

TONY HARRISON

Plaintiff

SUE NEALES

Firstnamed Defendant

GARRY BAILEY

Secondnamed Defendant

DAVIES BROTHERS PTY LIMITED  
ACN 009 475 754

Thirddnamed Defendant

**AMENDED STATEMENT OF CLAIM  
PURSUANT TO AN ORDER OF THE MASTER  
MADE 13 MARCH 2007**

1. The Plaintiff is and was at all material times:
  - (a) a public relations consultant; and
  - (b) the Managing Director of Corporate Communications (Tas) Pty Ltd.
2. Corporate Communications (Tas) Pty Ltd is a company specialising in public relations advice, for reward, to members of the public requiring same.
3. The Firstnamed Defendant ("Neales") is and was at all material times a journalist employed by the Thirddnamed Defendant ("Davies Brothers").
4. Davies Brothers was at all material times the publisher of "The Mercury" newspaper, which newspaper is published at Hobart in Tasmania.
5. The Mercury is circulated throughout Tasmania and is also circulated in other States and Territories of the Commonwealth of Australia.

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Filed on behalf of TONY HARRISON (Plaintiff)  
**MURDOCH CLARKE**  
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REF: Mr A Gaggin

6. The Secondnamed Defendant ("Bailey") was at all material times an employee of Davies Brothers and the editor of "The Mercury".
7. At all material times Neales acted in the course of her employment with Davies Brothers and with the authority of Bailey and Davies Brothers.
8. On 22 March 2006 Davies Brothers published in "The Mercury" an article, which, inter alia, stated:

*"Ad man lands in hot water.*

*The secretive \$200,000.00 plus political advertising campaign waged by the anonymous group Tasmanians for a Better Future has landed its Hobart front man Tony Harrison in professional hot water.*

*Mr Harrison, who runs the Corporate Communications public relations company and sits on the Australian Cricket Board, is regarded as one of Tasmania's best connected powerbrokers.*

*But his decision to front the Better Future Group, which strongly urged Tasmanian voters to back the return of a majority government last Saturday, appears to have broken his own professional organisation's code of ethics.*

*The code of the Public Relations Institute of Australia clearly states that "members must be prepared to identify the source of funding of any public communication they initiate or for which they act as a conduit".*

*Mr Harrison has repeatedly refused to reveal the identity of any of the people or groups who have anonymously funded the Better Future election advertising".*

9. Neales was the author of the article.

10. The article referred to in Paragraphs 8 above bore and was understood of bearing the following meanings which are the natural and ordinary meanings thereof:

- (a) the Plaintiff's conduct, as identified in the article, had caused the Plaintiff to become embroiled in professional difficulties;
- (b) that he had been found to have breached the Code of the Public Relations Institute of Australia;
- (c) that his behaviour had fallen short of the professional standards to be observed and expected of a member of the public relations profession and particularly a member of the Public Relations Institute of Australia; and
- (d) that the Plaintiff was likely to be the subject of disciplinary proceedings by the Public Relations Institute of Australia.
- (e) that he had breached the Code of the Public Relations Institute of Australia.

11. By reason of the publication of the article referred to in paragraph 8 hereof by the Defendants, the Plaintiff has been greatly injured in his credit and reputation and has been brought to ridicule and contempt and has suffered loss and damage. (Further particulars to be provided).

AND the Plaintiff claims damages.

DATED this 15th day of March, 2007

MURDOCH CLARKE

Per 

Practitioners for the Plaintiff

To: Butler McIntyre & Butler  
20 Murray Street  
HOBART  
Practitioners for the Defendants