



Local Government Standards Panel

Complaint Number	20240391
Legislation	<i>Local Government Act 1995</i>
Complainant	Ms Tralee Cable (CEO)
Respondent	Councillor Ian Black
Local Government	Shire of Mount Magnet
Regulation	Regulations 20, 22 of the <i>Local Government (Model Code of Conduct) Regulations 2021</i> Regulation 34D of the <i>Local Government (Administration) Regulations 1996</i>
Panel Members	Mr Tim Fraser (Presiding Member) Ms Elanor Rowe (Deputy Member) Councillor Peter Rogers (Member)
Heard	28 May 2024 Determined on the documents
Outcome	One breach of Regulation 34D No breaches of Regulations 20 and 22

FINDING AND REASONS FOR FINDING

Published 12 June 2025

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Summary of the Panel's decision

1. The Local Government Standards Panel ("the Panel") found that Councillor Ian Black ("Cr Black"), an elected member for the Shire of Mount Magnet ("the Shire") committed one breach under the *Local Government Act 1995 (WA)* ("the Act") and Regulation 34D of the *Local Government (Administration) Regulations 1996* when, at the Council Meeting held on 27 March 2024, he remarked that one of the Shire's employees was "*not a nice person*".
2. The Panel found that Cr Black had not breached Regulations 20 and 22 of the *Local Government (Model Code of Conduct) Regulations 2021* ("the Regulations") in relation to the same conduct.

Jurisdiction and procedural fairness

3. The Act makes provision for the circumstances in which a council member commits a minor breach.¹
4. On 10 April 2024, the Department of Local Government, Sport and Cultural Industries ("the Department") received a Complaint of Minor Breach Form ("Complaint"). The Complaint was signed by Ms Tralee Cable, Chief Executive Officer of the Shire at the time, ("the Complainant") and contained three allegations of breaches of the Regulations by Cr Black.
5. On the same day, the Department advised Cr Black of the Complaint and invited him to respond. The Department sent Cr Black copies of the original Complaint and all the supporting documents provided by the Complainant.
6. Under the Act the Panel is required to consider a complaint of a minor breach and make a finding as to whether the alleged breach occurred.² On 28 May 2024 the Panel convened to consider the Complaint.
7. The Panel:
 - (a) accepted the Department's advice, based on information from the Western Australian Electoral Commission, that Cr Black was a councillor at the time of the alleged breaches, and was still a Councillor when the Panel met on 28 May 2024;
 - (b) was satisfied the Complaint had been made within six months after the alleged breaches were said to have occurred.
 - (c) was satisfied the Complaint had been dealt with in accordance with the administrative requirements in the Act for dealing with complaints of minor breaches³; and
 - (d) was satisfied that the Department had provided procedural fairness to Cr Black.

¹ Section 5.105 of the Act.

² Section 5.110(2)(a) of the Act.

³ Sections 5.107, 5.108, 5.109 of the Act.



8. If a councillor has previously committed two or more minor breaches, the Panel may send the complaint to the Chief Executive Officer of the department assisting the relevant Minister at the time instead of considering the Complaint itself.⁴ Cr Black had not previously been found to have committed any breaches of the Regulations. Therefore, the Panel decided to not send the Complaint to the Chief Executive Officer of the Department.
9. Based on the information referred to above, the Panel found it had jurisdiction to determine whether Cr Black had breached the Regulations in connection with the Complaint.

Panel's role

10. The Panel is not an investigative body. It determines complaints of minor breaches solely upon the evidence presented to it.
11. Any finding, that a councillor has committed a minor breach, must be based on evidence from which it may be concluded that it is more likely than not that the breach occurred than that it did not occur (the required standard of proof).⁵
12. In order to find the allegation, proposition or conduct has been established, and where direct proof is not available, the Panel must be satisfied from the evidence that it is more probable than not that it has occurred. The Panel cannot make a finding that the alleged fact, proposition or conduct occurred if the evidence merely supports two or more conflicting but equally possible inferences.⁶
13. For a finding that a councillor has breached a particular regulation, the Panel must be satisfied that every element of the particular regulation has been established to the required standard of proof.

Regulation 20

14. Regulation 20 regulates councillors' interactions with local government employees:

"20. Relationship with local government employees

(1) In this clause — local government employee means a person —

- (a) employed by a local government under section 5.36(1) of the Act; or*
- (b) engaged by a local government under a contract for services.*

(2) A council member or candidate must not:

⁴ Sections 5.110(2)(b), 5.111(1) of the Act.

⁵ Section 5.106 of the Act.

⁶ *Bradshaw v McEwens Pty Ltd* (1951) 217 ALR 1, paragraph 5.



- (a) *direct or attempt to direct a local government employee to do or not to do anything in their capacity as a local government employee; or*
 - (b) *attempt to influence, by means of a threat or the promise of a reward, the conduct of a local government employee in their capacity as a local government employee; or*
 - (c) *act in an abusive or threatening manner towards a local government employee.*
- (3) *Subclause (2)(a) does not apply to anything that a council member does as part of the deliberations at a council or committee meeting.*
- (4) *If a council member or candidate, in their capacity as a council member or candidate, is attending a council or committee meeting or other organised event (for example, a briefing or workshop), the council member or candidate must not orally, in writing or by any other means —*
- (a) *make a statement that a local government employee is incompetent or dishonest; or*
 - (b) *use an offensive or objectionable expression when referring to a local government employee.*
- (5) *Subclause (4)(a) does not apply to conduct that is unlawful under The Criminal Code Chapter XXXV.”*

Regulation 22

15. *Regulation 22 provides:*

“22. Disclosure of interests

- (1) *In this clause —*
- (a) ***interest** means an interest that could, or could reasonably be perceived to, adversely affect the impartiality of the person having the interest; and*
 - (b) *includes an interest arising from kinship, friendship or membership of an association.*
- (2) *A person who has an interest in any matter to be discussed at a council or committee meeting attended by the member must disclose the nature of the interest —*
- (a) *in a written notice given to the CEO before the meeting; or*
 - (b) *at the meeting immediately before the matter is discussed.*



- (3) *Subclause (2) does not apply to an interest referred to in section 5.60 of the Act.*
- (4) *Subclause (2) does not apply if a council member fails to disclose an interest because the council member did not know -*
- (a) that they had an interest in the matter; or*
- (b) that the matter in which they had an interest would be discussed at the meeting and the person disclosed the interest as soon as possible after the discussion began.*
- (5) *If, under subclause (2)(a), a council member discloses an interest in a written notice given to the CEO before a meeting, then —*
- (a) before the meeting the CEO is to cause the notice to be given to the person who is to preside at the meeting; and*
- (b) at the meeting the person presiding must bring the notice and its contents to the attention of the persons present immediately before any matter to which the disclosure relates is discussed.*
- (6) *Subclause (7) applies in relation to an interest if –*
- (a) under subclause (2)(b) or (4)(b) the interest is disclosed at a meeting; or*
- (b) under subclause (5)(b) notice of the interest is brought to the attention of the persons present at a meeting.*
- (7) *The nature of the interest must be recorded in the minutes of the meeting.”*

Elements of Regulation 22(2)

16. *The essential elements of a breach of Regulation 22(2) are that it is more likely than not that:*

- *a person who is a current council member (“member”);*
- *subject to Regulation 22(3), had a private or personal interest (“relevant interest”) in a matter (“matter”) that is more likely than not a conflict of interest or a bias (apparent or real) that does adversely affect, or might adversely affect the member’s impartiality in considering the matter, and includes an interest arising from kinship, friendship, membership of an association, or another circumstance;*
- *the member attended at the council or committee meeting concerned and was present when the matter under consideration came before the meeting and was discussed;*
- *the member did not disclose the nature of the relevant interest in the matter in either of the two ways required by Regulation 22(2)(a) or 22(2)(b); and*



- *Regulation 22(4) does not apply.*

Regulation 34D

17. Regulation 34D provides:

(1) *In this regulation -*

“local law as to conduct” means a local law relating to conduct of people at council or committee meetings.

(2) *The contravention of a local law as to conduct is a minor breach for the purposes of section 5.105(1)(b) of the Act.”*

18. Section 5.105(1)(b) of the Act states as follows:

“A council member commits a minor breach if she or he contravenes...

(b) *a local law under the this Act, contravention of which the regulations specify to be a minor breach.”*

Elements of Regulation 34D

19. In order to find a breach of Regulation 34, the Panel must be satisfied to the required standard of proof that:

- The conduct occurred at a council or committee meeting;
- A standing orders local law or meeting procedures local law applied at the meeting; and
- The relevant local law prohibited the specific conduct displayed by the council member.

Substance of the Complaint

20. Cr Black was the Shire President at the time of the Complaint. He had operated a Short Stay Accommodation facility named Mount Magnet Cabins (“Business”) on a lot (“Property”) under a lease (“Lease”) from the Department of Planning, Lands and Heritage (“DPLH”).

21. Cr Black’s tenure on the Lease had expired in 2013. Cr Black had a history of convincing the DPLH to grant him further extensions on terminated leases over a thirteen-year period during which he had continued to “*hold over*”.

22. Most recently, the Lease had not been renewed due to the fact that Cr Black had refused to comply with Health and Building Regulations.

23. By way of background, the Complainant explained (in summary):

- In 2023, DPLH officers inspected the Property along with the Shire’s Environmental Health Officer (“Shire EHO”) to determine whether the



Property complied with regulations. On a number of occasions previously, Cr Black had refused entry to the Shire EHO.

- b. The Shire EHO had advised that the Property was inappropriately being used to store salvage materials, and they had attempted to negotiate with Cr Black to remove them. Cr Black had refused to comply, and a prosecution was before the Court for breaches of planning legislation.
- c. The Complainant alleged that Cr Black blamed the Shire EHO and the Complainant (as CEO) for the Lease on the Property being terminated.
- d. At the commencement of the Council Meeting held on 27 March 2024 (“Cr Meeting”), Cr Black stated that his activities for the month were only in relation to “*saving Mount Magnet Cabins.*”
- e. Item 17.3 Profit and Loss on EHO Consulting was then considered:

17.3 PROFIT AND LOSS ON EHO CONSULTING	
55.23(2)a	
Officer:	T Cable, Chief Executive Officer
Date of Report:	21 March 2024
Amended By:	Not Amended
Disclosure of Interest:	No Interest Disclosed
Nature of Interest:	Nil
Meeting Date:	27 March 2024
Attachments:	Nil
Matter for Consideration	
To accept the statement of financial position provided in respect of consulting services provided by the Shire of Mount Magnet.	
COUNCIL RESOLUTION	
Moved: Cr Dann	Seconded: Cr Jones
That Council accept the financial position as presented in respect of the Environmental Health Officer consultancy.	
RESOLUTION 2024-059	CARRIED 6/0
Councillors Voting in favour of the Motion – McGorman, Black, Homewood, Kelly and Dann	

- f. Cr Black had repeatedly suggested that the Council was unaware of the “*true*” cost of the Shire EHO, despite the fact that he himself had moved the motion to update the Organisational Chart to include their direct hire. Cr Black further commented in relation to the Shire EHO that “*it is a shame he is not a nice person*”.
- g. In addition, Cr Black had not acknowledged he should declare an interest in the Matter and had not left the room when the matter was considered. He participated in the discussion.

Cr Black’s Response

24. On 10 April 2024, the Department requested comment on the allegations from Cr Black. However, Cr Black had not responded.

Panel’s Consideration

First Allegation – alleged breach of Regulation 20



25. The Panel was not satisfied that Cr Black breached his obligations under Regulation 20 when he attended the Council Meeting.
26. The Complainant had not particularised which section of Regulation 20 it was alleged that Cr Black had breached. It was not the Panel's role to speculate - the Panel is not an investigative body. It determines complaints of minor breaches solely upon the evidence presented to it.

Findings

27. Accordingly, for the above reasons, the Panel finds that Cr Black had not breached Regulation 20 in relation to the First Allegation.

Second Allegation – alleged breach of Regulation 22

28. The Panel finds that the essential elements of Regulation 22(2) had not been satisfied:
 - a. The Panel noted that the allegation against Cr Black in relation to Regulation 22 was again not well particularised by the Complainant.
 - b. Moreover, the Complainant had lodged a number of other complaints in and around the same time against Cr Black in relation to various Agenda Items discussed at the Council Meeting and had relied on the same rather vague information in respect of each allegation.
 - c. The link / nexus between the allegation and the evidence relied upon was not strong enough for the Panel to base a finding that Cr Black had breached Regulation 22.

Findings

29. Accordingly, for the above reasons, the Panel finds that Cr Black had not breached Regulation 22 in relation to the Second Allegation.

Third Allegation – alleged breach of Regulation 34D

30. The Panel is satisfied that Cr Black breached Regulation 34D.
31. The Complainant had not particularised which Local Law it was alleged that Cr Black had breached, and it was not the Panel's role to speculate. Again, the Panel is not an investigative body. It determines complaints of minor breaches solely upon the evidence presented to it.
32. However, based on the evidence presented, the Panel found that the reasonable conclusion could be drawn that it was a breach of Clause 7.4 (Adverse Reflection) of the *Standing Orders Local Law 2018* that it was alleged Cr Black had breached:



7.4 Adverse reflection

(1) No member is to reflect adversely upon a decision of the Council or Committee except on a motion that the decision be revoked or amended.

(2) No member is to—

(a) reflect adversely on the character or actions of another member or any other person; or

(b) impute any motive to another member or any other person;

unless the Council resolves, without debate, that the question then before the meeting cannot otherwise be adequately considered.

(3) No member is to use offensive or insulting expressions in reference to any member or any other person.

33. The conduct occurred at a council meeting; the abovementioned *Standing Orders Local Law 2018* applied at the meeting and prohibited the specific conduct displayed by Cr Black.
34. The Complainant submitted that at the Council Meeting Cr Black had made a comment regarding the Shire EHO that “*it is a shame he is not a nice person*”.
35. Such a remark was in direct contravention of Clause 7.4; Cr Black had clearly reflected adversely on the Shire EHO’s character. Stating that someone is “*not a nice person*” suggests they lack certain positive qualities in their behaviour and interactions with others. It implies they may be unkind, unpleasant, or have negative characteristics like being mean, rude, or disrespectful.



Findings

36. Accordingly, for the above reasons, the Panel finds that Cr Black had breached Regulation 34D in relation to the Third Allegation.

Signing

A handwritten signature in black ink, appearing to be 'Tim Fraser'.

Tim Fraser (Presiding Member)

A handwritten signature in black ink, appearing to be 'Elanor Rowe'.

Elanor Rowe (Deputy Member)

A handwritten signature in black ink, appearing to be 'Peter Rogers'.

Peter Rogers (Member)



Local Government Standards Panel

Complaint Number	20240391
Legislation	<i>Local Government Act 1995 (WA)</i>
Complainant	Chief Executive Officer Tralee Cable
Respondent	Councillor Ian Black
Local Government	Shire of Mount Magnet
Regulation	Regulation 34D of the <i>Local Government (Administration) Regulations 1996</i>
Panel Members for Penalty Consideration	Mrs Emma Power (Presiding Member) Mr Ethan Redshaw (Member) Mr Peter Rogers (Member)
Heard	28 May 2024 Determined on the documents
Penalty Considered	9 July 2025
Outcome	Public Apology

DECISION AND REASONS FOR DECISION

Delivered 22 September 2025

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Introduction

1. At its meeting on 28 May 2024, the Panel found that Councillor Ian Black, a councillor of the Shire of Mount Magnet (“**the Shire**”), committed a minor breach under the *Local Government Act 1995* (WA) (“**the Act**”) and Regulation 34D of the *Local Government (Administration) Regulations 1996* when, during a Council Meeting, he referred to a Shire employee as “*not a nice person*” (“**the Minor Breach**”).

Jurisdiction and Law

2. The Panel convened on 9 July 2025 to consider how it should deal with the Minor Breach.
3. The Panel accepted the advice of the Department of Local Government, Industry Regulation and Safety (“**the Department**”) that on this date there was no available information to indicate that Cr Black had ceased to be, or was disqualified from being, a councillor.
4. If the Panel finds that a councillor has committed a minor breach, it must give the councillor an opportunity to make submissions to the Panel about how it should deal with the breach under section 5.110(6).¹
5. By a letter dated 12 June 2025, Cr Black was:
 - a. notified of the Panel’s finding of the Minor Breach;
 - b. provided with a copy of the Panel’s Finding and Reasons for Finding; and
 - c. offered an opportunity to make submissions as to how the Minor Breach should be dealt with under section 5.110(6) of the Act.

Possible Sanctions

6. Section 5.110(6) of the *Local Government Act 1995* (WA) (“**the Act**”) provides that the Panel is to deal with a minor breach by:
 - (a) *ordering that no sanction be imposed; or*
 - (b) *ordering that —*
 - (i) *the person against whom the complaint was made be publicly censured as specified in the order;*
or
 - (ii) *the person against whom the complaint was made apologise publicly as specified in the order;*
or
 - (iii) *the person against whom the complaint was made undertake training as specified in the order;*
or
 - (iv) *the person against whom the complaint was made pay to the local government specified in the order an amount equal to the amount*

¹ *Local Government Act 1995* (WA), s 5.110(5).



of remuneration and allowances payable by the local government in relation to the complaint under Schedule 5.1 clause 9;

or

(c) ordering 2 or more of the sanctions described in paragraph (b).

Cr Black's Submissions

7. Despite being an opportunity to provide submissions as to an appropriate penalty, Cr Black did not provide a response to the Department.

Panel's Consideration

8. Section 5.110(6) is solely about penalty. The Panel does not have the power to review any finding of a breach.
9. The Panel may order under section 5.110(6)(a), that no sanction be imposed, not to reverse the Panel's finding of a breach, but to indicate that in all the circumstances the relevant councillor should not be penalised further.
10. Guidance as to the factors which the Panel may consider in determining the appropriate penalty to impose include, but are not limited to, the following:
 - a. the nature and seriousness of the breaches;
 - b. the councillor's motivation for the contravention;
 - c. whether or not the councillor has shown any insight and remorse into his/her conduct;
 - d. whether the councillor has breached the Act knowingly or carelessly;
 - e. the councillor's disciplinary history;
 - f. likelihood or not of the councillor committing further breaches of the Act;
 - g. personal circumstances at the time of conduct, and of imposing the sanction;
 - h. need to protect the public through general deterrence and maintain public confidence in local government; and
 - i. any other matters which may be regarded as aggravating conduct or mitigating its seriousness.²
11. In this case it is noted that Cr Black specifically referred to the Shire's Environmental Health Officer as "*not a nice person*" during the Council Meeting of 27 March 2024.
12. This was a clear and public adverse reflection on the character of the Shire's Environmental Health Officer.
13. As the conduct was public and specifically referred to the impacted the staff of the Shire, the Panel considers that a public apology is the appropriate sanction in the circumstances.

² *Chief Executive Officer, Department of Local Government and Communities and Scaffidi* [2017] WASAT 67 (S).



14. Making a public apology is a significant sanction, being a personal admission by the individual of wrongdoing.³ It is a suitable and appropriate penalty when a councillor's conduct:
 - a. adversely affects particular individuals⁴; and/or
 - b. does not meet the standards other councillors seek to uphold.
15. In the relevant circumstances, the Panel considers that making a public apology is an adequate sanction and that it is not necessary to make an order in accordance with Schedule 5.1 clause 9 of the Act that Cr Black recoup to the Shire the costs of the Department incurred with respect to the Complaint.

Panel's decision

16. The Panel orders pursuant to section 5.110(6)(b)(ii) of the Act that, in relation to the Minor Breach of regulation 34D of the Administration Regulations, Cr Black make a public apology in terms of the attached Order.

Signing

Emma Power (Presiding Member)

Ethan Redshaw (Deputy Member)

Peter Rogers (Member)

³ *Treby and Local Government Standards Panel* [2010] WASAT 81 (Pritchard J).

⁴ *Treby and Local Government Standards Panel* [2010] WASAT 81 [127] (Pritchard J).



ORDER

Delivered 22 September 2025

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THE LOCAL GOVERNMENT STANDARDS PANEL ORDERS THAT:

1. Councillor Ian Black, a councillor for the Shire of Mount Magnet **publicly apologise** as specified in paragraph 3; OR
2. Failing compliance with paragraph 3 within the specified timeframe, then paragraph 4 shall apply.

Public Apology

3. On the ordinary council meeting of the Shire of Mount Magnet first occurring after the expiration of **28 days** from the date of service of this Order on him, Cr Ian Black shall:
 - i. attend the relevant ordinary council meeting;
 - ii. ask the presiding person, or acting presiding person, for his or her permission to address the meeting to make a public apology to the public;
 - iii. make the apology immediately after Public Question Time or during the Announcements part of the meeting, or at any other time when the meeting is open to the public, as the presiding person thinks fit; and
 - iv. address the Council and public as follows, without saying any introductory words before the address, and without making any comments or statement after the address:

"I advise this meeting that:

- i. A complaint was made to the Local Government Standards Panel, in which it was alleged that I contravened Regulation 34D of the *Local Government (Administration) Regulations 1996*, when I referred to a Shire employee as "*not a nice person*" during a public Council meeting.
- ii. The Panel found that I breached Regulation 34D as my conduct constituted an adverse reflection on the character of that employee.
- iii. I acknowledge that I should not have made such statement and I now apologise to the particular staff member referred to, as well as all Shire administrative staff and my fellow councillors."



4. If Cr Ian Black fails to, or is unable to, comply with the requirements of paragraph 3 above in the required time frame THEN, within the next **28 days** following the ordinary council meeting referred to in paragraph 3 above the Chief Executive Officer of the Shire of Mount Magnet shall arrange for the notice of public apology to be published:
 - a. on the Facebook Page of the Shire of Mount Magnet shall in no less than 10 point font size; and
 - b. in an appropriate place on the website of the Shire of Mount Magnet shall in no less than 10 point font size; and
 - c. in the next occurring issue of any Shire of Mount Magnet shall public newsletter (if any) whether in electronic or print copy) in no less than 10 point font size.

PUBLIC APOLOGY BY COUNCILLOR IAN BLACK

A complaint was made to the Local Government Standards Panel, in which it was alleged that I contravened Regulation 34D of the *Local Government (Administration) Regulations 1996*, when I referred to a Shire employee as “*not a nice person*” during a public Council meeting.

The Panel found that I breached Regulation 34D as my conduct constituted an adverse reflection on the character of that employee.

I acknowledge that I should not have made such statement and I now apologise to the particular staff member referred to, as well as all Shire administrative staff and my fellow councillors.

Appeal

5. In the event that, prior to the date for compliance with the above Orders, Cr Ian Black:
 - a. commences an appeal the decision of the Standards Panel to the State Administrative Tribunal in accordance with section 5.125 of the *Local Government Act 1995*; and
 - b. notifies the Complaints Officer of such appeal in writing,THEN:
 - c. compliance with the above Orders may be delayed until the State Administrative Tribunal has made a finding in respect to the decision; and
 - d. such Orders may be amended by an order of the State Administrative Tribunal.



NOTICE TO THE PARTIES TO THE COMPLAINT

RIGHT TO HAVE PANEL DECISION REVIEWED BY THE STATE ADMINISTRATIVE TRIBUNAL

The Local Government Standards Panel (the Panel) advises:

- (1) Under section 5.125 of the *Local Government Act 1995* the person making a complaint and the person complained about each have the right to apply to the State Administrative Tribunal (the SAT) for a review of the Panel's decision in this matter. In this context, the term "decision" means a decision to dismiss the complaint or to make an order.
- (2) By rule 9(a) of the *State Administrative Tribunal Rules 2004*, subject to those rules an application to the SAT under its review jurisdiction must be made within 28 days of the day on which the Panel (as the decision-maker) gives a notice [see the Note below] under the *State Administrative Tribunal Act 2004 (SAT Act)*, section 20(1).
- (3) The Panel's ***Breach Findings and these Findings and Reasons for Finding – Sanctions***, constitute the Panel's notice (i.e. the decision-maker's notice) given under the *SAT Act*, section 20(1).

Note:

- (1) This document may be given to a person in any of the ways provided for by sections 75 and 76 of the *Interpretation Act 1984*. [see s. 9.50 of the *Local Government Act 1995*]
- (2) Subsections 75(1) and (2) of the *Interpretation Act 1984* read:
 - "(1) Where a written law authorises or requires a document to be served by post, whether the word "serve" or any of the words "give", "deliver", or "send" or any other similar word or expression is used, **service shall be deemed** to be effected by properly addressing and posting (by pre-paid post) the document as a letter to the last known address of the person to be served, and, **unless the contrary is proved, to have been effected at the time when the letter would have been delivered in the ordinary course of post.** [Bold emphases added]
 - (2) Where a written law authorises or requires a document to be served by registered post, whether the word "serve" or any of the words "give", "deliver", or "send" or any other similar word or expression is used, then, if the document is eligible and acceptable for transmission as certified mail, the service of the document may be effected either by registered post or by certified mail."
- (3) Section 76 of the *Interpretation Act 1984* reads:

"Where a written law authorises or requires a document to be served, whether the word "serve" or any of the words "give", "deliver", or "send" or any other similar word or expression is used, without directing it to be served in a particular manner, service of that document may be effected on the person to be served —

 - (a) by delivering the document to him personally; or
 - (b) by post in accordance with section 75(1); or
 - (c) by leaving it for him at his usual or last known place of abode, or if he is a principal of a business, at his usual or last known place of business; or



- (d) *in the case of a corporation or of an association of persons (whether incorporated or not), by delivering or leaving the document or posting it as a letter, addressed in each case to the corporation or association, at its principal place of business or principal office in the State.”*