

APPLICATIONS TO CROSS-EXAMINE GRANT GALVIN

Introduction

1. Counsel Assisting proposes to call Grant Galvin (**Mr Galvin**) to give evidence on 14 July 2026. He has given a statement sworn on 2 July 2026 (**Galvin Statement**)
2. Michael Ravbar (**Mr Ravbar**) has filed an application dated 8 July 2026 to cross-examine Mr Galvin (**Application**). Mr Ravbar has also sworn a statement in aid of his application, dated 9 July 2026 (**Statement**).
3. The CFMEU has filed an application dated 10 July 2026 to cross-examine Mr Galvin (**Union Application**).
4. Counsel Assisting opposes both applications for the reasons that follow.

The Ravbar Application

5. Mr Ravbar applies to cross-examine Mr Galvin about a number of topics, none of which should be allowed, save for limited exceptions as set out below.

BERT

6. Mr Ravbar should not be granted leave to cross-examine Mr Galvin “about the arrangements between BERT and the CFMEU” (c.f., Application, [2](a)). This request is too broad for someone who was a director of BERT for two years nearly 10 years ago.
7. In any event, paragraphs [13] to [15] of the Galvin Statement were meant only to provide background context to the 2017 Rally. Mr Galvin is not put forward as a witness to prove up the arrangements or workings of BERT or similar funds, nor is he put forward to provide any support or critique of those arrangements. For the avoidance of doubt, paragraphs [13] to [15] of the Galvin Statement will not be read.

The 2017 Rally

8. Mr Ravbar should not be granted leave to cross-examine Mr Galvin about the “reasons” for the 2017 Rally (cf., Application, [2](b)). Mr Galvin is not put forward as a witness who can give evidence about the reasons motivating the rally organisers. Only the organisers would know the reasons. Mr Galvin might have had an understanding of what he thought the Rally was about, but whether this is correct or not does not matter for the sake of his evidence. The purpose of paragraphs [12] and [16] to [21] of the Galvin Statement is to give evidence about what he saw and heard on the day of the 2017 Rally.
9. Mr Ravbar should not be granted leave to cross-examine Mr Galvin about the “conduct” of the 2017 Rally in any general sense (c.f., Application, [2](b)). That said, Mr Ravbar gives evidence on some topics that relate to the 2017 Rally:

- (a) First, Mr Ravbar says he sought to obtain but could not get confirmation from Mr Galvin about the MBQ's position on the Bill in the lead up to the 2017 Rally (see Ravbar Statement, [13]-[14]).
 - (b) Second, Mr Ravbar says he did not hear any lewd or sexual comments made (see Ravbar Statement, [15]). It's not clear whether Mr Ravbar wants to make a further point, which is that such comments were not made.
 - (c) Third, Mr Ravbar gives evidence about his conversation with Mr Galvin on the day of the 2017 Rally, and what he said to the crowd immediately afterwards (see Ravbar Statement, [16]-[19]).
10. Accordingly, Mr Ravbar should be given leave to cross-examine Mr Galvin on the following topics only:
- (a) whether Mr Ravbar sought, but could not get, confirmation from Mr Galvin about MBQ's position on the Bill;
 - (b) whether lewd or sexual comments were made at the 2017 Rally at all (if this is Mr Ravbar's position); and
 - (c) whether Mr Galvin's version of events about the conversation during the Rally, and about what Mr Ravbar said to the crowd immediately afterwards, should be accepted (c.f., Galvin Statement, [18]-[21]).

The stickering of the car incident

11. Mr Ravbar should be allowed to cross-examine Mr Galvin about this evidence at paragraphs [22] to [25], by reference to Ravbar's Statement at [20] to [24].

BUSSQ

12. Mr Ravbar should not be permitted to cross-examine Mr Galvin "about the events at BUSSQ in 2021 and 2022" (cf., Application, [2](d)).
13. Mr Galvin was a director of BUSSQ from 1 January 2014 to 13 October 2021.
14. By contrast, Mr Ravbar was a director of BUSSQ from 3 November 2021 to 12 September 2024. Further, as Mr Ravbar says, before he became a director, he "did not have any decision-making capacity or role" (see Ravbar Statement, at [33]). Mr Ravbar also accepts that he does "not know what was said at the board meetings before I was appointed" (see Ravbar Statement, at [34]).
15. It could be that the CFMEU or BUSSQ might wish to take a position about matters relating to the conduct of BUSSQ before 3 November 2021, but Mr Ravbar does not fall into the same category. This includes any matters raised by Mr Galvin with APRA, and any response by APRA, which all pre-dated Mr Ravbar's appointment as a director of BUSSQ.
16. There is one exception to this. Mr Ravbar gives evidence about a meeting at Harvey's Café in New Farm in around August 2021. It appears that Mr Ravbar then wants to draw a link between the proposal discussed in that meeting, and Mr Galvin then raising concerns with APRA, although this is not clear.
17. Thus, in relation to anything taking place before Mr Ravbar was appointed as a director of BUSSQ, Mr Ravbar should only be granted leave to cross-examine Mr Galvin about the following:

- (a) the meeting at Harvey's Café in New Farm; and
- (b) whether Mr Galvin only raised his concerns with APRA because of what transpired at the meeting at Harvey's Café in New Farm (if this is Mr Ravbar's position).

The 2022 Rally

18. Mr Ravbar should not be granted leave to cross-examine Mr Galvin about the "reasons" for the 2022 Rally (cf., Application, [2](e)). Mr Galvin does not give evidence about the reasons for the rally. Only the organisers would know the reasons. The sole purpose of paragraphs [46] to [54] of the Galvin Statement is to give evidence about what he saw and heard and felt on the day of the rally.
19. Mr Ravbar should also not be granted leave to cross-examine Mr Galvin about the "conduct" of the 2022 Rally (cf., Application, [2](e)). As Mr Ravbar says, he was not involved in organising the rally (see Ravbar Statement, [51]). Mr Ravbar was present at the rally, but the only evidence he gives about the 2022 Rally is the following:
 - (a) the identity of the speakers at the Rally, which includes a denial that Mr Ravbar was a speaker (see Ravbar Statement, [50]);
 - (b) he did not witness a coffin being hoisted into the tree (see Ravbar Statement, [51]); and
 - (c) he was not aware of anyone making a death threat against Mr Galvin (see Ravbar Statement, [51]).
20. On these last two points, it is not clear whether Mr Ravbar wants to submit that a coffin was not hoisted into the tree at all, nor is it clear whether he wants to submit that no one made a death threat against Mr Galvin. To be clear about the latter, Mr Galvin does not say that anyone made a death threat against him; what he says is that he took the coffin in the tree to be a death threat (see Galvin Statement, at [53]).
21. Accordingly, Mr Ravbar should only be granted leave to cross-examine Mr Galvin about the following:
 - (a) that Mr Ravbar was not a speaker at the rally;
 - (b) that a coffin was not hoisted into the tree (if this is Mr Ravbar's position); and
 - (c) that no one made a death threat against Mr Galvin (if this is Mr Ravbar's position).

The Union Application

22. The Union applies to cross-examine Mr Galvin about three topics, none of which should be allowed.

BERT

23. The Union should not be granted leave to cross-examine Mr Galvin "about the policy and purpose of BERT in funding union run activities" (c.f., Union Application, [9](a)). This is for the same reasons as set out above in relation to Mr Ravbar wanting to cross-examine Mr Galvin about BERT.

BUSSQ

24. The Union should not be granted leave to cross-examine Mr Galvin “about the policy and purpose as to having BUSSQ as a preferred superannuation fund” (c.f., Union Application, [9](b)).
25. Mr Galvin is not being put forward as a witness about these matters. Rather, his evidence is only about the following, insofar as it concerns BUSSQ:
 - (a) the way board meetings were run when Mr Lette and Mr Trohear were on the board;
 - (b) the way board meetings were run once Mr Trohear resigned;
 - (c) the concerns he raised with APRA;
 - (d) the phone calls he received from Mr Ravbar; and
 - (e) the pressure he received from Tier 1 contractors.

Current leadership of the Administration

26. The Union should not be granted leave to cross-examine Mr Galvin so as to “distinguish and clarify his involvement with the previous leadership of the CFMEU and the Administration” (c.f., Union Application, [9](c)).
27. Mr Galvin left the industry in early 2022. He gives no evidence about anyone who is involved in the current leadership of the Union.

Conclusion

28. For the reasons set out above:
 - (a) Mr Ravbar should only be granted leave to cross-examine Mr Galvin about the following topics:
 - (i) whether Mr Ravbar sought, but could not get, conformation from Mr Galvin about MBQ’s position on the Bill in the lead up to the 2017 Rally;
 - (ii) whether lewd or sexual comments were made at the 2017 Rally at all (if this is Mr Ravbar’s position);
 - (iii) whether Mr Galvin’s version of events about the conversation during the 2017 Rally, and about what Mr Ravbar said to the crowd immediately afterwards, should be accepted (c.f., Galvin Statement, [18]-[21]);
 - (iv) whether Mr Galvin evidence at paragraphs [22] to [25], by reference to Ravbar’s Statement at [20] to [24], should be accepted;
 - (v) the meeting at Harvey’s Café in New Farm in around August 2021;
 - (vi) whether Mr Galvin only raised his concerns with APRA because of what transpired at the meeting at Harvey’s Café in New Farm (if this is Mr Ravbar’s position);
 - (vii) that Mr Ravbar was not a speaker at the 2022 Rally;

- (viii) that a coffin was not hoisted into the tree at the 2022 Rally (if this is Mr Ravbar's position); and
 - (ix) that no one made a death threat against Mr Galvin at the 2022 Rally (if this is Mr Ravbar's position); and
- (b) the Union should not be granted leave to cross-examine Mr Galvin.

E Gisonda KC

S Jenkins

Counsel Assisting

13 July 2026