

BIAS INHERENT AND PRACTISED IN THE VETERANS REVIEW BOARD

OVERVIEW

There is bias inherent in the structure of the VETERANS' REVIEW BOARD.

There is also evidence of actual bias during case hearings and in the decisions reached.

The structure of the Veterans' appeals system leaves the Veterans' Review Board in a position where it is not held accountable at law for its behaviour during hearings or for the decisions which it issues! (See **ACCOUNTABILITY & CONTROL**)

Both the Department of Veterans' Affairs and the Veterans' Review Board publicly present the Board as an autonomous decision making organisation ostensibly unaffected by any possibility of day to day influence by the Department of Veterans' Affairs.

Research indicates otherwise.

In order to investigate the supposed impartiality and lack of bias of the Veterans' Review Board, I have applied the legal concepts required in "**lifting the corporate veil**" during civil commercial law cases.

They are;

1. Was the parent organisation the head and brain of the subsidiary?
2. Were the persons conducting the daily activities of the subsidiary appointed by the parent organisation?
3. Did the parent organisation govern the subsidiary and decide what finances should support it?
4. Was the parent organisation in effectual and constant control of the subsidiary?
5. Were the profits (savings) made by the skill and direction of the parent organisation?
6. Were the profits (savings) treated as those of the parent organisation?

The above questions were answered by reference to legislation and documents published by the Federal Government, the Department of Veterans' Affairs and the Veterans' Review Board.

Other information was provided by Departmental/Board employees.

The following information was obtained.

1. **WAS THE PARENT ORGANISATION THE HEAD AND BRAIN OF THE
SUBSIDIARY ?**

On 1 JANUARY 1985, the Veterans' Review Board replaced the previous Repatriation Review Tribunals which had formed part of the REPATRIATION COMMISSION.

The existence of the Veterans Review Board and the abolition of the Repatriation Review Tribunals resulted from the deficiencies itemised by the ADMINISTRATIVE REVIEW COUNCIL in their Report No. 20 of 16 SEPTEMBER 1983.

The report was titled "**Review of Pension Decisions under Repatriation Legislation**" and was published by the Australian Government Publishing Service as R83/416 Cat. No. '3 1691 4.

At paragraph 4, under the heading "**INTRODUCTION**", in the first annual report of the Veterans' Review Board at page 97 of the 1984-85 annual report of the Repatriation Commission, the following statement appears:

"The new structure was introduced to overcome the problems associated with the previous system of primary decision making and review. An appreciation of those problems and the remedial action taken by Parliament provides a useful basis for assessing the VRB's operations".

Some of the many deficiencies itemised in the Administrative Review Council's Report No. 20 were:

1. Primary decisions being made on the basis of incomplete evidence.
2. Consequently, not enough claims and applications were being allowed by primary decision makers but were subsequently overruled by higher Tribunals and Courts when all of the relevant evidence was finally heard.
3. Inadequate representation of claimants.
4. The Commission and the Repatriation Boards had a tendency to prefer the opinion of their own (biased) medical personnel and ignore or reject any other.
5. Undue delay in the final disposition of cases.

Although not stated, the report implicated an adversarial approach to primary decision-making and reviews by the Commission, the Boards and the Repatriation Review Tribunals.

The legislative action taken by Parliament to establish the existence of the Veterans' Review Board (VRB) was intended as a remedy to the adversarial behaviour of the (former) Repatriation Review Tribunals.

Since its establishment, the VRB has been administered by the **Minister for Veterans' Affairs** who also administers the **Veterans' Entitlements Act 1986** and the **Department of Veterans' Affairs**. REFERENCE - ANY COMMONWEALTH GOVERNMENT DIRECTORY PUBLISHED SINCE 1985. (SEE MINISTER FOR VETERANS' AFFAIRS PORTFOLIO).

The VETERANS' REVIEW BOARD (the VRB) was established by the **Repatriation Legislation Amendment Act 1984** which came into operation on **1 JANUARY 1985**. REFERENCE - PARA 1, PAGE 97, FIRST ANNUAL REPORT OF THE VRB.

The **first** Annual Report of the VRB was published in and as part of the 1984-85 Annual Report of the **Repatriation Commission**.

It is found at pages 93 - 123 of the same document.

The 1985 first annual report of the Veterans' Review Board, for the period 1 JANUARY to 30 JUNE 1985, contains the following statements;

"Before the Principal Member commenced duty, some steps to establish the VRB were taken by an implementation cell set up by the Department (of Veterans' Affairs) under an Assistant Secretary, Mr Tony Ashford".
REFERENCE - PARAGRAPH 7, PAGE 102, under the heading "ESTABLISHING THE VRB".

"The Department made **the Repatriation Review Tribunals' staff, accommodation, equipment, and other resources available to the VRB from 1 January 1985**".
REFERENCE - PARAGRAPH 2, PAGE 103.

"Of the MEMBERS appointed to the VRB, fifty-eight were former Repatriation Review Tribunal members".
REFERENCE - PARAGRAPH 2, PAGE 104.

The VRB replaced the former Repatriation Boards and Repatriation **Review Tribunals**, both of which formed part of the **Repatriation Commission** under the **Repatriation Act 1920**. REFERENCE - PARAGRAPH 1, PAGE 68, COMMONWEALTH GOVERNMENT DIRECTORY, VOLUME 2, FOI STATEMENTS, MAY 1985, VETERANS' AFFAIRS PORTFOLIO.

In the same document, the following statement is found in the second last paragraph in the appendix at page 71 under the heading Commonwealth legislation administered by the Minister for Veterans' Affairs:

"It (the 'Repatriation Act 1920) also sets up and REGULATES the Veterans' Review Board".

The organisational and administrative structure of the VRB was established by senior officers of the **Department of Veterans' Affairs**.

In JANUARY 1990, during a telephone conversation with me about DVA procedures, Acting Deputy Commissioner Jim Dalton stated that **"we made some mistakes when we were setting up the VRB"**.

When asked to identify to whom he was referring when he used the term "we", Mr Dalton stated that he was referring to senior officers of the Department of Veterans' Affairs.

The Veterans' Entitlements Act 1986 (VEA) came into operation on 22 MAY 1986 and replaced the repealed Repatriation Act 1920.

The VEA continued to regulate the VRB (at Sections 133 - 173) under the portfolio of the Minister for Veterans' Affairs.

The VRB is administered by a PRINCIPAL MEMBER who is appointed by the Governor General on the recommendation of the Minister for Veterans' Affairs. (See appointment of VRB personnel).

2. WERE THE PERSONS CONDUCTING THE DAILY ACTIVITIES OF THE SUBSIDIARY APPOINTED BY THE PARENT ORGANISATION ?

The personnel who conduct the daily activities of the VRB fall into three categories:

1. The PRINCIPAL MEMBER.
2. The MEMBERS OF THE BOARD, composed of;
 - A. the PRINCIPAL MEMBER or a SENIOR MEMBER,
 - B. the SERVICES MEMBER and
 - C. one other (unspecified, often medical) MEMBER
3. The ADMINISTRATIVE / CLERICAL STAFF.

All MEMBERS of the Board, including the Principal Member, are appointed by the Governor General on the recommendation of the Minister for Veterans' Affairs. REFERENCE - VEA, SECTION 158.

All members of the Board, including the Principal Member, are appointed under the provisions and authority of the Veterans' Entitlements Act 1986. REFERENCE - VEA, SECTION 134 (1)(2).

The Veterans' Entitlements Act 1986 is administered as part of the portfolio of the Minister for Veterans' Affairs.

The Minister for Veterans' Affairs may delegate power to the Principal Member for the purposes of Sections 161 and 162. REFERENCE - VEA, SECTION 212 (1)(b).

Any such power exercised by the Principal Member is deemed to have been exercised by the Minister for Veterans' Affairs for the purposes of the Veterans' Entitlement Act 1986. REFERENCE - VEA, SECTION 212 (2).

The Principal Member reports directly to the **Minister for Veteran' Affairs**. REFERENCE - VEA, SECTION 215 (4).

The Minister for Veterans' Affairs has the power to suspend **any** MEMBER of the Board, including the Principal Member. REFERENCE - VEA, SECTION 164 (2).

The Governor General may, on the recommendation of the Minister for Veterans' Affairs, remove from office any Member suspended by the Minister. REFERENCE - VEA, SECTION 164 (3)(a).

All CLERICAL/ADMINISTRATIVE staff required to assist the Board are appointed or employed under the PUBLIC SERVICE ACT and made **available for the purpose by the SECRETARY of the Department of Veterans' Affairs** (they are employees of the Department of Veterans' Affairs). REFERENCE - VEA, SECTION 172.

Under the heading of **RESOURCES** in the annual reports of the VRB commencing 1986-87, the following statement appears:

"In recognition of the fact that its staff are officers of the Department of Veterans' Affairs and operate in a comparable environment, the VRB **acts consistently with departmental policies** and initiatives ---- etc. etc."

Reference to the **AUDIT REPORTS ON FINANCIAL STATEMENTS** contained in the Annual Reports of the Department of Veterans Affairs, commencing 1988-89, reveals the following:

- A. The annual incomes of VRB MEMBERS (Holders of Public Office) are paid out of ANNUAL APPROPRIATIONS for the Secretary of the Department of Veterans' Affairs.
- B. The salaries of VRB ADMINISTRATIVE / CLERICAL STAFF are paid by the Department of Veterans' Affairs.

3. DID THE PARENT ORGANISATION GOVERN THE SUBSIDIARY AND DECIDE WHAT FINANCES SHOULD SUPPORT IT ?

The Veterans' Review Board and its Members and Staff are governed by the same legislation which governs the Department of Veterans' Affairs; the Veterans' Entitlements Act 1986 (**VEA**).

The Veterans' Entitlements Act, the Department of Veterans' Affairs and the Veterans' Review Board are **all** part of the portfolio of the Minister for Veterans' Affairs.

Reference to the AUDIT REPORTS ON FINANCIAL STATEMENTS of the annual reports of the Department of Veterans' Affairs reveals that all of the annual costs of operating the Veterans' Review Board form part of the annual total costs of the Department of Veterans' Affairs.

4. WAS THE PARENT ORGANISATION IN EFFECTUAL AND CONSTANT CONTROL OF THE SUBSIDIARY ?

Evidence which indicates legislated effective and constant control of the Veterans' Review Board by the senior administrator (the Minister for Veterans' Affairs) of the parent organisation (the Department of Veterans' Affairs) has already been itemised in this document.

In Western Australia, the VRB computer system is "slaved" to the DVA mainframe computer system. Whenever the DVA system goes "off-line", so does the VRB system.

The structure and organisation of the VRB was formed by senior officers of the Department of Veterans' Affairs.

The VRB is controlled by a portion of the same legislation to which the Department of Veterans' Affairs owes its existence.

Both are administered by the Minister for Veterans' Affairs.

There is also extreme potential for indirect control of the VRB by the Department of Veterans' Affairs and the Minister.

The Minister for Veterans' Affairs has the effective power to "**hire**", suspend, "**fire**" or otherwise affect the future promotional prospects of any of the MEMBERS or STAFF of the VRB.

Annual incomes, salaries and running costs of the VRB are provided by the Department of Veterans' Affairs.

It is contended that, in the circumstances already described, it is virtually impossible for any MEMBER of the VRB to issue a decision without being at least subconsciously aware of its possible effect on the DVA and the Minister.

Nor can they be unaware of the potential consequences for their own reappointment to, or suspension from, their sinecures. (Members are appointed to office for periods not exceeding 5 years).
REFERENCE - VEA, SECTION 159 (1).

5. WERE THE PROFITS (SAVINGS) MADE BY THE SKILL AND DIRECTION OF THE PARENT ORGANISATION ?

This document has already shown sufficient information to support the contention that the skill and direction which guides the VRB, has its origins in the DVA.

Although the VRB does not make "profits" by its operations, there is a parallel.

Any adverse decision made by the VRB against the case of either a veteran or a veterans' dependant, results in a saving of the relevant entitlement.

Payment of that entitlement, had it been granted by the VRB, would be made out of the annual appropriations for the operating costs of the Department of Veterans' Affairs, **not** the Veterans' Review Board.

The practical result of adverse decisions made by the VRB, is that the Department of Veterans' Affairs makes a saving, thereby **reducing** the annual appropriations of the Department.

6. WERE THE PROFITS (SAVINGS) TREATED AS THOSE OF THE PARENT ORGANIZATION ?

The savings which result from the adverse decisions made by the Veterans' Review Board are savings which would otherwise have been paid from the annual appropriations of the parent organization, the Department of Veterans' Affairs.

BIAS

In a 1985 book titled COMMONWEALTH ADMINISTRATIVE LAW - AN ADMINISTRATOR'S GUIDE, the author, Mr C.N. Doogan, writes about **bias**.

Mr Doogan was a Barrister of the Supreme Court of New South Wales and Director of the Department of Defence at the time of publication. He held the qualifications of B.A. (Admin.) and B.Leg.S. (Hons).

The book was published by the Australian Government Publishing Service as R85/229, Catalogue No. 85 1516 1.

Under the heading of NATURAL JUSTICE in Chapter 2 and Paragraph 4, he wrote of **The fairness test** which requires that two rules be observed, the second of which is the rule against bias.

The rule requires that "the decision-maker or persons who make up the decision-making body have no personal interest in the matter to be decided and have no bias one way or the other as to the outcome".

It is contended that the VRB is an organisation structured in such a way that it is difficult to avoid bias.

The contention is reinforced when reference is made to VRB behaviour and phraseology contained in specious decisions found in documents in my possession.

The documents relate to a number of VRB decisions made over a period of five (5) years in relation to my own case and further periods in the cases of other veterans and veterans dependants whom I have represented in the capacity of case advocate.

The situation is even more complex than has already been described.

VRB decisions are ostensibly made by a "majority" consensus of a Board consisting of at least three Members. REFERENCE - VEA, SECTION 141 (1) (a) (b) (c) and SECTION 149 (1).

The implication is that the structure avoids the possibility of "deadlock" and/or "bias" by any individual Member during the decision-making process.

Closer examination of the Board structure and composition reveals otherwise.

The VEA requires that either the Principal Member or the Senior Member **preside** over the other Members constituting the Board for the purposes of a review of any decision. REFERENCE - VEA, SECTION 146 (1) (2).

In practice, each Board is usually presided over by a Senior Member.

At paragraph 2, under the heading ORGANISATION, in the successive annual reports of the VRB since 1985-86, the following statement appears;

"Membership of the VRB is in a number of categories - the PRINCIPAL MEMBER and SENIOR MEMBERS, (all of whom are qualified in LAW) ---_etc, etc".

The PRINCIPAL and SENIOR MEMBERS of the VRB **are qualified in law** but the SERVICES and OTHER MEMBERS are not.

It is therefore contended that, without proper training and qualifications in Commonwealth Administrative Law and other relevant Federal legislation, the SERVICES and ORDINARY MEMBERS are at a distinct disadvantage in relation to the SENIOR MEMBER presiding in each case.

In those circumstances it is submitted that they would inevitably defer to the opinion/s of the qualified Senior Member where any legal, procedural or evidentiary question arose during any hearing.

It places the SENIOR MEMBER in a position where he or she has the power to **unduly** influence the outcome of any Board hearing.

Such a situation does not constitute a majority

decision. The parties to any hearing of a review before the VRB are:

1. the applicant for the review and
2. the Commission.

Either or both parties have the right to be represented before the VRB (at the parties' own expense) during any hearing of the review.

They do not have the right to be represented by a qualified legal practitioner.

Qualified legal representation is expressly forbidden by the Veterans' Entitlements Act 1986. REFERENCE - VEA, SECTION 147 (2) (a), (3).

The Section 147 prohibition on qualified legal representation is iniquitous and benefits only the Repatriation Commission.

Veterans and their dependants are usually represented at the VRB by (untrained and legally unqualified) advocates from ex-service organisations.

Although the Commission also has the right to be represented by an advocate and their Central Office Compensation and Review Branch contains trained advocates, they are usually NOT represented by **anyone** at **VRB hearings in Western Australia.**

In the existing circumstances, there is no necessity for the Commission to be represented at VRB hearings because they already have a qualified legal practitioner "in situ" in the form of the SENIOR MEMBER presiding, appointed by the recommendation of the Minister for Veterans' Affairs.

No wonder the Act prohibits qualified legal representation!

The situation takes on an even more biased aspect when one considers the existing structural aspects of the VRB and adds the practical effects of SECTION 150 of the Veterans' Entitlements Act 1986.

Section 150 (1) of the VEA states that the hearing of any review by the VRB shall be in PRIVATE.

At the hearing of reviews in any other Board, Tribunal or Court anywhere in Australia, hearings are usually held in PUBLIC (any member of the public may attend).

Section 150 (2) gives the **Presiding Member** the power to issue directions as to who may be present at any hearing of a review by the VRB.

Section 150 (3) allows the **Presiding Member**, if requested to do so by the applicant, to permit a hearing, or a part of a hearing of a review by the VRB, to take place in PUBLIC.

I possess numerous legally verifiable documents which indicate that the VRB strenuously resists any attempt by an applicant to have the hearing of a review held in PUBLIC.

The VRB would presumably contend that private hearings protect the privacy of the applicant. The contention becomes nonsense when it is the **applicant** who requests the public hearing.

Could it possibly be that the VRB is fearful that their hearings may be attended by legally qualified and experienced scrutineers capable of understanding the illegality and blatant bias of the procedures and decisions?

In the present circumstances, the VRB is not being held legally accountable for their procedures and decisions.

One need look no further for evidence of the resultant actual bias than to refer to the VRB decisions previously cited.

In any other legal proceedings in Australia, the incestuous relationship which exists between the DVA and the VRB would be deservedly condemned as fraught with undue influence and a gross CONFLICT OF INTEREST.

At Chapter 2, paragraph 18 of his book on Commonwealth Administrative Law - An Administrators Guide, Chris Doogan (the author) writes;

"The presence of actual bias is immaterial: what is important, is whether or not a reasonable person looking at the situation as a whole would conclude that there was a real likelihood of bias or would reasonably suspect that a member of the decision-making body was biased".

Lord Denning also dismissed the need to show actual bias. He said;

"The court will not inquire whether he (the decision - maker) did, in fact, favour one side unfairly. Suffice it that responsible people might think he did".

The High Court of Australia has endorsed Lord Dennings' views as the correct approach to be followed in Australia.

The **adversarial** attitude displayed towards veterans and their dependants by the Repatriation Commission and the Department of Veterans' Affairs also permeates the VRB and is reflected in their procedural and decision-making behaviour.

Nor has the adversarial attitude and behaviour of the Repatriation Commission and the Department of Veterans' Affairs towards applicants changed for the better with the introduction of the supposedly "independent" Veterans Review Board.

If anything, the attitude has hardened in that legislation, intended to cripple the cases of applicants, is progressively being enacted.

I am able to furnish more than adequate tangible documentary evidence of **actual** bias exhibited in VRB decisions, in addition to the bias perceived in the structure of the VRB.

Deputy Commissioner Dalton was right, "they" certainly **did** make some mistakes when "they" were setting up the VRB!

"They" were foolish enough to leave their traceable "fingerprints" all over the VRB as legally verifiable evidence of their influence.

I have no doubt that there are individual VRB Members who perform their decision-making duties in an unbiased manner, unaffected by any of the existing undue influences.

Personal experience of the VRB in WA has produced an entirely different result.

ACCOUNTABILITY AND CONTROL

In addition to any structural and administrative situational influences which apparently affect VRB decision-making processes, there is also a legal aspect.

Whenever an applicant appeals to the Administrative Appeals Tribunal against a decision made by the VRB, the AAT has legal authority to examine only the decision/s made by the **ORIGINAL** decision maker (**the Repatriation Commission**).

It can not examine the subsequent decision-making procedure/s or decision/s of the VETERANS REVIEW BOARD!

The practical effect is that the VRB is not held accountable at law for their decision-making procedures or the decisions they issue.

Neither are they scrutinised by higher legal authority.

Even legally substantiated formal complaints to the COMMONWEALTH AND DEFENCE FORCE OMBUDSMAN produce no more than inordinate delays and deliberate "dodging" of the issues about which the complaints were lodged.

The totality of the plight of Repatriation applicants and their dependants in Western Australia has the feel of "appealing to Caesar against Caesars' laws" when dealing with the various Federal government departments involved.

The response universally adopted is that of adversarial opposition instead of that of objective and unbiased inquiry.

The only legal avenue available for an applicant to make the VRB accountable at law for their behaviour and decisions is by appeal direct to the ADMINISTRATIVE DECISIONS (JUDICIAL REVIEW) BRANCH of the FEDERAL COURT.

Such an appeal must be made during the period when the VRB is in the process of exhibiting the behaviour about which the complaint is being made.

Appeals to the AD (JR) BRANCH against final decisions issued by the VETERANS' REVIEW BOARD must be made within **28 days** of the issue of the decision.

In either situation, an appeal requires qualified legal representation which even the major ex-service organisations are not able (or, more correctly, are **unwilling**) to provide.

Without legal aid and qualified legal representation, the applicant is unable to take action against the behaviour and decisions of the VRB.

The administrative obstacles encountered by Repatriation applicants and their dependants in obtaining means-test free and contribution-free Federal legal aid has been detailed in part of a separate forty three page document which was forwarded to the National Executive of both the RAAF Association and the RSL in August 1992. The document was titled RAAFA MEMBERSHIP BY POST-WWII PERSONNEL. The content of the document is applicable to **all** ex-service organisations.

Existing avenues of Federal legal aid for Repatriation applicants are deliberately being denied or delayed beyond the 28 day appeal time limit.

With the assistance of the VETERANS' ENTITLEMENTS ACT MONITORING COMMITTEE, the Federal government is also in the process of enacting legislation imposing restrictive conditions which will have the practical effect of eliminating Repatriation applicants' access to free legal aid for their war compensation cases.

The Veterans' Review Board is as bad, if not worse, than the Repatriation Review Tribunals which they supposedly replaced for the purpose of **remedying the deficiencies** previously existing.

No matter how the VRB behaves during decision-making or in the decisions it issues, it is not held accountable at law. **The VRB is virtually "fireproof" in terms of legal accountability and control in the circumstances which I have detailed here!**

The Australian community of serving and ex-service personnel and their dependants are the ultimate losers in the failure of the major ex-service organisations to recognise and combat the political and administrative actions being applied against them by a rapacious and indifferent government.

So are the ex-service organisations; they are dying.

SUMMARY

The legal concepts of "lifting the corporate veil" which I have utilized in this critical analysis of the Veterans Review Board are used in commercial law for a specific purpose.

Where a "parent" company operates a commercial enterprise through a registered "\$2" subsidiary company, the parent organisation can not legally or financially be held accountable for any of the actions or financial responsibilities of the subsidiary.

An individual or organisation with a valid legal action against the subsidiary may win the case only to find that the subsidiary has no financial or other assets with which to settle the claim.

If the claimant is able to provide evidence in a court of law to prove the six principle criteria for lifting the corporate veil and legally demonstrate the **links** between the subsidiary and the parent organisation, then they can legally access the assets of the parent organisation in order to satisfy their claim against the subsidiary.

CONCLUSIONS

The Department of Veterans Affairs is the "head and brain" of the Veterans Review Board.

The persons who conduct the daily activities of the Veterans Review Board are composed of:

MEMBERS who are appointed by recommendation of the Minister for Veterans Affairs who is the head of the Department of Veterans Affairs.

ADMINISTRATIVE STAFF who are employees of the Department of Veterans Affairs.

The Minister for Veterans Affairs has the power to "hire, fire, suspend or promote or demote" any of the Veterans Review Board personnel.

The Veterans Review Board is governed by the Minister for Veterans Affairs and the Veterans Entitlements Act 1986.

The Veterans Review Board is financed by a portion of the annual parliamentary appropriations allocated to the Department of Veterans Affairs. The Veterans Review Board is financed by the Department of Veterans Affairs.

The Principal Member of the Veterans Review Board is answerable directly to the Minister for Veterans Affairs for the effectual and constant control of the Board.

The savings engendered by the decisions of the Veterans Review Board result from the control and undue influence of the Veterans Review Board by the Department of Veterans Affairs. Any savings thus made are savings for the annual budget of the Department of Veterans Affairs.

The Veterans Review Board is not held accountable for its behaviour during hearings nor for the decisions which it issues.

THE VETERANS REVIEW BOARD IS NOT THE INDEPENDENT, UNBIASED DECISION-
MAKING REVIEW ORGANISATION WHICH BOTH THE VRB AND THE DEPARTMENT OF
VETERANS AFFAIRS PURPORT IT TO BE.

IT IS MERELY A DIFFERENTLY TITLED EXTENSION OF THE DEPARTMENT
OF VETERANS AFFAIRS WITH BIAS BUILT INTO ITS STRUCTURE.

DOCUMENT ENDS.

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This fifteen page document was researched and drafted by:

GRAHAM HUGH MacLEOD
POST OFFICE BOX 748,
ARMADALE WA 6992

who accepts legal responsibility for any statement made in this
document.

INSPECTOR (Retired) Graham Hugh MacLeod (TPI)
LEGAL LIAISON OFFICER
VETERANS AND PENSIONERS ADVOCACY
WESTERN AUSTRALIA