



**PRIVATE AND CONFIDENTIAL**

Our reference: 2016-0141

Mr Peter Zonneville  
ISSCO  
329 Concord Rd  
CONCORD NSW 2138

Dear Mr Zonneville

I write to you in relation to the allegations relating to Ms Joanne Bailey, Chief Procurement Officer of the Department of Education ('the Department') and the Department's Procurement Solutions Directorate (PSD).

The Employee Performance and Conduct Directorate (the Directorate) has considered all the available information, including that provided by you. It has been determined that there is no evidence to support your allegations that Ms Bailey and/or staff at the PSD engaged in misconduct, corrupt conduct or any other form of inappropriate conduct. The Directorate will not be taking any further action in relation to this matter at this time.

As you are aware your allegations were also reported to the Independent Commission Against Corruption ('the Commission') for an independent assessment. The Commission assessed the matter and determined that no further action would be taken. Should you wish to make enquiries regarding the Commission's determination, please visit the Commission's website at <https://www.icac.nsw.gov.au/>

In relation to your concerns I note the Department's records outline that there is no trading restriction in place against you or your company and in fact you and your company have continued to engage in business with the Department since 2012.

As you are aware, the Department wrote to you in 2013 advising that electronic communication from your email accounts had been suspended due to the Department receiving voluminous SPAM material originating from your accounts. You were requested to take measures to ensure this activity ceased and provided with information regarding the steps to take to lift the suspension. I am advised that you did not respond to the letter. I have attached a copy of the letter for your reference.

The Department's Information Technology Directorate has advised that any electronic communication sent from your accounts is filtered and not accessible by other employees of the Department, including Ms Bailey and any staff of the PSD. Further, Ms Bailey and staff at the PSD do not have access to any emails sent from individual Department schools. I note that at present you and your company have the ability to communicate with the Department via telephone and facsimile.

Should you wish to seek a review of the suspension of your electronic (email) communication with the Department I recommend you contact the office of Mr David Malcolm, Acting Chief Procurement Officer on telephone number 1300 338 289 or facsimile 8633 1212.

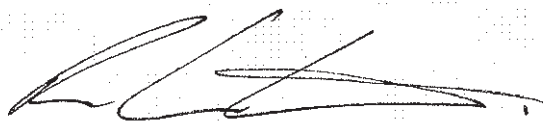
**EMPLOYEE PERFORMANCE AND CONDUCT DIRECTORATE**

Locked Bag 53 Darlinghurst NSW 1300 T 9266 8070 F 9266 8077

[www.det.nsw.edu.au](http://www.det.nsw.edu.au)

Should you wish to discuss this matter please contact Mr Jason Goyal on telephone number 9266 8070 or facsimile 9266 8077.

Yours sincerely



Rob Easton  
**Director Investigations**  
27 June 2016

Encl.

EPAC <EPAC@det.nsw.edu.au>

To

pzgipa@yahoo.com.au

Mar 18 at 10:59 AM

**This message contains blocked images.**

Dear Mr Zonneville

I refer to your faxed letter dated 17 March 2016 regarding your formal complaint.

This matter has been referred to Mr Robert Easton who is currently conducting a fact finding enquiry to determine whether there is sufficient evidence of possible misconduct to open an EPAC investigation. It is unlikely that anyone from EPAC would have contacted you yet although I understand you spoke to Mr Easton by phone recently. I can confirm the matter has been reported to ICAC.

At this stage it would not be appropriate to forward any material to you. In any event it is unclear the correspondence to which you refer.

Mr Riordan is my line manager and as such I report to him. He is unaware of this matter at this stage as EPAC does not advise Mr Riordan of all investigations. However, should he make enquiries about an investigation I would be obliged to provide him with information and advice.

Jane Thorpe  
Executive Director  
Employee Performance and Conduct Directorate



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\*\*\*\*\*

From: Peter Z  
To: EPAC; pzgipa@yahoo.com.au  
Subject: Re Corruption allegations against Joanne Bailey  
Date: Monday, 21 March 2016 11:10:45

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Dear Ms Thorpe,

thank you for your email in response to my faxes.

Noted that Mr Easton is conducting a fact finding enquiry.  
Mr Easton did not disclose that he was charged with the investigation of my complaint.

I am gravely concerned that your dept. / Mr Easton have not requested further details from me in connection to my very serious complaints.  
Is this standard procedure?  
Wouldn't this also compromise the ICAC referral?

If this is not the standard procedure, my grave concerns also extend to the very tense conversation I had with Mr Easton (which I refer to in my fax to him March 9, 2016).

Re the referred to correspondence.  
Please refer to my fax to you dated Feb 28 & refaxed March 7, 2016  
Would you please confirm that you understand that the correspondence referred to is the private / commercial in confidence / legally privileged emails between myself / my company and our customers, NSW state schools?  
If this remains unclear please advise at your earliest.

Noted that Mr Riordan is your boss.  
Does this also mean that Mr Riordan can have influence over my complaint and / or your associated investigation?

Thanks for your earliest advice  
regards  
Peter Zonneville  
Ph.0401 611 455 pzgipa@yahoo.com.au ; accessenquiries@yahoo.com.au

PS If there is a conflict of interest with your directorate & our complaints please advise at your earliest convenience

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GIPA-19-062 – Zonneville –  
 Point 4 a, b, c, d - NCAT Matters – external legal costs  
 Note: Cannot find any reference to NCAT161023

GIPA Ref	SUBJECT	NCAT Ref	COST
	S110 GIPA Act proceedings	<u>2018/00322532</u>	No cost to the department. TOTAL \$0
GIPA-16-292	Documents showing all sales commissions, management fees and consultancy fees for procurement activities, accounts detailing funds taken from schools & correspondence	<u>2017/ 0060025</u>	Hicksons and Peter McGhee, LSD Legal Officer acted. 31.1018 Hicksons advise total costs for external review proceedings: TOTAL \$4,330.26
GIPA-16-023	Data for all GIPAA formal release applications received by Department in 2014 and 2015	<u>1610593</u>	CSO: \$9,208.00 \$9,433.05 \$286.00 TOTAL: \$18,927.05
GIPA-15-265	Emails and correspondence to various email addresses held by him by Department staff member	<u>1510696</u>	CSO: \$1,229.25 \$ 773.19 \$5,263.50 \$3,437.92 \$ 217.80 \$5,028.10 TOTAL: \$15,949.76
GIPA-14-107	List of 25 items - related to documents about authorisation to block emails from Peter Zonneville and his company addresses	<u>1401330</u>	CSO: \$4,159.78* (Not included - Duplicated in 141029 & 1410331)
GIPA-14-046	Documents about authorisation to block emails from Peter Zonneville and his company addresses	<u>1410329</u>	CSO: \$3,079.45 \$2,885.30 \$4,159.78* ( not included - Duplicated in 141030 & 1410331) \$1,511.13* (not included - Duplicate in in 1410331) TOTAL: \$5,964.75
GIPA-13-252	Maxine Zonneville - Documents about the Department blocking emails from Zonneville and 4 other entities and related DEC policies	<u>1410331</u>	CSO: \$13,946.90 \$4,159.78* (also in 141029 & 330) \$13,074.60 \$3,956.70 \$1,511.13* (also in 141029) TOTAL: \$36,649.11
	<b>TOTAL OF EXTERNAL LEGAL COSTS</b>		<b>\$81,820.93</b>



**ABN: 58 215 418 381**  
**Tax Invoice No: 184064**

Our ref: CEM 173999

31 October 2018

Insurance for NSW  
 ABN 97 369 689 650  
 GPO Box 5474  
 SYDNEY NSW 2001

**Department of Education ats Peter Zonneville**  
**Client Reference: CN03502901**

<b>Prior to this Bill:</b>		
Total fees	\$36,593.70	
Total disbursements paid by us	\$0.00	\$36,593.70
<b>This Bill:</b>		
Total fees	\$4,582.38	
Total disbursements paid by us	\$102.00	\$4,684.38
<b>To Date:</b>		
Total fees and disbursements		\$41,278.08

**Please Pay:** **\$4,684.38**

**To our costs** of acting on your behalf in this matter from 24 September 2018 to 31 October 2018 as follows:

Date	Lawyer	Description	Time Units	Value	GST
24/09/2018		Schedule 1 Clause 5	Item 4(c) & (d)	\$190.80	\$19.08



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 Barangaroo NSW 2000 / DX 309 Sydney  
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**SYDNEY NEWCASTLE CANBERRA MELBOURNE BRISBANE**

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Date	Lawyer	Description	Time Units	Value	GST	
25/09/2018				\$763.20	\$76.32	
02/10/2018				\$349.80	\$34.98	
18/10/2018				\$349.80	\$34.98	
19/10/2018				Item 4(c) & (d)	\$63.60	\$6.36
19/10/2018				\$381.60	\$38.16	
19/10/2018				Schedule 1 Clause 5	\$318.00	\$31.80
19/10/2018				\$254.40	\$25.44	
19/10/2018				\$381.60	\$38.16	
22/10/2018				\$0.00	\$0.00	
23/10/2018				\$413.40	\$41.34	



31 October 2018

Date	Lawyer	Description	Time Units	Value	GST
29/10/2018	CEM	Schedule 1 Clause 5	Item 4(c) & (d)	\$222.60	\$22.26
29/10/2018	CEM			\$190.80	\$19.08
29/10/2018	CME			\$63.60	\$6.36
30/10/2018	CEM			\$63.60	\$6.36
30/10/2018	CEM			\$95.40	\$9.54
31/10/2018	CEM			\$63.60	\$6.36
<b>Total Fees</b>					

<u>Initials</u>	<u>Name</u>	<u>Position</u>	<u>Time Spent (Hours)</u>	<u>Hourly Rate</u>	<u>Total Amount</u>
		Item 4(c) & (d)			\$2,321.40
					\$0.00
					\$1,844.40
<b><u>Total Time Spent</u></b>			13:12		<b>\$4,165.80</b>

**Disbursements:**

Date	Description	Value	GST
22/10/2018	NSW Civil and Administration Tribunal - Filing fee for Application	\$102.00	\$0.00

<b>Fees &amp; Disbursements</b>	<b>\$4,267.80</b>	<b>\$416.58</b>
<b>Total Now Due</b>	<b>\$4,684.38</b>	

With thanks,

*Hicksons*

Cameron Leaver  
Responsible Principal





**ABN: 58 215 418 381**  
**Tax Invoice No: 182715**

Our ref: CEM 173999

31 August 2018

Insurance for NSW  
 ABN 97 369 689 650  
 GPO Box 5474  
 SYDNEY NSW 2001

**Department of Education ats Peter Zonneville**  
**Client Reference: CN03502901**

<b>Prior to this Bill:</b>		
Total fees	\$21,587.28	
Total disbursements paid by us	\$0.00	\$21,587.28
<b>This Bill:</b>		
Total fees	\$11,298.54	
Total disbursements paid by us	\$0.00	\$11,298.54
<b>To Date:</b>		
Total fees and disbursements		\$32,885.82

**Please Pay: \$11,298.54**

**To our costs** of acting on your behalf in this matter from 2 July 2018 to 31 August 2018 as follows:

Date	Lawyer	Description	Time Units	Value	GST
02/07/2018	CEM	Schedule 1 Clause 5	Item 4(c) & (d)	\$254.40	\$25.44
05/07/2018	CEM			\$254.40	\$25.44



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**SYDNEY NEWCASTLE CANBERRA MELBOURNE BRISBANE**

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11204252.1:mcc

Date	Lawyer	Description	Time Units	Value	GST
18/07/2018	CEM	[Redacted]	[Redacted]	\$477.00	\$47.70
09/08/2018	CEM			\$286.20	\$28.62
09/08/2018	CEM			\$31.80	\$3.18
13/08/2018	CEM			\$159.00	\$15.90
13/08/2018	CME			\$190.80	\$19.08
14/08/2018	CEM			\$254.40	\$25.44
15/08/2018	CME			\$31.80	\$3.18
16/08/2018	ELB			\$954.00	\$95.40
17/08/2018	ELB			\$477.00	\$47.70
21/08/2018	CME			\$636.00	\$63.60
22/08/2018	CEM			\$159.00	\$15.90
22/08/2018	CME			\$190.80	\$19.08
23/08/2018	ELB			\$0.00	\$0.00

Schedule 1 Clause 5

Item 4(c) & (d)

Date	Lawyer	Description	Time Units	Value	GST
24/08/2018	CME			\$190.80	\$19.08
24/08/2018	CEM			\$31.80	\$3.18
24/08/2018	CEM			\$95.40	\$9.54
24/08/2018	CEM			\$95.40	\$9.54
24/08/2018	CEM			\$95.40	\$9.54
24/08/2018	CEM			\$95.40	\$9.54
24/08/2018	CEM			\$222.60	\$22.26
27/08/2018	ELB			\$0.00	\$0.00
27/08/2018	CEM			\$95.40	\$9.54
27/08/2018	CEM	Schedule 1 Clause 5	Item 4(c) & (d)	\$381.60	\$38.16
27/08/2018	CME			\$31.80	\$3.18
28/08/2018	ELB			\$127.20	\$12.72
28/08/2018	ELB			\$0.00	\$0.00
28/08/2018	ELB			\$159.00	\$15.90
28/08/2018	ELB			\$31.80	\$3.18
28/08/2018	ELB			\$636.00	\$63.60
28/08/2018	CEM			\$159.00	\$15.90

Date	Lawyer	Description	Time Units	Value	GST
28/08/2018	CEM			\$95.40	\$9.54
28/08/2018	CEM			\$349.80	\$34.98
28/08/2018	CEM			\$381.60	\$38.16
28/08/2018	CEM			\$31.80	\$3.18
28/08/2018	CME			\$985.80	\$98.58
29/08/2018	CEM			\$159.00	\$15.90
29/08/2018	CME			\$508.80	\$50.88
30/08/2018	CEM			\$31.80	\$3.18
30/08/2018	CEM	Schedule 1 Clause 5	Item 4(c) & (d)	\$31.80	\$3.18
30/08/2018	CEM			\$0.00	\$0.00
30/08/2018	CME			\$349.80	\$34.98
30/08/2018	ELB			\$31.80	\$3.18
31/08/2018	ELB			\$0.00	\$0.00
31/08/2018	ELB			\$0.00	\$0.00
31/08/2018	ELB			\$190.80	\$19.08
31/08/2018	CEM			\$159.00	\$15.90
31/08/2018	CEM			\$95.40	\$9.54
31/08/2018	CEM			\$63.60	\$6.36
<b>Total Fees</b>				<b>\$10,271.40</b>	<b>\$1,027.14</b>

<u>Initials</u>	<u>Name</u>	<u>Position</u>	<u>Time Spent (Hours)</u>	<u>Hourly Rate</u>	<u>Total Amount</u>
					\$0.00
		Item 4(c) & (d)			\$4,547.40
					\$3,116.40
					\$0.00
					\$2,607.60
<b><u>Total Time Spent</u></b>			44:54		<b><u>\$10,271.40</u></b>

<b>Fees</b>	<b>\$10,271.40</b>	<b>\$1,027.14</b>
<b>Total Now Due</b>		<b><u>\$11,298.54</u></b>

With thanks,

*Hickson*

Cameron Leaver  
Responsible Principal

**56**

**ABN: 58 215 418 381**  
**Tax Invoice No: 182937**

Our ref: CEM 173999

27 September 2018

Insurance for NSW  
 ABN 97 369 689 650  
 GPO Box 5474  
 SYDNEY NSW 2001

**Department of Education ats Peter Zonneville**  
**Client Reference: CN03502901**

**Prior to this Bill:**

Total fees	\$32,885.82	
Total disbursements paid by us	\$0.00	\$32,885.82

**This Bill:**

Total fees	\$3,707.88	
Total disbursements paid by us	\$0.00	\$3,707.88

**To Date:**

Total fees and disbursements		<u>\$36,593.70</u>
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**Please Pay:**

**\$3,707.88**

**To our costs** of acting on your behalf in this matter from 3 September 2018 to 19 September 2018 as follows:

Date	Lawyer	Description	Time Units	Value	GST
03/09/2018	CME	Schedule 1 Clause 5	Item 4(c) & (d)	\$31.80	\$3.18
04/09/2018	CEM			\$254.40	\$25.44
04/09/2018	CME			\$190.80	\$19.08



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**SYDNEY NEWCASTLE CANBERRA MELBOURNE BRISBANE**

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**56**

Date	Lawyer	Description	Time Units	Value	GST
05/09/2018	CEM	[Redacted]	[Redacted]	\$477.00	\$47.70
05/09/2018	CME			\$0.00	\$0.00
05/09/2018	CME			\$31.80	\$3.18
06/09/2018	CME			\$349.80	\$34.98
06/09/2018	CEM			\$63.60	\$6.36
06/09/2018	CEM			\$95.40	\$9.54
07/09/2018	CME			\$349.80	\$34.98
07/09/2018	CEM			\$63.60	\$6.36
07/09/2018	CEM			\$159.00	\$15.90
11/09/2018	CME			\$381.60	\$38.16
12/09/2018	CEM			\$31.80	\$3.18
12/09/2018	CME			\$445.20	\$44.52
19/09/2018	ELB			\$349.80	\$34.98

Schedule 1 Clause 5

Item 4(c) & (d)



27 September 2018

Date	Lawyer	Description	Time Units	Value	GST
19/09/2018	CME	Schedule 1 Clause 5	Item 4(c) & (d)	\$95.40	\$9.54
<b>Total Fees</b>				<b>\$3,370.80</b>	<b>\$337.08</b>

<u>Initials</u>	<u>Name</u>	<u>Position</u>	<u>Time Spent (Hours)</u>	<u>Hourly Rate</u>	<u>Total Amount</u>
		Item 4(c) & (d)			\$1,144.80
					\$0.00
					\$1,876.20
					\$349.80
<b>Total Time Spent</b>			11:54		<b>\$3,370.80</b>

<b>Fees</b>	<b>\$3,370.80</b>	<b>\$337.08</b>
<b>Total Now Due</b>	<b>\$3,707.88</b>	

With thanks,

*Hicksons*

Cameron Leaver  
Responsible Principal



**ABN: 58 215 418 381**  
**Tax Invoice No: 185964**

Our ref: CEM 173999

31 January 2019

Insurance for NSW  
 ABN 97 369 689 650  
 GPO Box 5474  
 SYDNEY NSW 2001

**Department of Education ats Peter Zonneville**  
**Client Reference: CN03502901**

<b>Prior to this Bill:</b>		
Total fees	\$60,624.96	
Total disbursements paid by us	\$157.00	\$60,781.96
<b>This Bill:</b>		
Total fees	\$25,500.42	
Total disbursements paid by us	\$1,811.00	\$27,311.42
<b>To Date:</b>		
Total fees and disbursements		\$88,093.38

**Please Pay:** **\$27,311.42**

**To our costs** of acting on your behalf in this matter from 20 December 2018 to 31 January 2019 as follows:

Date	Lawyer	Description	Time Units	Value	GST
20/12/2018	ELB	Schedule 1 Clause 5	Item 4(c) & (d)	\$636.00	\$63.60
20/12/2018	ELB			\$0.00	\$0.00



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[www.hicksons.com.au](http://www.hicksons.com.au) ABN 58 215 418 381  
**SYDNEY NEWCASTLE CANBERRA MELBOURNE BRISBANE**

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Date	Lawyer	Description	Time Units	Value	GST		
20/12/2018	ELB			\$31.80	\$3.18		
09/01/2019	ELB			\$477.00	\$47.70		
15/01/2019	GZN			\$508.80	\$50.88		
15/01/2019	GZN			\$31.80	\$3.18		
15/01/2019	GZN			\$1,176.60	\$117.66		
15/01/2019	GZN			\$540.60	\$54.06		
15/01/2019	ELB			\$795.00	\$79.50		
16/01/2019	GZN			Schedule 1 Clause 5	Item 4(c) & (d)	\$1,399.20	\$139.92
16/01/2019	GZN					\$286.20	\$28.62
16/01/2019	GZN					\$254.40	\$25.44
16/01/2019	GZN					\$159.00	\$15.90
16/01/2019	GZN					\$254.40	\$25.44
16/01/2019	GZN					\$63.60	\$6.36
16/01/2019	GZN					\$31.80	\$3.18
16/01/2019	GZN					\$31.80	\$3.18
16/01/2019	CEM					\$286.20	\$28.62
17/01/2019	GZN					\$1,971.60	\$197.16

Date	Lawyer	Description	Time Units	Value	GST
17/01/2019	GZN			\$31.80	\$3.18
17/01/2019	GZN			\$31.80	\$3.18
17/01/2019	GZN			\$254.40	\$25.44
17/01/2019	CEM			\$190.80	\$19.08
17/01/2019	CEM			\$381.60	\$38.16
17/01/2019	CEM			\$159.00	\$15.90
18/01/2019	GZN			\$2,226.00	\$222.60
21/01/2019	GZN			\$2,544.00	\$254.40
21/01/2019	CEM	Schedule 1 Clause 5	Item 4(c) & (d)	\$190.80	\$19.08
21/01/2019	CEM			\$190.80	\$19.08
22/01/2019	GZN			\$1,113.00	\$111.30
23/01/2019	CEM			\$63.60	\$6.36
23/01/2019	CEM			\$63.60	\$6.36
23/01/2019	CEM			\$190.80	\$19.08
24/01/2019	GZN			\$826.80	\$82.68
24/01/2019	GZN			\$1,685.40	\$168.54

Date	Lawyer	Description	Time Units	Value	GST		
24/01/2019	GZN			\$31.80	\$3.18		
24/01/2019	GZN			\$127.20	\$12.72		
24/01/2019	CEM			\$1,844.40	\$184.44		
25/01/2019	GZN			\$31.80	\$3.18		
25/01/2019	GZN			\$63.60	\$6.36		
25/01/2019	GZN			\$826.80	\$82.68		
25/01/2019	GZN			Schedule 1 Clause 5	Item 4(c) & (d)	\$95.40	\$9.54
25/01/2019	CEM			\$699.60	\$69.96		
30/01/2019	CEM			\$159.00	\$15.90		
31/01/2019	CEM			\$63.60	\$6.36		
31/01/2019	CEM			\$159.00	\$15.90		
<b>Total Fees</b>				<b>\$23,182.20</b>	<b>\$2,318.22</b>		

<u>Initials</u>	<u>Name</u>	<u>Position</u>	<u>Time Spent (Hours)</u>	<u>Hourly Rate</u>	<u>Total Amount</u>
					\$4,642.80
					\$0.00
					\$1,939.80
					\$16,599.60
<b>Total Time Spent</b>			73:06		<b>\$23,182.20</b>

**Disbursements:**

Date	Description	Value	GST
26/01/2019	Law In Order Pty Ltd Scanning, copying & document preparation	\$1,646.36	\$164.64
<b>Fees &amp; Disbursements</b>		<b>\$24,828.56</b>	<b>\$2,482.86</b>
<b>Total Now Due</b>		<b>\$27,311.42</b>	

With thanks,

*Hickson*

Cameron Leaver  
Responsible Principal

**From:** Tom Brennan  
**Sent:** Thursday, 9 August 2018 5:47:27 PM  
**To:** Chris Moore  
**Subject:** Re: State of NSW v Peter Zonneville - application under s 110 GIPA Act

Thanks Chris, that's fine

**TOM BRENNAN | BARRISTER**  
**T H I R T E E N W E N T W O R T H S E L B O R N E**

A LEVEL 13 | 174-180 PHILLIP STREET | SYDNEY NSW 2000 | T 02 9238 0047 | F 02 9232 4071 | DX 386  
 Sydney | E [brennan@selbornechambers.com.au](mailto:brennan@selbornechambers.com.au) | W [www.13wentworthselbornechambers.com.au](http://www.13wentworthselbornechambers.com.au)

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**From:** Chris Moore <[Chris.Moore@hicksons.com.au](mailto:Chris.Moore@hicksons.com.au)>  
**Date:** Thursday, 9 August 2018 at 9:29 am  
**To:** Tom Brennan <[brennan@selbornechambers.com.au](mailto:brennan@selbornechambers.com.au)>  
**Subject:** State of NSW v Peter Zonneville - application under s 110 GIPA Act

Hi Tom

We spoke a little while ago about your assisting in this matter.

Schedule 1, Clause 5

Schedule 1, Clause 5

Are you content to accept the AG's rates as set out at:

<https://www.justice.nsw.gov.au/legal-services-coordination/Pages/info-for-govt-agencies/attorney-generals-rates-for-legal-representation.aspx>

Best regards  
 Chris



**Chris Moore**  
 Partner

T +61 2 9293 5475 F +61 2 9264 4790 M 0408 968 173  
 E [Chris.Moore@hicksons.com.au](mailto:Chris.Moore@hicksons.com.au)

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**From:** Tom Brennan  
**Sent:** Thursday, 14 February 2019 2:46:26 PM  
**To:** Chris Moore  
**Cc:** Gail Noe  
**Subject:** Department of Education v Zonneville  
**Attachments:** Department of Education v Zonneville - Alternate With Outstanding Fees 14-2-2019.pdf

Chris

I attach my invoice for work to date, with thanks.

 **TOM BRENNAN | BARRISTER**  
**T H I R T E E N W E N T W O R T H S E L B O R N E**

A LEVEL 13 | 174-180 PHILLIP STREET | SYDNEY NSW 2000 | T 02 9238 0047 | F 02 9232 4071 | DX 386  
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**TOM BRENNAN | BARRISTER**

**THIRTEENWENTHWORTHSELBORNE**

180 Phillip Street Sydney 2000

T 0292380047 | DX 386 Sydney

E [brennan@selbornechambers.com.au](mailto:brennan@selbornechambers.com.au)

W [www.13wenthworthselbornechambers.com.au](http://www.13wenthworthselbornechambers.com.au)

A ABN 59848771798

**Tax Invoice**

**Invoice no 00000925**

**Issue date 14/02/2019**

**Issued To**

Hicksons Lawyers  
DX 309 Sydney

**In Relation To**

*Department of Education v Zonneville*  
NSW Civil And Administrative Tribunal at  
Sydney

Your reference: CEM:173999

**Due date 16/03/2019**

**Itemisation for Tax Invoice 00000925**

Tasks Date	Description	Time	Amount (ex GST)
03/09/2018			\$580.00
05/09/2018			\$957.00
20/11/2018			\$116.00
20/11/2018			\$203.00
04/12/2018	Schedule 1, Clause 5	Item 4(c) & (d)	\$406.00
05/12/2018			\$435.00
29/01/2019			\$58.00
29/01/2019			\$928.00
30/01/2019			\$725.00

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31/01/2019			\$1,276.00
04/02/2019			\$1,218.00
05/02/2019			\$1,160.00
06/02/2019			\$348.00
07/02/2019	Schedule 1, Clause 5	Item 4(c) & (d)	\$1,160.00
08/02/2019			\$812.00
13/02/2019			\$145.00
13/02/2019			\$290.00

Professional fees for the period ending 14/02/2019 (excl. GST)	\$10,817.00
GST (Professional fees)	\$1,081.70
<b>Total Payable</b>	<b>\$11,898.70</b>

**Payment:**

1. These fees may be paid by cheque payable to Tom Brennan, or by EFT to ACCOUNT NAME Items 3(a), 3(b)

Items 3(a), 3(b)

**Other information:**

2. These fees are calculated in accordance with the costs agreement dated 03 Sep 2018.
3. For matters in which instructions were received from the client on or prior to 30 June 2015:
  - (a) If these fees are not paid by the due date (being 30 from the date of this invoice), I may charge interest on the unpaid fees at the maximum rate from time to time prescribed pursuant to section 321 of the Legal Profession Act 2004 (NSW) (the Act).
  - (b) You may apply to have these fees assessed under Division 11 of Part 3.2 of the Act. Any application for assessment is to be made within 12 months after you have been given this tax invoice or within such further time as the Manager, Costs Assessments may allow. Any such application may be made even if the fees have been wholly or partly paid. You may also apply to set aside the costs agreement under section 328 of the Act or for mediation under Division 8 of Part 3.2 of the Act.
4. For matters in which instructions were received from the client on or after 1 July 2015:
  - (a) If these fees are not paid by the due date (being 30 from the date of this invoice), I may charge interest on the unpaid fees at the maximum rate from time to time prescribed pursuant to section 195(4) of the Legal Profession Uniform Law, which is presently the Reserve Bank of Australia cash rate target plus 2 percentage points.
  - (b) A client may apply to have his or her legal costs assessed by a costs assessor in the event of a

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dispute. For NSW, the application is made to the Manager, Costs Assessment. The application must usually be made within 12 months after the bill is given to the client.

(c) A client who complains about a lawyer or law practice to the designated local regulatory authority (for NSW, the Legal Services Commissioner) may include a costs dispute in the complaint. The time limit is usually 60 days after the costs become payable or 30 days after the law practice complies with a duly made request for an itemised bill.

**Tom Brennan**

**From:** Tom Brennan  
**Sent:** Thursday, 11 April 2019 5:44:30 PM  
**To:** Chris Moore  
**Cc:** Gail Noe  
**Subject:** Zonneville  
**Attachments:** Department of Education v Zonneville - Alternate With Outstanding Fees 11-4-2019.pdf

Chris and Gail

Thanks for the instructions in this matter.

I attach my invoice.

Tom

TOM BRENNAN | BARRISTER

THIRTEENWENTHWORTHSELBORNE

180 Phillip Street Sydney 2000

T 0292380047 | DX 386 Sydney

E brennan@selbornechambers.com.au

W www.13wentworthselbornechambers.com.au

A ABN 59848771798

Tax Invoice

Invoice no 00000940

Issue date 11/04/2019

Issued To

Hicksons Lawyers  
DX 309 Sydney

In Relation To

Department of Education v Zonneville  
NSW Civil And Administrative Tribunal at  
Sydney

Your reference: CEM:173999

Due date 11/05/2019

Itemisation for Tax Invoice 00000940

Tasks Date	Description	Time	Amount (ex GST)
25/03/2019			\$580.00
28/03/2019			\$580.00
04/04/2019			\$522.00
09/04/2019	Schedule 1, Clause 5	Item 4(c) & (d)	\$580.00
10/04/2019			\$870.00
11/04/2019			\$2,175.00

Professional fees for the period ending 11/04/2019 (excl. GST)	\$5,307.00
GST (Professional fees)	\$530.70
<b>Total Payable</b>	<b>\$5,837.70</b>

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**Payment:**

1. These fees may be paid by cheque payable to Tom Brennan, or by EFT to ACCOUNT NAME Items 3(a), 3(b)

Items 3(a), 3(b)

**Other information:**

2. These fees are calculated in accordance with the costs agreement dated 03 Sep 2018.

3. For matters in which instructions were received from the client on or prior to 30 June 2015:

(a) If these fees are not paid by the due date (being 30 from the date of this invoice), I may charge interest on the unpaid fees at the maximum rate from time to time prescribed pursuant to section 321 of the Legal Profession Act 2004 (NSW) (the Act).

(b) You may apply to have these fees assessed under Division 11 of Part 3.2 of the Act. Any application for assessment is to be made within 12 months after you have been given this tax invoice or within such further time as the Manager, Costs Assessments may allow. Any such application may be made even if the fees have been wholly or partly paid. You may also apply to set aside the costs agreement under section 328 of the Act or for mediation under Division 8 of Part 3.2 of the Act.

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(b) A client may apply to have his or her legal costs assessed by a costs assessor in the event of a dispute. For NSW, the application is made to the Manager, Costs Assessment. The application must usually be made within 12 months after the bill is given to the client.

(c) A client who complains about a lawyer or law practice to the designated local regulatory authority (for NSW, the Legal Services Commissioner) may include a costs dispute in the complaint. The time limit is usually 60 days after the costs become payable or 30 days after the law practice complies with a duly made request for an itemised bill.

**Tom Brennan**