

AFFIDAVIT

Name Graham Douglas Liao
Address 1 Warra Court, Mudgeeraba QLD 4213
Occupation Trustee
Date ~~11th March 2021~~ 13th March 2021

I affirm:

- 1 I established a business in Samoa, and after a few months I was put in a position to provide cash and electronic payments to the Hon. Minister Afamasaga Lepuia Rico Tupai (the Minister) and to private individuals as directed by the Minister.
- 2 In total cash and electronic payments to the Minister and other parties totalled over \$90,000 Australian Dollars.
- 3 I also provide gifts as requested by the Minister and was informed that to get support people needed to feel valuable and that gift giving was customary.
- 4 There are documented payments to the Minister and as he needed money desperate once he provided his passport and others and had me transfer funds through Western Union. See attached exhibit WU1. The Minister also had me give his daughter AU\$20,000 over 6 months and in his words "so she could make payments on his behalf".
- 5 I was also asked by the Minister to be Guarantor for a loan and to assist the Minister in obtaining an overdraft for his Rugby team. See attached exhibit BSP1.
- 6 The Minister was fully aware as was the Hon. Prime Minister of my past criminal youth record and the Hon. Prime Minister was also aware that the Minister and his CEO travelled to Australia to review my business and to meet with my business partners and associates as some of the attached pictures prove. See attached exhibits AU1
- 7 In a media interview the Hon. Prime Minister made a statement "It might come out as a joke, but it stresses that government officials shouldn't be negligent but go out to investigate countries (where the investors are from) and check with bank institutions if they (investors) have any money," Tuilaepa said.
- 8 I had many meetings with the Minister, was invited personally by the Hon. Prime Minister to dinner with many other Ministers and on one occasion was invited by the Hon. Prime Minister to breakfast to discuss the NPF investing in PEEQ.
- 9 I was also requested to provide technical information in relation to the landing station and was appointed in writing to offer services to the Government for Cyber Security. See attached exhibit CS1.

- 10 I objected to continuing business in Samoa until I was granted a lease and was advised again that if I did not continue with support the Minister would find it hard to have others support PEEQ and again the Minister advised others needed to feel valuable and that gift giving was customary.
- 11 I was asked by the Minister to pay for accommodation in Singapore a further AU\$10,000, I provided 15 laptops to the Minister and in the end I was given an alternatim in relation to the lease and when I refused to pay any further money until I had a lease the Attorney General all of a sudden become involved. See attached exhibit G11.
- 12 The Minister also asked me for WS\$17,000 as he brought a bus for the rugby team and he needed to return the money urgently to his church. There is further information and video evidence held in the USA at a secure data storage provider should it be required.

APPROVED 
 SWORN at Robina

Signature of deponent

Name of witness

Address of witness

Capacity of witness

DAVID JOHN ASHFIELD C. DEC

C/- Justices of the Peace Branch
 Level 6/154 Melbourne Street
 South Brisbane QLD 4101
 Ph: 1300 301 147
 E: jp@justice.qld.gov.au

And as a witness, I certify the following matters concerning the person who made this affidavit (the **deponent**):

- 1 I saw the face of the deponent.
- 2 I have confirmed the deponent's identity using the following identification document:

Driver's licence

Queensland Driver License

Identification document relied on (may be original or certified copy)*

Signature of witness

Note: The deponent and witness must sign each page of the affidavit. See UCPR 35.7B.



[* "Identification documents" include current driver licence, proof of age card, Medicare card, credit card, Centrelink pension card, Veterans Affairs entitlement card, student identity card, citizenship certificate, birth certificate, passport or see [Oaths Regulation 2011](#) or refer to the guidelines in the NSW Department of Attorney General and Justice's "[Justices of the Peace Handbook](#)" section 2.3 "Witnessing an affidavit" at the following address: <http://www.jp.nsw.gov.au/Documents/jp%20handbook%202014.pdf>]

This page and pages ...1..... to ...4.... are the particulars marked



Referred to In the Affidavit of

Graham Liao

Sworn/Affirmed before me atRobina.....

This13th..... day ofMarch..... 2021.

Deponent

Justice of the Peace (Qualified)





*1235 Send Money



1800 501 500



*1236 Receive Money

CUSTOMER NAME

PLEASE PRINT CLEARLY. Identification is required for all customers: Current Passport, Australian Drivers Licence or Proof of Age Card.

Full Legal Name: JINGWEN LIAO

EXISTING CUSTOMERS

Mobile Number: 0432208030 or Western Union Customer Number

NEW CUSTOMERS or updated details for existing customersAddress (Post office box addresses are not permitted): 1 Warra Ct Mudgeeraba
Suburb: Mudgeeraba State: QLD Postcode: 4213 Country of Citizenship (must have): China
Mobile Number: 0432208030 Date of Birth (DD/MM/YYYY): 27/03/1962 Country of Birth (must have): China**To send money, complete this section****TRANSACTION DETAILS**Destination Country: Samoa SAMOA
Destination Currency: WST Amount to be Sent, Complete one only: Australian Dollars \$500.00 or Payout Amount at Destination**OPTIONAL SERVICES FOR SENDING**☐ I want the money sent direct to a Bank Account
Bank Name: Bank Code: BIC
Account Name: Bank Location (City): Account Number / IBAN
☐ I want the money sent to a mobile
Country Code: Mobile Number:**RECEIVER'S DETAILS**

Western Union wants to help you avoid being exposed to fraud. If you don't know the person you're sending to, we recommend you do not send. Neither Western Union nor its Agents carry out a comparison of the "To Send Money" form against the "To Receive Money" form to verify the address given for the receiver.

Full Legal Name: AFAIACAGA / EPWAI / RICE TUIAI
Current Address (Post office box addresses are not permitted): Utulei
City / Suburb: Apia State / Province: Postcode: Country: SAMOA**To receive money, complete this section****All fields must be completed**Money Transfer Control Number: Amount Expected \$: Originating Country:
Sender's Name: First: Last:**CUSTOMER'S SIGNATURE All customers to complete this section**

The exchange rate for your transfer appears on the Transaction Receipt. However, if the country to which you are sending requires that transfers be converted when paid, the rate shown is only an estimate. Western Union and its Agents also make money from currency exchange. The terms and conditions governing this money transfer are available at this Agent location, can be viewed at westernunion.com.au, and have been summarised on the back of this form for reference only. You agree to those terms and conditions by signing this form.

☐ By checking this box, I: 1. Expressly consent to the transfer of my personal data entered above to WU Affiliates located in countries such as the U.S. for the purpose of providing the money transfer service to me and undertaking the additional data processing activities specified to me in the Data Protection section of the terms and conditions. 2. Expressly consent to the carrying out of profiling activities and marketing communications. I have the right to withdraw my consent at any time. 3. Confirm that the information I have provided is correct and that I have read and accepted the terms and conditions of the service overleaf and the loyalty program terms if applicable. 4. Declare that I (i) am authorised to provide the personal details herein; (ii) consent to my information being checked with the document issuer or official record holder for the purpose of confirming my identity; and (iii) understand that personal details provided by me will be matched to information held by the issuer or official record holder as part of an information match request via third party systems.

Customer's Signature: X JINGWEN LIAO Date (DD/MM/YYYY): 5/7/19

OFFICE USE ONLY

Attach Duplicate Transaction Receipt to this copy Money Transfer Control Number: Staff Name: Staff Signature: Date (DD/MM/YYYY):

WU1

P2-4

ROBINA FOLIO 4230

WU Send Money \$5000.00
 Ref: 7157483223
 TOT \$5000.00
 Details
 Cash \$5000.00

Date

05/01

419581 13:10

PROVIDE FEEDBACK ON TODAY'S VISIT AT
 WWW.VISIT

Customer: JINGWEN
 Receiver: A TUPAI
 Destination: Samoa

SEND AMOUNT

Principal	\$4978.00
Money Transfer Fee	\$22.00
Delivery Charges	\$0.00
Message Charge	\$0.00
Total AUD Amount	\$5000.00

Exchange Rate 1.7683002
 Approximate Payout 8802.60 WST

Privacy Notice:

Australia Post collects your personal information as an agent for Western Union in order to process your transaction. Without this information Australia Post will be unable to provide this service. Your personal information will be disclosed to Western Union to fulfil this purpose and processed in accordance with Western Union's Privacy Statement, which can be found at:
www.westernunion.com/au/en/privacy-statement.html

Whilst in our possession, your personal information is handled in accordance with Australia Post's Privacy Policy which outlines how to access and/or correct your personal information or make a privacy related complaint. You may contact the Privacy Contact Officer, Australia Post, GPO Box 1777, Melbourne, Vic, 3001 for privacy related queries. For more information please visit
www.auspost.com.au/privacy.

Send Money Completed

RUBINA POST SHOP

4230

WU Send Money

\$

5000.00

Ref No 7157488223

TOTAL

\$5000.00

Payment Method Details

Cash

5000.00

Date

05/07/19 04/48484 jk4/p4 419581 13:

PROVIDE FEEDBACK ON TODAY'S VISIT AT
USPS.COM/MYVISIT

WESTERN UNION MONEY TRANSFER

734282704

7157488223

05/07/19

13:00

This page and pages ...1..... to ...2..... are the particulars marked

" BSP 1 "

Referred to In the Affidavit of

..... Graham Liao

Sworn/Affirmed before me at Robina

This 13th day of March 20.21

.....
Deponent

.....
Justice of the Peace (Qualified)



Subject: FW: Aana Chiefs TOD

Date: Monday, 8 March 2021 at 2:12:34 pm Australian Eastern Standard Time

From: Graham Liao

To: Epenesa Pouesi Young

Just for your eye's only.

From: Afamasaga Lepuia'i Rico Tupai <ricotupai@gmail.com>

Date: Thursday, 6 June 2019 at 9:16 am

To: Graham Liao <liao.g@yahoo.com>, <gl@pee.com.au>

Subject: Fwd: Aana Chiefs TOD

Fyi

Kind Regards

Hon. Afamasaga Rico Tupai

Minister of Communications and Information Technology

Government of Samoa

Ph: +685 24031

Mob.: +685 7770577

email : ricotupai@gmail.com

hart@mcit.gov.ws

skype: ricasamoa

----- Forwarded message -----

From: Mele Misela <MMisela@bsp.com.pg>

Date: Thu, Jun 6, 2019, 9:55 AM

Subject: Aana Chiefs TOD

To: ricotupai@gmail.com <ricotupai@gmail.com>

Cc: Jennifer Fruean <JFruean@bsp.com.pg>

Talofa Afamasaga,

Trust all is well with you.

Further to our phone conversation yesterday and your request for a Temporary Overdraft for Aana Chiefs.

Kindly provide the following information to enable us to assess your request for a Temporary OD.

1. Copy of the formal signed contract with your sponsor Graham Liao, to confirm terms and conditions of sponsor etc.
2. Confirmation letter from the sponsor Graham Liao.
3. Formal request from the association for a Temporary OD.

Appreciate provision of the above information's for our assessment.

Thank you and Kind Regards,

Mele Misela – Gegera
Senior Credit Analyst/ Business Banking

Bank of South Pacific Limited
Beach Road
P O Box 1860, APIA, SAMOA
T: +685 66143 | E: mmisela@bsp.com.pg | W : www.bsp.com.pg



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".....AU1....."

Referred to In the Affidavit of

.....Graham Liao.....

Sworn/Affirmed before me atRobina.....

This13th..... day ofMarch..... 20.21

.....
Deponent

.....
Justice of the Peace (Qualified)





AV 1

P2-7



AU 1

P3-7



AU1

P4-7







AUG

P7-7



This page and pages1..... to1.... are the particulars marked

"CS1..... "

Referred to In the Affidavit of

.....Graham Liao.....

Sworn/Affirmed before me atRobina.....

This13th..... day ofMarch..... 20..21

.....
Deponent

.....D. C. L.
Justice of the Peace (Qualified)





GOVERNMENT OF SAMOA

**OFFICE OF THE MINISTER
OF COMMUNICATIONS, AND INFORMATION TECHNOLOGY**

(Ministry of Communications and Information Technology, Samoa Post Ltd and Office of the Regulator)

11 March 2019

Susuga Graham Liao
Executive Trustee
PEEQ

Dear Graham,

RE: CYBER SECURITY EXPERTS ASSISTANCE

I write on behalf of Hon. Tuilaepa Lufesoliai Sailele Malielegaoi, the Chairman of the Digital Transformation Council to formally seek your assistance in providing us with expertise in cyber security to assist us with the ransomware attack that hit our Ministry of Health about two weeks ago.

The professionals' expert advice and forensics skills will be of great help to us as we prepare to setup a CERT and it will also provide firsthand experience for government ICT personnel on how to start to protect Samoa from these type of criminal activity.

We trust that you will favourably consider our request and thank you in anticipation.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Liao'.

Afamasaga Lepuia'i Rico TUPA'I

Minister of Communications & Information Technology / Deputy Chair - DTC

Cc: Hon. Tuilaepa Lufesoliai Sailele Malielegaoi, Prime Minister
Leausa Dr. Take Naseri, CEO-MOH
Fualau Talatalaga Matau Matafeo, CEO-MCIT

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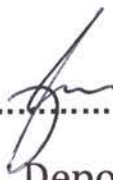
" G11 "

Referred to In the Affidavit of

Graham Liao

Sworn/Affirmed before me atRobina.....

This13th..... day ofMarch..... 2021.



Deponent



Justice of the Peace (Qualified)





M. +61 455 999 858

E. gl@peeq.com.au

W. www.peeq.com.au

PRIVACY REQUEST: I would ask that you do not provide or include my email address for any marketing or promotional campaign. I would also ask that my contact information not be passed onto any other person or entity. I thank you in advance and look forward to a long and lasting relationship with your company.

CONFIDENTIALITY NOTICE: This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

-

From: Aumua Ming Leung Wai <ming@aumua.ws>

Date: Friday, 5 July 2019 at 8:04 pm

To: 'Graham Liao' <liao.g@yahoo.com>

Subject: RE: Sub-Lease Agreement between Government of Samoa and PEEQ

Hi Graham.

This is very serious. What sponsorship?

And is that actually Hon. Afamasaga asking you for \$10k? And what prizegiving?

Regards, Ming



Ming C. LEUNG WAI, LLB (Hons)
PRINCIPAL

Phone: +685 29545

Email: aumua_law@aumua.ws

Postal: P.O.Box 6096, Apia, Samoa

Office: Level 2,

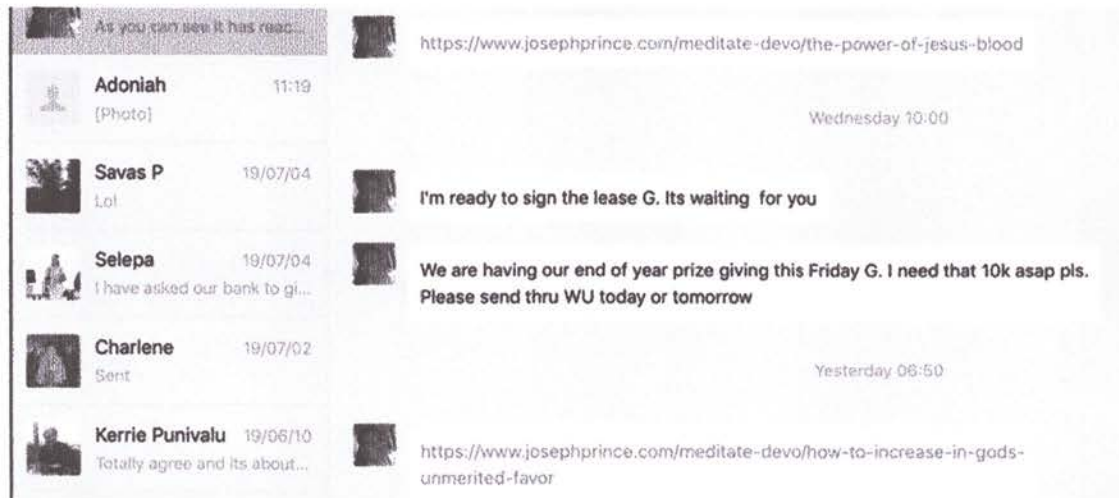
SSAB Business Complex,
Togafuafua, Samoa

Disclaimer: The information in this email is confidential and may be legally privileged. If you are not the intended recipient, please respect this and notify the sender immediately by email or phone. Please also destroy the email. Thank you.

From: Graham Liao [mailto:liao.g@yahoo.com]
Sent: 05 July 2019 16:17
To: Aumua Ming Leung Wai <ming@aumua.ws>
Subject: Re: Sub-Lease Agreement between Government of Samoa and PEEQ

Hi Ming,

I had a call from a person that does not want to be named at this time and they told me that fixing up the sponsorship may help. I hope this is not the case, but I did receive this the other day.



Warmest Regards

Graham



Life's good be part of it.

M. +61 455 999 858

PRIVACY REQUEST: I would ask that you do not provide or include my email address for any marketing or promotional campaign. I would also ask that my contact information not be passed onto any other person or entity. I thank you in advance and look forward to a long and lasting relationship with your company.

CONFIDENTIALITY NOTICE: This comm LIAO GRAHAM 039001 2001110804 +300.71 PEEQ TELECOMMUNICA 039001 2001110655 +197.59 unication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure or

Saturday, May 2, 2020 at 3:48:35 PM Australian Eastern Standard Time

Subject: RE: Sub-Lease Agreement between Government of Samoa and PEEQ
Date: Monday, 8 July 2019 at 12:18:34 pm Australian Eastern Standard Time
From: Aumua Ming Leung Wai
To: 'Graham Liao'
Attachments: image010.jpg, image015.png, image018.jpg, image019.jpg, image001.jpg, image002.jpg, image003.png, image004.jpg

Thanks Graham.

I am sad to hear about there being more that what you have already disclosed regarding the Minister. Given solicitor/client privilege, I don't know what I can do about what you have divulged already. Unless of course you waive solicitor client privilege.

As for your other email about past issues when you were 17 years old. If that was the case – then that was a long time ago when you were just a teenager.

That shouldn't have any bearing on your current business dealings.

But let's await the "concerns" mentioned by AG.

Kind regards, Ming

PS: sorry I am in meetings today so will not be able to take your call.



Ming C. LEUNG WAI, LLB (Hons)
PRINCIPAL

Phone: +685 29545
Email: aumua_law@aumua.ws
Postal: P.O.Box 6096, Apia, Samoa

Office: Level 2,
SSAB Business Complex,
Togafua, Samoa

Disclaimer: The information in this email is confidential and may be legally privileged. If you are not the intended recipient, please respect this and notify the sender immediately by email or phone. Please also destroy the email. Thank you.

From: Graham Liao [mailto:liao.g@yahoo.com]
Sent: 07 July 2019 17:10
To: Aumua Ming Leung Wai <ming@aumua.ws>
Subject: Re: Sub-Lease Agreement between Government of Samoa and PEEQ

Hi Ming,

The sponsorship is for the Ministers Rugby Team the Chiefs and yes, it is Hon. Afamasaga. He advised he needs to pay money to the players at the end of year. There is more that I would like to talk to you about as it goes a bit deeper than just this.

Warmest Regards

Graham Liao
Executive Trustee

dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

—

From: Aumua Ming Leung Wai <ming@aumua.ws>
Date: Friday, 5 July 2019 at 3:40 pm
To: <gl@pee.com.au>, 'Graham Liao' <liao.g@yahoo.com>
Subject: FW: Sub-Lease Agreement between Government of Samoa and PEEQ

Hi Graham. I am waiting for explanation from AG. Regards, Ming



Ming C. LEUNG WAI, LLB (Hons)
PRINCIPAL

Phone: +685 29545
Email: aumua_law@aumua.ws
Postal: P.O.Box 6096, Apia, Samoa

Office: Level 2,
 SSAB Business Complex,
 Togafua, Samoa

Disclaimer: The information in this email is confidential and may be legally privileged. If you are not the intended recipient, please respect this and notify the sender immediately by email or phone. Please also destroy the email. Thank you.

From: Lemalu Hermann P. Retzlaff [<mailto:hermann.retzlaff@ag.gov.ws>]
Sent: 05 July 2019 10:09
To: 'Aumua Ming Leung Wai' <ming@aumua.ws>
Subject: RE: Sub-Lease Agreement between Government of Samoa and PEEQ

Aumua

I will reply to you shortly,

Regards

From: Aumua Ming Leung Wai <ming@aumua.ws>
Sent: Friday, 5 July 2019 9:06 AM
To: 'Lemalu Hermann Retzlaff' <hermann.retzlaff@ag.gov.ws>
Cc: 'Afamasaga Lepuia'i Rico Tupai' <ricotupai@gmail.com>; 'Talatalaga Mata'u' <t.matau@mcit.gov.ws>
Subject: FW: Sub-Lease Agreement between Government of Samoa and PEEQ

Dear Mr Attorney-General,
 Can you please explain what is going on?
 If this lease is not signed by 3pm today, then my client withdraws all his businesses from Samoa.
 As you are aware, he already has staff being trained at Vaivase for the call centre. There are other businesses in the pipeline that would provide employment and benefit our country, eg assembling of motor bikes in Samoa and exporting them, flights from Samoa to China, data centre, etc.
 I would appreciate your early response.
 Kind regards, Ming



Office: Level 2,
SSAB Business Complex,
Togafuafoa, Samoa

From: Talatalaga Mata'u [<mailto:t.matau@mcit.gov.ws>]
Sent: 04 July 2019 17:26
To: Aumua Ming Leung Wai <ming@aumua.ws>
Cc: Afamasaga Lepuia'i Rico Tupai <ricotupai@gmail.com>; Lemalu Hermann Retzlaff <hermann.retzlaff@ag.gov.ws>; Ane Iati <ane.iati@ag.gov.ws>; Lydia Lemalu Jahnke <l.jahnke@mcit.gov.ws>
Subject: Re: Sub-Lease Agreement between Government of Samoa and PEEQ

Thank you for your email to Ms Lydia Lemalu, dated on the 3rd of July 2019 with regards to the proposed wording of the mentioned clauses.

The Ministry have considered the proposed changes and were in the process of finalising the Lease Agreement with the Attorney Generals Office. However, I regret to inform you that the Attorney General has raised some concerns against your client that need to be addressed before we can proceed.

In light of this, we are bounded and guided by the correspondence from the Attorney General and would appreciate if you could direct your queries to the Attorney General for further details and clarity on the concerns raised.

Please note to copy the Honorable Minister Afamasaga and myself in the correspondences.

Thank you for your understanding.

Ma le faaaloalo tele

Fualau Talatalaga MATA'U MATAFEO
Chief Executive Officer
Ministry of Communications and Information Technology
Level 6 TATTE Building, SOGI | TEL: +685 26117 | DDI: +685 27000 | FAX: +685 24671
Mobile: +685 7770777 | WhatsApp: +685 7570777
e-Mail: t.matau@mcit.gov.ws | Facebook: facebook/samoa-mcit | Website: www.mcit.gov.ws

Please consider the environment before printing.

Subject: Re: Very Urgent Cargo: Mr Liao Freight (BNE - APW OL 844/13 FEB)

Date: Wednesday, 13 February 2019 at 2:08:04 pm Australian Eastern Standard Time

From: Alison

To: sptalamaivao@samoairways.com

CC: 'Cargo', 'Ground Handling', 'A.Tuala', Alyson Sefo, Alfred Senara, gl@pee.com.au, cargo@samoairways.com

Faafetai Peter

We already made contact with Menzies BNE and received the AWB which I have forwarded to Si'i who is aware of what needs to be done.

BTW please note cargo email for future as Ops office do not handle freight.

Cheers

Alyson

On Wed, February 13, 2019 3:52 am, sptalamaivao@samoairways.com wrote:

> Talofa Team,

>

>

>

>

> Please find copy of AWB shipment attached for Mr Graham Liao on our
> flight OL844 from Brisbane to Apia today.

>

>

> Please contact him immediately once we receive his freight, just a
> reminder to handle those 15 X laptops with caution, one of those is his
> personal laptop and we don't want to damage any of them.

>

>

>

> We have been through a lot of problems and difficulties in trying to get
> this freight into the country. Could you also assist him with any customs
> requirement to clear his freight or recommend a Customs broker to him.

>

>

>

> Contact him on mob: 7502321

>

>

>

>

> Any other issues please contact me.

>

>

>

>

> Regards

>

>

>

>

> Sala Peter Talamaivao

>

>

> Auckland Airport and Cargo Manager

>

