

QUEENSLAND RACING COMMISSION OF INQUIRY

Commissions of Inquiry Act 1950

SUPPLEMENTARY STATEMENT PURSUANT TO SECTION 5(1) (d).

I, **WILLIAM PATRICK LUDWIG OAM** of c/- level 13, 333 Adelaide Street, Brisbane QLD 4000, do solemnly and sincerely declare as follows:

1. In this supplementary statement, I comment on some of the allegations that have been made in statements by other people. It is not an exhaustive analysis of every allegation that is made against me but rather is the best that I can do given the short time that is available to me and the resources that are available to me.

COUNTRY RACING COMMITTEE

2. I have read the statements of Messrs Slatter, McDonald, Brosnan, Fitchett, Peoples, Flynn, Roberts and Webster.
3. I was chair of the Country Racing Committee (CRC) for many years including during the period that witnesses address in their statements.
4. The CRC was a Class A Member of QRL. The CRC was established by section 66 of the Racing Act. It consisted of 9 members – 8 from country racing associations and 1 committee member from the board of QRL which was me.

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Signed:



Taken by:



**Supplementary Statement of
William Patrick Ludwig**

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5. Under the Racing Act, I as the committee member appointed by QRL, was the chairman of the CRC.
6. The Racing Act did not set out many rules for how the CRC was to conduct itself. As chairman of the CRC, I believed that I was the responsible member of the CRC to act on behalf of the CRC.
7. While the members of the CRC were entitled to appoint 2 member representatives, their role under the constitution of the QRL was only to vote for the appointment of a Class A Representative. They had no vote at general meetings of QRL itself or at any meeting of Class A Members. Rather, the CRC itself, of which I was the chair, had the entitlement to vote at a meeting of Class A Members.
8. The proposal for the amendment of the constitution of QRL arose in 2008. While it was first proposed to go to a meeting of members in May 2008, and documents outlining the proposal were circulated to many people, that meeting did not proceed.
9. During June and July 2008, there were a number of country racing seminars held and I visited various regions in Queensland. While I cannot now recall, after so many years, precise discussions with people from the country racing associations, I believe that the issue of the proposed amendment of the QRL constitution would have been discussed. I say this because the issue was very current at the time.
10. During all of my discussions and meetings over that time leading up to the meeting of members on 6 August 2008, no one expressed a view to me that they were against the proposed amendment.



11. I refer to paragraphs 5-10 of the statement of Mr Truscott dated 8 August 2013. I note that Mr Truscott says that he attended various stakeholder meetings with me and Mr Bentley in mid 2008. That is correct. Mr Truscott was the secretary of the CRC at the time. As secretary of the CRC, he was a conduit for information between the CRC and QRL. At no time did Mr Truscott communicate to me any negative reaction that he may have received to any suggestions about changing the constitution of QRL.
12. I was aware at the time that QRL has obtained senior counsel's opinion in relation to the proposed amendment and I formed the belief that the proposed amendment was in the best interests of QRL.
13. Clearance had been obtained from ASIC for directors to vote in favour of the resolution in which they were materially involved. So having regard to that permission, and the QC's opinion that QRL had received, and the fact that the proposal for the amendment to the constitution had been made known to various stakeholders and that no one from the Country Racing Associations had ever spoken to me against the proposal, I believed that I was entitled to vote in favour of it.
14. At the meeting of the Class A Members on 6 August 2008, the resolution to amend the constitution was passed by a 14 to 1 majority. I voted on behalf of the CRC in favour of the resolution because QRL had obtained a QC's opinion that said that the proposal was in the best interests of the company. If I did not vote of behalf of the CRC, or if I voted against the resolution, the outcome of the meeting of Class A Members would have been the same anyway.
15. In any event, the amendments to the constitution that were voted on were subsequently rejected by the government which had a right to veto such a change.

Signed:



Taken by:




16. This issue had been subject of complaints to ASIC, CMC and the police. It has been investigated thoroughly. I am aware that the police interviewed many people. The police also seized records from QRL.


17. I have commenced defamation proceedings against the Courier Mail in relation to a story it published about this matter. In the course of those proceedings, my lawyers wanted RQL to obtain its records back from the police. Despite requests made to RQL, it has failed to provide any records to us. Therefore, I am at a disadvantage to go into any further detail about this matter.

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

SIGNED AND DECLARED)
at Brisbane)
on 11 September 2013)
in the presence of:)



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Solicitor / Justice of the Peace