

Mentions of Jason Breton and \$1,000 Donation

1. Initial Discussion of Campaign Donations

- **Location:** Chunk 48, Page 1880
- **Content:**
 - MS McDONALD: As part of your campaign, did you receive any donations to assist you in your campaign?
 - MR BRETON: One.
 - MS McDONALD: How much was that for?
 - MR BRETON: \$5000.
 - MS McDONALD: Who was that from?
 - MR BRETON: Sam Sofi, is-o-, if-i.
 - MS McDONALD: Didn't you receive \$1000 from Mr Mannoun?
 - MR BRETON: Not to my knowledge.

2. Email Evidence of Thanks to Mr. Mannoun

- **Location:** Chunk 49, Page 1881
- **Content:**
 - MS McDONALD: Would document JCA.001.0001.0007 - yes. Thank you. If we go to - not the top email, but can you see an email from you dated 23 November?
 - MR BRETON: Yes.
 - MS McDONALD: This is from you to Mr Mannoun: "Thank you so much for your support of my campaign to run for a seat in the South Ward. As a Liverpool local, born and bred on the streets, et cetera, your kind assistance will help me with advertising and costs associated with my campaign, which would not be possible without you."
 - MR BRETON: Yes.
 - MS McDONALD: What you are acknowledging is a donation of \$1000 that came through Mr Mannoun as a conduit - in a sense, as a conduit?
 - MR BRETON: Is that a question?
 - MS McDONALD: Yes.
 - MR BRETON: What is the question?
 - MS McDONALD: What you are acknowledging is that you received money via a bank transfer for your campaign, which Mr Mannoun organised.
 - MR BRETON: I can't recall the \$1000 you refer to.

3. Bank Transfer Evidence

- **Location:** Chunk 50, Page 1882
- **Content:**
 - MS McDONALD: I'll show you this document. I'm sorry. You can give one to the Commissioner as well. Can I first ask you - this is at - what's known as a trace document?
 - MR BRETON: Okay.
 - MS McDONALD: Can I first take you to the information under BSB and account?
 - MR BRETON: That's my account.
 - MS McDONALD: Right. This is from the bank and it records a transfer of \$1000 from a particular bank account into your bank account, with the reference, "Election contribution".
 - MR BRETON: Yes. I'm concerned about the transaction amount.
 - MS McDONALD: Why?
 - MR BRETON: Well, I can read it as \$100,000. Where's the amount?
 - MS McDONALD: It's under Transaction Amount and it's in the amount of \$1000.
 - MR BRETON: Okay. So it's - I've got a number here, "0000100000".
 - MS McDONALD: Last two are cents. We can show you -
 - MR BRETON: In any case, I have no - I have no recollection whatsoever of that contribution amount.

4. Further Confirmation and Lack of Recollection

- **Location:** Chunk 51, Page 1883
- **Content:**
 - MS McDONALD: But is the position you're not denying you received \$1000 as a contribution to your campaign, you just can't recall at the moment?
 - MR BRETON: I can't recall at any stage, and I'm not denying anything. I've got records in front of me - exhibits in front of me that indicate that my name, my bank account and a number - if there was a decimal point, looks like \$1000, and a thank you email. So I think the evidence is clear that \$1000 was donated. I don't recall it whatsoever.
 - MS McDONALD: All right. The email that you have forwarded would suggest that - sorry, I withdraw that. The email is thanking Mr Mannoun; correct?
 - MR BRETON: Yes.
 - MS McDONALD: Can you recall any discussion with him about the source of the funds? Where the funds were originating from?
 - MR BRETON: It's impossible to answer because I don't recall the donation.

5. Connection to Icon Property Investments

- **Location:** Chunk 52, Page 1884
- **Content:**
 - MS McDONALD: Could document LCC.006.001.0650 be brought up.
 - MS McDONALD: Do you recall receiving this letter towards the beginning of the year?
 - MR BRETON: Can I see the letter, please? A bit more detail of it.
 - MS McDONALD: In particular the first paragraph, which refers to a particular company - or at least one company.
 - MR BRETON: Yes.
 - MS McDONALD: And then if you note the second paragraph, it asserts: "It is noted that at the request of the mayor our client donated" - now, the amount there, there is a discrepancy in the amount and the trace amount in the - from the bank records. It nominates 2000, but the trace document is 1000 to your campaign. Now - and also, if you go to the top of the page, where it lists the addressees of this document, it refers to you and has your private email address. Again, they're not using your Council email address?
 - MR BRETON: I'll accept that, but what I'm challenged with is we have - you took me to evidence that Mr Mannoun donated some money - the wrong amount, and now you're taking me to another piece of evidence that says that Icon Properties donated a different amount. So I'm really challenged with where -

6. Continued Discussion on Source of Funds

- **Location:** Chunk 53, Page 1885
- **Content:**
 - MS McDONALD: No, no. Just listen to me. What we have is an email from you thanking Mr Mannoun; correct?
 - MR BRETON: Correct.
 - MS McDONALD: And I put to you that - and then we have evidence that around this time \$1000 was deposited into your bank account with the reference "Election contribution".
 - MR BRETON: Yes.
 - MS McDONALD: And with the source document and your email to Mr Mannoun, what I suggested to you was that your email to Mr Mannoun seemed to be - or was thanking him for some kind of financial contribution.
 - MR BRETON: Yes.
 - MS McDONALD: And my recollection is that although you don't have a recollection of this, you agreed that that seemed plausible.
 - MR BRETON: Yes.

7. Trace of Funds to Icon Properties

- **Location:** Chunk 57, Page 1889
- **Content:**
 - MS McDONALD: The trace of the money, \$1000, is it actually came from Icon Properties.
 - MR BRETON: Okay.
 - MS McDONALD: But is your evidence that, from the documents put before you, the thousand-dollar donation or financial election contribution, your view was that it came from Mr Mannoun?
 - MR BRETON: Yes. I would have had to disclose this to the Electoral Commission after the - I'm obliged to disclose all donations post-election in a form to the Electoral Commission. So - and my evidence remains exactly the same as I've said today. I may be proven wrong by that disclosure, but there should be a document that supports either your version or my version.
 - MS McDONALD: Sorry, what's your version?
 - MR BRETON: My version is I got - I don't remember this 1000.
 - MS McDONALD: All right. So you don't remember it?
 - MR BRETON: That's my evidence.
 - MS McDONALD: Though you accept there is documents which would support that \$1000 was transferred into your private account?
 - MR BRETON: Yes.

8. Allegations and Context of Donation

- **Location:** Chunk 60, Page 1893
- **Content:**
 - MS McDONALD: The other aspect that I would put to you is that the preferences went to the Liberal Party. And then the evidence that we've seen today that Mr Mannoun is assisting you in your campaign, as evidenced by the email that you sent to him - and also, I would put to you, that you received \$1000 from him. So that's what I'm putting to you and that's the basis on what - that I'm putting that to you. Do you agree that at the time, that was what was occurring?
 - MR BRETON: No.

9. Repeated Questioning on Awareness

- **Location:** Chunk 61, Page 1894
- **Content:**
 - MS McDONALD: So at no time did it pass your mind that this might be why Mr Mannoun was helping you so much, giving you \$1000 -

- MR TYNAN: Can I object? I mean, the witness has - these propositions have been put to Mr Breton, he's answered it. He's answered it categorically, and now he's being asked again whether it was in his mind at the time. He actually just answered the question before that.
- MS McDONALD: Not as a definite proposition but whether it passed through his mind at all, the possibility.
- COMMISSIONER: I think it's been answered, but you can answer it again.
- MR BRETON: Do you want me to answer it again?
- COMMISSIONER: Yes.
- MR BRETON: No. No. Not everything that's brown and wiggles in the grass is a snake. In retrospect, you can put these pieces together and they look fantastic as evidence. I've given my - I didn't have a clue what I was doing. I thought that was blatantly obvious by the fact that I hadn't met any of my running partners.

10. Connection to Later Roles at Council

- **Location:** Chunk 62, Page 1895
- **Content:**
 - MS McDONALD: And in answer to my question last week, at no time in you applying originally unsuccessfully for the CEO and for these subsequent positions did you reveal your association with Mr Mannoun that arose from October, November, December 2021?
 - MR BRETON: No.
 - MS McDONALD: What I suggest to you is that association is something that you should have revealed when you were applying for the various positions.
 - MR BRETON: I wasn't required to. And what was the association? I only met him for a short period.
 - MS McDONALD: And you got \$1000 from him and you received assistance from him in your campaign.
 - MR BRETON: The period of time between these events, it's not - I didn't - I have never, you know, had a meal at anybody's home, I haven't - I'm not this person's friend, okay? I was in a circumstance where I was introduced to Mr Mannoun - this is all in evidence - I did a little bit of work for him, putting the Gantt chart up, and during that process had a discussion about some candidacy for running. Didn't have a clue how to do it. Didn't do the forms. Didn't know who was on my ticket. I think that all goes to demonstrate my mind at the time and, per chance, an opportunity comes up at Liverpool City Council, which - they come up, apparently, all the time, but per chance I applied for it through an independent third party and failed. Didn't get the job. And the assumption is that - or the assertion is - which is, with respect, really distasteful, that by some way what I - the circumstance in two thousand - parachuted me into this - well, my talent -