

**COMMISSION OF INQUIRY INTO THE DIAPHRAGM WALL AND PLATFORM  
SLAB CONSTRUCTION WORKS AT THE HUNG HOM STATION EXTENSION  
UNDER THE SHATIN TO CENTRAL LINK PROJECT**

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**WITNESS STATEMENT OF LEE TZE MAN  
FOR  
MTR CORPORATION LIMITED**

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I, **LEE TZE MAN**, of c/o [REDACTED],  
[REDACTED], WILL SAY AS FOLLOWS:

1. I have over 23 years of experience in the MTR Corporation Limited (“MTRCL”) in managing railway projects and specialising in the electrical and mechanical (“E&M”) discipline. My last title within MTRCL was General Manager – SCL and Head of E&M Construction.
2. In 1981, I obtained a Bachelor of Science Degree in Mechanical Engineering from the City University, London. Since May 1991, I have been a member of the Hong Kong Institution of Engineers (Building Services Division). As for my career background, from 1992 to 1988 I worked as a Consulting Engineer (E&M) with Messrs. Rankine & Hill. From 1988 to 1994, I worked as a Consulting Engineer (E&M) with Messrs. J. Roger Preston.
3. In April 1995, I started my career in MTRCL as a Senior Construction Engineer (Building Services). I have been involved in a number of major construction projects, namely the Airport Railway, the Tseung Kwan O Extension, Beijing Line 4 and the Express Rail Link Projects, with an emphasis on the E&M discipline.
4. In respect of the SCL Project, my titles / positions changed over time as follows:
  - (a) In 2010, when I was repatriated back to Hong Kong from Beijing upon completion of the Beijing Line 4 Project, I was appointed as the Project Manager (E&M) of the SCL Project.
  - (b) From January 2013, I acted as General Manager – SCL E&M reporting to Dr. Philco Wong Nai-Keung (“**Philco Wong**”) who was General Manager – SCL at that time.
  - (c) In October 2014, Philco Wong was promoted to take up the position of the Projects Director. In November 2014, I was asked by Philco Wong to take up

the role of Acting General Manager – SCL. I always had the understanding that Philco Wong would continue to directly supervise the technical side of the civil engineering works under the SCL Project. For my part, apart from my general duties to oversee and manage the project delivery of the SCL Project, I would also be mainly responsible for the E&M engineering aspects of the works. On the basis of the same understanding, in April 2015 I took up the position of General Manager – SCL.

- (d) In this connection, I wish to explain that: (1) civil engineering; and, (2) E&M engineering are two different and distinct fields in railway construction projects, and they require different sets of expertise, skill and experience. It is rare to find a person with the expertise in both fields in managing a sizable and highly complex railway project. For this reason, there has always been a division of responsibilities among personnel within MTRCL's senior management team for the purpose of overseeing these two aspects.
- (e) Indeed, as I specialise in E&M engineering, I oversaw and supervised the project managers and construction managers who were handling over 30 E&M contracts under the SCL Project, in addition to my general management duties as General Manager – SCL. These E&M contracts related to, amongst others:
  - (i) Signalling Systems (including the integration of the new system for SCL with the existing systems for the existing lines);
  - (ii) Rolling Stock;
  - (iii) The Platform Screen Door and Automatic Platform Gate systems;
  - (iv) Station Building Services;
  - (v) The Power Supply System and Trackside Auxiliaries System, including the High Voltage Power Supply System and Electrical Sub-stations;
  - (vi) The Automatic Fare Collection System;
  - (vii) Tunnel ventilation, lifts and escalators;
  - (viii) Public address system and radio communication systems;
  - (ix) The Main Control System;
  - (x) Testing and commissioning and systems integration.
- (f) On the other hand, Philco Wong continued to oversee and supervise the technical aspects of the civil engineering works. Mr. Aidan Gerald Rooney (**"Aidan Rooney"**) (who specialises in civil engineering) was promoted to Acting General Manager / General Manager – SCL Civil – EWL to look after the civil technical aspects of the works in conjunction with Philco Wong. Under this arrangement, if there was a technical issue regarding civil engineering and construction, Aidan Rooney would directly report to Philco Wong (even though he was my subordinate), and he would deal with his team and/or in conjunction with Philco Wong. I refer to the organisation chart dated

January 2017 (Ref: Projects – PjMD – SCL – 1) where one can see that there is a dotted line from Aidan Rooney directly to Philco Wong. Whilst this organisation chart is dated January 2017, it reflects my understanding as referred to in paragraph 4(c) above. There is also a dotted line from Mr. Wong Chi Chung (“**Jason Wong**”) (who became General Manager – SCL Civil – EWL in July 2015) directly to Philco Wong.

5. In addition to my responsibilities under the SCL Project, in September 2015, after the departure of the General Manager – E&M of the Express Rail Link Project, I was asked by Philco Wong to oversee the E&M aspects of the works under the Express Rail Link Project and other railway projects (e.g. the South Island Line and the Kwun Tong Line Extension Projects). This explains my title of Head of E&M Construction in addition to General Manager – SCL. I remained in these two positions until August 2018.
6. I am providing this witness statement in response to various matters raised in a letter dated 27 July 2018 from Messrs Lo & Lo ("**Letter**"), who I understand are the solicitors acting for the Commission of Inquiry into the Diaphragm Wall and Platform Slab Construction Works at the Hung Hom Station Extension under the Shatin to Central Link Project ("**Commission of Inquiry**"). In this statement, I shall address the matters listed as items 3, 7, 8(a), 8(d), 8(e), 8(f), 11(a), 11(b), 11(d), 11(i), 11(l), 11(n) and 13(b) of the Letter.
7. While I am aware of the matters raised in items 3, 7, 8(a), 8(d), 8(e), 8(f), 11(a), 11(b), 11(d), 11(i), 11(l), 11(n) and 13(b) of the Letter based on my first-hand observations and personal involvement in the SCL Project from 2010 to August 2018 and I confirm that the contents of this statement are true to the best of my knowledge and belief, there are occasions when I can only speak to matters by reference to MTRCL's documents due to the lapse of time, in which case I believe the contents of those documents are true and correct.

**Item 3: With reference to an Organisation Chart of Your Company, describe and explain the roles and responsibilities of each person in Your Company involved in the construction, quality control, supervision, monitoring, inspection of the diaphragm walls and the platform slabs and the steel bars and steel bar structures within the diaphragm walls and the platform slabs. Identify, with names and job description, the relevant persons on the Organisation Chart and indicate whether such persons are still in the employment of Your Company. If such persons have left Your Company, please provide contact details if such information is available.**

(A) *Roles and Responsibilities*

8. As General Manager – SCL, I had general duties to oversee and manage the project delivery of the SCL Project (including time, cost, safety, quality, environmental,

public interface, staffing and stakeholder management). Apart from that, as mentioned in paragraph 4(e) above, I was also mainly responsible for overseeing the E&M aspects of the SCL Project.

9. As mentioned in paragraph 4(f) above, Philco Wong and Aidan Rooney were responsible for overseeing the civil technical aspects of the SCL Project, including the civil engineering and construction works for the diaphragm walls and the platform slabs under Contract 1112. Aidan Rooney would directly report any issue regarding civil engineering and construction to Philco Wong, and he would deal with the issue with his team and/or in conjunction with Philco Wong. From around July 2015 onwards, Jason Wong was promoted to General Manager – SCL Civil – EWL, while the title of Aidan Rooney changed to General Manager – SCL Civil – NSL. However, as far as Contract 1112 was concerned, Jason Wong’s responsibility was limited to being the Competent Person (which he had been since February 2015).
10. I know that Philco Wong and Aidan Rooney would have regular meetings with MTRCL’s civil team and Leighton Contractors (Asia) Limited (“**Leighton**”) to review and discuss the civil aspects of the works in relation to Contract 1112. When I first took up the role of Acting General Manager – SCL, I also attended some of these meetings. Although I do not remember exactly when, sometime in 2015, with the agreement of Philco Wong I stopped attending these meetings, as I could make little contribution in these meetings given my expertise in E&M but not in civil engineering.
11. Although I had a primary responsibility for E&M works, as General Manager – SCL, I also had a duty to oversee the general progress of the SCL Project. To discharge such a duty, I would carry out regular site walks which also covered the site of Contract 1112 with relevant colleagues in the MTRCL Construction Team. During the site walks, I would observe the general progress of the works, whether there were sufficient resources / manpower on site, whether there were any safety concerns and would inspect and comment on E&M-related works.
12. In addition, as a convenient means for me to oversee the general progress of the works and to be kept informed of any safety concerns, the frontline staff added me to some of their Whatsapp groups (which also covered a host of topics including in relation to civil works) at my request so as to keep me posted as to the general progress of the works.
13. I never saw anything that put me on notice regarding any issues about the alleged shortening or cutting of threaded steel reinforcement bars, or of any defective connection of threaded steel reinforcement bars, in the diaphragm walls and platform slabs during any of the site walks or in any of the Whatsapp groups.

(B) Reports

14. Apart from the above, as General Manager – SCL, I was required to prepare and/or review various reports:

- (a) First of all, on a weekly basis, Aidan Rooney would submit a Weekly Summary Report on major civil contracts including those related to Contract 1112 to Philco Wong and copy me in as a matter of procedural reporting.
- (b) Also, a “Project Progress Report” would be prepared on a monthly basis by various MTRCL personnel. These reports would contain updates for the SCL Project in relation to safety, progress, stakeholder management, the environment, quality and any other problems and issues. I would provide comments where appropriate / if necessary.
- (c) In addition, a “Projects Director’s Report on Progress and Cost for New Railway Projects” would be prepared on a monthly basis by the Projects Team based on information contained in “Project Progress Reports” and information from other sources. These reports would include updates on the SCL Project as well as other MTRCL projects (e.g. the Express Rail Link Project and the South Island Line Project). I would provide comments where appropriate / if necessary.
- (d) A “Monthly Progress Report on Entrustment Activities” for the SCL Project would be prepared on a monthly basis by various MTRCL personnel and submitted to the Railway Development Office (“**RDO**”) of the Highways Department (“**HyD**”) to report on issues in relation to the progress, safety status, cash flow and expenditure and other concerns of the SCL Project. I would provide comments where appropriate / if necessary.

(C) Meetings

15. In addition, I had to attend various internal meetings within MTRCL as well as external meetings with representatives of the RDO, HyD, the Transport and Housing Bureau (“**THB**”) and other stakeholders:

Internal meetings

- (a) **Projects Division Leadership Meetings** – These meetings were usually held bi-weekly and were chaired by Philco Wong, and all General Managers including Aidan Rooney, Jason Wong, myself and the General Managers of MTRCL’s other projects would attend. In these meetings, Philco Wong would talk about general topics regarding MTRCL’s business, challenges affecting

the Projects Division, progress on previously identified issues, as well as any future project opportunities.

- (b) ***Senior Project Management Meetings*** – On a bi-weekly basis, all General Managers, Project Managers, the Chief Programming Manager, the Chief Safety Manager and Heads of Sections would attend Senior Project Management Meetings to discuss safety, progress and other areas and challenges concerning the SCL Project, as well as MTRCL's other projects.
- (c) ***SCL Senior Management Communication Meetings*** – I chaired most of the SCL Senior Management Communication Meetings which were held bi-weekly. In these meetings, the General Managers, Project Managers and Construction Managers of MTRCL would discuss, in respect of the SCL Project, general progress, areas regarding contract administration, design management, construction management and environmental challenges.
- (d) ***Executive Committee Meetings*** – Executive Committee Meetings were held on a regular basis. When required, the General Managers of the SCL Project (including Aidan Rooney, Jason Wong and myself) would attend to provide the Executives with updates as to the general progress of the SCL Project.
- (e) ***SCL Stakeholder Engagement Steering Committee Bi-weekly Meetings*** – I chaired most of the SCL Stakeholder Engagement Steering Committee Bi-weekly Meetings, which were internal meetings held within MTRCL to discuss how best to respond to questions / issues / concerns / possible challenges raised by external stakeholders, including members of the public in the vicinity of the construction sites, environmental concern groups, councillors and media and to agree on the way forward.

#### External meetings

- (f) ***RDO-MTRCL Public Relations Task Group (PRTG) Meetings*** – Representatives of the RDO and MTRCL would attend these monthly meetings to discuss affairs which concerned various stakeholders (e.g. complaints of noise level, inquiries from the media and building damages claims). I attended most of these meetings.
- (g) ***RDO-MTRCL Coordination Meetings*** – I chaired most of the RDO-MTRCL Coordination Meetings for the SCL Project which were held monthly. Representatives of the RDO and MTRCL would attend these meetings to discuss various areas, including design, construction, the environment, challenges in community liaison and the progress of the works.

- (h) ***Project Supervision Committee Meetings*** – I attended most of the Project Supervision Committee Meetings. Representatives of HyD, THB and MTRCL would attend these meetings to discuss, in respect of the SCL Project, topics in relation to project progress, project expenditure and other areas of concern.
  - (i) ***SCL Project Progress Meetings*** – I attended most of the SCL Project Progress Meetings which were held monthly in respect of the entire SCL Project. These are meetings between representatives of MTRCL, RDO and Pypun-KD to review the monthly progress.
16. No issue of any shortening or cutting of any threaded steel reinforcement bars, or of any defective connection of any threaded steel reinforcement bars in the diaphragm walls and platform slabs, was discussed or brought to my attention during any of the above meetings that I attended up until May 2018.

**Item 7: Describe and explain Your Company's system and measures in place at the material time to ensure that the steel bars in the diaphragm walls and platform slabs were properly installed and connected in compliance with Requirements, Standards and Practice and that any irregularities, non-compliances and defects will be reported and addressed by the appropriate parties and/or persons. Please adduce all related manuals, records and documents on this topic.**

17. I am generally familiar with MTRCL's systems and measures in place for Contract 1112. MTRCL devised and established its own project management system and procedures called Project Integrated Management System ("PIMS"). As to the specific measures in place to ensure that the steel bars in the diaphragm walls and platform slabs were properly installed and connected, I will let Aidan Rooney speak to the details.

**Item 8(a): Explain and confirm whether Your Company has any knowledge of the Defective Steel Works (whether undertaken by Leighton and/or its sub-contractors) and if so, identify and describe the relevant events and occasions. Please describe the defects, explain in what ways Requirements, Standards and Practice had been breached and provide particulars of such events and occasions (with reference to plans and drawings, photographs and documents as necessary and appropriate), including but not limited to the dates, time, locations, number of steel bars affected and the equipment used to shorten or cut the steel bars.**

**Item 8(d): If the events and occasions were reported to you by your managers, supervisors, inspectors and/or other persons, identify the person(s) who made the reports to you.**

**Item 8(e): Following Your Company's knowledge of the relevant events and occasions, please describe and explain what steps and measures were taken by Your Company to (i)**

investigate the Defective Steel Works; (ii) alert and report the matter to the Main Parties and the Government or any of them and (iii) rectify the Defective Steel Works.

Item 8(f): If a report was made, please identify the persons in Your Company who reported the matter to the Main Parties and the Government and the recipient(s) of such reports. If the matter was not reported to the Main Parties and the Government, please explain why no report was made.

18. I did not hear of the alleged Defective Steel Works until 6 January 2017 when Aidan Rooney notified me that he had received an email earlier that day from Mr. Michael Fu (“**Michael Fu**”), the Construction Manager of Contract 1112 at the time, forwarding an email chain containing an email from Mr. Jason Poon (“**Jason Poon**”) of China Technology to Mr. Anthony Zervaas (“**Anthony Zervaas**”) of Leighton on the same day.

19. To refresh my memory, I have re-read the email from Aidan Rooney to me dated 6 January 2017 (1:32 pm) which contains Jason Poon’s email to Anthony Zervaas. In his email to Leighton, Jason Poon alleged, among other things, that “*two Leighton labour cut away the threading section of the threaded lapping bars and installed them onto the west shear face on the diaphragm wall, while MTRC didn’t discover such malpractice and even unable to inspect the coupler installation due to access problem. The pour had been poured without finding on such malpractice finally*”.

20. I also note that in the email from Aidan Rooney to myself dated 6 January 2017 (at 1:32 pm), Aidan Rooney said that:

*“Following our discussion at lunch time regarding China Technology and Jason Poon, Ref below email from Jason.*

*This is a part of Jasons strategy to put pressure on Leighton to pay him the extra \$3M this week.*

*As Michael advises we are checking our records to ascertain whether there is any validity in Jason’s claim.*

*Jason may leak such claims to the media, we are preparing the LTT.”*

21. A few days later, on 10 January 2017 at 12:09 pm, I received another email from Aidan Rooney, which said “FYI” and forwarded an email sent earlier that day from Floran Lee Yat Ling (MTRCL’s Projects Communication Manager) regarding a LTT (which should mean “Line To Take”) that she and her colleagues had prepared.

22. I recall that around that time (though I cannot recall the exact date and time), Michael Fu came to brief me and explain to me Jason Poon’s allegations in (as well as the



photos attached to) Jason Poon's email. Michael Fu showed me an email between Mr. Kobe Wong of MTRCL and Leighton dated 15 December 2015, and assured me that the issue mentioned in Jason Poon's email had already been dealt with in 2015 during the construction period.

23. I had a separate conversation on the subject with Mr. Wu Ka Wah Carl ("**Carl Wu**") whom I have known for more than 20 years. He has a lot of experience in quality management and audit as he was MTRCL's Project Quality Manager in the past. He was also the Coordination Manager of the SCL Project since 2016. Carl Wu suggested performing an internal review, independent of the MTRCL construction team, to examine the construction records to confirm that the steel reinforcement and couplers for the EWL track slab of Contract 1112 had been installed in accordance with the requirements of the relevant quality assurance (QA) and quality control (QC) regimes, and to prepare an internal report. I asked him to go ahead.
24. In early February 2017, I received a report entitled "*Review of quality assurance & quality control of steel reinforcement and coupler installation for the East West Line (EWL) track slab of Contract 1112 for the Shatin to Central Link (SCL) Project*" prepared by Mr. Peter Fung (Quality Assurance Engineer) and endorsed by Carl Wu. I have re-read the report to refresh my memory and I note that it was concluded that "*the steel reinforcement and coupler for the East West Line (EWL) track slab of Contract 1112 had been installed in accordance with the requirements of relevant quality assurance (QA) and quality control (QC) regimes.*" I recall that I talked to Aidan Rooney about this report. Given the conclusion of the independent internal report, I felt reassured and did not pursue the matter any further.
25. On 15 September 2017 at 6:13 pm, I received an email from Aidan Rooney, forwarding to me an email chain containing an email dated 15 September 2017 (11:06 am) from Jason Poon to Mr. Chan Fan Frank (Secretary for Transport & Housing). I have re-read that email exchange to refresh my memory and I note that in his email, Jason Poon alleged that "*[he] would like to invite a joint interview in presence of the senior representative of the Bureau, MTRC, Leighton and our company reviewing and discussing an important issue that we found and reported in this January 2017 on the execution of the works, which is much related to the interest of the Public.*"
26. On the same day at 6:58 pm, I received another email from Aidan Rooney, saying that:

*"The meet[ing] between Carl Speed/Anthony Zervaas and Jason Poon has just been completed.*

*Jason Poon is seeking a payment of alleged \$3M, for completed works*

*The agreement is for their respective QS to meet tomorrow to agree this figure.*

*Carl Speed and Anthony will meet with Jason Poon again on Monday to agree the payment.*

*I have told Anthony that Leighton must finalise and close their 1112 subcon account with CT next week, once and for all, the legal terms of which to cover all related aspects will need to be agreed."*

27. Three days later, on 18 September 2017 at 11:36 pm, I received an email from Aidan Rooney, forwarding to me an email chain containing an email dated 18 September 2017 (7:22 pm) from Jason Poon to Mr. Sai Ho Leung of the THB. I have re-read that email exchange and I note that in his email, Jason Poon stated that:

*"During these few days we are working tight and hard on the suspecting technical issue with Messrs Leighton and had reached satisfactory understanding and full clarification. ie the suspecting subject had been cleared now and no significant impact is retained.*

...

*We believe that it is a full and final end of the issue and may we invite to close all relevant files accordingly."*

28. Apart from the circumstances mentioned in paragraphs 18 to 27 above, nobody raised any issues relating to any shortening, cutting or defective connection of the steel bars in the diaphragm walls and platform slabs during any of the meetings or site visits that I attended or on any other occasions.

**Item 11(a): Provide your detailed comments and explanation on the matters and allegations stated in the said Press and Media Reports.**

29. Having reviewed the photos and videos published in the Press and Media Reports (as mentioned and defined in the Letter), I am unable to tell when and where those photos and videos were in fact taken. I do not, therefore, wish to include in my witness statement any comments or speculation related to the Press and Media Reports.

**Item 11(b): Please identify the person or persons responsible for preparing the MTRCL Report.**

30. I was not involved in the preparation of the MTRCL Report since it related to the civil engineering as opposed to the E&M part of the works under Contract 1112.

31. I do recall, however, attending a Capital Works Committee meeting on 14 June 2018 at which the MTRCL Report was tabled and discussed before it was finalised on 15 June 2018.

**Item 11(d): Confirm whether Your Company has any additional information and materials to supplement the MTRCL Report and if so, please adduce such additional information and materials by way of a supplemental report.**

32. On 5 July 2018, I received a letter dated 4 July 2018 from Mr. Jonathan Leung of the RDO, which referred to MTRCL's covering letter dated 15 June 2018 enclosing the MTRCL Report. I understand Philco Wong, who signed the covering letter dated 15 June 2018, was also passed a copy of the letter. I passed the letter to Mr. Ngai Yum Keung, Clement ("Clement Ngai"), Aidan Rooney and Jason Wong for their handling.
33. I recall sometime after 5 July 2018 discussing this matter with Clement Ngai. Clement told me he and the construction team were looking into the matter and preparing a draft response. He also mentioned to me they were retrieving site photographs and records and that this was a big exercise.
34. On 13 July 2018, I received from my secretary a letter in response to the RDO's letter dated 4 July 2018 with an instruction from Philco Wong via his secretary to sign the letter. I considered the letter and its enclosures and being aware of the large amount of work done by the team in preparing the letter, I signed it.

**Item 11(i): Explain and confirm how often or common it was that Leighton and its sub-contractors would encounter difficulties in the steel fixing works.**

**Item 11(l): Confirm whether Leighton, its subcontractors and/or their respective workers had referred such difficulties and issues to Your Company and if so, please identify (with particulars) the entities and/or person(s) who referred the difficulties and issues to Your Company and describe the replies and instructions given by Your Company to resolve the difficulties and issues. Please state whether the replies and instructions were given orally or in writing. If orally, identify by whom and to whom the same were made, when and in what circumstances. If in writing, please produce all relevant documents.**

**Item 11(n): Confirm whether Your Company was aware that instructions were given by Leighton for the steel bars to be shortened and cut in order to overcome the said difficulties and issues. If so, at which point in time did Your Company become aware of such instructions.**

35. I am not aware whether Leighton, its sub-contractors and/or their respective workers referred any difficulties in steel fixing works to MTRCL, nor am I aware whether

instructions were given by Leighton for the steel bars to be shortened and cut, and certainly no specific issues were elevated to me in this regard.

**Item 13(b): Confirm whether Your Company was aware that steel bars were being shortened or cut by hydraulic cutters on site, and if so, what were the reasons for using a hydraulic cutter to carry out such work.**

36. I recall that during the site walks and as shown in some of the photographs sent in the Whatsapp groups, I did observe workers carrying out steel fixing works. However, I can confirm that I did not observe any workers shortening or cutting steel bars with hydraulic cutters.
37. Finally, I would like to mention the following:
- (a) The events in question and which form the subject matter of the Commission of Inquiry took place several years ago and my recollection of every detail is not therefore perfect.
  - (b) Accordingly, in preparing this witness statement I have reminded myself of the events in question by reference to various hard copy and electronic documents and materials, including contemporaneous email correspondence, meeting minutes and contractual documents and other records. I understand these materials were retrieved by MTRCL's Legal Department, with the assistance of the MTRCL's external lawyers, Mayer Brown.
  - (c) The hard copy documents were: (1) extracted from physical files kept at the Hung Hom site office or the Hung Hom main office of MTRCL; (2) printed from the MTRCL's "Electronic Project Management System" (ePMS); or, (3) printed from other electronic sources in response to the matters specifically raised by the Commission of Inquiry or matters which were discussed in the course of preparing this witness statement.
  - (d) I understand that MTRCL's Legal Department and external lawyers have recently established a database using software named *Relativity* which has captured a large amount of data from hard disk drives, including some of those that stored my emails and other electronic documents for the relevant period. I understand that they have commenced the process of identifying specifically relevant documents by use of search terms and date ranges and that this is an ongoing process due to a large volume of data. I have been given some of the documents identified from *Relativity* during the last week or so and commented on these in appropriate sections of this statement.

- (e) I would like to add, therefore, that there may be matters referred to or stated in other documents which have not been recently placed before me. To that extent, I would be happy to comment on any such other materials at a later date if and when identified and placed before the Commission of Inquiry.

**Dated the 14<sup>th</sup> day of September 2018**



**LEE TZE MAN**

Corrigendum to the Witness Statement of Lee Tze Man  
dated 14 September 2018

Page	Paragraph	Content
B154	2	Replace “As for my career background, from <u>1992</u> to 1988 I worked as a Consulting Engineer (E&M) with Messrs. Rankine & Hill” with “As for my career background, from <u>1982</u> to 1988 I worked as a Consulting Engineer (E&M) with Messrs. Rankine & Hill”