



**STATUTORY DECLARATION**

QUEENSLAND  
TO WIT

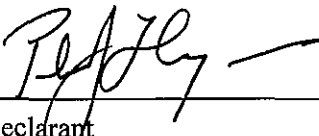
I, PETER JOSEPH FLYNN of [REDACTED] in the State of Queensland, do solemnly and sincerely declare as follows:-

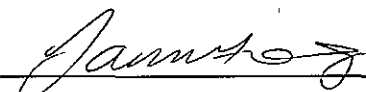
1. I am [REDACTED] years of age, and I reside at [REDACTED]. I am a travel agent by occupation.
2. I have been involved in the racing industry for over forty years. I am currently the elected Vice President of the Roma Turf Club. In that role, I was nominated as the Chairman of the Downs Racing Association in December 2006, and the Downs representative of the Queensland Country Racing Committee ("QCRC") in March 2007. I am still a member of the QCRC.
3. My understanding of the role of the Queensland Racing ("QR") directors is to govern all aspects of the racing industry in Queensland, including the integrity of racing, the stewards, and all other aspects of racing within Queensland.
4. My understanding is that the QCRC is a Committee formed by QR to oversee all country racing in Queensland. My role on the QCRC involves attending meetings to allocate and vote on race dates and related racing matters such as prize money. I understand that the QCRC was set up under the Queensland Racing Act 2002, and that Act sets out the function and responsibilities of the QCRC.
5. My experience is that the QCRC has had very few direct dealings with QR or the QR Board. My dealings are generally with Col TRUSCOTT, who is an employee of QR, whose role, to my knowledge, is to look at the general running of country racing in QLD.
6. I received notification three weeks to a month in advance of a committee meeting in writing via e-mail and about a week before the meeting I received a hard copy of the agenda and the previous minutes via e-mail.
7. Prior to 2012 when the Committee met, the meetings were Chaired by Mr Bill LUDWIG. I understand that he was a non-voting member of the committee, and he Chaired the meetings as the representative of QR on the committee. Consensus on the committee about decisions to be made is generally by a vote made by a show of hands. A written agenda and written minutes were maintained by Col TRUSCOTT.

  
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8. Col TRUSCOTT recorded the minutes by written notes at the time. As per normal practice, at each meeting the minutes of the previous meeting were passed. At each meeting I have attended the minutes were an accurate record of the business of the previous meeting.
9. Mr LUDWIG, to my understanding, was an appointee of QR to chair the QCRC committee and act as a liaison between the QCRC and QR. I had seen documentation about the role of the directors of QR, but not for LUDWIG'S role of responsibilities with the QCRC.
10. The discussions at the QCRC meetings of the relevant parts of racing would be passed onto QR for their discussions, approval, disapproval, etc. The QCRC did not have any direct influence over the operation and decisions of QR. There was no specific person on QR specified to take the matters of QCRC to QR.
11. I have a very limited knowledge of the voting rights of the QCRC in terms of the QR because I wasn't on the committee in 2002 when the arrangements were finalised. I have since been made aware that two of the QCRC members had voting rights, as do representatives from other Class A Members.
12. My understanding was that the two members of the QCRC that had voting rights Mr BROSANAN and Mr PEOPLES. I became aware of that subsequent to the meeting on the 6th of August 2008.
13. I understand that there was a Constitutional vote held at a meeting of the QR Committee on the 6th of August 2008. I only became aware of the meeting after the event as a result of press coverage. I did not receive any notice of that meeting and I am not aware of any other QCRC member receiving notification of that meeting.
14. I subsequently became aware of what that vote was about. I am aware that QR voted to change a number of aspects of QR's Constitution ("the Constitution"). I understand that of some people who had a right to vote at that meeting may not have been given the right to exercise that vote.
15. The matter of the changes to the Constitution had not been discussed with me prior to the meeting of the 6th of August 2008, and I am not aware of any discussions held with any other member of the QCRC about this matter. I was not aware of the meeting of Class A Members or the General Meeting that took place this date where this matter was raised. I was never approached by Mr LUDWIG or any other person regarding my views as to the proposed Constitutional changes nor did I give Mr LUDWIG or any other person my consent or authority to vote on this issue.

  
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16. I believe that as a matter of protocol, members of the QCRC should have been given some prior advice that the meeting was to be held, and Mr PEOPLES and Mr BROSAN should have been allowed to exercise their vote at that meeting. I do not believe the outcome of the vote on the issue of the Constitutional change would have been any different if the matter had been brought to the QCRC's notice.
17. I am not prepared to say whether or not I would have supported the proposed Constitutional changes.
18. I am not aware of any other occasions where QCRC have exercised their voting rights in relation to the operations of QR. I am not aware of any other meetings called by QR where the QCRC had a right to vote.
19. My only contact with Mr LUDWIG has only been through QCRC meetings.

And I make this solemn declaration conscientiously believing the same to be true, and by virtue of the provisions of the Oaths Act 1867-1981.

SIGNED TAKEN AND DECLARED

before me, at Roma

this 23rd day of AUGUST. 2013



JESSICA ANNE ARMSTRONG

~~A Justice of the Peace/Solicitor/~~

~~Commissioner of Declarations~~

