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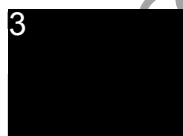
www.cielegal.com.au

8 April 2014

Our Ref: LPA1:DF:AB

Mr Tom Rogers
Acting Australian Electoral Commissioner
Australian Electoral Commission
GPO Box 768
Melbourne VIC 3001

CLO
Schmitt please



14 Apr

Dear Sir,

**Federal Election 2013
Electoral Division of Indi**

We act on behalf of the Liberal Party of Australia (Victorian Division).

Whilst accepting the result of the 2013 Federal Election in which Cathy McGowan (Independent) was elected as Member for Indi, our client has significant concerns about certain processes that occurred in relation to the election process in that Division.

In particular we are instructed by our client that:-

1. Some of the AEC staff engaged at polling booths were not truly independent and had biases towards certain candidates (in particular Ms McGowan) and their conduct may have contravened Part XXI of the *Commonwealth Electoral Act 1918 (the Act)*;
2. Lack of appropriate checks regarding enrolments and voters in the Division; and
3. False enrolments in the Division by supporters of Ms McGowan.

AEC Staff

You will no doubt appreciate that these claims are serious. In light of this in order that our clients can make further inquiries we seek a list of names of all AEC staff performing work during the election in the Division of Indi, including any casual workers.

Released under Freedom of Information Act 1990

The Electoral Roll

Pursuant to Section 90B(1) of the Act, we also seek items 4, 4A and 5 in that section, namely –

- a habitation index;
- voting information; and
- a copy of the Roll for the Division.

Pursuant to section 90B(2) we also seek additional information which the AEC holds about persons included in the Roll at the time of voting regarding (adopting the paragraph numbers of section 90B(10) for **additional information**) –

- (a) *the person's postal address;*
- (f) *the most recent enrolment date and enrolment transaction number for the person;*
- (g) *whether the person is:*
 - (i) *not entitled to be enrolled as an elector of the Commonwealth; or*
 - (ii) *not also enrolled as a State elector, Australian Capital Territory elector or Northern Territory elector; or*
 - (iii) *less than 18 years old;*
- (h) *whether the person is a general postal voter;*
- (i) *whether the person has only recently been enrolled;*
- (j) *whether the person has re-enrolled, and if so:*
 - (i) *the Division and State or Territory in which they were previously enrolled; and*
 - (ii) *the enrolment transaction number for the person's previous enrolment*

Please also advise if subsequent to election, any voters who had recently enrolled in the Division have now moved out or are not living in the Division.

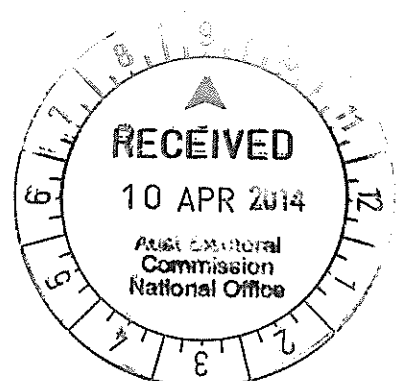
Please provide the above requested information by Friday 9 May 2014. Based upon the information provided, submissions may be made to Parliament.

If you require any further information, please contact Dan Feldman or Anat Bogaty.

Yours faithfully

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Dan Feldman
Partner



REDACTION CODES

- 1 Personal Information (name) redacted.
- 2 Personal Information (facsimile of signature) redacted
- 3 Personal Information (facsimile of manuscript initialling) redacted
- 4 Personal Information (Individual's address)
- 5 Personal information (individual's telephone number)
- 6 Business information (Bank Account details) redacted.
- 7 Business information (Billing Account details) redacted.
- 8 Legal Professional Communication redacted.
- 9 Deliberative material redacted.
- 10 Irrelevant material redacted.

Released under Freedom of Information Act 1982