

**REPORT OF THE INDEPENDENT PANEL APPOINTED TO REVIEW THE
REVOCATION OF THE 2020 SPORTS NEWS QUILL AWARD TO SAM MCCLURE**

Background

1. By terms of reference received on 23 February 2022, an independent panel comprising Dr Matt Collins AM QC (chair), Jill Baker, John Ferguson and Jonathan Holmes was appointed by the Board of the Melbourne Press Club (**Board**) to review the Board's decision made on 9 February 2022 to revoke the 2020 Sports News Quill awarded to Sam McClure for his article, 'The Camp That Shattered A Football Club' published on pages 1, 10 and 11 of *The Sunday Age* on 5 July 2020 (**impugned article**).
2. We have been asked to perform two tasks:
 - (a) to provide our recommendation on whether it is appropriate that the Quill awarded to Mr McClure be revoked; and
 - (b) to provide a recommendation on the appropriate process to be adopted and the criteria to be considered in any future circumstances where a question arises on whether a Quill should be revoked.
3. After receiving and reviewing the terms of reference and the documents referred to in them, we invited submissions and requested various documents from Mr McClure and *The Age*. Submissions and documents were provided. We found those submissions and documents to be of considerable assistance in the performance of our task and commend Mr McClure and *The Age* for their co-operation.
4. We also received submissions from Peter Bartlett (who represented *The Age*, Mr McClure and others on the complaint made and proceedings issued in respect of the impugned article and other related publications and broadcasts), and Tom Salom (Melbourne Press Club Board member, and the original mover of the motion to revoke the award). Again, the panel thanks Mr Bartlett and Mr Salom. We found those submissions to be of considerable value.
5. We have carefully considered the submissions and documents received. Those documents included, but were not limited to, the impugned article, the Quill entry form completed by Mr McClure, the judges' citation for the impugned article, the minutes of the Board meeting held on 9 February 2022 and a Zoom recording of that meeting, the minutes of the Board meeting held on 15 February 2022, correspondence between *The Age* and its solicitors and

the solicitors for Collective Mind, Amon Woulfe and Derek Leddie (**Complainants**), the statement of claim in the defamation proceedings brought by the Complainants, the settlement deed of those proceedings, the press release issued on behalf of the Complainants after the settlement, and the suite of articles and videos removed from the internet as a result of the settlement.

Process and Criteria to be Applied

6. It is convenient to start with the second task set out in paragraph 2—our recommendation on the process to be followed and the criteria applied in a future case; before moving to the first task in paragraph 2—the application of that process and criteria to the impugned article.

Process

7. We are of the view that where a motion is moved before the Board to revoke a Quill award on the grounds of events transpiring or coming to light since the award, the Board should, before making any decision, first give the winner a reasonable opportunity to show cause why the award ought not be revoked.
8. The Board should inform the winner of the matters of concern, so that submissions and documents can be directed to them.
9. Depending on the circumstances, it may also be appropriate to invite submissions and the provision of documents from other relevant parties, such as the employer of the winner or the publisher of the winning entry. That may be important in a case, such as the present one, where the publisher's reasons for the removal of a winning entry from its website may bear on the Board's decision.
10. We consider a show cause process of the kind we have outlined to be important, for at least three reasons. *First*, winning an award is a significant event in the life of any journalist. The revocation of an award is equally significant, having the potential to cause reputational and career damage and distress to the winner. As a matter of fairness, the winner of an impugned award should be given an opportunity to respond to the allegations which have caused the Board to consider its revocation. *Secondly*, the according of natural justice by inviting the winner to make submissions ensures that the decision on whether or not to revoke the award is made on the basis of relevant information, and not potentially undermined by incorrect assumptions or inferences. *Thirdly*, it is highly desirable that any decision to revoke an award be final and not subject to review, as has occurred in this case. Here, the Board's decision to

award the 2020 Sports News Quill to the runner-up, Michael Warner, means that two journalists—Mr McClure and Mr Warner—will naturally be anxious about the outcome of the review process now underway.

11. Having regard to its importance, we consider it desirable that any revocation be made, to the extent possible, by the whole Board. If a significant number of members of the Board are absent, there is a risk that the decision will lack legitimacy. Decisions should be deferred, if necessary, to a meeting at which all or most members of the Board are present and able to participate.
12. We do not think that conflicts of interest among members of the Board ought to present insurmountable difficulties. As Mr Salom rightly observed in his submission to the Panel, it will generally be obvious that members of Board will be conflicted in one way or another, and there is merit in having ‘more smart minds dealing with this issue, not less’. Of course, circumstances may arise where a member of the Board should recuse themselves from consideration of a review—for example, where the winner or editor of an impugned award or a runner-up entry for the same award is a member of the Board. But aside from a direct interest of that kind, the fact that a Board member has a professional relationship to an affected party would not ordinarily require recusal in our view, provided that the relationship is either already known to the Board or expressly disclosed before any decision is deliberated on and made.
13. The process followed by the Board should not be mechanistic. It may be, in particular cases, that more than one round of submissions or documents is required. It may be that inquiries need to be made from third parties, including complainants. It may be that an oral hearing should be held either instead of, or to supplement, written submissions. The criterion to be applied should in all cases be the requirements of natural justice: has the winner been afforded an adequate opportunity to be heard on a decision that potentially affects their rights in an important way? And, before deciding to revoke an award, does the Board have sufficient information to justify its conclusion?
14. Depending on the circumstances, the Board may think it expedient to delegate the initial review to a sub-committee comprised of three or five members, none of whom have a direct relationship with the award-winner or its publisher, and one of whom has legal qualifications. The decision on whether a Quill should be revoked should, however, be made by the full Board after considering the sub-committee’s reasoning and recommendation.

Criteria

15. The Quill awards celebrate journalistic excellence. It follows, in our view, that when considering whether to revoke a Quill, the Board should focus its inquiry on whether the events which have transpired or come to light since the grant of the award lead to the conclusion that the winning entry has been shown not to constitute journalistic excellence.
16. We have framed that test with some care. It imports a number of consequences.
17. *First*, in considering whether an award should be revoked, we do not see the Board's role as reconsidering the correctness of the original decision to award the Quill. That is because there is inevitably a degree of subjectivity in any decision to grant an award, and it can be accepted that the judges considered the winning entry, on information then available to them, to embody journalistic excellence.
18. *Secondly*, for the same reason, the review should not focus on the comparative merits of the impugned entry and other entries for the same award. The nature of the exercise is not to second guess the original decision to grant the award: it is to determine whether subsequent events mean that the winning entry falls short of the journalistic excellence that is celebrated by the Quills.
19. *Thirdly*, in any review, the Board should focus on shortcomings that have been established to its satisfaction by events that have transpired or come to light since the grant of the award. The mere existence of a defamation or other complaint, or the making of allegations, is not enough. Nor is the mere fact that a complaint or proceedings have been settled. Often the very best journalism will be the subject of complaints and allegations, because it reveals matters which its subjects would prefer never to see the light of day. Many defamation and like complaints—including groundless ones—are resolved on commercial terms involving concessions by publishers without any admission of liability. This is often done because of the cost, inconvenience and uncertainty of litigation. The fact that a matter has been settled on terms involving a compromise by a publisher does not intrinsically say anything about the quality of the underlying journalism.
20. *Fourthly*, we consider that in deciding whether to revoke a Quill, the Board should focus on the precepts of excellent journalism, and not other matters. The precepts for excellent journalism will be well known to the Board, but are found, for example, in codes such as the Australian Press Council's *Statement of Principles* and the MEAA's *Journalist Code of Ethics*. In most cases, the question will boil down to whether, in light of subsequent events, a winning

entry has been shown to be infected by serious factual errors that should not have occurred, or serious shortcomings in journalistic ethics such as plagiarism or failure to give a fair opportunity for reply.

21. Only matters bearing on whether the winning entry constitutes excellent journalism should be taken into account in deciding whether to revoke a Quill. The mere fact that a winning entry has been removed from the internet, for example, is not sufficient to establish that the entry does not constitute excellent journalism; it is necessary to inquire into the reasons why the entry was removed and to interrogate whether those reasons bear on the quality of the journalism.

In our view, even an adverse court ruling in a defamation or like case would not of itself justify the revocation of a Quill. It would still be necessary to scrutinise the reasons for the adverse ruling and ask whether they establish a departure from the precepts of excellent journalism such that the Quill should be revoked. Legal and journalistic norms intersect but do not necessarily coincide; each case should be considered on its merits.

Application to the Impugned Article

22. On the impugned article, the Panel has been tasked with considering ‘the matter afresh, as though it is the original decision maker’. While we have had regard to the decision made by the Board on 9 February 2022, we have come to our own decision.
23. The events that transpired and matters that came to light after the award can be relevantly summarised as follows:

- (a) On 17 August 2020, about six weeks after publication of the impugned article, the solicitors for the Complainants sent a defamation concerns notice to *The Age*. The notice alleged that the impugned article carried two indefensible defamatory imputations, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The notice alleged that ‘most of the factual matters’ in the impugned article were false, and enumerated 19 matters. The notice complained that ‘none of the allegations’ were put to the Complainants in advance of publication. It demanded the publication of an ‘apology and retraction for the imputations’, removal of the

impugned article and payment of the Complainants' reasonable expenses. No other compensation was sought.

- (b) On 11 September 2020, the solicitors for Nine, Minter Ellison, responded to the concerns notice. The Minter Ellison letter rejected the assertion that the allegations had not been put to the Complainants in advance of publication, referring to two unreturned calls from Mr McClure to Mr Woulfe and an annexed text message exchange on 24 June 2020 (about two weeks before publication of the impugned article) between Mr McClure and Mr Woulfe. In the text message exchange, Mr McClure said to Mr Woulfe that he had 'details of the activities that the players were put through' and invited comment. Mr Woulfe responded just under three hours later, 'Hi Sam, our involvement with the Adelaide Football Club in 2017/18 has been discussed at depth and length over the past two years. We stand by our work with the AFC at that time, but are no longer involved with the club and don't have anything further to add. Thanks.' Mr McClure responded, 'No worries, thanks for getting back to me. [REDACTED] [REDACTED]' There was no response. The Minter Ellison letter said that 'Mr McClure would embrace the opportunity to discuss these matters ... in a comprehensive on-the-record interview.' The letter 'vehemently' rejected the assertion that the impugned article contained factual inaccuracies and said that 'every allegation contained in the Publications is supported by *at least* one player who attended the Camp [and] most of the facts reported have been recounted by a number of eye witnesses' (original emphasis). The letter summarised the sources of the information in the impugned article and asserted that, if defamation proceedings were brought, defences of truth and qualified privilege would be relied upon. The letter offered to publish a 'correction' on page 2 of a print edition of *The Sunday Age* and at the bottom of the online version of the impugned article acknowledging that the Complainants 'have a successful business providing mindset performance training'. It offered to remove from online various publications, not including the impugned article, and to pay the Complainants' reasonable expenses.
- (c) An exchange of correspondence then ensued between the parties, culminating in a further without prejudice offer being made by Minter Ellison on 11 December 2020. The offer began with a defence of the impugned article, asserting that it 'was true and accurate'. It went on, 'Put simply, we can either fight a court case for the next 18 months and incur \$1 million in fees or we can try and find a solution that both sides can live with.' It offered the publication and broadcast of an apology to the

Complainants that acknowledged ‘that the Adelaide Crows camp was run in good faith with the players’ interests front of mind’ and included the words ‘The Age apologises if the article caused hurt or offence to Mr Woulfe, Mr Leddie or Collective Mind.’ The letter offered to remove various online publications, including the impugned article and to pay the Complainants’ reasonable expenses.

- (d) There does not appear to have been any response to that letter until 22 June 2021 when the Complainants commenced defamation proceedings in the Supreme Court of Queensland. This was just before the expiration of the one year limitation period after the publication of the impugned article.
- (e) According to Mr Bartlett, the proceedings were not served by the Complainants until 28 September 2021, more than three months later.
- (f) On 14 December 2021, the defamation proceedings were settled by the parties executing a Deed of Settlement. The proceedings were settled before any defence had been filed by the defendants. The terms of settlement required the payment of a confidential sum ‘being the costs reasonably incurred’ by the Complainants, removal of various matters, including the impugned article, and the publication of an apology in *The Sunday Age* and on *The Age* website in the following terms:

Apology to Collective Mind

On 4 July 2020, an article was published in *The Sunday Age* and on *The Age* website reporting on the Adelaide Crows camp in 2018. The article made a number of statements about Amon Woulfe, Derek Leddie and Collective Mind. *The Age* acknowledges that SafeWork SA made no findings of wrongdoing against Collective Mind. *The Age* acknowledges that the camp was run in good faith and with the players’ interests front of mind. If the article was read to suggest otherwise, *The Age* withdraws that suggestion.

The Age apologises and expresses regret if the article caused hurt and offence to Mr Woulfe, Mr Leddie and Collective Mind. *The Age* has withdrawn these publications.

No other compensation was paid. The Deed stated that it was made on the basis of no admissions by the defendants. It will be observed that the terms of settlement, including the terms of the apology, were similar to those offered in Minter Ellison’s letter of 11 December 2020, more than a year earlier.

- 24. There are a number of matters of particular relevance to our ultimate recommendation.

Accuracy

25. There is a dispute as to whether there are factual inaccuracies in the impugned article. That dispute could only be authoritatively resolved through costly and prolonged litigation. That has not occurred, because the proceedings commenced by the Complainants were settled at an early stage without any admissions of liability, without any compensation being paid beyond reimbursement of legal costs, and with the publication and broadcast of an apology that did not involve any retraction of the imputations of which the Complainants complained or any acknowledgments of factual errors in the impugned article. No concessions have been made by either *The Age* or Mr McClure as to any factual inaccuracies in the impugned article; to the contrary, they each stand by its accuracy.
26. The impugned article was said to be based primarily on ‘detailed and distressing accounts of events and exercises’ obtained from six Adelaide Crows players who attended the camp. In the exchange of correspondence with the Complainants’ solicitors, *The Age* and Mr McClure maintained that every allegation in the impugned article was supported by at least one, and in most cases a number of eyewitnesses. We have no reason to doubt that that is so. There is no suggestion that any part of the impugned article was fabricated. The allegations in the impugned article concerned the experiences of the players and others at the camp, recounted by them some time after the event. Some of the alleged factual inaccuracies identified by the Complainants may be in the nature of differences in recollection or emphasis (for example, whether the players gathered in a basement car park before being picked up by the bus; whether a player was taken home ill on the first or the third day of the camp; whether players were ordered to keep their heads down for the entirety or some lesser period of the journey). Others are evaluative or conclusionary (for example, whether the camp brought down or brought about the capitulation of the Club; whether the environs of the camp could be described as ‘woods’). At the end of the day, the most that can be said is that the Complainants alleged a number of factual inaccuracies in the impugned article, all of which were vigorously denied by the journalists, publishers and their solicitors.
27. The published apology states that ‘SafeWorkSA made no findings of wrongdoing against Collective Mind.’ *The Age*’s submission makes the point that SafeWorkSA’s report has not been published, and that its conclusion was simply that it had found no breaches of the South Australian *Workplace Health and Safety Act*. We accept that it does not follow from that finding that SafeWorkSA either conducted a detailed investigation of the allegations in Mr McClure’s article or concluded that any of those allegations were unfounded.

33. Mr McClure did not provide a recitation of each of those allegations to the Complainants and seek their response prior to publication. We think it would have been better had he done so.
34. However, the impugned article was published against the backdrop of much speculation over a long period about what had happened at the camp. A number of players and others had left the Crows in the period following the camp. An external review of the club had been called and an AFL investigation conducted. Against that backdrop, the Complainants can be taken to have known that their conduct of the camp was a matter of significant public interest and speculation.
35. Further, McClure twice tried to call Mr Woulfe prior to publication of the impugned article. In his first text message after those calls were not returned, Mr McClure said he wanted to talk to Mr Woulfe about the 'details of the activities that the players were put through'. In his second text message, he said that those activities included 'the blindfolded bus ride', 'the harness' and 'the knife'. The Complainants did not engage with those text messages beyond saying that they had nothing further to add. They must have known, however, from the combination of the context and the text messages, that Mr McClure was intending to publish a piece about the activities at the camp that had led to speculation, players and others leaving the club, and an external and AFL investigation. They also knew that the activities known to Mr McClure included a blindfolded bus trip and other controversial activities. Despite all of those matters, they elected not to engage, other than to say that they had nothing to add.
36. We also observe that Minter Ellison stated, in its response to the concerns notice dated 11 September 2020 that 'Mr McClure would embrace the opportunity to discuss these matters ... in a comprehensive on-the-record interview.' That invitation was never taken up.
37. The activities described in the impugned article came from sources, some on and others off the record. There is no suggestion that any part of the content of the impugned article was fabricated. Mr McClure made a number of attempts to obtain the Complainants' side of the story, put them on notice that his article would include details of controversial activities allegedly undertaken during the camp, and extended to them an invitation to participate in a comprehensive interview to respond to the allegations in the impugned article which they did not take up. The impugned article set out the substance of the text exchange between Mr McClure and Mr Woulfe, and acknowledged that some players considered the camp to be a success.

38. On balance, we do not consider that it has been established that the impugned article was unfair in the sense referred to in the APC Statement or the MEAA Code.

Settlement of the defamation proceedings and removal of the online version of the impugned article

39. We have considered whether the terms of the settlement of the defamation claim, including the decision to remove the online version of the impugned article from *The Age's* website, lead to the conclusion that the impugned article did not constitute journalistic excellence.
40. *The Age* characterised the settlement in its submissions to us as the result of a 'business decision to resolve the legal claim'. Mr Bartlett referred to it as a 'commercial decision to settle a claim.' We have no reason to doubt the accuracy of those characterisations. They appear to us to be a fair reflection of the events we have described above and our review of the relevant documents. There is, in particular, nothing in the correspondence or terms of settlement constituting an acknowledgment of error on the part of Mr McClure or *The Age*. The terms of the agreed apology do not engage with the imputations on which the Complainants had sued.
41. We note that a media release issued by a public relations company on behalf of the Complainants after the settlement asserted that Mr McClure had personally apologised for and retracted the impugned article. In the course of the discussion at the 9 February 2022 Board meeting, some members of the Board appeared to be under the impression that the media release was issued by or with the approval of *The Age*, that there was therefore no doubt that Mr McClure had retracted his own story, and that it followed that there was no need to consult either *The Age* or Mr McClure before revoking the award. We have carefully considered each of those matters by reference to the information available to us, including the settlement deed and the submissions made by Mr McClure and *The Age*.
42. The media release was inaccurate. It is clear from the settlement deed, and the terms of the apology itself, that the apology was proffered by The Age Co Pty Ltd, not Mr McClure.
43. Mr McClure, in his submissions to us, said that the impugned article was the result of speaking to some 25 sources and was based on information provided by sources with direct knowledge of the camp that he accurately recounted. He said the decision to settle the case was not up to him and that if it had been, he would have 'defended the case by calling the players as witnesses to describe what happened on the camp.' He said he was and still is 'incredibly proud of the article' and was 'devastated' to learn of the revocation of the Quill

awarded to him ‘in circumstances where I had never admitted fault in the story and where no finding had been made that the article was wrong.’ We accept each of those matters.

44. The fact that the impugned article and related publications and broadcasts were removed by their publishers as part of the settlement of the defamation action is a matter of significance. Such decisions are not taken lightly. Their removal means that the impugned article cannot readily be consulted. Having reviewed the Zoom recording of the Board meeting on 9 February 2022 and the minutes of that meeting, it seems to us that the unavailability of the impugned article was the principal matter that resulted in the Board’s decision to revoke the Quill awarded to Mr McClure, on the basis that since the impugned article ‘no longer exists’, it could not be worthy of a Quill award.
45. However, the impugned article still exists. As was pointed out in submissions made to us, it remains accessible in various places, including in archived print editions of *The Sunday Age*. In any event, we do not think that the mere fact of removal of a winning entry should be treated as sufficient to warrant revocation of a Quill award. The removal of a winning entry may or may not be indicative of a lapse in the standards of journalism. In this case, we are not satisfied that it was. Rather, we accept that here, the impugned article was removed as part of a commercial settlement of defamation proceedings, without admissions of liability.
46. Nor do we consider it determinative that the removal of an impugned online article means that it is no longer readily able to be consulted. The online availability of an entry is a requirement for the award of a Quill. However, the rules do not state that its subsequent removal from the internet disqualifies an entrant or necessitates the revocation of an award.
47. We have therefore concluded that nothing in or relating to the terms of settlement of the defamation claim, or the decision to remove the online version of the impugned article from *The Age’s* website, leads to the conclusion that the impugned article did not constitute excellent journalism.

Other matters

48. In his submission to us, Mr Salom said that he moved the motion to revoke the award ‘because I believe that retaining a prestigious award for a story which the publisher has conceded came up well short in meeting accuracy and fairness tests was lowering the standards of the Quill Awards to unacceptable levels.’

49. We agree that, if it were established to the satisfaction of the Board that a winning entry was infected by serious inaccuracies or unfair journalistic practices, the Board would be entitled to conclude that the entry did not embody journalistic excellence and to revoke the award.
50. The Board did not, of course, have the benefit of the submissions and documents that were available to us. As will be clear from what we have set out above, it is not correct that *The Age* or Mr McClure have made concessions in respect of the accuracy or fairness of the impugned article.
51. More importantly, having carefully considered the submissions and documents available to us, we are not satisfied that the impugned article has in fact been shown to fall short in meeting standards of accuracy and fairness.
52. Mr Salom also submitted that the acknowledgment by Nine that the camp was run in good faith and with the players' interests in mind was 'in complete contrast to the entire tenor of the original story'. We do not see such a sharp contrast. The original story did not allege bad faith on the part of the Complainants; rather, the tenor, in our view, was that, objectively, the conduct of the camp was harmful rather than beneficial to some (though not all) of the players.

Conclusion

53. As will be clear from the above analysis, we consider that the process followed by the Board at the meeting of 9 February 2022 was flawed in a number of respects. In particular:
 - (a) Mr McClure and *The Age* should have been given the opportunity to show cause why the Board should not revoke the Quill. Having regard to the implications of the decision, it was unfair not to do so.
 - (b) The decision on whether to revoke the award should have been deferred, in our view, until after that opportunity had been afforded, and should have been made at a meeting of the whole Board (or as close as possible to the whole Board). Instead, the decision was made at a meeting at which five members of the Board, including the President, were not present.
 - (c) The decision to revoke appears to have been based on three assumptions, each of which was wrong. *First*, it seems to have been considered determinative that the impugned article no longer existed. That was wrong. The online version had been

removed, but the impugned article was still available in various places, including archived copies of the print edition of *The Sunday Age*. *Secondly*, it seems to have been assumed that *The Age* and Mr McClure had conceded serious errors of accuracy and unfairness in respect of the impugned article. As a review of the correspondence and settlement deed revealed, that was not so. *Thirdly*, it seems to have been assumed that Mr McClure had apologised for and retracted the impugned article. That assumption appears to have been based on the terms of a press release issued by the Complainants that was inaccurate. Each of these errors could have been avoided had natural justice been afforded to Mr McClure and *The Age*.

- (d) The principal criterion applied by the Board, as expressed in the minutes of the 9 February 2022 meeting, was that ‘the publisher, Nine, has withdrawn the publication.’ We do not consider that that is an appropriate criterion to apply when deciding whether to revoke a Quill. Rather, we think that, as the Quill awards celebrate journalistic excellence, the focus should be on whether the events that have transpired or come to light since the grant of the award lead to the conclusion that the winning entry has been shown not to constitute journalistic excellence.
 - (e) For obvious reasons, it is regrettable that the Board resolved to substitute Michael Warner as the winner of the 2020 Sports News Quill, without first having afforded natural justice to Mr McClure and *The Age*.
54. We are asked to provide our recommendation ‘with respect to whether or not it is appropriate that the Quill awarded to Sam McClure be annulled or revoked.’ In light of all of the above matters, we are not satisfied that the events which have transpired or come to light since the grant of the award lead to the conclusion that the impugned entry has been shown not to constitute journalistic excellence. We therefore recommend to the Board that it reinstate the award to Mr McClure.
55. If our recommendation is accepted, it has the unfortunate consequence of affecting the Board’s decision on 9 February 2022 to award the 2020 Sports News Quill Award to Michael Warner. Our terms of reference do not require us to make a recommendation with respect to that decision. We make it clear that our recommendation is no reflection whatsoever on the merits of Mr Warner’s entry or the relative merits of his entry compared with the impugned article. It is a matter for the Board to determine what, in the unusual circumstances of this matter, it should do with respect to the fact that, upon revocation of

Mr McClure's award, it declared Mr Warner to be the winner of the 2020 Sports News Quill.

Dated: 31 March 2022

M J COLLINS

J BAKER

J FERGUSON

J HOLMES