

AFFIDAVIT OF MARIA TIMOTHY AFFIRMED 12 DECEMBER 2024

FILE DETAILS

Tribunal NSW Civil and Administrative Tribunal
Division Administrative and Equal Opportunity
Case number NCAT 2024/00367444

TITLE OF PROCEEDINGS

First applicant **Secretary, NSW Department of Communities and Justice**
Number of applicants 3

First respondent **Telina Webb**
Second respondent DraftCom Pty Ltd (ACN 076 511 941)
Third respondent Paul McEwan

FILING DETAILS

Filed for **Goulburn Mulwaree Council**
Legal representative Justin Cahill, Principal Solicitor, Department of communities and Justice
Legal representative reference GIPA24/4046
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AFFIDAVIT

Name Maria Timothy
 Address Locked Bag 22, Goulburn NSW 2580
 Occupation Business Manager Governance, Goulburn Mulwaree Council
 Date 12 December 2024

I affirm:

- 1 I am the Business Manager Governance of Goulburn Mulwaree Council ('**GM Council**'). I have been employed in this role for 12 years. The Business Manager Governance role is responsible for the implementation and management of the governance and risk management frameworks of GM Council.
- 2 I affirm this affidavit in support of the application by the applicants for an order under s 110 of the *Government Information (Public Access) Act 2009* (NSW) ('**GIPA Act**') to restrain the Respondents, Telina Webb, DraftCom Pty Ltd (ACN 076 511 941) ('**DraftCom**') and Paul McEwan from making access applications to any New South Wales government agency without first obtaining the approval of the NSW Civil and Administrative Tribunal ('**NCAT**').
- 3 The contents of this affidavit are true to the best of my knowledge, information and belief. In preparing this affidavit, I have relied on my own knowledge and recollections and, where necessary, I have reviewed relevant documents held by GM Council.
- 4 For the purposes of preparing this affidavit, I have received information from Amanda Keegan, who is GM Council's sole Information Access Officer. In my role, I oversee and supervise the work of Ms Keegan. Where I state in this affidavit that I am informed in relation to a matter by Ms Keegan I believe that information to be true.
- 5 I have requested that paragraphs 77 to 87 of my affidavit be made on a confidential basis. This is because of my concerns that releasing this information would alert Ms Webb to the nature of significant negative impacts that her conduct has had on myself and other GM Council staff members. The paragraphs of my affidavit which I seek to make on a confidential basis are in red text and have been redacted from the copies to be served on the Respondents.

EXHIBIT

- 6 I have prepared a bundle of documents separated by numbered tabs marked "**Exhibit MT1**", which was exhibited to me at the time I affirmed this affidavit. I will refer to documents in this affidavit by reference to the tab numbers within Exhibit MT1.

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SUMMARY

- 7 My affidavit is divided into four parts. Part one details Ms Telina Webb's access applications made to GM Council which are "lacking in merit" for the purpose of s 110(2) of the GIPA Act.
- 8 Part two provides a background to this application and part three sets out the dealings between GM Council and the Respondents.
- 9 Part four sets out the significant impact of the Respondents conduct on GM Council and its functions. Specifically, part four details the impact on GM Council's time and publicly funded resources, in addition to the work health and safety impact on staff over the course of the last four years.
- 10 Part five details Ms Webb's conduct when engaging with GM Council and her use of the GIPA Act for the ancillary purpose of what I consider to be harassment and intimidation.
- 11 Part six provides GM Council's efforts to mitigate the health and safety impacts arising as a consequence of Ms Webb's conduct, and the impact a s 110 order would have on GM Council.

PART 1: Ms Webb's GIPA Applications found to lack merit

- 12 The two applications found to lack merit for the purpose of s 110(2) of the GIPA Act were decided by GM Council on the following basis:
- a. GIPAA2223012 – information not held (s 58(1)(b)); and
 - b. GIPAA2324025 – information not held (s 58(1)(b)).

GIPAA2223012

- 13 On 13 February 2023, GM Council received an access application on the letterhead of DraftCom t/as NSW Freedom of Information ('the DraftCom letterhead') signed by Ms Webb ('GIPAA2223012'). This access application sought information relating to *Palerang Council, Queanbeyan City Council & Goulburn Mulwaree Council v Powell* (2015) NSWCATAD 44:
- a. *...an unedited copy of the Minutes of the Meeting referred to at Paragraph 43 of that decision.*
- 14 On 22 February 2023, GM Council determined that the information was not held. A copy of GIPAA20223012 and the notice of decision is exhibited at **Tab 1** of Exhibit MT1.

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GIPAA2324025

- 15 On 29 January 2024, GM Council received an access application on the DraftCom letterhead that was signed by Ms Webb ('GIPAA2324025'). This access application sought:
- a. *...an unedited copy of every remittance notice for payment by Council to any external legal services provider in relation to IPC Review No: IPC23 / R000625.*
- 16 On 12 February 2024, GM Council determined that the information was not held. A copy of GIPAA2324025 and the notice of decision is exhibited at **Tab 2** of Exhibit MT1.

PART 2: BACKGROUND

- 17 Since 2021, GM Council has received seven access applications signed by Ms Webb. Of those, the 2023 and 2024 applications appearing at Tabs 1 and 2 of Exhibit MT1 respectively have been found to lack merit.
- 18 Ms Webb's various access applications and conduct has resulted in significant resourcing consequences adversely impacting GM Council's ability to comply with its obligations under the GIPA Act.
- 19 Additionally, during this period of time Ms Webb has persistently conducted herself with myself and Ms Keegan in what I consider to be an intimidating and harassing manner, making false allegations and publishing defamatory and derogatory content online.
- 20 To the best of my knowledge, Ms Webb and her husband, Paul McEwan, have never lived within the local government area of GM Council.
- 21 Ms Webb's interest in GM Council appears to relate to an order that was made against Allan Powell under s 110 of the GIPA Act by the Tribunal in *Palerang Council, Queanbeyan City Council & Goulburn Mulwaree Council v Powell* [2015] NSWCATAD 44. The order was made on 17 March 2015. Ms Webb's first access application to GM Council sought access to information mentioned in the report of this decision.

DraftCom Pty Limited t/as NSW Freedom of Information

- 22 Mr McEwan is the sole director and Shareholder of DraftCom. A copy of an ASIC current and historical extract for DraftCom dated 8 November 2024 is exhibited at **Tab 3** of Exhibit MT1.
- 23 On 7 September 2021, NSW Freedom of Information ABN 87 076 511 941 ('**NSW Freedom of Information**') was registered as a business name held by Draftcom. A

copy of an ASIC current and historical extract for NSW Freedom of Information dated 8 November 2024 is exhibited at **Tab 4** of Exhibit MT1.

- 24 Ms Webb has, on all occasions aside from one, used the DraftCom letterhead to submit access applications with GM Council.
- 25 NSW Freedom of Information has a website in the public domain, of which Ms Webb is the "Site Administrator". Exhibited at **Tab 5** of Exhibit MT1 is a copy of the Site Administrator page.

PART 3: DEALINGS WITH THE RESPONDENTS

Applications

- 26 Since August 2021, GM Council has received the following access applications and informal requests from Ms Webb:
- a. six access applications on the DraftCom letterhead signed by Ms Webb under s 41 of the GIPA Act. This includes the two access applications that are found to be lacking in merit;
 - b. one access application signed by Ms Webb not on the DraftCom letterhead under s 41 of the GIPA Act, and
 - c. six informal requests under s 8 of the GIPA Act with GM Council.
- 27 A table identifying each of these access applications is exhibited at **Tab 6** to Exhibit MT1. This table outlines the GM Council reference number, the scope of each access application, the date of the decision, the page references for the access applications in Exhibit MT1, and the hours spent processing the access application. The table also identifies;
- a. the access applications that were submitted on the DraftCom letterhead, signed by Ms Webb, as highlighted in yellow; and
 - b. the access applications that are found to lack merit, as highlighted in blue.
- 28 All access applications made under s 41 of the GIPA Act signed by Ms Webb, including those on the DraftCom letterhead, are exhibited at **Tab 7** to Exhibit MT1.

Paul McEwan

- 29 GM Council has not received any access applications signed by Mr McEwan directly.
- 30 To the best of my knowledge, GM Council has received two email enquiries from Mr McEwan, in 2014 and 2019. Copies of these emails are exhibited at **Tab 8** of Exhibit MT1.

31 Both of these emails were sent from "draftcom@bigpond.com" being the same email address Ms Webb has previously used as the contact email for access application GIPAA2122005 (see Tab 7 of Exhibit MT1 at pages 33 to 37 of Exhibit MT1). Ms Webb has also used this email address to correspond with GM Council and send, in my view, disparaging emails to myself and Ms Keegan. I have detailed these emails below at paragraphs 65 to 67.

Review of GM Council's decisions

32 Ms Webb has sought internal and external review of GM Council's decisions under the GIPA Act on seven occasions. This figure can be broken down as follows:

- a. one external review by the NCAT (*Webb v Goulburn-Mulwaree Shire Council* [2023] NSWCATAD 194) ('NCAT Review');
- b. four external reviews by the Information Commissioner ('the IPC'); and
- c. two internal reviews conducted by GM Council.

33 I am responsible for conducting the internal reviews of Ms Keegan's decisions.

PART 4: IMPACT OF MS WEBB'S DEALINGS ON GM COUNCIL

Governance Business Unit's functions

34 GM Council's Governance Business Unit ('the **Governance Business Unit**') has two employees and one current vacancy: one Information Access Officer (Ms Keegan), one Business Manager Governance (my role) and one Governance and Risk Coordinator, being the vacant position.

35 The Governance Business Unit is responsible for processing access applications and also has other functions outside of the GIPA Act. A document detailing those functions, and GM Council's process for responding to access applications is exhibited at **Tab 9** of Exhibit MT1.

36 Notably, Ms Keegan is responsible for processing all of GM Council's requests for information received, including access applications and informal requests received under the GIPA Act. At times, I assist her in processing these requests.

37 Over the course of 4 October 2022 to 4 October 2024, the Governance Business Unit received:

- a. 66 access applications made under s 41 of the GIPA Act;
- b. 1147 informal requests made under s 8 of the GIPA Act;
- c. six subpoenas; and

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- d. two notices to produce.
- 38 On average, GM Council spends:
- a. six hours processing an access application; and
 - b. three hours processing an informal request.
- 39 Since 31 August 2021, being the date of the first access application submitted by Ms Webb, GM Council has spent approximately:
- a. 197 hours processing all access applications received by GM Council; and
 - b. 5670 hours processing all informal requests received by GM Council.

Time spent processing Ms Webb's access applications and informal requests

- 40 GM Council has spent a total of 21 hours alone in processing access applications and informal requests received from Ms Webb. This can be broken down as:
- a. 18 hours processing Ms Webb's access applications; and
 - b. three hours processing Ms Webb's informal requests.

Impact of the NCAT Review

- 41 Ms Webb's dealings have caused significant financial expenditure to GM Council.
- 42 In defending the NCAT Review, GM Council was required to engage external legal representatives as it does not have in house legal representatives. Ms Keegan and I did not have capacity to defend this matter on our own, while continuing to perform our usual functions and provide services to other members of the public under the GIPA Act.
- 43 As a result, GM Council has spent \$22,882.00 in external legal costs in defending the NCAT Review. Copies of the remittances and invoices issued by GM Council's external legal representatives are exhibited at **Tab 10** of Exhibit MT1. Some information contained in these documents has been redacted where it was the subject of an access application made by Ms Webb and GM Council determined to withhold access to that information. Other information has been redacted as it is unrelated to these proceedings or is coincidental to GM or to GM Council's external legal representatives.
- 44 In addition, GM Council spent approximately 256 hours of internal staff hours equating to a cost of \$20,072.71 in defending Ms Webb's NCAT review matter. This figure is calculated based on an estimate of 217 hours for the work completed by me, and an estimate of 39 hours for the work completed by Ms Keegan, noting that I mostly assisted our external legal representatives with the NCAT Review.

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- 45 GM Council's practice at the time did not include a log of the number of internal staff hours for NCAT reviews. The estimate of internal staffing hours is derived from the retrieval of documentation and information, as well as the related correspondence with Council's external legal representatives in preparation for the NCAT proceedings.

Impact of IPC reviews and internal reviews

- 46 GM Council, namely Ms Keegan, spent approximately 20 hours of internal staff hours in responding to the IPC reviews I mentioned at paragraph 32(b) above. This equates to \$789.00 of internal costs for the work completed by Ms Keegan.
- 47 GM Council spent approximately 10 hours on responding to Ms Webb's internal reviews I mentioned in paragraph 32(c) above. As I am responsible for conducting internal reviews, the estimated cost for conducting these reviews equates to \$853.30 for the work completed by me.
- 48 Council's practice at the time did not involve a log of the number of internal staff hours for IPC and internal reviews. The estimate of internal staffing hours is based on an average of 5 hours allocated per IPC review and 5 hours allocated per internal review.

Impact of defamation matters

- 49 Additionally, GM Council has also spent \$3,297.14 in external legal costs in attempting to mitigate Ms Webb's defamatory media releases by way of a cease and desist letter, which I have detailed at paragraphs 91 to 94 below. Copies of the remittances and invoices issued by GM Council's external legal representatives that concern the cease and desist letter are exhibited at **Tab 11** of Exhibit MT1.

Impact to the community

- 50 Ms Webb's access applications, informal requests, and subsequent internal and external reviews delayed the processing of other requests for information received by GM Council. These other requests for information include access applications and informal requests under the GIPA Act from members of the community and other government agencies, and other requests such as subpoenas and notices to produce.
- 51 The internal access to information function was also disrupted resulting in the postponement of access to information training sessions and the delay in responding to internal requests and advice. This placed additional pressure on existing limited resources and led to further stress amongst the Governance team.



52 Additional staffing resources were engaged, consisting of a casual officer for a 3-month period between November 2023 and February 2024 and an existing administration officer from February 2024 to date to assist the Governance Business Unit in processing requests for information, in particular open access and informal requests and assist Council to provide an efficient access to information service for all residents. This increase in resourcing requirements was directly related to the impact of Ms Webb's various applications and reviews. The existing administration officer is a shared resource within the Council's Executive Services Directorate and performs other administrative functions in the Governance area, and was diverted away from other teams within Council's Executive Services Directorate. Each team bears the cost of this shared resource including the Governance Business Unit. During the period from November 2023 to February 2024 period, the Governance Business Unit was required to expend \$8412.00 in costs to engage the casual officer and an additional \$2,496.00 for the existing administration officer resource.

Diversion of GIPA functions

- 53 The 20 hours spent on responding to the IPC reviews by Ms Keegan was diverted from processing approximately 40 informal requests from other applicants within the community.
- 54 The 39 hours spent on NCAT proceedings by Ms Keegan was diverted from processing approximately 78 informal requests from other applicants.
- 55 Customer timeframes for processing informal property requests were extended from 15 business days to a minimum of 20 business days due to the additional workload created by Ms Webb's access applications and subsequent reviews.

Diversion of community funds

- 56 The funds used to pay the combined \$26,179.14 in external legal costs could have been used to provide services to the community or improve community assets, examples of these can include:
- a. assist in the delivery of community services such as Senior Social Support programs and Youth Services programs;
 - b. approximately one third of the annual programming budget for Council's Library which includes all children, youth, adult and senior programs;
 - c. a full-time Trainee for Council's Art Gallery; or
 - d. hosting of three sporting events with an estimated economic benefit to the community of \$1.97 million.

Disproportion of dealings

- 57 The abovementioned costs and resourcing impacts are significantly disproportionate in comparison to other GIPA applicants GM Council has dealt with.
- 58 On average, GM Council spends 6 hours responding to an access application, and 5 hours in responding to internal reviews and reviews by IPC.
- 59 With respect to Ms Webb, GM Council has spent 18 hours processing her access applications, and approximately 30 hours in processing her internal reviews and IPC reviews.
- 60 Since the time Ms Webb commenced lodging access applications with GM Council, no other applicants have sought external review with the NCAT. Noting this and the \$26,179.14 in external legal costs, and the 250 internal hours spent in responding to the NCAT Review, I am of the view that this is grossly disproportionate in comparison to other GIPA applicants.

PART 5: MS WEBB'S CONDUCT

- 61 Ms Webb's manner when dealing with the Governance Business Unit has been unreasonable, distressing and exhausting.
- 62 Ms Keegan, the Governance Business Unit's sole Information Access Officer informed me of circumstances where she has felt distressed because of Ms Webb's conduct over an extended period of time.
- 63 Ms Keegan informed me that Ms Webb has made accusations that staff within the Governance Business Unit responsible for deciding applications under the GIPA Act are not performing their functions correctly and are incompetent in their professional capacity.
- 64 In my direct dealings with Ms Webb, I consider her conduct to be unreasonable and intimidating. Ms Webb has made numerous false accusations about my professionalism, integrity and ability to conduct my work. For example, that I have been "...*decidedly misleading to the Tribunal.*"

Correspondence

- 65 Ms Webb has a history of sending, in my view, antagonising correspondence to GM Council staff and its councillors.
- 66 This is reflected in Ms Webb's correspondence to the Governance Business Unit, which has included accusatory and derogatory comments about Ms Keegan and I. This correspondence was often copied to GM Council's Chief Executive Officer and/or the Information and Privacy Commission.

- 67 Examples of Ms Webb's comments in her correspondence are as follows:
- a. On 23 September 2020, alleging "...might be some kind of secret Council business, I've seen this from time to time";
 - b. On 15 February 2023, "...clearly Ms Timothy was decidedly misleading to the Tribunal, which will be duly noted at the appropriate time. It may be that this is not the first time Ms Timothy has acted in this way..." and "This matter has been overly and unnecessarily procrastinated and complicated by Council."
 - c. On 17 February 2023, "I have now paid your unlawfully demanded advance deposit";
 - d. On 24 October 2023, alleging that as an agency we "lacked basic accounting capabilities, forcing applicants to pay undue amounts which were not refunded";
 - e. On 25 October 2023, "One wonders how these people get through the interview process";
 - f. On 2 February 2024, "...your calculations are yet again incorrect, false and misleading, and considered an ongoing abuse of the legislation," and "You do understand this matter will yet again be referred to the Commissioner, and will be made public"; and "The fact those making legal administrative decisions lack the most fundamental of mathematical capabilities as evidenced in this case is extraordinary!!"; and
 - g. On 24 July 2024, alleging to the IPC that we are an "incompetent agency" and that there was an "absence of professionalism by this organisation which clearly desperately needs high quality GIPA Training and a lesson in disclosure and accountability".

A copy of the emails containing these quotes are exhibited at **Tab 12** of Exhibit MT1.

NSW Freedom of Information Website

- 68 Ms Webb's conduct also extends to her defamatory posts on the *NSW Freedom of Information* website.
- 69 As stated at paragraph 25 above, Ms Webb identifies herself as the "Site Administrator" for the website.
- 70 Ms Webb has published seven posts referred to as "**media releases**" on the website related to me and GM Council. These media releases predominantly relate to Ms Keegan and I, alongside external legal representatives engaged by GM Council. The media releases also post our direct contact details which are not publicly available.

71 The following table itemises the media releases which are exhibited at Tab 13 to Exhibit MT-1:

Date	Title of Media Release	Exhibit Pages
13/02/2023	NSW Local Council Wins Community Award for Unreservedly Procrastinating Legislated Freedom of Information Processes	103 – 105
13/03/2023	Goulburn-Mulwaree Shire Council First to Receive Multiple Community Awards as a Stand-Out NSW Government Agency	106 - 107
25/07/2023	Local Council Manager Governance Exposed Acting to Simultaneously Breach State Records Act and Privacy Legislation When Colluding with Agencies Against Oblivious Member of the Public	108 - 110
25/07/2023	NSW Civil and Administrative Tribunal Accepts Local Council's Hand-Written Selective Search Results as Satisfying the Legislative Requirements of the GIPA Act 2009	111 - 113
24/11/2023	Goulburn-Mulwaree Shire Council Continues to Procrastinate Valid Access Applications by Unethically Imposing Inapplicable Advance Deposits and Enforcing Discretionary Powers	114 - 115
11/03/2024	Goulburn Mulwaree Shire Council Staff Exposed Using Public Monies to Threaten Defamation Acting Against Site Administrator of Free Community Service	116 - 120
14/07/2024	NSW Office of Local Government Discloses it has a 'BS' Department	121 - 122

"Certificates of Achievement"

72 The website includes a 'Forum' tab in which Ms Webb has posted a series of documents titled "Certificates of Achievements".

First certificate

73 On 13 February 2023, Ms Webb published a document titled '*Certificate of Achievement: Unreservedly Procrastinating Legislated Freedom of Information*

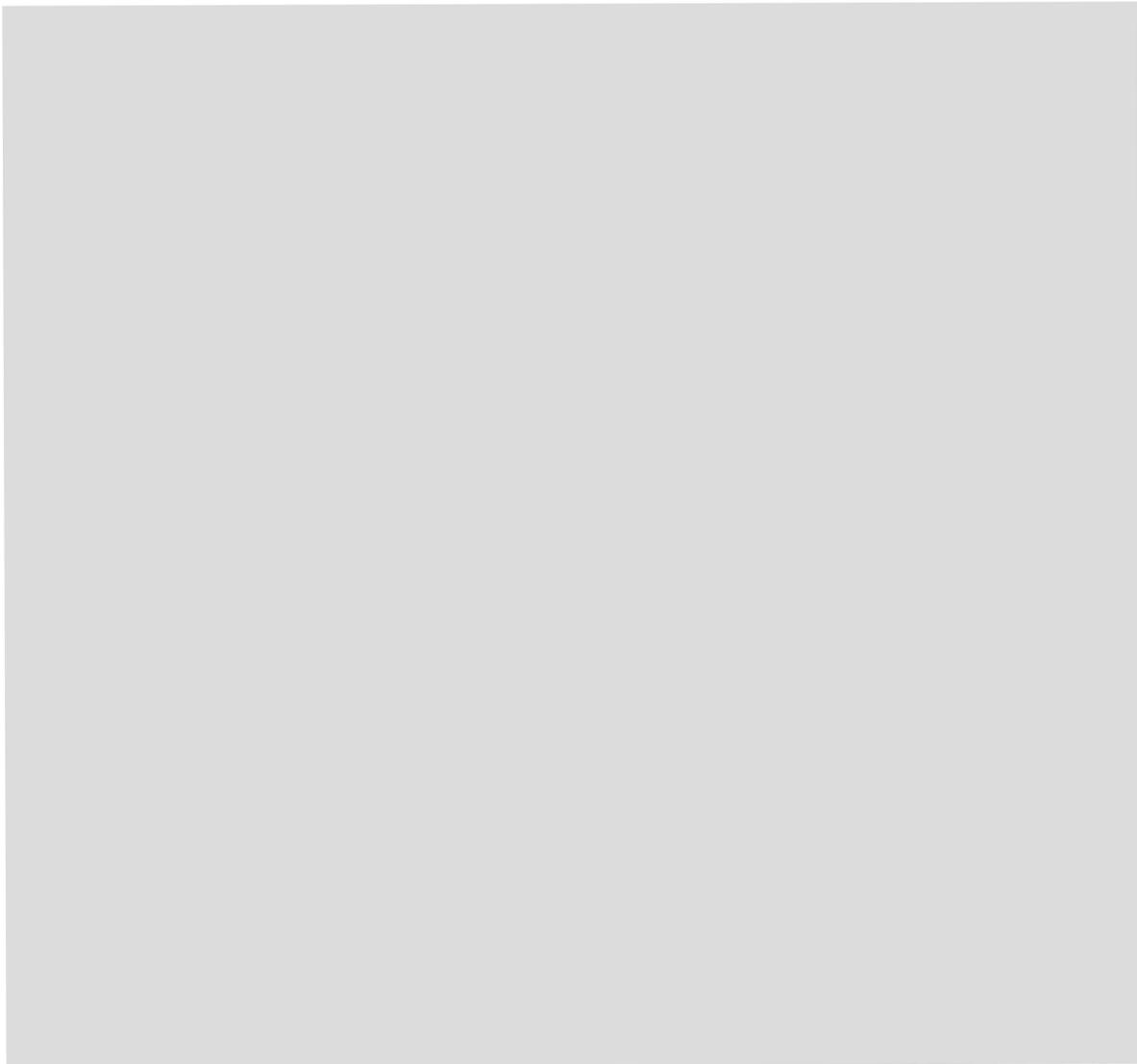
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Processes – Goulburn Mulwaree Shire Council. A copy of the certificate is exhibited at **Tab 14** of MT1.

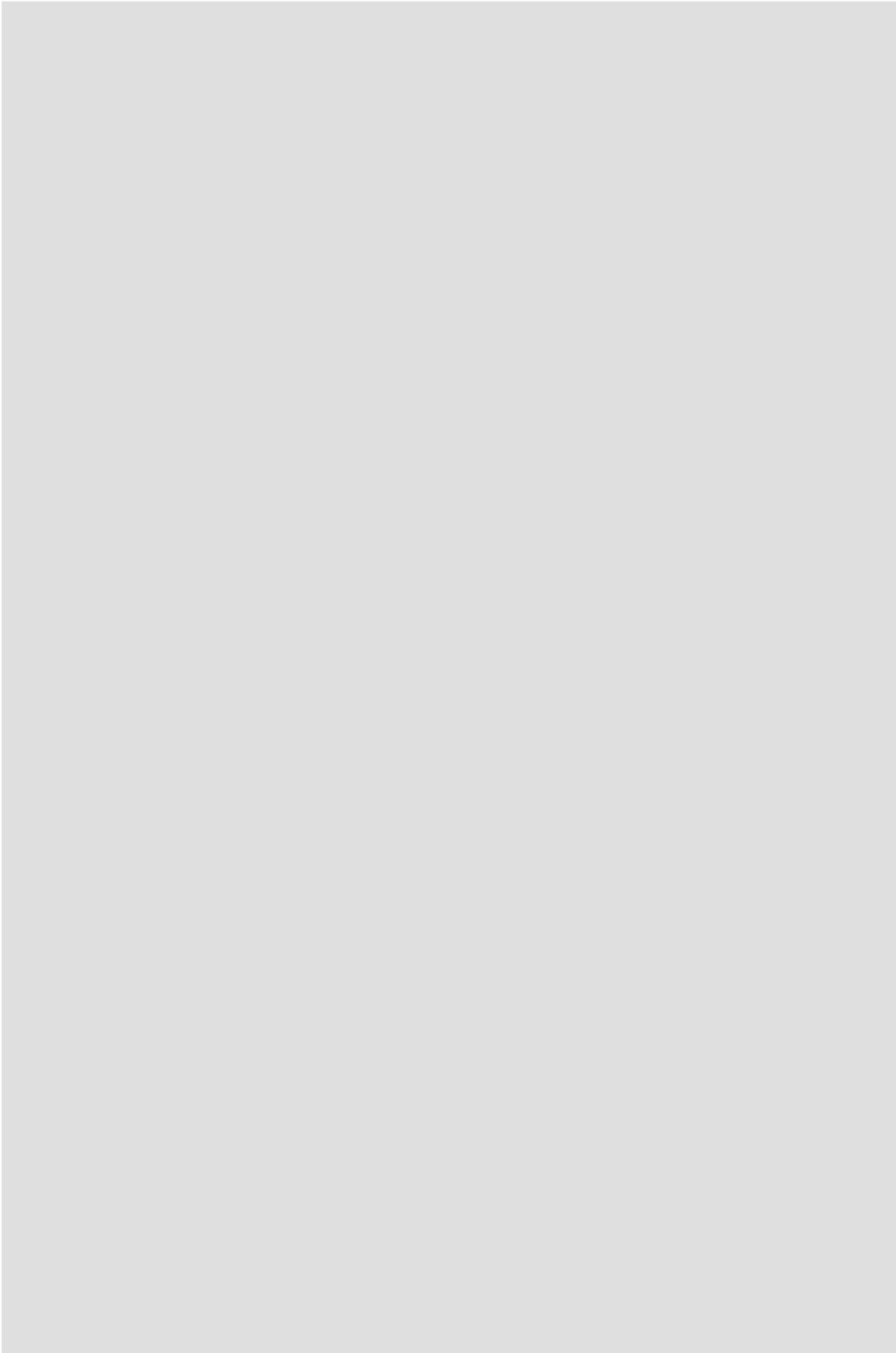
Second certificate

- 74 On 13 March 2023, Ms Webb published in a media release that GM Council had received its second 'community award as a NSW Government Stand-Out Agency'.
- 75 On that same day, Ms Webb sent an email to GM Council's Councillors and the Mayor notifying them of the media release and attaching the second certificate. A copy of that email is exhibited at **Tab 15** of Exhibit MT1.
- 76 I consider the awards to be intended to intimidate, upset and harass staff within the Governance Business Unit and GM Council more broadly.

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[END CONFIDENTIAL]

PART 6: MITIGATION AND ATTEMPTS TO LIMIT MS WEBB'S CONDUCT

Warning letter

- 88 On 31 March 2023, solicitors for GM Council sent a letter to Ms Webb in relation to the NCAT matter *Telina Webb v Goulburn Mulwaree Council [2023] NSWCATAD 194*. A copy of this letter is exhibited at **Tab 16** of Exhibit MT-1.
- 89 That letter requested, among other things, that the media release published on 13 March 2023 be removed from the website. This media release alleged that GM Council has engaged in 'gross professional misconduct' and that I had acted in contempt of the NCAT by failing to appear, when I had not received the correct dial in details from the Registry.
- 90 Ms Webb has continued to post false and disparaging media releases since this letter.

Cease and desist letter

- 91 On 11 March 2024, solicitors for GM Council sent a cease and desist letter to Ms Webb (**'the cease and desist letter'**). A copy of the cease and desist letter, and Ms Webb's response dated 25 March 2024 is exhibited at **Tab 17** of Exhibit MT-1.
- 92 The cease and desist letter requested that a number of already published media releases be removed from the website. It further requested that Ms Webb refrain from publishing any further material that is false, misleading or defamatory towards Ms Keegan and myself. This was requested on the basis that the Ms Webb had made the following imputations:
- a. I acted in contempt of the NCAT by failing to attend a case conference;
 - b. I breached the State Records Act 1998 (NSW), stating that I have 'no hesitation in breaching the legislation, abusing [my] position, and actually working with other agencies to do that'; and
 - c. Ms Keegan and I invoked discretion in requiring Ms Webb to pay an advance deposit in respect of a GIPA access application on the basis that I 'dislike' her.

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- 93 As at the date of affirming this affidavit, the media releases listed in the cease and desist letter have not been removed from the website. A printout of the media releases page from the NSW Freedom of Information Website is exhibited at **Tab 18** of Exhibit MT1.
- 94 Notably, on 11 March 2024, Ms Webb posted a copy of the cease and desist letter on her media release titled '*Goulburn Mulwaree Shire Council Staff Exposed Using Public Monies to Threaten Defamation Action Against Site Administrator of Free Community Service*'. She acknowledged in this media release that the cease and desist letter was marked 'Not for Publication', but still published a copy of it to the website. A copy of the media release is exhibited at Tab 13 of Exhibit MT1 at pages 116 – 120.

Communications restrictions

- 95 The Governance Business Unit developed and implemented a standard practice whereby all external incoming correspondence was directed to the GM Council email address and external outgoing correspondence was sent from an internal Governance Enquiries email address. This standard practice was implemented as a strategy to deal with unreasonable customer conduct, including fixated persons, by restricting access to individual Governance staff members' email accounts. This standard practice was re-emphasised as a strategy to manage employee well-being. It was also implemented to allow the Governance Business Unit to perform other functions and duties efficiently.

PART 6: IMPACT OF AN ORDER MADE UNDER SECTION 110 OF THE GIPA ACT

- 96 As outlined at 88 to 95 above, GM Council has attempted to find ways to manage the impact of Ms Webb's conduct on employees caused by her applications and her correspondence and her harmful and distressing allegations.
- 97 If an order is not made under s 110 of the GIPA Act, I expect that Ms Webb will continue to lodge applications for information of the kind and continue to engage in the same conduct as detailed at paragraphs 61 to 76.
- 98 Ms Webb's applications and overall conduct have had a significant impact on the resources of GM Council, and her conduct has negatively affected staff in the Governance Business Unit. I am concerned that the conduct of Ms Webb will continue to escalate and she will become more fixated with staff within the Governance Business Unit.
- 99 In those circumstances, I consider that an order under s 110 is necessary to safeguard GM Council's resources and protect the wellbeing of staff members.



AFFIRMED at Goulburn, NSW 2580

Signature of deponent

Name of witness

Address of witness

Capacity of witness

Goulburn, NSW 2580

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C/- 10 DARBY ST. PARRAMATTA NSW 2150

Solicitor

And as a witness, I certify the following matters concerning the person who made this affidavit (the deponent):

1 I saw the face of the deponent.

2 I have confirmed the deponent's identity using the following identification document:

NSW DRIVERS LICENCE

Identification document relied on (may be original or certified copy)

Signature of witness

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NOTE: This document was signed in counterpart and witnessed over audio visual link in accordance with section 14G of the Electronic Transactions Act 2000.

Note: The deponent and witness must sign each page of the affidavit.

["Identification documents" include current driver licence, proof of age card, Medicare card, credit card, Centrelink pension card, Veterans Affairs entitlement card, student identity card, citizenship certificate, birth certificate, passport or see [Oaths Regulation 2011](#) or refer to the guidelines in the NSW Department of Attorney General and Justice's "[Justices of the Peace Handbook](#)" section 2.3 "Witnessing an affidavit" at the following address: <http://www.jp.nsw.gov.au/Documents/jp%20handbook%202014.pdf>]