

QUEENSLAND RACING COMMISSION OF INQUIRY

AFFIDAVIT OF BRETT THOMSON

I, **BRETT ALEXANDER THOMSON**, of Level 1, 6 Innovation Parkway, Birtinya, in the state of Queensland, director of Contour Consulting Engineers Pty Ltd, state on oath:

1. I refer to my affidavits sworn 5 August 2013, 27 August 2013, 29 August 2013, and 30 August 2013.

2. As a result of media reports prior to and during the Queensland Racing Commission of Inquiry, the business operations, reputation of Contour Consulting Engineers Pty Ltd, and my personal professional reputation have been adversely impacted upon.

NO WRONGDOING BY CONTOUR

3. The Queensland Racing Commission of Inquiry has confirmed that *"Nothing has emerged in the public hearings that would suggest wrongdoing by Contour"*

4. **Exhibited hereto and marked with the letters "BT-01" is a true** copy of a letter from the Queensland Racing Commission, dated 18 October 2013.

FALSE ALLEGATIONS IN MEDIA REPORTS REGARDING CONTOUR

6. The Queensland Racing Commission of Inquiry's Counsel Assisting, James Bell QC, has confirmed that *"There have been allegations in the press to the effect that Contour was awarded either 150 million or 20 million worth of contracts without tender. It is clear that those figures have been greatly exaggerated from what was extensive and ongoing Queensland Racing work during more than five years of the relevant period"*. That statement is found at page 2-7 of the Transcript of Proceedings of the Hearing of the Commission of 19 September 2013.

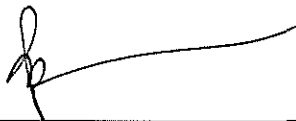
7. Attached to the 2 August 2013 Statement of Adam Carter is a Report by Deloitte Touche Tohmatsu ("**Deloitte**"), entitled "Racing Queensland Limited Final Report – Examination of Procurement Processes", dated 29 April 2013 ("**The Deloitte Report**").

8. Page 3 of the Deloitte Report provides, *"Contour was appointed to manage projects to the approximate value of \$158 million"*. I believe that this statement, which was widely reported by the media, was false and based on inaccurate information.

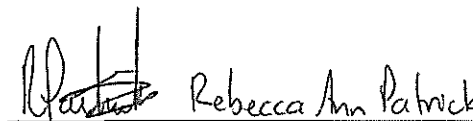
9. Prior to the State Government initiating the Queensland Racing Commission of Inquiry, Contour took steps to correct the content of those inaccurate media articles, through correspondences to RQL, the State Government, the media outlets responsible for publishing those articles, and Deloitte.

10. All the facts and circumstances to which I have deposed above are within my own knowledge except those to which I have deposed from information only and my means of knowledge and belief and sources of information appear on the face of this affidavit.

Sworn by **BRETT THOMSON** on 21 October 2013 at **BIRTINYA, QUEENSLAND** in the presence of:



Deponent



Rebecca Ann Patrick
Justice of the Peace/Solicitor/ Reg NO. 106955
Commissioner of Declarations

AFFIDAVIT OF BRETT THOMSON
Filed on behalf of the Respondents

Porter Davies Lawyers
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Queensland Racing
Commission of Inquiry

Ref: 2359530

18 October 2013

Mr Rod Lawson
Senior Associate
Porter Davies Lawyers
GPO Box 2942
Brisbane QLD 4001

Dear Mr Lawson

I refer to your email dated 18 October 2013, to which I am authorised to reply as follows.

Nothing has emerged in the public hearings that would suggest wrongdoing by Contour. Until the Commission has released its report it cannot provide any assurances of the kind sort.

Yours sincerely



Joanne Bugden
Executive Director (Secretary)
Queensland Racing Commission of Inquiry

