



Local Government Standards Panel

Complaint Number	20250587
Legislation	<i>Local Government Act 1995</i>
Complainant	Dr Trudy Stewart
Respondent	Councillor Craig McKinley
Local Government	City of Albany
Regulation	Regulation 18 of the <i>Local Government (Model Code of Conduct) Regulations 2021</i>
Panel Members	Mr Tim Fraser (Presiding Member) Ms Emma Power (Member) Cr Bronwyn Ife (Member)
Heard	13 June 2025 Determined on the documents
Finding	1 x Breach Regulation 18

FINDING AND REASONS FOR FINDING

Delivered 21 October 2025

DEFAMATION CAUTION

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Summary of the Panel's decision

1. On 13 June 2025, the Panel found that Councillor Craig McKinley a councillor of the City of Albany ("**the City**") did commit a minor breach pursuant to the *Local Government Act 1995 (WA)* ("**the Act**") and Division 4 and Regulation 18 of the *Local Government (Model Code of Conduct) Regulations 2021* ("**the Regulations**") when he approached a local business and left his Councillor business card as further set out in paragraph 17 below.

The Panel's Role

2. Under section 5.110(2) of the Act the Panel is required to consider a minor breach complaint and make a finding as to whether the alleged minor breach occurred.
3. The Act and the *Local Government (Administration) Regulations 1996* provide for the circumstances in which a council member commits a minor breach.
4. Section 5.105(1) of the Act provides that a council or committee member commits a minor breach if the council or committee member contravenes a rule of conduct. Division 4 of the Regulations sets out the rules of conduct for council members and candidates.
5. Regulation 34D of the *Local Government (Administration) Regulations 1996* also provides that the contravention of a "*local law as to conduct*" is a minor breach pursuant to the Act.
6. The Panel may make a finding that a councillor has committed a minor breach of the Act and Regulations based on evidence from which it may be concluded that it is more likely that the alleged breach occurred than it did not occur.¹
7. In order to find a breach, it must be established that each element of the relevant Regulation is more likely than not to have been breached or met.
8. In considering whether a minor breach is established the Panel must consider:
 - a. all evidence provided and, where there are conflicting circumstances, inferences or evidence, must come to a reasonable conclusion that any circumstance, inference or evidence relied upon is more likely than not to have occurred or be accurate²; and
 - b. the seriousness of any allegation made, as well as the gravity of the consequences flowing from a particular finding³.
9. The Panel does not possess investigative or supervisory powers.⁴ The Panel makes decisions about complaints regarding minor breaches solely upon the evidence presented to it and, where appropriate, materials in the public domain or published by the relevant local authority's website.

¹ Section 5.106 of the Act

² *Bradshaw v McEwans Pty Ltd* (1951) 217 ALR 1

³ *Briginshaw v Briginshaw* (1938) 60 CLR 336

⁴ *Re and Local Government Standards Panel* [2015] WASC 51 (at paragraph 24)



10. It is the responsibility of both complainants and respondents to provide the Panel with all information they wish the Panel to consider when making its determination.
11. The Panel also must have regard to the general interests of local government in Western Australia⁵.
12. The Panel is obliged to give notice of the reasons for any finding it makes under section 5.110(2) of the Act.

Jurisdiction and Procedural Fairness

13. On 27 March 2025 the Panel received a complaint from Mr Andrew Sharpe acting as complaints officer of the City (**“the Complaints Officer”**). The same enclosed a Complaint of Minor Breach Form dated 27 March 2025.
14. In the complaint form, the Complainant asserts that Cr McKinley has breached regulation 18 of the Regulations when he approached a local business and left his Councillor business card as further referred to in paragraph 17 below (**“the Complaint”**).
15. The Panel convened on 13 June 2025 to consider the Complaint.
16. The Panel:
 - a. accepted the advice of the Department of Local Government, Sport and Cultural Industries (**“the Department”**) that, based on information published on the Western Australian Electoral Commission’s website, Cr McKinley was:
 - i. last elected to the Council of the City in October 2023 for a term expiring in October 2027;
 - ii. a Councillor at the time of the alleged breach; and
 - iii. a Councillor when the Panel met on 13 June 2025;
 - b. was satisfied the Complaint was made within six months after the alleged breach occurred⁶;
 - c. was satisfied that the City’s Complaints Officer had dealt with the Complaint in accordance with the administrative requirements in the Act for dealing with complaints of a minor breach⁷;
 - d. was satisfied the Department had provided procedural fairness to Cr McKinley; and
 - e. found it had jurisdiction to consider the Complaint.

The Specifics of the Complaint

17. The Complainant provided following comments and arguments in respect to the Complaint as summarised by the Panel:

⁵ Section 8(6) of Schedule 5.1 of the Act

⁶ Section 5.107(4) and 5.109(2) of the Act

⁷ Section 5.107 and 5.109 of the Act



- a. Cr McKinley presented to the Complainant's orthodontist clinic wanting to speak with the Complainant.
 - b. When advised by the receptionist that Cr McKinley was not at the clinic on this day he provided his councillor card and demanded that the Complainant contact him and stated:

“ I can make it very hard for Trudy as a new business owner in town, make sure she gets this message, it's in her best interest to rectify this”
 - c. He repeated this statement multiple times.
 - d. Cr McKinley also noted down Dr Trudy's Perth clinic and confirmed she was the new orthodontist and owner of the Albany practice.
 - e. The Complainant purchased the Albany Orthodontics in January 2025. The prior owner treated Cr McKinley's daughter, completing her treatment in September 2024. The Complainant has never seen this family or received any payment for treatment from this family. She operates a completely new business.
 - f. The family contacted the practice as they are not happy with the daughter's finished treatment. The Complainant's staff have provided the family with information of how to make a complaint regarding the prior owner's work
 - g. The family would like the Complainant to provide retreatment for free.
18. The Complainant also supplied a copy of Cr McKinley's City of Albany business card.

The Respondent's Response

19. By an email dated 12 April 2025, Cr McKinley provided a response to the Complaint.
20. Cr McKinley denies that he has committed any minor breach.
21. Cr McKinley provided the following comments and arguments regarding the Complaint:
 - a. All correspondence was with the reception staff member lasting approximately 1 minute and at no time did Cr McKinley mention anything about 'free' treatments as indicated in the Complaint.
 - b. All comments by the Complainant are hearsay and are false as she was not present during the said exchange.
 - c. Cr McKinley's daughter attended Albany orthodontist for a scheduled appointment in January 2025 for follow up treatment and was denied appointment due Albany Orthodontist advising treatment had ceased, even though \$10,000 had been pre-paid to Albany Orthodontic in 2023.
 - d. Cr McKinley became aware that the business (Albany Orthodontist) had been sold as a going concern.
 - e. Cr McKinley attended Albany Orthodontist in March 2025 and requested to speak to the new owner as a concerned father over the treatment of his daughter. Reception advised that the Complainant was not onsite. Cr McKinley



requested Dr Trudy Stewart call him regarding his daughter's case. Cr McKinley requested to reception that it was important to call him as soon as possible as he was not happy with the business.

- f. Cr McKinley handed over his City of Albany business card, so Dr Trudy Stewart had his mobile phone number.
- g. The dispute is totally a private matter between Albany Orthodontist and Cr McKinley's family and has no connection with the City of Albany or his role as councillor.
- h. Cr McKinley has lodged a formal complaint against Albany Orthodontist.
- i. The only mistake from Cr McKinley's point was handing over his City of Albany councillor business card which was convenient at the time as it contained his name and phone number for contact as he does not have a private business card.
- j. Cr McKinley now can see in hindsight how it may have been misinterpreted.

Regulation 18

22. Regulation 18 prohibits councillors engaging in conduct to either gain an advantage for themselves (or another party) or cause detriment to another party and specifically provides as follows:

“ 18. Securing personal advantage or disadvantaging others

(1) A council member must not make improper use of their office —

(a) to gain, directly or indirectly, an advantage for the council member or any other person; or

(b) to cause detriment to the local government or any other person.

(2) Subclause (1) does not apply to conduct that contravenes section 5.93 of the Act or The Criminal Code section 83.”

23. To make a finding of a minor breach of regulation 18(1)(b) of the Regulations the Panel must be satisfied to the required standard that:
 - a. Cr McKinley was an elected member at the time of the alleged breach and the time of the determination;
 - b. Cr McKinley made use of his office as Council member of the City;
 - c. when viewed objectively, such use was an improper use of Cr McKinley's office in that it:
 - i. involved a breach of the standards of conduct that would be expected of a person in the position of councillor by reasonable persons; and
 - ii. was so wrongful and inappropriate in the circumstances that it calls for the imposition of a penalty; and



- d. Cr McKinley engaged in the conduct to gain an advantage for himself or another party.
24. The Complainant has not made any allegation of any disadvantage allegedly sought by Cr McKinley so the Panel has only considered regulation 18(1)(a) in this instance.

PANEL CONSIDERATION

Cr McKinley was an Elected Member at the relevant times

25. Cr McKinley was an elected member at the time of the alleged breach and at the date the Panel considered the Complaint.
26. This element is met.

Cr McKinley made use of his office as Council Member of the City

27. In this case it is asserted by Cr McKinley that this matter is a solely private matter.
28. The Panel would generally agree with this assertion, except for the undisputed fact that Cr McKinley had handed his City of Albany councillor business card to the receptionist, expressly to provide to the Complainant in respect to a possible dispute by Cr McKinley relating to the orthodontist practice.
29. Even if Cr McKinley did not make the comments exactly as alleged by the Complainant, noting the interaction was reported by a third party, by providing his councillor business card to the Complainant as his sole form of contact Cr McKinley gave the impression that he was acting in his capacity as a local councillor in respect to this matter.
30. The fact that Cr McKinley did not have an alternative business card is not a reasonable justification. He could have provided his contact details in an alternative manner.
31. Given the above, the Panel finds to the required standard that, in providing his City business card, Cr McKinley acted in his capacity as a local councillor.
32. This element is met.

Cr McKinley's use was improper

33. Deciding if conduct is an improper use of office requires something more than simply a demonstration of poor judgment or lack of wisdom. It requires an abuse of power or the use of the councillor's position in a manner that such councillor knew (or ought to have known) was not authorised.
34. Impropriety does not depend on a councillor's consciousness of impropriety. It is to be judged objectively and does not involve an element of intent.



35. Any decision as to what is “improper” cannot be made in isolation but must be considered in the relevant context including the specifics of the relevant event as well as councillor's formal role and responsibilities.
36. In the case of impropriety arising from an abuse of power, a councillor's alleged knowledge or means of knowledge of the circumstances in which the power is exercised and his purpose or intention in exercising the power will be important factors in determining whether the power has been abused⁸.
37. In this case it is alleged that Cr McKinley:
 - a. told the Complainant's receptionist that he could “*make it very hard*” for the Complainant in the locality; and
 - b. provided a copy of his City business card to the Complaint's receptionist.
38. The Panel finds that, even of the words alleged to be said by Cr McKinley are not entirely accurate, that it is more likely than not that Cr McKinley acted in an annoyed or hostile manner and likely strongly implied that there would be adverse consequences if the Complainant did not comply with his requests.
39. This, combined with handing over the City business card, had the strong implication that Cr McKinley would use his position as a councillor influence the outcome to the disagreement between the parties.
40. Even if Cr McKinley did not intend to directly assert this stance, he should have been keenly aware that it simply was not appropriate to refer to his position as a councillor in connection with a private commercial dispute and that such reference would be likely to intimidate the party he was speaking to.
41. The City does not have a published policy as to the use of resources such as business cards or City email addresses, however, it is the general position is that such items are only authorised to be used by elected members in connection with their role as a councillor.
42. Clearly, the relevant interaction was not of the type that Cr McKinley should have been using such City resources or holding himself out to be acting in the capacity of an elected member as the matter:
 - a. was connected to the City;
 - b. should not have been related to Cr McKinley's role as a councillor.
43. Given the above, the Panel finds that it is more likely than not that the relevant conduct was improper as:
 - a. the conduct was of such a nature that a reasonable individual would consider the same to be inappropriate or not in keeping with the conduct that would be expected of a councillor; and
 - b. the conduct is deserving of a penalty.
44. This element is met.

⁸ Treby and Local Government Standards Panel [2010] WASAT 81 (at 31); Chew v The Queen (1992) 173 CLR 626 (at 640 - 641 [Dawson J]); R v Byrnes (1995) 183 CLR 501 – (at 514 - 515 [Brennan, Deane, Toohey and Gaudron JJ] and at 521 [McHugh J]).



Cr McKinley intended to gain an advantage

45. The definitions of the noun 'advantage' in the Shorter Oxford English Dictionary (6th ed) include: a favouring circumstance; something which gives one a better position, benefit; increased well-being or convenience or pecuniary profit.
46. The Panel considers the term 'advantage' in regulation 18(1)(a) is to be construed widely, and includes a financial or a non-financial benefit, gain or profit, or any state, circumstance, opportunity or means specially favourable.⁹
47. It is not necessary to find whether any advantage actually gained¹⁰ but an intent to gain such advantage must be established.
48. In this case the Panel finds that there was no reasonable excuse to hand over the City business card, except to:
 - a. ensure that the Complainant (being new to the area) was aware that Cr McKinley was a local councillor; and
 - b. imply that Cr McKinley' position as a local councillor may influence the outcome of any dispute between the parties.
49. The Panel therefore finds that it is more likely than not that Cr McKinley intended to gain an advantage for himself in achieving a more favourable negotiating or commercial position in any dispute between the parties.
50. This element is met.

Conclusion

51. The elements required to find a breach of regulation 18 of the Regulations have been met.

Panel's Findings

52. Cr McKinley did commit a breach of Regulation 18 of the Regulations and therefore did commit a minor breach.

⁹ Complaint SP 12 and 13 of 2011

¹⁰ *Yates and Local Government Standards Panel* [2012] WASAT 59 at [72]



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

Erin Gauntlett (Presiding Member)

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

Emma Power (Member)

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

Bronwyn Ife (Deputy Member)

Signing



Local Government Standards Panel

Complaint Number	20250587
Legislation	<i>Local Government Act 1995 (WA)</i>
Complainant	Dr Trudy Stewart
Respondent	Councillor Craig McKinley
Local Government	City of Albany
Regulation	Regulation 18 <i>of the Local Government (Model Code of Conduct) Regulations 2021</i>
Panel Members for Penalty Consideration	Ms Erin Gauntlett (Presiding Member) Ms Emma Power (Member) Mr Peter Rogers (Member)
Heard	13 June 2025 Determined on the documents
Penalty Considered	13 November 2025
Outcome	Public Apology

DECISION AND REASONS FOR DECISION

Delivered 08 January 2026

DEFAMATION CAUTION

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Introduction

1. At its meeting on 13 June 2025, the Panel found that Councillor Craig McKinley, a councillor of the City of Albany (**“the City”**), committed a minor breach under the *Local Government Act 1995 (WA)* (**“the Act”**) and Division 4 and Regulation 18 of the *Local Government (Model Code of Conduct) Regulations 2021* (**“the Regulations”**) when he approached a local business and left his Councillor business card (**“the Minor Breach”**).

Jurisdiction and Law

2. The Panel convened on 13 November 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 McKinley 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 21 October 2025, Cr McKinley 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

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



- (iv) *the person against whom the complaint was made pay to the local government specified in the order an amount equal to the amount 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 McKinley's Submissions

7. By an email 22 October 2025 the Department received a response from Cr McKinley.
8. Cr McKinley provided the following comments:
 - a. Cr McKinley can understand how the Complainant may have perceived his actions of the using the City of Albany business card and any apparent displeased demeanour. Cr McKinley has learnt going forward that this behaviour was not appropriate for the situation.
 - b. Cr McKinley therefore request that no sanction be imposed for the subject minor breach.

Panel's Consideration

9. Section 5.110(6) is solely about penalty. The Panel does not have the power to review any finding of a breach.
10. 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.
11. 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 seriousness².

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



12. In this case it is noted that Cr McKinley acknowledges the breach and that his conduct was not appropriate. The Panel further finds that it is highly unlikely that Cr McKinley would re-offend in the same way in the future.
13. However, as the conduct specifically impacted a particular person in the community to a degree they felt it necessary to make a formal complaint, the Panel considers that a public apology is the appropriate sanction in the circumstances.
14. Making a public apology is a significant sanction, being a personal admission by the individual of wrongdoing³. 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 McKinley recoup to the City 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 18 of the Regulations, Cr McKinley make a public apology in terms of the attached Order.

Signing

Erin Gauntlett (Presiding Member)

Emma Power (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 08 January 2025

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THE LOCAL GOVERNMENT STANDARDS PANEL ORDERS THAT:

1. Councillor Craig McKinley, a councillor of the City of Albany **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 City of Albany first occurring after the expiration of **28 days** from the date of service of this Order on him, Councillor Craig McKinley 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 18 *of the Local Government (Model Code of Conduct) Regulations 2021*, when I provided a local business owner with my councillor business card when contacting her regarding a private dispute.
- ii. The Panel found that I breached Regulation 18 and that my conduct was improper as it implied I was acting in my role as a local councillor.
- iii. I acknowledge that I should not have engaged in such conduct and I now apologise to Dr Trucy Stewart and her staff, as well the public and my fellow councillors."



4. If Councillor Craig McKinley 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 City of Albany shall arrange for the notice of public apology to be published:
 - a. on the Facebook Page of the City of Albany shall in no less than 10 point font size; and
 - b. in an appropriate place on the website of the City of Albany shall in no less than 10 point font size; and
 - c. in the next occurring issue of any City of Albany shall public newsletter (if any) whether in electronic or print copy) in no less than 10 point font size.

PUBLIC APOLOGY BY COUNCILLOR CRAIG MCKINLEY

A complaint was made to the Local Government Standards Panel, in which it was alleged that I contravened Regulation 18 *of the Local Government (Model Code of Conduct) Regulations 2021*, when I provided a local business owner with my councillor business card when contacting her regarding a private dispute.

The Panel found that I breached Regulation 18 and that my conduct was improper as it implied I was acting in my role as a local councillor.

I acknowledge that I should not have engaged in such conduct and I now apologise to Dr Trucy Stewart and her staff, as well the public and my fellow councillors.

Appeal

5. In the event that, prior to the date for compliance with the above Orders, Councillor Craig McKinley:
 - 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.”*