Ms Higgins should be telling her story.
116. Throughout the First Meeting I was very aware of my responsibilities towards Ms Higgins and I felt that I needed to guide the conversation responsibly. This meant anticipating Ms Higgins' needs, for example by making sure that we were taking breaks before she needed to and monitoring whether she was doing okay while telling her story.
117. I recorded the audio of the First Meeting on my iPhone [FRD.001.00002400, FRD.001.00002401, FRD.001.00002402].
118. I asked everyone at the start of the First Meeting whether I could record it, and everyone agreed.





119. I knew this was going to be a long meeting and we were in a completely quiet hotel room, so I thought that being able to listen back to the recording would help me come up with themes to pursue in my initial draft list of questions for any subsequent interview. It was also easier than trying to write notes of everything that was said.
120. I also took handwritten notes of the First Meeting [FRD.001.00002205].
121. During the course of the First Meeting, which went for over 5 hours, I forgot that it was being recorded and the others seemed to forget about it too. There was a lot of small talk, particularly over the lunch break, which was not relevant to the story. I kept the recording on my iPhone and did not upload it to a Network Ten server or 7PM server.
122. During the lunch break we ordered some alcoholic drinks. This was in the context of Ms Higgins recounting the worst experience of her life to me and Ms Wilkinson, two strangers.
123. She had given up her whole day to fly to Sydney to share her story with us. I understood from what Ms Higgins told us during the First Meeting that she was sharing her story in more detail than she had with anyone, including Mr Sharaz. It was obvious from her demeanour that she was recounting something that had been highly traumatic and that the process of recounting it to us caused her to be re-traumatised and upset. It was after lunch that Ms Higgins disclosed to us the details of the alleged rape.
124. Mr Sharaz left the room after lunch and during the time Ms Higgins disclosed details of the alleged rape to us.
125. My opinions and experience shaped what I said during the First Meeting about whether Mr Lehrmann would be identifiable or not and about the amount of time we would allow for comment.
126. Ms Higgins, like any other alleged victim, was not going to be keen on me seeking the alleged perpetrator's side of the story. Because I knew I had to seek his comment, I used humour to make her feel at ease. She needed to know that I would approach Mr Lehrmann. If I had been sitting in a room with Mr Lehrmann I would have been just as sensitive to his emotions and perspective.
127. At the First Meeting, I observed the following in relation to Ms Higgins:
- (a) Her experience was obviously very raw. I observed that Ms Higgins appeared very traumatised and very much in need of counselling. Ms Higgins was very tearful and cried when describing the details of the alleged rape. As my wife is a registered psychologist, I am conscious of that aspect of health care. I was thinking of the questions my wife would ask of me as a psychologist: is she seeing a psychologist? Does she have a mental health plan? Who is she with tonight? Does she have someone to call? When are you going to call her next to check on her?

- (b) It definitely felt like she had only verbalised the details of the alleged sexual assault in full maybe once or twice before. I made this observation based on my experience of speaking to many victims of sexual assault and trauma before. Ms Higgins' recollections seemed unfiltered, raw, and she appeared to only just be maintaining control of her emotions.
- (c) It seemed like when she had told others before, she had been succinct, whereas this was the first time she had gone through it step by step. I made this observation because I had to keep Ms Higgins focussed on the chronology and on track when she was recounting the alleged assault during the First Meeting.
- (d) Ms Higgins was also tearful when discussing how she felt she had been let down by those she worked with. I observed that she appeared to enjoy working for and respected Michaelia Cash and it was upsetting for her that Minister Cash had not provided more support to Ms Higgins. Linda Reynolds did not sound a lot of fun to work for so there was less for her to hold on to, but it was the whole thing of her becoming a "political problem" in the lead up to the election which she was so hurt by.
- (e) She was very believable in the way she told her story. Ms Higgins' experience seemed very close to the surface, not processed and not dealt with. It is not enjoyable asking people to recount these experiences, but my judgment of Ms Higgins was that she appeared believable and honest.
- (f) It was clear to me that Ms Higgins had called off the police investigation because the Australian Federal Police's (**AFP**) sexual assault unit had told her they had hit roadblocks with obtaining the CCTV footage from Parliament House. Ms Higgins was also worried at the time of the initial police investigation that if she did not go to Western Australia to help campaign for the federal election that her job could be at risk. She felt pressured to go to Western Australia. I observed that based on how Ms Higgins spoke about her job, she appeared to enjoy it. I thought she was intelligent and hard-working. Ms Higgins told me it was her dream job and based on these observations, I believed her.
- (g) Ms Higgins seemed so scared, which contributed to her believability. She seemed terrified about the magnitude of what she was doing in speaking out. She was very worried about whether she would hold onto her job after exposing the alleged assault in the media. I observed that she was worried she could become a target. She spoke about the "Hunger Games" type workplace at Parliament House where people were summarily dismissed with no recourse.



- (h) Ms Higgins was passionately upset about the fact others had seen the CCTV footage of her entering Parliament House on the night but she hadn't and couldn't get access to it, nor could the AFP's sexual assault unit.
  - (i) In some ways Ms Higgins seemed so young, but it was clear she was very smart and mature beyond her years. The way she spoke displayed a worldliness. It appeared to me that Ms Higgins did not just do her job in a vacuum. She was inquisitive and focused, and knew who was who and that helped her in her job. Her intelligence and maturity was clear when she was talking about the levers of power, including departmental and cabinet appointments, but her youth was awfully clear when she was talking about her own raw experience of trauma.
  - (j) Although Ms Higgins seemed very fragile, I also observed that she was determined that telling her experience was needed. I observed that Ms Higgins seemed aware that her experience in the workplace was not right. She knew the alleged sexual assault was the worst thing to happen to her, but a slow building feeling of injustice about how she was dealt with at work had risen to the point where she wanted to make that public. Ms Higgins was traumatised not just by what she alleged the perpetrator had done to her, but also by the response and inaction of her workplace for the past two years. She was now calling out this secondary trauma. She wanted her negative experience to create change so it could be prevented from happening again. She wanted to help others.
  - (k) It was clear to me that Ms Higgins did not have a vendetta. Her motivation was to make sure that what happened to her didn't happen to anyone else. At that time, the alleged perpetrator had left Parliament House and carried on with his career. She was worried about whether he might do it again to someone else.
  - (l) I thought that Ms Higgins was candid when she did not know or could not recall something. Because she was recounting events that happened several years before it did not concern me that she clearly remembered some things and did not remember others because that is how memories work. I thought she honestly did not know it; I did not think she was covering it up.
128. During the First Meeting, Ms Higgins said: *"I just need to, I want to touch it once and then just move forward"*.
129. This indicated to me that Ms Higgins wanted to do The Project story and a news.com.au story at the same time because she only wanted to tell her story to the media once.
130. During the First Meeting, Ms Higgins said:




*"And then, that night, my phone completely died and I was like, that's fine, I've got another device, I'll just back it up. And all my WhatsApps were gone, all my conversations were gone, all my photos were gone. And I've swapped devices half a dozen times, it's quite normal, but yeah, it was completely wiped, which was weird."*

131. Ms Higgins, in substance, suggested that this could have been the result of the Government hacking her phone. I discounted this suggestion because there was no evidence to support it. I decided that it was something that needed to be left out of the story. I thought that it sounded more like operator error rather than any conspiracy on the part of the Government.

132. During the First Meeting, I asked Ms Higgins whether she was in contact with a psychologist. I then said:

*"If you go to your GP, and you say, look, I've got a serious mental thing that I need to deal with, I think I'm leading to depression, or whatever. You can get through it pretty easily, you'll get twelve sessions. You get twelve sessions that you can use within the calendar year" and "it doesn't actually cost you, it's covered by Medicare".*

133. I said this because Ms Higgins had trusted us with her story and I was concerned about the possible impact on her when the story was broadcast. I wanted her to have as much support from a mental health perspective as possible.

134. Following the First Meeting, the main aspects of the story I thought we should pursue were:

- (a) the roadblocks encountered by the AFP in investigating the complaint and obtaining the CCTV footage from Parliament House; and
- (b) the lack of a proper human resources process for responding to workplace complaints within Parliament House.

135. From what Ms Higgins said during the First Meeting, it seemed to me that Parliament House had a terrible culture of secrecy. She said all team messages were sent via WhatsApp or Signal, no sensitive information was put in emails and meetings were not in calendars. I felt it was important that those issues were reported to the public. Ms Higgins told me the reason for this was so staffers were not subject to Freedom of Information requests. The public had a right to know staff working for the executive and legislative arms of the Commonwealth were actively avoiding public scrutiny. I felt that the aspects of Ms Higgins' story set out in paragraph 134 above and this paragraph were of significant public interest and that reporting on them could be very important to others who work there.

*Annalyse Redel*

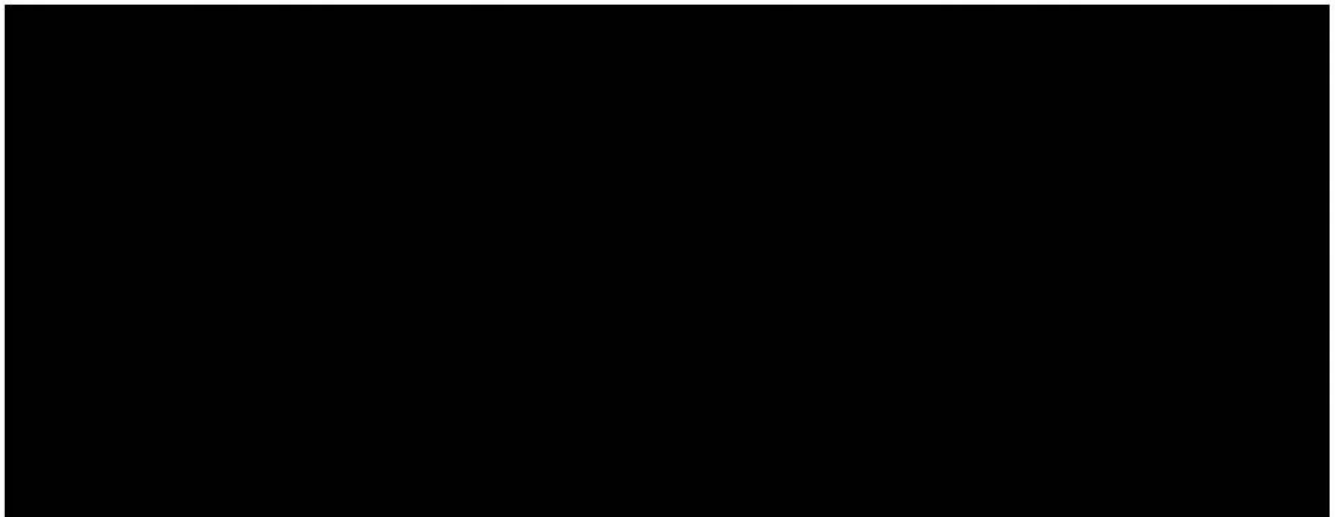
*Annalyse Redel*





a record of receiving it by WhatsApp or email. [FRD.006.00000382] is a screenshot of the photograph as it appears on my mobile phone, which is dated 27 January 2021.

144. After the First Meeting I asked Ms Higgins to send me any documents or contact information she had. Each new bit of information helped created a more solid foundation for the Higgins Segment. The documents were also instrumental to establishing the extent of the workplace investigation into Ms Higgins' allegation.
145. Over the next few weeks, Ms Higgins and Mr Sharaz provided me with additional documents from time to time, as set out below.
146. After the First Meeting, I received a WhatsApp message from Mr Sharaz in which he said Ms Higgins had "stress grabbed" a bottle of Bollinger from the hotel fridge and offered to pay for it [FRD.001.00002393].
147. Following the First Meeting, Mr Sharaz created an iMessage group with myself and Ms Wilkinson in which we exchanged iMessages between about 27 and 29 January 2021 [FRD.005.00000190, FRD.005.00000191, FRD.005.00000192, FRD.005.00000188, FRD.005.00000194, FRD.005.00000189, FRD.005.00000195].



#### Research and fact checking

150. Following the First Meeting, I said to Ms Wilkinson words to the effect of: "*Did anything flag with you?*" by which I invited Ms Wilkinson to let me know if anything that Ms Higgins had said raised any red flags or caused her concern.
151. We then had a discussion about Ms Higgins, the substance of which was that nothing had jumped out as inconsistent or weird about her account.
152. The only thing that I thought was strange was Ms Higgins' suggestion that her phone had been wiped, which, as I have explained above, I thought was more likely due to operator error than anything improper. I did not think it was unusual for Ms Higgins to have the



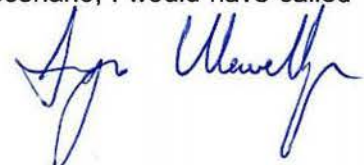
photograph of the bruise even though she said her phone had been wiped and she had lost lots of material because she had provided me with other supporting screenshots which suggested that her phone had actually not been wiped or at least some of the content was still accessible.

153. On 28 January 2021 at 1:48pm, I received an email from Ms Wilkinson in relation to the Liberal Party's "women problem" [FRD.001.00000940].
154. On 28 January 2021, I received legal advice from Mr Farley in respect of the Higgins Segment. As referred to above, I do not waive privilege in respect of the advice.
155. Between about 28 January 2021 and 15 February 2021, Ms Binnie, Mr Meakin and I exchanged iMessages in relation to the Higgins Segment in our pre-existing iMessage group chat [FRD.001.00000252, FRD.001.00000257, FRD.001.00000256, FRD.001.00000258, FRD.001.00000254, FRD.001.00000255].
156. On 28 January 2021, I conducted some research on the Internet about Parliament House, specifically about the human resources structure, how the AFP operated within Parliament House and who the security personnel reported to. I then sent an email to Mr Farley, Ms Binnie, Mr Meakin and Ms Wilkinson at 4.25pm in relation to this research [FRD.001.00002439].
157. On 28 January, Mr Sharaz sent me the following documents via WhatsApp [FRD.001.00002393]:
  - (a) at 10:10am, an audio recording of a conversation between Ms Higgins and Mr Try on 28 January 2021 [FRD.001.00002315];
  - (b) at 1:14pm, a link to a Channel Nine news story from 31 July 2019 about Liberal Party sexual assault allegations which included an interview with Minister Cash and the Vice President of the Federal Liberal Party located at: <https://www.youtube.com/watch?v=X0Rv4qGVMg4>; and
  - (c) at 6:58pm, Alex Humphreys' contact details [FRD.001.00002329].
158. Between about 28 and 29 January 2021, I made arrangements with Ms Valvo by email and telephone for flights and accommodation for Ms Higgins and Mr Sharaz to attend Sydney for the purpose of filming an interview [FRD.001.00000014].
159. From about 29 January 2021, I exchanged text messages with Samantha Maiden regarding the timing of the Higgins Segment and the provision of a grab from the segment for her to use [FRD.003.00000020]. At Ms Higgins' request, Ms Maiden was writing an article for news.com.au which was to coincide with our story on The Project.

*Clausley Redd*

*Agar Alwelly*

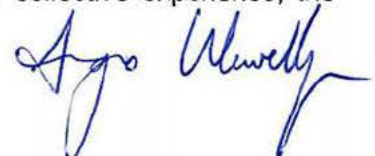
160. On 29 January 2021 at 9:40am, Mr Sharaz sent me an excerpt of an Insiders program broadcast on 16 June 2019 [FRD.001.00002337] via WhatsApp [FRD.001.00002393].
161. On 29 January 2021 at 11:25am, Mr Sharaz sent me a WhatsApp message which stated *"Brittany quit"* [FRD.001.00002393]. I sent Mr Sharaz the following WhatsApp messages at 12:20pm: *"Can you get b to screen shot all those cash messages please? And if it includes the cash number even better to back that up."* and *"Get photos of the phone, take photos with YOUR phone please of the messages."* These documents were relevant to how Ms Higgins' workplace had handled her allegation of sexual assault so I wanted to see them. Mr Sharaz sent me the following documents via WhatsApp:
- (a) at 12:20pm, a screenshot of messages between Ms Higgins and Minister Cash on 29 January 2021 [FRD.001.00002341; FRD.001.00002342];
  - (b) at 12:24pm:
    - (i) a screenshot of an email sent by Ms Higgins to Mr Try on 29 January 2021 attaching her resignation letter [FRD.001.00002347];
    - (ii) Ms Higgins' resignation letter addressed to Mr Try on 29 January 2021 [FRD.001.00002346];
    - (iii) a screenshot of missed calls from Minister Cash to Ms Higgins on 29 January 2021 [FRD.001.00002344]; and
    - (iv) a photograph and video of Minister Cash's contact details [FRD.001.00002343; FRD.001.00002345].
162. By this time, I had formed the view that, while the context of the story was the alleged rape, the real story was that Ms Higgins felt she could not pursue a police complaint at that time because of the strange arrangements and political pressures within Parliament House, and that there needed to be changes made to the culture and arrangements within Parliament House to support complainants.
163. I thought that the story was of public interest because, unlike other workplaces in Australia, employees in Parliament House like Ms Higgins were not being well supported. In Ms Higgins' case, this was despite her making a claim of a sexual assault happening within the building.
164. What I also found disturbing was that this was not just a case of one employee allegedly being the victim of a crime, but an allegation that it had been perpetrated by another employee, and yet no investigation had been carried out by the workplace. I was astounded - I thought that if I had been the manager in this scenario, I would have called



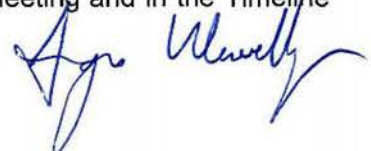
the police. Instead, there had been a meeting with the alleged perpetrator and a dismissal that was apparently for a security breach.

165. I wanted to know why there was such limited care for Ms Higgins and why no workplace investigation had taken place. I thought that we needed to find out what had happened to prevent an investigation from being conducted. This aspect alone justified it being a story of public interest to me: a large organisation with a significant number of employees and a human resources department that on the face of it is not doing a great job.
166. I felt that the public interest was compounded because this is the workplace of hundreds of elected politicians who represent Australians. I wanted to investigate whether politicians and their staff operated under a completely different set of workplace conditions and whether this version of a human resources department was compromised by the fact that it formed part of an executive which is headed by a senior politician, who was also part of the executive in our Westminster system.
167. On 29 January 2021, I attended a meeting via Microsoft Teams with Ms Wilkinson, Mr Campbell, Ms Thornton, Mr Meakin, Ms Binnie, Ms Smithies and Mr Farley [FRD.001.00002438, FRD.001.00002641]. For the avoidance of doubt, I do not waive privilege in respect of any advice provided by Ms Smithies or Mr Farley at the meeting. At this meeting, we discussed:
- (a) Whether to name the alleged perpetrator. We discussed that the story would be stronger if we named him, and the risks involved in doing so. A decision was made that we would not name him. We came up with terms or labels to use to refer to him, including "senior male advisor", "senior male colleague", "senior colleague" or "senior staffer". In deciding these terms, we were very conscious that we did not want to inadvertently identify the wrong person as being the alleged perpetrator. We had to give sufficient detail to exclude other males who worked in Linda Reynolds' office at the relevant time. I felt that it was important to include that the alleged perpetrator worked at Parliament House and was an employee of Senator Reynolds because the reasons Ms Higgins felt paralysed and unable to pursue her alleged rapist was because he had worked at Parliament House and because he was a senior employee of Senator Reynolds. These two points were therefore crucial to understanding Ms Higgins' story. His name was not used in the course of this discussion.
  - (b) Whether the story was going to work. I said words to the effect of: "*Yes totally, we need to do it*". I thought that this story was in the public interest for the reasons set out above. I recall that Mr Meakin agreed. Given our collective experience, the

team trusted our instincts. Ms Wilkinson's instincts were also a significant factor here.

168. I do not recall what was said exactly at this meeting.
169. On 30 January 2021 at 12:04pm, Ms Higgins sent me photographs of her with various politicians, including then Prime Minister Scott Morrison, Minister Christopher Pyne, Minister Karen Andrews, Minister Cash, Minister Steve Ciobo, Minister Julie Bishop and Minister Reynolds, and at Parliament House [FRD.001.00002295, FRD.001.00002296, FRD.001.00002297, FRD.001.00002298, FRD.001.00002299, FRD.001.00002300, FRD.001.00002301, FRD.001.00002302, FRD.001.00002303, FRD.001.00002305, FRD.001.00002307, FRD.001.00002309, FRD.001.00002311, FRD.001.00002312] via WhatsApp [FRD.001.00002390].
170. Later that day, at 12:51pm, I sent a WhatsApp message to Ms Higgins to check in on her to which she responded on 30 January 2021 [FRD.001.00002390].
171. From about 30 January 2021, I exchanged a number of WhatsApp messages and calls with Ms Higgins [FRD.001.00002390, FRD.001.00002392].
172. On 30 January 2021, I created a group WhatsApp chat with Ms Higgins and Mr Sharaz called "Ideas" [FRD.005.00000185] in which we exchanged messages relating to the Higgins Segment up until it was broadcast.
173. Before and after the First Meeting, I made a number of enquiries to fact check and verify the information in the First Wilkinson Email and the information Ms Higgins had provided me during the First Meeting, including:
- (a) looking up Mr Lehrmann online and on social media, including LinkedIn, Twitter and Facebook. I took screenshots of Mr Lehrmann's LinkedIn [FRD.001.00002228, FRD.001.00002229, FRD.007.00000015, FRD.007.00000018, FRD.007.00000019];
  - (b) researching how the AFP worked within Parliament. I do not now recall every website that I looked at, but I recall that I looked through Parliament House's website, read various articles and papers on it, and looked through The Conversation's website for any pieces written by academics on the topic. During the course of this research, I noted that there was no dedicated human resources department in Parliament House, but rather the Department of Finance was used to manage human resources issues. I thought at the time that the Department of Finance had its own Minister and was therefore political; and
  - (c) looking up on LinkedIn, Google, and old media releases and ministerial lists where people that Ms Higgins had mentioned during the First Meeting and in the Timeline

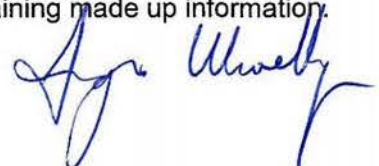


attached to the First Wilkinson Email were working at the times she mentioned. Through that research, I confirmed that:

- (i) in March 2019, Chris Payne was the Department Liaison Officer to the Minister for Defence Industry;
- (ii) in March 2019, Dean Carlson was Acting Senior Media Advisor to Minister Reynolds;
- (iii) in March 2019, Senator Reynolds was the Minister for Defence Industry;
- (iv) in October 2019, Minister Cash was the Minister for Employment, Skills, Small and Family Business;
- (v) in October 2019, Daniel Try was Chief-of-Staff to Minister Cash;
- (vi) in March 2019, Daniel Wong was EA to Chief-of-Staff to the Prime Minister;
- (vii) in March 2019, John Kunkel was Chief-of-Staff to the Prime Minister;
- (viii) in 2020, Karly Abbott was a Senior Advisor to Minister Cash and had previously worked for Minister Ciobo;
- (ix) Ben Dillaway was a former Senior Media Adviser to Minister Ciobo;
- (x) in March 2019, Julian Leembruggen was a Policy Adviser to the Prime Minister;
- (xi) in 2020, Regina Camara was a Senior Advisor to Minister Cash;
- (xii) Dhanya Mani was a former Liberal staffer;
- (xiii) Ally Lupino was an adviser to Minister Andrews;
- (xiv) Sophia Carlini was a former adviser to Minister Cash;
- (xv) Clare Green was a former advisor to Minister Tehan; and
- (xvi) Kathryn Cripps worked at the Canberra Rape Crisis Centre.

174. I recall that I could not independently verify that Fiona Brown was Acting Chief of Staff to Senator Reynolds in March 2019. The only public information I could find on Ms Brown was a Hansard of a Senate inquiry that indicated she worked for Phillip Ruddock when he was the Immigration Minister. This matched what Ms Higgins had told me during the First Meeting – that Ms Brown had worked at Parliament House since John Howard was Prime Minister.

175. I undertook the fact checking process set out above to ensure that I had not been provided with made up information, including documents containing made up information.

176. I was satisfied that the documents and information provided by Ms Higgins and Mr Sharaz at that point in time were accurate.
177. On 29 January 2021, I spoke to Kathryn Cripps from Canberra Rape Crisis Centre on the telephone. She said words to the effect that she could not speak to me about a client.
178. I then called Mr Sharaz and Ms Higgins and asked her to contact Ms Cripps. Mr Sharaz confirmed in a WhatsApp message at 3:53pm that Ms Higgins had given Ms Cripps permission to speak to me [FRD.001.00002393].
179. On a date in late January or early February, I had a second conversation with Ms Cripps.
180. I do not now recall precisely what Ms Cripps said, but Ms Cripps acknowledged that Ms Higgins was her client and said in substance that she could not speak to me about a client. I took handwritten notes during this conversation [FRD.001.00002205].
181. Between about 29 January 2021 and 1 February 2021, I exchanged text messages with Ms Humphreys, who I understood to be Ms Higgins' former flatmate [FRD.001.00002231, FRD.001.00002232].
182. During this period, I also had a telephone conversation with Ms Humphreys, during which she said words to the effect that Ms Higgin's mood had changed following the incident and she had not seen a lot of her afterwards.
- On or about 12
183. Between about 29 January 2021 and 1 February 2021, I attempted to contact by telephone the following officers from the AFP who Ms Higgins had told me about in the First Meeting and whose details appeared in the documents provided by Ms Higgins:
- (a) Emma Frizzell, who said words to the effect that she could not speak with me;
  - (b) Rebecca Cleaves, but was advised by a person at the AFP whose name I do not now recall that Ms Cleaves had left the AFP; and
  - (c) Katie Thelning, but received no response.
184. I was unable to confirm anything about the AFP investigation into Ms Higgins' allegations in 2019 until I received an official statement from the AFP on 15 February 2021. Even though I could not corroborate Ms Higgins' story with the AFP officers involved at this time, I had no reason to doubt that the email correspondence with the AFP Ms Higgins had provided to me with was anything other than genuine. It also did not surprise me that AFP officers did not want to talk to a producer of a current affairs program about an investigation that they were apparently having difficulty with. In my view, for those reasons, a lack of information in this specific case did not mean that something was untrue or that the reliability of Ms Higgins story was otherwise in doubt.





185. On 1 February 2021, I sent two emails to Mr Campbell, Ms Thornton, Ms Binnie, Mr Meakin, Mr Farley and Ms Smithies providing an update on the segment [FRD.001.00001620, FRD.001.00001622].
186. On 1 February 2021, I exchanged emails with Ms Valvo and Sharyn Hart regarding crew and hair and makeup requirements for the interview with Ms Higgins [FRD.001.00001627, FRD.001.00000017].
187. On 1 February 2021, I had a telephone conversation with Professor Anne Twomey, a constitutional law expert at the University of Sydney. I asked Professor Twomey what the constitutional arrangements were for the police at Parliament House. She said that she did not know enough about this aspect of constitutional law, I recommend you speak to one of the clerks of the Senate such as Rosemary Laing.
188. I took handwritten notes of my conversation with Professor Twomey [FRD.001.00002205].
189. Also on 1 February 2021 at 3:35pm, I received an email from Professor Twomey [FRD.001.00002208]. I clicked on the link in her email and read the information contained on the resulting website about parliamentary precincts. I remember thinking: *"wow this is Charles I territory. This is a really weird way to work out who gets to set foot in the parliamentary zone"*. It seemed anachronistic. I thought it was an extremely interesting topic and something no one knew about. It helped explain, and created a whole heap of questions about, the difficulties that had been experienced accessing CCTV during the investigation of Ms Higgins' alleged sexual assault.
190. On 1 February 2021, I had a telephone conversation with Mr Sharaz during which he advised me of Mr Lehrmann's telephone number. I took handwritten notes of this conversation [FRD.001.00002205].
191. On 1 February 2021, I had a telephone conversation with Dr Rosemary Laing, the former Clerk of the Senate. She said to me words to the effect that there is a jurisdictional circle around Parliament and policing within that circle operates thanks to an agreement between the Speaker of the House and the Senate President.
192. I took handwritten notes of my conversation with Dr Laing [FRD.001.00002206].
193. I thought that Dr Laing's explanation of how policing in Parliament House, particularly that two elected politicians were the ones who granted police access to Parliament House, sounded bizarre.
194. I then conducted internet searches using Mr Lehrmann's name and the phone number Mr Sharaz had provided to confirm that it was the correct number.

195. As a result of this search, I located a media release for Senator Reynolds and Minister Stuart Robert from 23 October 2018 and downloaded a copy [FRD.004.00000360].
196. I noted that the same phone number Mr Sharaz had provided me with was attributed in the media release to Mr Lehrmann. *slightly different to the number I used the number I found myself.*

### Interview with Ms Higgins

#### Preparation

197. The usual process at 7PM when producing segments for The Project is for the script to be put on a shared server that anyone from 7PM can access. However, for this story, I kept everything, including research, documents and scripts on my own personal Google Drive folder (which I called "ACT SHOTS") and granted access to only a select few people, being Mr Meakin, Ms Binnie Mr Bendall, Ms Smithies and Mr Farley. I did this because I did not want Ms Higgins' story to get out.
198. Before the interview with Ms Higgins on 2 February 2021, on or about 1 February 2021, I decided that the footage of the interview would not be uploaded on the Ardome system to avoid the story being leaked. The head of post-production, Sam Moncur, helped guide me in keeping the footage of the Interview off the main 7PM system while the segment was being produced. I sent an email to that effect to *Mr Campbell and others* Ms Valvo on 1 February 2021 at 11.52am [FRD.001.00002644].
199. On 1 February 2021 at 3:55pm, I sent an email to Antony Steele and Isaac Madden, two librarians at The Project, advising them of this decision [FRD.001.00002645]. Mr Steele and Mr Madden were responsible for moving media between the Ardome system and the AVID server.
200. Before the interview with Ms Higgins, I also created a Google Doc that I shared with Ms Wilkinson which set out the draft questions I thought Ms Wilkinson and I could work on for the interview with Ms Higgins.
201. While preparing the questions, I listened to the entire recording from the First Meeting. I did not share the recording from the First Meeting with anyone else. I worked on the questions for several days with Ms Wilkinson to work out the order and structure. We spoke on the phone while we worked together editing the Google Doc. It was a monster task. We spent many hours working on how the interview with Ms Higgins would flow.
202. During the process of creating themes and questions, I was primarily focused on establishing the allegations and the timeline of Ms Higgins' story. I also gave specific consideration to the way in which the questions were framed so that it was clear to viewers that Ms Higgins' story consisted of allegations or claims, which had not yet been proven in court. As the drafting of the questions evolved, I thought about the phrasing

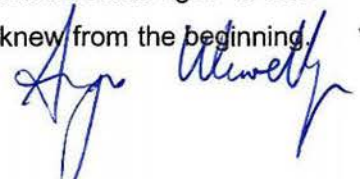


used to convey that Ms Higgins' claims about the rape were allegations, while also being sensitive to Ms Higgins.

203. I sent the draft questions to Mr Meakin for his review and input. I do not recall how I provided them to Mr Meakin. Drafts of the questions are [FRD.001.00002198 and FRD.001.00002204]. [FRD.001.00002204] contains two version of the draft questions. The first draft of questions begins on page 4 of the document. The second draft begins on page 1. [FRD.001.00002198] contains a later draft of the questions.
204. In the end, we had lots of questions but I felt it was better to have too many questions than not enough. A copy of the Google Doc containing the final list of questions is [FRD.001.00002221].
205. Between about 1 and 2 February 2021, I sought legal advice from Ms Smithies and Mr Farley regarding the upcoming interview with Ms Higgins.
206. On 2 February 2021 at 9:54am, I sent an email to Ms Wilkinson containing quotes from the ABC's Four Corners' Canberra Bubble program and Federal Parliament Hansard [FRD.001.00002452].
207. On 2 February 2021 at 10:28am, I sent Ms Wilkinson an email containing information about Parliament House security [FRD.006.00000093].

*The interview with Ms Higgins*

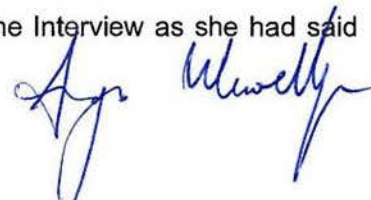
208. On 2 February 2021, I attended the interview between Ms Wilkinson and Ms Higgins (**Interview**) at The Darling Hotel in Pyrmont, Sydney.
209. The Interview lasted for over two hours and was recorded [FRD.001.00002389].
210. In addition to Ms Wilkinson, Ms Higgins and myself, Mr Sharaz, Ms Smithies and two freelance camera operators (Dan Guia and Peter Mullins) were in attendance.
211. The main things I wanted to focus on during the Interview were:
- (a) The fact Ms Higgins had apparently prematurely terminated the police investigation because of a lack of access by investigators to CCTV of Parliament House and due to the unusual constitutional set-up of policing within Parliament House. To me, this was a significant problem affecting everyone who works there.
  - (b) The strange arrangement at Parliament House where there was no human resources department, and employees reported any issues to the Department of Finance, which had a Minister in charge.
212. I was also concerned to get the details of Ms Higgins' alleged sexual assault right. It was crucial that we did that. The allegation was defamatory, which I knew from the beginning.

It was always important to get the details of the allegation correct. While it was not the main focus of the Interview, it had to be accurate because the other topics flowed from it. For example, the details of Ms Higgins' interactions with Ms Brown were crucial to the human resources angle.

213. I was concerned that the fact that the alleged sexual assault took place on a Minister's couch would be sensationalised and "bury" the message regarding the protection of people working at Parliament House.
214. It was important to me that this did not happen, so I ensured that that fact was not the primary focus of the Interview and the story, and that the Interview and story covered other important issues. This approach was reflected in the themes of the questions Ms Wilkinson and I agreed on.
215. During the Interview, I observed that Ms Higgins was emotional and at times, tearful.
216. She seemed very vulnerable in how she spoke.
217. I could hear, see and feel the difficulty that Ms Higgins was going through as she told her story. To me, the way she told her story felt very real.
218. During the Interview, we needed to take a few breaks for Ms Higgins. Ms Higgins was given time to go for a walk or to get a coffee.
219. As stated above, an important part of my job is duty of care for the talent. I needed to provide Ms Higgins with help and support through the process of her telling her story and to check in with her as to how she was feeling. I checked in with Ms Higgins during the Interview where appropriate. I observed that the others present, Ms Wilkinson, Mr Mullins and Mr Guia, also checked in on her. I had to consider whether I felt Ms Higgins could tell her story publicly and be okay.
220. Ms Higgins had trusted us with her story. In my experience, you cannot make people tell stories of sexual assault or stories of an intimate and personal nature, they need to be at a point where they feel that they do not have any other option or they feel the need to speak publicly in order to help others. My assessment after the Interview was that Ms Higgins fitted into both categories.
221. Airing Ms Higgins' story was the only thing I had control over. I could not obtain justice or accountability for her, but we could provoke public discussion which could lead to Ms Higgins feeling sufficiently supported to seek justice again.
222. Immediately after the Interview, I felt that the story was very strong because:

- (a) Ms Higgins had said exactly the same things during the Interview as she had said during the First Meeting.



- (b) Ms Higgins' accounts were consistent and did not feel contrived.
  - (c) I believed Ms Higgins' stated reasons for telling the story – that she had no other avenue to seek justice and to ensure that what she experienced did not happen to anyone else - and I did not consider her to be motivated by a vendetta.
223. I observed from Ms Higgins' recount of the incident that she had proceeded on the basis of a number of assumptions in how she acted after the incident, but I considered her assumptions were reasonable ones for a junior staffer such as Ms Higgins to make.
224. For example, Ms Higgins did not know what Mr Lehmann had told Ms Brown, nor what Ms Brown had told Minister Reynolds. I thought that she was honestly expressing how she felt at the time as to the pressure not to report the allegations to police based on the facts that were within her knowledge. She said that she had received phone calls and the odd drop in from Yaron Finkelstein, who she said was known as "The Fixer" in her circles. I imagined that it would have been terrifying for her.
225. Immediately after the Interview, I received legal advice from Ms Smithies regarding the Interview and Ms Higgins.
226. I then sat with Ms Higgins to unwind after the Interview at which time she said words to the effect that she felt better after the interview, which she thought had been cathartic and not as bad as she thought it was going to be.
227. At some stage on 2 February 2021, I provided Ms Higgins with a hard copy of the standard "Adult Appearance Release" form for her to sign and return to me.

### **Production process**

228. Throughout the production process for the Higgins Segment, I spoke to Mr Bendall quite regularly. In the last two weeks before it was broadcast, we spoke approximately once every three days. I do not recall what was said during these conversations, but I recall that Mr Bendall checked in on how I was doing, and how Ms Wilkinson was doing, and I kept him across everything that was happening in relation to the Higgins Segment.
229. On 2 February 2021 at 5.21pm, Ms Higgins sent me contact details for then Prime Minister Scott Morrison and his staffers including John Kunkel, Yaron Finkelstein, Andrew Carswell and Ms Brown [FRD.001.00002318, FRD.001.00002322, FRD.001.00002317, FRD.001.00002320, FRD.001.00002321, FRD.001.00002323, FRD.001.00002324, FRD.001.00002325, FRD.001.00002326, FRD.001.00002327, FRD.001.00002328, FRD.001.00002330, FRD.001.00002331, FRD.001.00002332, FRD.001.00002333, FRD.001.00002334] via WhatsApp [FRD.001.00002390].

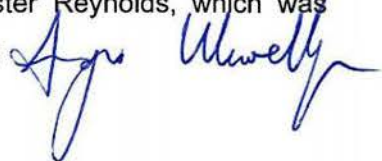



230. On 2 February 2021, I received links to the audio and video of the Interview filmed by Mr Guia by email [FRD.001.00002455, FRD.001.00001644, FRD.001.00001643, FRD.001.00001642, FRD.001.00001641, FRD.001.00001640].
231. On 3 February 2021 at 10.58am, I sent these links to Mr Moncur by email [FRD.001.00001639].
232. On 3 February 2021, I received further links to the audio and video of the Interview filmed by Mr Guia by email [FRD.001.00002461, FRD.001.00002463, FRD.001.00002464, FRD.001.00002465, FRD.001.00002466, FRD.001.00001651].
233. On 3 February 2021 at 11:43am, Ms Higgins sent me her signed "Adult Appearance Release" form by WhatsApp [FRD.001.00002335, FRD.001.00002390]. By signing the "Adult Appearance Release", Ms Higgins agreed to the following clause:
- 2. You warrant and represent to 7PM and 10 that any information contributed by you to the Program will be true and factually accurate, that you own or are entitled to all right, title and interest (including copyright) in any materials (i.e. documents, pictures or videos) provided by you to 7PM or 10 for the purpose of inclusion in the Program and that such materials do not contain confidential information or otherwise breach a duty of confidence owed by You to a third party.*
234. Ms Higgins was not paid for the story, but her expenses in order to come to Sydney to attend the First Meeting and the filming of the Interview (and those of Mr Sharaz in accompanying her) were covered by Network Ten including flights, accommodation, taxis and food and drinks.
235. On 3 February 2021 at 2.17pm, I arranged for an external company called Scribewriters to prepare a transcript of the Interview [FRD.001.00001645]. I was aware that Jo Allan from Scribewriters signed a non-disclosure agreement in relation to preparing the transcript.
236. Between about 3 and 4 February 2021, emails were exchanged between Mr Campbell, Ms Binnie, Mr Meakin, Ms Thornton and me regarding the proposed broadcast date and the timing of it in relation to the proposed publication of an article written by Ms Maiden for news.com.au [FRD.001.00000018, FRD.001.00000020, FRD.001.00002676].
237. In a television context, "TX date" means broadcast date and "IV" means interview.
238. Other than discussions around timing and whether to name the alleged perpetrator, I had no direct knowledge or involvement in the news.com.au story. There was no sharing of information between us and news.com.au, besides the provision of a grab for Ms Maiden to use at the top of her article the night before publication.






239. I am aware that there were many internal discussions about the broadcast date, but it was ultimately someone else's decision, not mine.
240. Between about 3 and 4 February 2021, I received the transcript of the Interview from Ms Allan in tranches by email [FRD.001.00001648, FRD.001.00001659, FRD.001.00001662].
241. On 4 February 2021 at 9.32am, I sent the links to the footage of the Interview to Mr Moncur by email [FRD.001.00002460].
242. On 4 February 2021, I created a group WhatsApp chat with Ms Smithies and Mr Farley for the purpose of obtaining legal advice in relation to the Higgins Segment [FRD.004.00000003]. For the avoidance of doubt, I do not waive privilege in respect of any advice provided by Ms Smithies or Mr Farley via the WhatsApp chat group.
243. On 4 February 2021, I started work on the paper edit or script for the Higgins Segment. I followed the same process as set out in paragraph 12(d) above.
244. I watched the recording of the Interview back and highlighted the parts of the transcript that I thought were the most important, what could be substantiated and what had been expressed well so that I could ascertain the best version of words to use in the edit [FRD.001.00002203, FRD.001.00002202, FRD.001.00002201].
245. I worked out what material we were confident of and could verify, and what material still needed to be verified between now and when we went to air.
246. When preparing the paper edit, I gave independent consideration to the words I used to reduce the legal risk as much as possible, while balancing the need to tell the story. For example, I was conscious to use "alleged" to make clear that Ms Higgins had made an allegation about Mr Lehrmann, but that it had not been proven. I also included questions asked by Ms Wilkinson to that effect, such as "*did Minister Reynolds know that that was the couch that you **allege** the rape happened on?*" and "*what's happened to the man that **you say** raped you?*" [emphasis added].
247. At the time I began working on the paper edit, I considered the main themes for the story to be:
- (a) who Ms Higgins was and her backstory;
  - (b) details of the night in question;
  - (c) the aftermath of the incident, including what happened when Ms Higgins went back to work, Mr Lehrmann being fired and Ms Higgins' awkward conversation with Ms Brown;
  - (d) what happened during Ms Higgins' meeting with Minister Reynolds, which was conducted in the same office where the incident occurred;

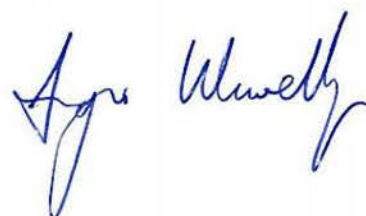



- (e) the lack of a human resources department for Parliament House staff;
  - (f) the unique Parliament House law enforcement set up which led to interference, intended or not, with the investigation which meant that the AFP had difficulty in obtaining the CCTV footage from Parliament House;
  - (g) Ms Higgins' subsequent decision not to pursue a police complaint; and
  - (h) the options Ms Higgins was given in relation to her employment in the future.
248. I initially worked on the paper edit in Microsoft Word on my desktop. My original paper edit is [FRD.001.00002199 and FRD.001.00002200].
249. I then uploaded this paper edit onto Google Docs so that others could work on it with me [FRD.001.00002467, FRD.001.00000945, FRD.001.00000022, FRD.001.00000250, FRD.001.00000255].
250. I worked with Mr Meakin on the paper edit. It was clear at this stage it was going to be a long segment. My view was that it should not go for the full hour and I pushed back on this when it was suggested by Ms Wilkinson. My view was that it would be a strong half hour segment, but a weak hour-long segment.
251. I thought this story deserved a half hour segment because, not only was it compelling, but we needed sufficient time to establish the relevant context and facts, particularly about the approach Ms Higgins' workplace took in response to her allegation and how workplace issues were managed and resolved in Parliament House, which I considered to be a matter of interest to the public. If the story had been solely about a rape allegation, it would have been a shorter segment.
252. In early February 2021, I had a conversation on the telephone with Mr Meakin and Ms Binnie about the length of the Higgins Segment, the details of which I do not now recall. I do recall that I said, in substance, that I thought the segment should be half an hour long and that Mr Meakin supported me.
253. Usually, I do not share my preliminary work with anyone else, but for this story, I granted Ms Smithies and Mr Farley access to the Google Folder entitled "ACT SHOTS" (referred to above) that contained material relevant to the Higgins Segment on or about 4 February 2021. I wanted Ms Smithies and Mr Farley to be across the story and I wanted to discuss with them the material I thought I was going to use as part of the production process and for the purposes of seeking and obtaining legal advice from them. In the circumstances, it was important for them to have access to the material. I renamed this folder "ENIVRO SHOTS" on or about 9 February 2021. This folder contained the material Ms Higgins and Mr Sharaz provided to me (as set out in this affidavit), the draft scripts and interview questions (as set out in this affidavit), a document entitled "ACT research" which I used as



a working document to take notes in from time to time [FRD.007.00000008], and a document entitled "peter\_laura chat" in which I put notes from a conversation I had with Mr Meakin and Ms Binnie about the Higgins Segment [FRD.007.00000021].

254. Between about 4 and 5 February 2021, I received links to the audio and video of the Interview filmed by Mr Mullins by email [FRD.001.00002461, FRD.001.00001664].
255. On 5 February 2021, I received the following documents from Ms Higgins by WhatsApp [FRD.001.00002390]:
- (a) voicemails from the Australian Federal Police on 4 April 2019 [FRD.001.00002336] and 9 April 2019 [FRD.001.00002339]; and
  - (b) screenshots of those voicemails [FRD.001.00002338, FRD.001.00002340].
256. On 5 February 2021 at 9:03am, I sent the links received from Mr Mullins to Mr Moncur by email [FRD.001.00001664].
257. On 5 February 2021 at 12:54pm and 3:10pm, Ms Higgins sent me screenshots of her Uber trip home from Parliament House on the morning of 23 March 2019 [FRD.001.00002223, FRD.001.00002224, FRD.001.00002225] via WhatsApp [FRD.005.00000185]
258. Between about 5 and 10 February 2021, I discussed how we were going to approach the promotion of the Higgins Segment with Mr Campbell, Ms Smithies, Ms Binnie, Ms Thornton, Mr Meakin, Mr Farley, Mr Bendall and Ms Wilkinson in person and by email [FRD.001.00001668, FRD.001.00001671, FRD.001.00001672, FRD.001.00001673, FRD.001.00001675, FRD.001.00001676, FRD.001.00001679, FRD.001.00001680].
259. On 6 February 2021 at 3:19pm, I sent an email to Mr Moncur requesting that an editor be assigned to the Higgins Segment [FRD.001.00001681]. Mr Moncur responded by email on 7 February 2021 [FRD.001.00002473].
260. I continued to check in on Ms Higgins after the Interview via WhatsApp, including by sending Mr Sharaz messages on WhatsApp [FRD.001.00002393].
261. On 6 February 2021 at 3.30pm, I received a WhatsApp message from Mr Sharaz advising that Ms Higgins had gone to the police [FRD.001.00002393].
262. On 7 February 2021 at 6.23pm, I received legal advice on the draft script of the Higgins Segment [FRD.001.00001682].
263. On 8 February 2021 at 9:49am, Mr Sharaz sent me Minister Reynolds' contact details [FRD.001.00002350] via WhatsApp [FRD.001.00002393].



264. On 8 February 2021, I worked with Mr Meakin and Ms Binnie on the opening of the Higgins Segment [FRD.001.00000948, FRD.001.00000949, FRD.001.00001685, FRD.001.00001686, FRD.001.00000023, FRD.001.00001689].
265. On 8 February 2021 at 12:07pm, I sent an email to Mr Steele and Mr Madden requesting certain items of footage, which Mr Steele provided to me by email at 2.51pm the same day [FRD.001.00001683, FRD.001.00001688].
266. On 8 February 2021 at 3:16pm, Ms Higgins sent me a screenshot of a text message from AFP Senior Constable Emma Frizzell confirming the initial report Ms Higgins made on 1 April 2019 and the reference number 6381473 [FRD.001.00002226] and a photograph of SC Frizzell's business card [FRD.005.00000183] via WhatsApp [FRD.005.00000185].
267. On 8 February 2021, I worked with editor Darryl Brown to prepare the first cut of the Higgins Segment, which was approximately 35 minutes long. Over the next few days, I worked with Mr Brown, Mr Meakin, Ms Binnie and Ms Wilkinson, including by email as set out below, to trim the Higgins Segment down and got it down to around 26 minutes.
268. At this point, I considered that there was nothing further in the Higgins Segment that could be cut. As set out below, various versions of the segment (called "works in progress" or "WIP") were circulated as Vimeos by email to the production team, Ms Smithies and Mr Farley.
269. The WIP was split into three parts so that ads could be played in the breaks.
270. On or about 8 February 2021, I had a telephone conversation with Ms Maiden during which she told me that she would not be naming the alleged perpetrator.
271. Shortly after this telephone conversation at 4:37pm, I sent an email to Mr Campbell, Mr Meakin, Ms Smithies and Mr Farley regarding my discussion with Ms Maiden [FRD.001.00001694]. Further emails were exchanged regarding my discussion with Ms Maiden [FRD.001.00001696, FRD.001.00001697, FRD.001.00001698, FRD.001.00001699, FRD.001.00001701, FRD.001.00001711].
272. Between about 8 and 9 February 2021, I received legal advice from Mr Farley and Ms Smithies.
273. On 8 February 2021, I received an email from Mr Brown providing a link to the WIP of the first part of the Higgins Segment [FRD.001.00002481]. When reviewing a draft edit on Vimeo, my usual practice is to handwrite notes or time codes for discussion. I would sometimes send an email with my notes.
274. On about 8 February 2021 at 6.49pm, I received an email from Mr Campbell stating that the story would be codenamed "ENVIRO" [FRD.001.00001711]. I then sent an email to

9 February 2021 at 7:53am

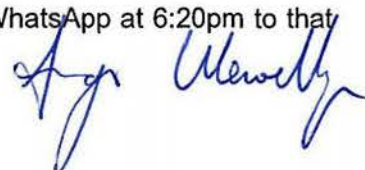
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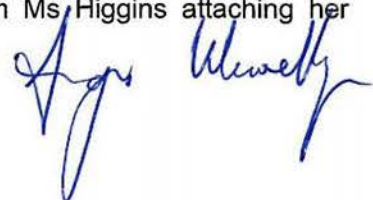
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- Mr Brown, Mr Moncur, Mr Steele and Mr Madden regarding the codename on 9 February 2021 at 9:28am [FRD.001.00000024]. In the production process, "slug" is the name files get which allows them to be grouped by story.
275. On 9 February 2021 at 9:25am, I sent the scripts for the first two parts and the WIP for the first part of the Higgins Segment to Mr Meakin and Ms Binnie [FRD.001.00000958].
276. On 9 February 2021 at 11:07am, I sent Ms Higgins an email attaching a draft statutory declaration [FRD.001.00001720]. The statutory declaration was drafted by Mr Farley. I had never previously asked talent to provide such a statutory declaration. I formed the view that a signed statutory declaration should be obtained from Ms Higgins to give us an extra layer of comfort that she had been truthful during the Interview. I provided the transcript of the Interview to Ms Higgins for her to check the accuracy of the information she had provided during the Interview and for the purposes of providing the statutory declaration.
277. The statutory declaration also included the photograph of the bruise so that Ms Higgins could verify when it was taken and what it showed. I thought it was important that the photograph of the bruise was included because it was key information. We did not have any other visible evidence to show that there had been an assault.
278. Prior to sending Ms Higgins a draft statutory declaration, I received legal advice from Mr Farley.
279. On 9 February 2021 at 1:39pm, I received a WhatsApp message from Ms Higgins confirming that the AFP were able to access the CCTV footage from The Dock [FRD.001.00002390].
280. During the production process of the Higgins Segment, I was very conscious of maintaining the confidentiality of the story [FRD.001.00000026].
281. On 9 February 2021 at 4:02pm, I received an email from Mr Brown with a link to the WIP for the second part of the Higgins Segment [FRD.001.00000967].
282. On 9 February 2021 at 4:12pm, I sent an email to Mr Steele regarding the footage that we required for the Higgins Segment [FRD.001.00002485]. I received a response from Mr Steele shortly after at 4:30pm [FRD.001.00000970].
283. On 9 February 2021 at 4.14pm, I sent the scripts and the WIP for the first two parts of the Higgins Segment to Mr Campbell, Ms Thornton, Mr Bendall, Ms Binnie and Mr Meakin [FRD.001.00000968].
284. On or about 9 February 2021, I realised that the statutory declaration I had provided to Ms Higgins contained the wrong date. I sent her a message on WhatsApp at 6:20pm to that

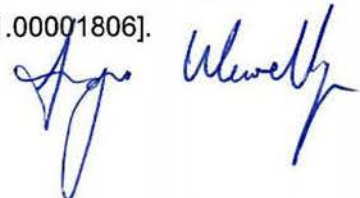


- effect [FRD.001.00002390]. On 9 February 2021 at 6:22pm, I sent Ms Higgins an email attaching an updated version of the statutory declaration [FRD.001.00000028].
285. On or about 9 February 2021, I had a telephone conversation with Professor George Williams, a constitutional law expert from the University of New South Wales. I was aware of Professor Williams from his previous media appearances in relation to constitutional law. During our conversation, Professor Williams said words to the following effect: *"Parliament doesn't like outside interference and as a result it sets up systems and laws that preserve its ability to function free of interference"*.
286. Shortly after, I organised a camera operator to film an interview with Professor Williams the next day [FRD.001.00001731, FRD.001.00001732, FRD.001.00000030, FRD.001.00000249, FRD.001.00000248]. I was on the phone with Professor Williams and asked him questions while it was filmed. During the interview, Professor Williams made a comment in substantially the same terms as the one he had made during our initial telephone conversation, as set out in the preceding paragraph. After the shoot, I organised for the camera operator, Oscar Vieira, to upload the footage to Dropbox and send the link to me by email [FRD.001.00001513].
287. On or about 9 February 2021, I drafted requests for comments, which I sent to Mr Farley, Ms Smithies, Ms Binnie and Mr Meakin for review [FRD.001.00001738, FRD.001.00001744].
288. Between about 9 February 2021 and 10 February 2021, I discussed who we should seek comment from with Ms Wilkinson via WhatsApp [FRD.005.00000187]. Ms Wilkinson also contributed to the drafting of the requests for comment [FRD.006.00000024].
289. On 10 February 2021, I reviewed the updated WIP of the first part of the Higgins Segment and discussed it over email with Mr Meakin [FRD.001.00000980].
290. On 10 February 2021, I attended a Microsoft Teams meeting with Mr Meakin, Ms Binnie, Ms Smithies and Mr Farley about the Higgins Segment [FRD.001.00002491].
291. On 10 February 2021 at 10:30am, I sent an email to Mr Campbell, Mr Bendall, Ms Thornton, Mr Meakin, Ms Binnie, Ms Smithies and Mr Farley regarding the broadcast date for the Higgins Segment [FRD.001.00001747].
292. On 10 February 2021 at 12:01pm, I received an email from Mr Bendall providing his comments on the Higgins Segment and response to the broadcast date of the Higgins Segment [FRD.004.00000100].
293. On 10 February 2021 at 1:28pm, I received an email from Ms Higgins attaching her signed statutory declaration [FRD.001.00001748].

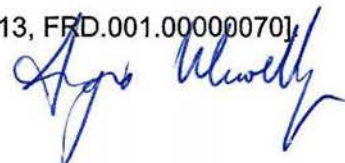





294. I requested that Ms Allan transcribe the interview with Professor Williams on 10 February 2021 at 6:26pm [FRD.001.00002697]. Ms Allan provided me with the transcript by email at 8:50pm on the same day [FRD.001.00000039]
295. On 10 February 2021 at 7:09pm, Mr Moncur suggested that Drew Heriot, an editor at 7PM, prepare the music for the Higgins Segment [FRD.001.00002500].
296. On 10 February 2021 at 8:54pm, I sent Ms Wilkinson links to the script by email [FRD.001.00002501].
297. On 10 February 2021 at 11:45pm, I received an email from Mr Brown with links to the WIP of the Higgins Segment [FRD.001.00000981].
298. On 11 February 2021 at 12:39am, I sent the WIP of the story to Mr Campbell, Mr Bendall, Ms Thornton, Mr Farley and Ms Smithies [FRD.001.00001769].
299. Later that morning I added the grab of Professor Williams into the script [FRD.001.00001773].
300. Mr Meakin and I discussed the inclusion of this grab over email [FRD.001.00001775, FRD.001.00001783, FRD.001.00000043].
301. On 11 February 2021, I exchanged emails with Mr Moncur and Mr Campbell about a GFX build for the Higgins Segment [FRD.001.00001527, FRD.001.00000044, FRD.001.00001528, FRD.001.00000045, FRD.001.00001530, FRD.001.00001531]. A GFX build is the process of preparing a still photograph for use in an edit. The Graphics Department take care of it.
302. On 11 February 2021 at 10:50am, Mr Campbell provided his feedback on the WIP of the first part of the Higgins Segment by email, to which I responded [FRD.001.00000991, FRD.001.00000993, FRD.001.00000994].
303. On 11 February 2021 at 2:55pm, Mr Sharaz sent me Mr Lehrmann's email addresses via WhatsApp [FRD.001.00002393].
304. Between about 11 and 12 February 2021, I made arrangements by email for a shoot in Canberra with Ms Wilkinson for the Higgins Segment [FRD.001.00002505, FRD.001.00001014, FRD.001.00001016, FRD.001.00001017, FRD.001.00001018, FRD.001.00001015, FRD.001.00001016].
305. On or about 11 February 2021, I drafted a script for a PTC for Ms Wilkinson to be shot outside Parliament House [FRD.001.00000048].
306. On 11 February 2021 at 5:24pm, I received an email from Mr Brown containing the links to the WIP for parts 1, 2 and 3 of the Higgins Segment [FRD.001.00001806].

307. On 11 February 2021 at 6:52pm, I sent material to be included as graphics in the Higgins Segment to Mr Moncur, Mr Heriot and Mr Brown, including the bruise photograph, audio of the voicemail left by Federal Agent Cleaves for Ms Higgins, and screenshots of text messages between Ms Higgins and Ms Brown [FRD.001.00002510].
308. On 11 February 2021 at 6:58pm, I sent Ms Higgins the following WhatsApp message [FRD.001.00002390]:
- "Hi Brittany Small favour. Do you have that screenshot of the WhatsApp messages from Fiona inviting you to meet with Reynolds still? The quality I've got from the word doc isn't great. If you've still got it can you send it again?"*
309. Ms Higgins sent me a screenshot of text messages between her and Fiona Brown, the Acting Chief of Staff to Reynolds exchanged on 31 March 2019 [FRD.001.00002348] via WhatsApp [FRD.001.00002390] at 7:26pm the same day.
310. Between about 11 and 13 February 2021, I exchanged text messages with Robb Shaw-Velzen, a camera operator, about the footage I needed shot in Canberra [FRD.001.00000244, FRD.001.00000245, FRD.001.00000242, FRD.001.00000243, FRD.001.00000246].
311. At some point prior to asking Mr Shaw-Velzen to shoot footage of The Dock, I conducted internet searches to confirm that the venue existed.
312. On 11 February 2021 at 7:26pm, I received legal advice in respect of the WIP [FRD.001.00001809].
313. On 11 February 2021 at 10:23pm, I received an email from Ms Wilkinson regarding some requested changes to the WIP [FRD.001.00000265].
314. Following Ms Wilkinson's email, on 12 February 2021, I sent emails to Mr Meakin proposing passages of the Interview to be included in the Higgins Segment [FRD.001.00001004, FRD.001.00001005, FRD.001.00000051].
315. On 12 February 2021, I received legal advice in respect to requests for comment [FRD.001.00001835, FRD.001.00002602, FRD.001.00002603].
316. On 12 February 2021, I received a telephone call from Ms Maiden about when I would be sending her a grab from the Higgins Segment. I also exchanged text messages with Ms Maiden regarding when I would be providing her with a grab from the Higgins Segment [FRD.003.00000020].
317. On 12 February 2021, I exchanged emails with Mr Meakin and Mr Bendall about providing a grab of the Higgins Segment to Ms Maiden [FRD.001.00000268, FRD.001.00001009, FRD.001.00000269, FRD.001.00001012, FRD.001.00001013, FRD.001.00000070].



318. On 12 February 2021 at 1:35pm, I sent an email to Mr Brown and Mr Heriot with requests for the editing of the Higgins Segment [FRD.001.00002513].
319. On 12 February 2021, I exchanged emails with Mr Meakin about ideas for a promo for the Higgins Segment [FRD.001.00001840, FRD.001.00001841, FRD.001.00002711, FRD.001.00001842].
320. At some point prior to the broadcast, I spoke to Ms Thornton about providing counselling support to Ms Higgins after the story went to air.

### Seeking comment

#### *First attempt to contact Mr Lehrmann*

321. As set out in paragraph 49 above, in my view it is crucial to seek comment from any person affected by a feature story in the sense that they are the subject of any allegations (whether named or not) or otherwise mentioned in a material way in the story.
322. In this case, the timing of seeking comment was sensitive. I did not want the story to leak, but I also needed to give everyone a reasonable amount of time to respond. I thought that giving them from Friday afternoon to mid-Monday morning was reasonable. If someone said that they would be available for interview then we would have time to interview them and include their comments.
323. I decided to seek Mr Lehrmann's comments on the allegations even though the Higgins Segment did not name him because I thought it was the right thing to do. Ms Higgins was accusing Mr Lehrmann of sexual assault. Even though we were not naming Mr Lehrmann, it was a serious allegation and it is a basic tenet of good journalism that if you are airing an accusation about someone, you have to seek comment from them. Mr Lehrmann was not named in the Higgins Segment, but I thought he was likely to know that he was the person the subject of the allegations. Therefore, I felt that I needed to seek his comment.
324. My preference would have been for Mr Lehrmann, as well as others who we sought comment from, to agree to be interviewed. Without Mr Lehrmann's comment, as well as the comment of others, I was aware that we were only airing one person's experience in the Higgins Segment, notwithstanding that we had taken various steps to ensure that the segment was true and accurate.
325. On 12 February 2021, I made the following attempts to contact Mr Lehrmann to obtain his side of the story by:

- (a) emailing him at 2:46pm to his personal email address [REDACTED] [FRD.001.00002521]; and

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- (b) sending a text message at 3:01pm to the mobile phone number 0455 076 480 [FRD.001.00002234, FRD.001.00002233].

326. I did not receive any "bounce-back" or error message in response to the email I sent.

327. I did not receive a response from Mr Lehmann to my call, email or text message.

*Attempts to contact others*

328. On 12 February 2021, I also sent requests for comment by email to:

- (a) at 2:41pm, Senator Scott Ryan, a Presiding Officer at Australian Parliament House, and the Hon, Tony Smith, a Presiding Officer at Australian Parliament House [FRD.001.00000053];
- (b) at 2:41pm, Reece Kershaw, the Commissioner of the Australian Federal Police, Federal Agent Katie Thelning and Federal Agent Rebecca Cleaves [FRD.001.00002515];
- (c) at 2:42pm, Minister Reynolds [FRD.001.00002516];
- (d) at 2:43pm, Fiona Brown, the Acting Chief of Staff for Minister Reynolds [FRD.001.00002517];
- (e) at 2:44pm, John Kunkel, the Prime Minister's Chief of Staff [FRD.001.00002518];
- (f) Yaron Finkelstein, the Prime Minister's Principal Private Secretary [FRD.005.00000198];
- (g) at 2:45pm, Minister Michaelia Cash [FRD.001.00002519]; and  
FRD.001.00002520
- (h) at 2:45pm, Daniel Try, Minister Cash's Chief of Staff [FRD.001.00002519].

329. On 12 February 2021, I sent text messages to:

- (a) at 2:50pm, Minister Reynolds [FRD.001.00002249, FRD.001.00002247];
- (b) at 2:53pm, Ms Brown [FRD.001.00002236, FRD.001.00002235];
- (c) at 2:55pm, Mr Kunkel [FRD.001.00002245, FRD.001.00002244];
- (d) at 2:56pm, Mr Finkelstein [FRD.001.00002242, FRD.001.00002241]; and
- (e) at 2:59pm, Minister Cash [FRD.001.00002239].

330. On 12 February 2021 at 3:24pm, I received an email from Julie Hope, Senior Team Leader AFP National Media.

331. On the same day at 5:34pm, I received a further email from Ellena Bisset, Coordinator Media and Engagement, ACT Policing [FRD.001.00001898].

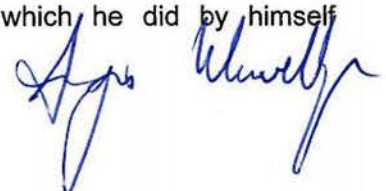
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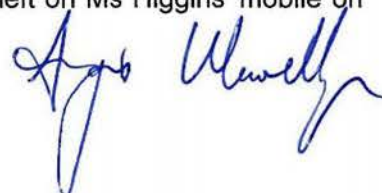
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332. On 12 February 2021 at 4:23pm, I sent ideas for plasma to Mr Moncur [FRD.001.00002523]. Plasma is a jargon term that refers to the screen in front of which Ms Wilkinson presented the story.
333. Around this time, Mr Moncur suggested that we use a photograph of Ms Higgins' employee access pass for Australian Parliament House on the plasma. On 12 February 2021 at 4:36pm, I sent the following WhatsApp message to Ms Higgins: *"Request from our picture people – do you have a picture of your old APH staff ID?"*. Ms Higgins responded *"Yep. I'll source it now"* and sent me photographs of her employee access passes for Australian Parliament House [FRD.001.00002306, FRD.001.00002308] via WhatsApp [FRD.001.00002392] shortly after.
334. Between about 12 and 13 February 2021, I received legal advice in respect of the PTC with Ms Wilkinson in Canberra and on a promo [FRD.001.00001844, FRD.001.00001846, FRD.001.00001853, FRD.001.00000073].
335. On 13 February 2021 at 1:38am, I received an email from Mr Brown containing links to the updated WIP for parts 1, 2 and 3 of the Higgins Segment [FRD.001.00001024]. I provided some feedback on the updated WIP by email [FRD.001.00000270].
336. On 13 February 2021 at 9:14am, I received an email from Mr Meakin which stated *"Really, really good. I love the sensitive way the interview is edited"* [FRD.001.00000271].
337. On 13 February 2021 at 9:45am, I sent an email to Mr Brown, Mr Meakin and Ms Binnie with two requests for the Higgins Segment from Ms Wilkinson which she had called me about [FRD.001.00000074]. Soon after, at 9:57am, I received a response from Mr Meakin by email [FRD.001.00001027]. I received a further email from Mr Meakin in response later that morning at 10:51am [FRD.001.00001029].
338. On 13 February 2021 at 10:01am, I received an email from Ms Wilkinson with some further requested changes to the WIP [FRD.001.00000272].
339. On 13 February 2021, I received emails from Mr Moncur and Mr Brown about notes on the editing of the Higgins Segment [FRD.001.00001552, FRD.001.00001553]. I forwarded the email correspondence to Mr Meakin and Ms Binnie at 1:17pm [FRD.001.00002527].
340. On 13 February 2021, Ms Wilkinson and I drove down to Canberra to record footage outside Parliament.
341. Mr Shaw-Velzen filmed a PTC from Ms Wilkinson while I was producing on site.
342. I had previously directed Mr Shaw-Velzen to shoot footage of the exterior of Parliament House, The Dock, CCTV cameras and other elements, which he did by himself [FRD.001.00000242].

343. Ms Wilkinson and I drove back to Sydney from Canberra on that day. I sent an email to Mr Meakin, Ms Binnie, Mr Bendall, Mr Campbell, Mr Moncur, Mr Brown and Ms Bunting providing an update following the trip to Canberra on 14 February 2021 at 9:09am [FRD.001.00000078].
344. On 13 or 14 February 2021, another editor, Andy Marriot, started to work on the Higgins Segment and assist Mr Brown with its editing. Mr Marriot edited the playoffs. Playoffs are the tease elements of a story "coming up" that are played before going to a commercial break. At this time Mr Heriot was editing the music.
345. On 14 February 2021 at 10:59am, I sent an email to Mr Bendall, Ms Bunting, Mr Jones, Mr Moncur, Mr Binnie and Mr Brown regarding voiceovers for the Higgins Segment [FRD.001.00002530].
346. On 14 February 2021 at 11:09am, I sent an email to Mr Meakin and Mr Brown regarding the clip I intended to provide to Ms Maiden [FRD.001.00001032]. I received a response from Mr Meakin by email at 11.59am [FRD.001.00001871].
347. On 14 February 2021 at 12:18pm, I sent an email to Mr Brown with a draft script for a promo for the Higgins Segment [FRD.001.00001872].
348. On 14 February 2021, I received two emails from Ms Binnie regarding the promo [FRD.001.00001873, FRD.001.00001874].
349. On 14 February 2021 at 1:22pm, I sent Ms Binnie an email regarding the promo and the grab for Ms Maiden [FRD.001.00001875].
350. On 14 February 2021, I exchanged email correspondence with Mr Meakin, Mike Mulgrew, editor, and Ms Binnie regarding the grab for Ms Maiden [FRD.001.00001034, FRD.001.00001035, FRD.001.00001036, FRD.001.00000079, FRD.001.00000080].
351. On 14 February 2021 at 7.49pm, Ms Higgins sent me the following documents via WhatsApp [FRD.001.00002392]:
- (a) a screenshot of a voicemail from Daniel Try left on Ms Higgins' mobile on 20 October 2019 [FRD.001.00002316];
  - (b) an audio recording of a voicemail from Mr Try left on Ms Higgins' mobile on 20 October 2019 [FRD.001.00002314];
  - (c) a screenshot of a voicemail from Minister Cash left on Ms Higgins' mobile on 20 October 2019 [FRD.001.00002313]; and
  - (d) an audio recording of a voicemail from Minister Cash left on Ms Higgins' mobile on 20 October 2019 [FRD.001.00002310].



These documents were directly relevant to how Parliament House dealt with Ms Higgins following her report of sexual assault and so I thought that it was important that I see them.

352. On 14 February 2021, I missed a telephone call from Andrew Carswell, Press Secretary to the then Prime Minister, Scott Morrison. I also received a text message from Mr Carswell [FRD.004.00000361].
353. On 14 February 2021 at 4:28pm, I sent an email to Mr Bendall, Mr Meakin, Ms Binnie, Ms Farley and Ms Smithies regarding the grab for Ms Maiden and the telephone call and text message from Mr Carswell (referred to in paragraph 352 above) [FRD.001.00001881]. I received an email from Mr Meakin with his approval on the grab at 4.49pm [FRD.001.00001882]
354. On 14 February 2021, I returned Mr Carswell's call, at which time we had a conversation. I do not now recall what Mr Carswell said exactly, but I recall that he yelled at me. His entire focus was that the story could potentially paint Ms Brown, who he called "a legend" of the party, in a poor light. He did not seem to me to be concerned by the allegation that a rape had allegedly occurred in a Minister's office. He was furious at the thought that we may name Ms Brown. I remember that he asked me whether I was aware of any correspondence between Ms Higgins and Ms Brown. I had no idea why he had called me given my request for comment had been sent to Ms Brown. I did not want to hear from a media manager, I wanted to hear from Ms Brown and the others Ms Higgins had mentioned. I kept emphasising to Mr Carswell that they had until 10am on Monday to get back to me. I took handwritten notes of this conversation [FRD.001.00002206].
355. On 14 February 2021, I received a telephone call from Ms Bisset from ACT Policing during which she said words to the effect that they were working on this and would get something to me. I took handwritten notes of this conversation [FRD.001.00002206].
356. On 14 February 2021, I organised for a social media producer to start work early on 15 February 2021 to limit the time the social team had possession of the promo of the Higgins Segment [FRD.001.00001875, FRD.001.00001883, FRD.001.00001887]. I was concerned to ensure that the story did not leak.
357. On 14 February 2021, I coordinated with Mr Brown by email to prepare the grab for Ms Maiden [FRD.001.00000083].
358. On 14 February 2021 at 6:00pm, I provided the grab to Ms Maiden [FRD.001.00002531].
359. On 14 February 2021 at 7:30pm, I received legal advice in relation to the promo and social media [FRD.001.00001892].

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360. On 14 February 2021, I discussed whether we should have a promo for the Higgins Segment by email with Mr Brown, Mr Bendall and Ms Thornton [FRD.001.00001894, FRD.001.00001895, FRD.001.00001896, FRD.001.00001897]. It was agreed that we would hold off finalising any promo until after we had seen Ms Maiden's story on news.com.au the next morning.
361. On 14 February 2021, at 8:26pm, I received an email from Ms Bisset containing a statement from ACT Policing. At 8.37pm, I forwarded the email to Mr Meakin, Ms Binnie, Mr Farley and Ms Smithies [FRD.001.00001898]. The ACT Policing statement stated:

*"ACT Policing received a report in April 2019 in relation to an alleged assault at Parliament House. ACT Policing investigators subsequently spoke to the complainant who chose not to proceed with making a formal complaint. ACT Policing's investigation remains open but did not progress at that time as a result. As part of initial enquiries, ACT Policing also liaised with Department of Parliamentary Services....*

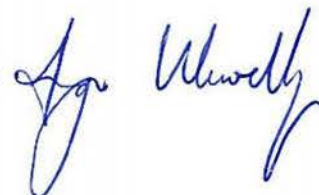
*ACT Policing has continued to engage with the complainant throughout the investigation and also provided details of support services such as Canberra Rape Crisis Centre. If the complainant wishes to proceed, ACT Policing will assess the case and make a decision about whether there is sufficient evidence. This is done in accordance with the ACT Director of Public Prosecutions guidelines and often in consultation with the Office of the ACT Director of Public Prosecutions.*

362. I noted that the statement from ACT Policing confirmed that:

- (a) ACT Policing received a report in April 2019 in relation to an alleged assault at Parliament House;
- (b) ACT Policing investigators subsequently spoke to the complainant who chose not to proceed with making a formal complaint;
- (c) ACT Policing's investigation remained open; and
- (d) ACT Policing continued to engage with the complainant throughout the investigation and provided details of support services such as the Canberra Rape Crisis Centre.

363. On 14 February 2021 at 10.03pm, I received a response from Mr Carswell by text to be attributed to a Federal Government spokesperson on behalf of the Prime Minister's Office, Minister Reynolds and Ms Brown [FRD.004.00000361, FRD.004.00000362, FRD.004.00000363].

364. I noted that the statement provided by Mr Carswell confirmed that:



- (a) on Tuesday 26 March 2019, senior staff in Minister Reynolds' office became aware of an incident that occurred in the Minister's office outside of work hours involving two staff;
- (b) it was initially treated as a breach of the Statement of Standards for Ministerial Staff;
- (c) after further consultation with one of the staff members over the following days, it became clear to senior staff that there were elements of the incident that may be of a more serious nature;
- (d) the staff member was told they would be supported by the office and the Minister if they chose to pursue a complaint;
- (e) the Minister and a senior staff member met with the staff member in the Minister's office;
- (f) given the seriousness of the incident, the meeting should have been conducted elsewhere;
- (g) the Minister encouraged the staff member to speak with the police;
- (h) the staff member indicated they would like to speak to the AFP, which the Minister supported and her office facilitated; and
- (i) the Minister was subsequently informed that a complaint had been made to the AFP.

365. Shortly after, I called Mr Carswell and said words to the effect that I wanted a direct response from each of Fiona Brown, John Kunkel and Yaron Finkelstein. Mr Carswell brushed me off. I did not receive a direct response from Ms Brown, Mr Kunkel or Mr Finkelstein.

366. On 14 February 2021 at 10:42pm, I copied and pasted the texts I had received from Mr Carswell into an email and sent it to Ms Binnie and Mr Meakin [FRD.001.00001899]. I received a response from Mr Meakin by email shortly after [FRD.001.00001900]. Mr Meakin sent me a further email suggesting edits to the Higgins Segment in light of Mr Carswell's texts on 15 February 2021 at 7:37am [FRD.001.00000273]. I responded to Mr Meakin by email at 8:20am [FRD.001.00002535].

*Ms Maiden's article*

367. The following day, I read Ms Maiden's piece when it was published and circulated a link to it by email on 15 February 2021 at 8:22am to the production team on the Higgins Segment [FRD.001.00000275]. Mr Bendall and I exchanged emails in relation to the promo of the Higgins Segment in light of Ms Maiden's article [FRD.001.00000277, FRD.001.00000278, FRD.001.00000279].

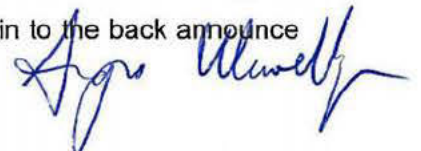
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368. On 15 February 2021 at 8:36am, I sent an email to Ms Wilkinson with links to Ms Maiden's articles [FRD.001.00000085].
369. On 15 February 2021, I received legal advice in relation to the promo of the Higgins Segment [FRD.001.00000280, FRD.001.00000281, FRD.001.00001050, FRD.001.00000284, FRD.001.00000285].
370. On 15 February 2021, I sent emails to Mr Meakin, Ms Smithies, Mr Farley, Ms Binnie and Chris Harrison regarding how responses to requests for comments should be included in the promo for the Higgins Segment [FRD.001.00001047, FRD.001.00000086].
371. On 15 February 2021 at 9:24am, I received legal advice in relation to the Higgins Segment [FRD.001.00000289].
372. On 15 February 2021 at 9:01am I sent Mr Sharaz the following message on WhatsApp: "Morning. Where does Bruce work again?" At 9:06am, Mr Sharaz sent me a screenshot of Mr Lehrmann's LinkedIn profile [FRD.001.00002351] via WhatsApp [FRD.001.00002393]. Even though Mr Sharaz provided me with this screenshot in response to my question about where Mr Lehrmann worked, I was not able to work out where Mr Lehrmann worked from the screenshot provided.

*Further attempts to contact Mr Lehrmann*

373. On 15 February 2021, I made further attempts to contact Mr Lehrmann by:
- (a) calling him twice at around 9:00am on the mobile phone number 0455 076 480. There was no voicemail, the line just rung out; and
  - (b) sending an email at 10:45am to [bruce.lehrmann@p-p.com.au](mailto:bruce.lehrmann@p-p.com.au) and [REDACTED] [FRD.001.00002540] which referred to the email I had sent to [REDACTED] on 12 February 2021 [FRD.001.00002521].
374. I also considered sending a message to Mr Lehrmann on Facebook, but when I reviewed his Facebook profile, I noted that his setting did not allow direct messages to be sent. Subject to section 136 limitation
375. I did not receive a response from Mr Lehrmann to any of the attempts I made to contact him as set out above.
376. If I had received a response from Mr Lehrmann, I would have included his response in the story. As stated above, depending on any response from Mr Lehrmann, my preference would have been to give him the opportunity to participate in an on-camera interview which could have been included in the story, but any response or the substance of any response from Mr Lehrmann setting out his side of the story would have been included. Even if Mr Lehrmann had responded in the middle of the broadcast of the Higgins Segment, I would have ensured that it was included by adding it in to the back announce



in the studio (the live section at the end of the show following the broadcast of the pre-recorded package).

377. I decided to proceed with the story despite not receiving a response from Mr Lehrmann. This was because I had given him a reasonable time to respond, had attempted to contact him multiple times and it was in the public interest that this story be aired. Further, he was not being named in the Higgins Segment and in light of the responses from ACT Policing and Mr Carswell referred to above, the fact that a police report had been made and that there was a very limited workplace investigation about the alleged sexual assault had been corroborated.
378. I recall that Ms Wilkinson asked me at least once prior to broadcast whether I had gotten responses to the requests for comment. I recall that she specifically asked me whether Mr Lehrmann had responded to any of my requests on at least one occasion.

*Final stages of production (continued)*

379. On 15 February 2021, I participated in a discussion about whether the comments on Network Ten's social media posts in respect of the Higgins Segment should be disabled.
380. I was in favour of disabling the comments, but I was not responsible for the ultimate decision. I was in favour of disabling comments for multiple reasons. First, we were not naming Mr Lehrmann and we did not want anyone to speculate on the identity of Ms Higgins' alleged perpetrator on social media. Secondly, I was concerned to protect Ms Higgins. She was a very vulnerable person and I did not want people casting judgment on her online and her reading those comments. My thought process was that I did not want to create any more risk for us in broadcasting the Higgins Segment or heartache for those involved in it, including Ms Higgins and Mr Lehrmann. I understand that social media comments were in fact disabled by Network Ten in respect of the Higgins Segment.
381. On 15 February 2021, I discussed whether material from the Higgins Segment should be provided to *The Sydney Morning Herald* by email with Mr Bendall and Ms Binnie [FRD.001.00000826, FRD.001.00000827, FRD.001.00002547].

*Further responses received and final stages of production*

382. On 15 February 2021 at 10:43am, I received a response by email from Guy Creighton, the Senior Media Adviser for Minister Cash [FRD.006.00000367]. Shortly after, I forwarded it to Mr Meakin, Ms Binnie, Mr Farley and Ms Smithies [FRD.001.00000299] and Ms Wilkinson [FRD.001.00000087].
383. On 15 February 2021 at 10:50am, I copied and pasted the texts I had received from Mr Carswell (referred to in paragraph 363) into an email and sent it to Ms Wilkinson [FRD.001.00002542]. I also copied and pasted the statement I had received from ACT

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Policing (referred to in paragraph 361) into an email and sent it to Ms Wilkinson [FRD.001.00002543].

384. On 15 February 2021 at 11:09am, I sent an email to Mr Meakin regarding an update to a voiceover for the Higgins Segment [FRD.001.00000089]. I sent Ms Wilkinson an email at 11:13am in relation to the updated voiceover [FRD.001.00000090]. On 15 February 2021 at 11:16am, I received an updated statement from Mr Carswell by text [FRD.004.00000363, FRD.004.00000364, FRD.004.00000365]. The updated statement referred to Ms Higgins and Minister Reynolds by name and restated the matters identified in paragraph 364(a) to (h). After reading the updated statement, I thought that there was an aspect of victim-blaming or a suggestion that Ms Higgins had been at fault in some way.
385. I copied and pasted the updated statement into an email and sent it to Mr Bendall, Mr Farley, Ms Smithies and Mr Meakin at 11:45am [FRD.001.00000093]. I also sent it in an email to Ms Wilkinson at 11:46am on the same day [FRD.001.00000094].
386. On 15 February 2021 at 12:21pm, I received a response by email from the Presiding Officers at Australian Parliament House. The statement from the Presiding Officers at Australian Parliament House stated:
- "The relevant security camera footage of that evening, which was viewed by the Australian Federal Police in 2019, has been stored on an ongoing basis at the direction of the Presiding Officers and with the agreement of ACT Policing for their access as required for any investigation."*
387. I forwarded the statement from the Presiding Officers to Mr Bendall, Mr Farley, Ms Smithies, Mr Meakin and Ms Binnie at 12:28pm [FRD.001.00000314]. Mr Meakin and I then exchanged emails regarding the statement [FRD.001.00000316, FRD.001.00000095, FRD.001.00000319].
388. On 15 February 2021 at 12:39pm, I received a further statement from ACT Policing in relation to the CCTV footage of Australian Parliament House by email from Ms Bisset [FRD.006.00000375] which I forwarded to Mr Meakin, Mr Farley, Ms Smithies and Ms Binnie [FRD.001.00001948]. The further statement stated:

*"ACT Policing liaised the Department of Parliamentary Services early in the investigation. CCTV, following the allegation being reported to ACT Policing, has been secured by the Department of Parliamentary Services. Should the CCTV footage be required for the ACT Policing investigation, it will be provided at our request."*

*Alexander Todd*

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*The CCTV footage has been viewed by AFP National as part of an analysis of the security breach."*

389. I noted that the statements from Mr Edwards and Ms Bissett confirmed that the Department of Parliamentary Services had secured CCTV footage from the night of the alleged sexual assault and would provide it to ACT Policing at their request.

390. On 15 February 2021 at 12:44pm, I sent the following two questions by email to the Presiding Officers [FRD.001.00002553]:

*"Where the statement says the footage was "viewed by the Australian Federal Police in 2019 " are these the AFP who work within APH on a MOU with the DPS?*

*Has the AFP's ACT Policing division ever seen the CCTV vision?"*

391. On 15 February 2021, I worked with Mr Meakin on intros and back announces [FRD.001.00002550]. These are the introductions to each section of the Higgins Segment and closing remarks, respectively, that Ms Wilkinson delivered in studio after the Higgins Segment finished.

392. On 15 February 2021, I liaised with Anthony Hawwa, a producer, about the voiceovers I needed from Ms Wilkinson [FRD.001.00000097].

393. On 15 February 2021 at 1.54pm, I sent an email to the @ATV-7pm-Writers distribution list setting out the full version of each response to requests for comment we had received to be put on the 10Play website after broadcast [FRD.001.00002552]. We follow a process with distribution lists within the team, and the 'Writers' team is in charge of making sure the website is up to date. The statements are still online at <https://10play.com.au/theproject/articles/statements-regarding-our-story-on-15-february/tpa210215wdtmh> [FRD.006.00000383]

394. On 15 February 2021, I watched the then Prime Minister Scott Morrison's comments in Parliament about Ms Maiden's story, including his statement:

*"My government takes all such matters – all matters of workplace safety very, very seriously. Everyone should feel safe in their workplace, wherever that is. Reports today are deeply distressing. This matter is under consideration by police. At all times, guidance was sought from Ms Higgins as to how she wished to proceed. And to support and respect her decisions. This important best practice principle of empowering Ms Higgins is something the government always sought to follow in relation to this matter. The government has aimed to provide Ms Higgins with her agency, to provide support to make decisions in her interests and to respect her privacy. This offer of support and assistance continues. It is important that Ms*

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*Higgins' views are listened to and respected and I table for the purposes of the House a statement issued by a government spokesperson today on these matters."*

395. On 15 February 2021, I received an email from Mr Carswell [FRD.001.00000326] which provided information on the support provided to Ms Higgins by Ms Brown "[f]or background".
396. On 15 February 2021 at 2:41pm, I sent an email to Mr Meakin with a draft opening for the Higgins Segment [FRD.001.00002554].
397. On 15 February 2021 at 2.49pm, I received further legal advice in relation to the Higgins Segment [FRD.001.00000335].
398. On 15 February 2021, I coordinated with Sean Marsicovetere, Planning Producer at The Project, to obtain the footage of Mr Morrison's comments about Ms Higgins [FRD.001.00000099, FRD.001.00000336, FRD.001.00000338, FRD.001.00000100]. I was in contact with Ms Wilkinson by phone about Mr Morrison's comments throughout the day.
399. On 15 February 2021 at 3:02pm, I sent an email to Mr Farley, Ms Smithies, Mr Bendall, Mr Meakin, Ms Binnie, Ms Thornton and Ms Wilkinson containing links to the first two parts of the story for review [FRD.001.00001955]. Mr Bendall provided his feedback by email at 3:03pm [FRD.001.00000339]. Mr Meakin suggested a revised opener for the Higgins Segment following Mr Bendall's feedback [FRD.001.00000343, FRD.001.00000344]. Mr Meakin's revised opener was not ultimately included in the final Higgins Segment.
400. On 15 February 2021 at 3:48pm, I sent an email to Mr Farley, Ms Smithies, Mr Bendall, Mr Meakin, Ms Binnie, Ms Thornton and Ms Wilkinson containing a link to the third and final part of the Higgins Segment for review [FRD.001.00001960].
401. On 15 February 2021, I obtained legal advice in respect of the links of the Higgins Segment [FRD.001.00000102, FRD.001.00000357, FRD.001.00000360, FRD.001.00000361, FRD.001.00000362, FRD.001.00000378, FRD.001.00000382].
402. In this context "link" refers to the part of the segment that links the prepared package to the opening credits and the breaks. A "closer" is the part the segment that comes at the end of the prepared package.
403. On 15 February 2021 at 4:06pm, I sent an email to Mr Campbell containing the links to the three parts of the story for review [FRD.001.00002557].
404. On 15 February 2021, I had a telephone conversation with Ms Bisset from ACT Policing during which she said words to the effect that the Department of Parliamentary Services






still stored the CCTV footage from Parliament House and the AFP did not think there is a conspiracy going on. I took handwritten notes of this telephone call [FRD.001.00002206].

405. On 15 February 2021 at 4:31pm, a person who identified themselves as Nick Edwards from the Department of Parliamentary Services telephoned me and said words to the effect that the CCTV footage had been obtained and indefinitely quarantined. I took handwritten notes of the telephone call [FRD.001.00002206]. I understood "indefinitely quarantined" to mean that the CCTV had been located and saved in a spot where it was not going to be deleted.

406. On 15 February 2021 at 4:59pm, I sent an email to Ana Milutin, Broadcast Producer, Ms Binnie, Mr Bendall and Mr Marsicovetere with the links for the Higgins Segment [FRD.001.00000365]. I exchanged emails with Alicia Lagourcette, Line Producer, and Mr Mulgrew in relation to the links [FRD.001.00000367, FRD.001.00000369, FRD.001.00000370, FRD.001.00000371, FRD.001.00000373, FRD.001.00000383, FRD.001.00000106].

407. On 15 February 2021, I received several emails from Ms Binnie regarding the intro and back announce for the segment [FRD.001.00001125, FRD.001.00000392].

408. On 15 February 2021 at 5:31pm, I sent the following WhatsApp message to Ms Higgins [FRD.001.00002390]:

*"How are you doing? You know the country will be amazed when they hear how strong and just you are tonight. If this helps you get a fair hearing that's going to be damn well the right outcome. But it's undoubtedly going to help others we've never heard of."*

409. My reference to Ms Higgins helping others in the message refers to the others still working at Parliament House.

410. On 15 February 2021 at 6:09pm, I received an email from Mr Edwards at Parliament House [FRD.006.00000377] regarding the retention of the CCTV footage which stated:

**FRD.001.00001996**

*"The AFP submitted a request to view the relevant APH CCTV footage on 3 April 2019, the request was formally approved by the Presiding Officers on 11 April 2019 and the AFP viewed the footage at Parliament House on 16 April 2019."*

411. I forwarded this email to Ms Smithies, Mr Farley, Mr Meakin, Mr Binnie and Mr Bendall at 6:30pm [FRD.001.00001996, FRD.001.00000107].

412. On 15 February 2021 at 6:50pm, I responded to Mr Bendall's question about why a change had been made to the intro to the third part of the Higgins Segment [FRD.001.00000108].

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413. On 15 February 2021, I edited the script for the story progressively throughout the day so that each of the responses I received from persons whose comment I had sought (as set out above) was included or reflected in the Higgins Segment.
414. I was very confident in the end product.
415. I had been careful to only put material into the Higgins Segment that I had independently verified, as set out above.
416. I felt the production team had done everything needed from a journalistic perspective prior to broadcast.
417. I was very happy with what was going to air.
418. Given a 30-minute segment was a massive change to how The Project normally operated, I had braced myself for compromises. But what went to air was all the important pieces of information I thought we needed to give the viewers to provide them with a thorough outline of the problems that Ms Higgins was discussing.
419. I considered that all of the editorial discussions we had engaged in improved the story and kept its integrity intact.
420. That was a great relief for me, because it was my job to make sure we got it right. It was important to me because I felt I had a duty of care to Ms Higgins. I was lucky enough to have managers and executive producers who were deeply involved in the story and who understood the importance of airing this story for the public.

#### **Broadcast of the Higgins Segment**

421. The story was broadcast from 6:59pm to 7:33pm on 15 February 2021 [FRD.001.00002416]. I watched it live.
422. I did not intend to convey to the world in the Higgins Segment that Mr Lehrmann had sexually assaulted Ms Higgins, I wanted to convey that an unnamed senior male staffer allegedly had.
423. Given Mr Lehrmann had not been named, I did not think he could be identified except to a small number of people with prior knowledge of the allegations.
424. At the time of broadcast of the Higgins Segment, I considered the following imputations to be true:
- (a) Bruce Lehrmann raped Brittany Higgins in Minister for Defence Industry Linda Reynolds' office in 2019.
  - (b) Bruce Lehrmann continued to rape Brittany Higgins after she woke up mid-rape and was crying and telling him to stop at least half a dozen times.



- (c) Bruce Lehrmann, whilst raping Brittany Higgins, crushed his leg against her leg so forcefully as to cause a large bruise.
425. At the time of the broadcast of the Higgins Segment, I believed that viewers of the Higgins Segment had an interest or apparent interest in the following subjects:
- (a) an allegation of rape occurring in a Minister's office at Parliament House after hours;
  - (b) political staffers accessing a Minister's office at Parliament House after hours while intoxicated;
  - (c) the Government's handling of an allegation by a political staffer of rape by a colleague;
  - (d) allegations of a political cover-up by the Government of an allegation by a political staffer of rape by a colleague;
  - (e) the treatment by the Government of a staff member who made a rape complaint;
  - (f) the absence of an appropriate human resources structure and complaints handling process for ministerial and parliamentary staff;
  - (g) the fact and circumstances of an investigation by the Parliament House police unit and the Australian Federal Police into an allegation of rape occurring in a Minister's office at Parliament House after hours, and the availability of CCTV footage from Parliament House as part of those investigations;
  - (h) the response by the Prime Minister in Parliament to an allegation of rape occurring in a Minister's office at Parliament House after hours;
  - (i) the conduct of the Government in the lead up to a federal election;
  - (j) the conduct of a Minister towards a member of her staff;
  - (k) the culture and safety of Parliament House as a workplace;
  - (l) the treatment of women in Parliament House;
  - (m) the treatment of women by the Liberal Party; and
  - (n) the treatment of sexual assault complainants.

#### **Reaction to the Higgins Segment**

426. Following the broadcast of the Higgins Segment, I received the following reactions:

- (a) on 15 February 2021 at 7:27pm, a text message from Mr Campbell [FRD.001.00000262];

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- (b) on 15 February 2021 at 7:37pm, an email from Sallese Gibson, Field Producer [FRD.001.00000109];
  - (c) on 15 February 2021 at 7.40pm, a WhatsApp message from Mr Sharaz [FRD.001.00002393];
  - (d) on 15 February 2021 at 8:33pm, an email from Mr Brown [FRD.001.00000403]; and
  - (e) on 15 February 2021 at 10:02pm, a text message from Mr Shaw-Velzen [FRD.001.00000247].
427. On 16 February 2021 at 12:44pm, I received a WhatsApp message from Mr Sharaz which contained the following statement from Ms Higgins [FRD.001.00002393]:

*"I shared my story yesterday because I didn't want what happened to me, to happen to anyone else.*

*I note the apology from the Prime Minister in the media this morning and thank him for this.*

*The Prime Minister's announcement of an investigation into the culture in Parliament House is a welcomed first-step, though it is long overdue. It should not have taken my story, or the story of other victim-survivors to air on national television for the Prime Minister - or any Member of Parliament - to take action on workplace sexual harassment, assault or bullying. A clear path forward is now required - and that includes a comprehensive review to the Members of Parliament (Staff) Act to ensure adequate protections for staff.*

*There needs to be an independent reporting mechanism for staff where they can confidently and safely make complaints – similar to processes in many other workplaces in Australia and abroad.*

*Political parties also need to conduct their own internal reviews and establish formal accountability processes. As we all know, this isn't a problem confined to one side of politics.*

*Finally, everyone should feel safe to report sexual assault without fear of losing their job.*

*These incidents shouldn't have to play out in the media for change to happen.*

*I would like to extend my gratitude to those who have sent messages of support during this time. I ask for my privacy to now be respected as I begin to emotionally recover from this difficult period and wish to make no further comment.*

ENDS"

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428. On 16 February 2021, I watched Mr Morrison's press conference during which he said:

*"We have to do more, whether it's in this workplace, or in any other workplace in the country, to ensure that people can work safely in their place and be at their best and do what they went into that job to do."*

and

*"So there are a number of things we can do immediately, and I'll be speaking about this in our party room today. The first of those is we must continue to address the environment of this place. Now, I believe, over the last few years, since this occurred, there have been changes and there have been improvements, but I'm not naive enough to think, and I don't think you or anyone else in this place is naive enough to think, that that is not a position of vulnerability that can still occur. Whether it's here, or, frankly, in so many other workplaces around this country. So I hope Brittany's call is a wake-up call for all of us from that point of view. I've asked Celia Hammond, the Member for Curtin, previous Vice-Chancellor of Notre Dame, who has had experience of dealing with these issues in institutional settings and offered herself to assist me with this overnight, to lead a process, working with our chief whips and our whips to work with colleagues, ministers, members, in the Government, in the Coalition parties, to identify ways that standards and expectations and practices can be further improved so that professional behaviour in this place does not involve a young woman finding herself in the situation that she found herself in, that is unacceptable."*

429. On 17 February 2021 at 3:30pm, I received a WhatsApp message from Mr Sharaz which contained the following statement from Ms Higgins [FRD.001.00002393]:

*"I have only been made aware of key elements of my own sexual assault as a result of coming forward publicly with my story.*

*I didn't know that security guards let me into Minister Reynolds suite. I didn't know that a security guards came into the office multiple times seeing me in a state of undress. I didn't know they were undertaking an internal review into how the matter was handled at the time. I didn't know that they debated calling an ambulance at the time of the incident.*

*The continued victim-blaming rhetoric by the Prime Minister is personally very distressing to me and countless other survivors. A current senior staffer to the Prime Minister and my former Chief-of-Staff refused to provide me with access to the CCTV footage from that evening and continually made me feel as if my ongoing employment would be jeopardised if I proceeded any further with the matter.*

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*The Government has questions to answer for their own conduct."*

430. I considered that my duty of care to Ms Higgins continued following the broadcast of the Higgins Segment and I exchanged emails and participated in telephone calls on this topic throughout February and March 2021 [FRD.001.00000419, FRD.001.00001173, FRD.001.00000734].
431. I think the value in the Higgins Segment lay in showing that the pinnacle of our representative democracy can be an awful or unsafe place to work.
432. On 5 March 2021, the Australian Government established the Independent Review into Commonwealth Parliamentary Workplaces, led by Sex Discrimination Commissioner Kate Jenkins. Two paragraphs in the introduction of the Inquiry's final report resonate with me:

*"This Report outlines what we heard. While we heard of positive experiences of work within the Parliament, there were others who shared experiences of bullying, sexual harassment and sexual assault. Too often, we heard that these workplaces are not safe environments for many people within them, largely driven by power imbalances, gender inequality and exclusion and a lack of accountability. Such experiences leave a trail of devastation for individuals and their teams and undermine the performance of our Parliament to the nation's detriment.*

*We concluded that while Commonwealth parliamentary workplaces are unique, they are not exceptional. It is time for our best workplace practices to live in these workplaces. Power and influence run in many directions in these workplaces, so we have proposed five shifts designed to ensure that power and influence always lean towards safety and respect, enabling high performance."*

433. A discussion which led to improvements for people who work in Parliament House, as well as outside of it, was a positive outcome from the broadcast of the Higgins Segment.
434. For Ms Higgins, it allowed her to restart a stunted police investigation once the CCTV footage was released. It also made people aware of how odd Parliament House was in the way it had a legal ring of protection around it. Highlighting that dichotomy with the rest of Australia's workplaces meant more protections could be put in place for people working in Parliament House.


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Affirmed by the deponent  
At Sydney  
in New South Wales  
on 21 September 2023  
Before me:

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Signature of deponent  
Signature of witness

Amelia CausleyTodd  
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