

## Witness Statement

**Name:** Clinical Associate Professor Winston Cheung

**Occupation:** Chair of Medical Staff Council and Intensive Care Specialist

1. This statement sets out the evidence that I am prepared to give to the Special Commission of Inquiry into Healthcare Funding as a witness.
2. This statement is true to the best of my knowledge and belief.

### A. My Role

3. I am a Senior Staff Specialist in the Intensive Care Unit (**ICU**) at Concord Repatriation General Hospital (**Concord Hospital**). I have been a staff specialist at Concord Hospital since 2005.
4. I am also the Chair of the Concord Hospital Medical Staff Council (**MSC**), a position I have held since March 2022.
5. Additionally, I am a Clinical Associate Professor with the Sydney Medical School – Concord, University of Sydney. I have held this position since 2013. I have been an Honorary Research Fellow at the George Institute for Global Health – Australia since 2014. I have also been a Director on the Board of Directors for the Australia and New Zealand Intensive Care Society (ANZICS) since February 2022.

### B. Concord Hospital Medical Staff Council

6. The MSC consists of senior medical staff at Concord Hospital who are either staff specialists or Visiting Medical Officers. There are approximately 350 members of the MSC currently. The MSC is governed by the Local Health Districts Model By-Laws and its Terms of Reference. The Chair of the MSC is elected annually by its members.

### C. The Concerns Raised

7. On 12 October 2022, I wrote to the Board of the Sydney Local Health District (**SLHD**) in my capacity as Chair of the MSC, requesting a meeting with the board, and summarising some of the concerns held by staff at Concord Hospital. I was

aware of those concerns as they were raised with me both informally and in the context of meetings of the MSC. Annexed hereto and marked "A" is a copy of this letter.

8. On 13 October 2022, I received a reply to my letter of 12 October 2022 from Dr Teresa Anderson, the Chief Executive of the SLHD at the time. Dr Anderson sought to arrange a meeting between herself, Mr John Ajaka (SLHD Board Chair), Dr John Sammut (SLHD Board Member and Chair of the Clinical Quality Council), and me on 15 November 2022. Annexed hereto and marked "B" is a copy of this letter.
9. At our meeting on 15 November 2022, Mr Ajaka recommended that I attend a meeting of the Clinical Quality Council. It was my understanding that the purpose of my attendance would be (among other things) to present to the Council the issues referred to above. During that meeting, I expressed a desire to present the concerns that had been expressed to me (and which were summarised in my letter to Dr Anderson) to the SLHD Board, however, Mr Ajaka suggested that they should be presented to the Clinical Council as they related to clinical matters. During the meeting I stated that staff needed to be able to feel free to raise issues without fear of reprisals.
10. On 24 November 2022 the MSC met with executives from the SLHD and Concord Hospital. The meeting was a regular meeting of the MSC and the SLHD Executive. The matters that were discussed at the meeting I attended on 15 November 2022 were not discussed. Annexed hereto and marked "C" is a copy of the minutes of the 24 November 2022 meeting.
11. On 16 December 2022, I received a letter from Dr Anderson, which sought to reassure me there were adequate governance processes in place within the SLHD and noting the successful accreditation of Concord Hospital under the National Safety and Quality Health Service (**NSQHS**) Standards. Annexed hereto and marked "D" is a copy of that letter. Annexed hereto and marked "E" is a copy of the Accreditation Report dated July 2022.

12. On 1 February 2023, I emailed Dr Sammut requesting that the MSC present its perceived issues to the Clinical Quality Council. Annexed hereto and marked “**F**” is a copy of this email.
13. Later that day, Dr Sammut replied to this email, inviting me to attend the Clinical Quality Council meetings, but rejected the idea of members of the MSC presenting to the Clinical Quality Council. Annexed hereto and marked “**G**” is a copy of that email.
14. On 2 February 2023, I replied to Dr Sammut’s email, reiterating that I still wished to present the issues at the Clinical Quality Council on behalf of the MSC. Annexed hereto and marked “**H**” is a copy of that email is annexed.
15. Later that day, I received an email from Dr Anderson, in which she sought to arrange a meeting between herself, Dr Andrew Hallahan (Executive Director Medical Services), Dr Sammut, and the MSC. Annexed hereto and marked “**I**” is a copy of that email.
16. On 21 February 2023, representatives from the Emergency department and the departments of Radiology, Nursing (General) and Neurosurgery presented to Dr Anderson and Dr Sammut. Annexed hereto and marked “**J**” and “**K**” are speech notes prepared by Dr Belinda Hokin (from the Emergency Department) and Dr Lloyd Ridley (from the Radiology Department) respectively. I was present during these presentations and they generally followed the speech notes.
17. On 18 April 2023, the Australian Salaried Medical Officers Federation (**ASMOF**) sent a letter to the MSC, advising of a meeting it had called of its members at Concord Hospital on 23 March 2023 to discuss assertions it had been informed of regarding bullying and harassment. Annexed hereto and marked “**L**” is a copy of this letter.
18. On 20 April 2023, the MSC Secretary sent the ASMOF letter to the Medical Staff Council members, along with an email from me advising that this matter would be discussed at the next MSC meeting on 11 May 2023. Annexed hereto and marked “**M**” is a copy of that email.

#### D. Medical Staff Council Terms of Reference

19. On 21 April 2023, I met with Dr Anderson and Dr Hallahan in my capacity as Chair of the MSC to discuss the proposed draft Terms of Reference for the MSC which I had prepared, dated 3 March 2023. Annexed hereto and marked “N” is a copy of the draft Terms of Reference dated 3 March 2023 which I prepared. The previous Terms of Reference for the MSC had been drafted in July 2017 and were due for review in July 2020. I had prepared the draft, because the membership outlined in the previous version was not, to my understanding, consistent with the *Health Services Act Model By-Laws* which state that MSCs should be composed of all visiting practitioners, staff specialists (and others) at clause 24.2.
20. In our meeting on 21 April 2023, Dr Anderson advised me of her displeasure with the draft and directed me to withdraw it. She also handed me three documents: a letter she had addressed to me regarding the terms of reference; the NSW Health Code of Conduct; and the SLHD By-Laws. Annexed hereto and marked “O”, “P” and “Q” is a copy of each of those documents.
21. Later on 21 April 2023, Dr Hallahan sent me an email with an amended draft Terms of Reference, removing the “Guiding Principles” section from the version that I had proposed. Annexed hereto and marked “R” is a copy of this email and the amended draft Terms of Reference which were attached to the email.
22. I sent an email to Dr Hallahan on 1 May 2023 seeking clarification over several aspects of the document he had sent on 21 April. Dr Hallahan replied to my email on that same date, stating that he would seek advice. I then wrote to Dr Anderson on 5 May 2023, advising that I would respond to her letter of 21 April once I received a formal response from Dr Hallahan. I never received a response from Dr Hallahan. Annexed hereto and marked “S” is a copy of this email correspondence.
23. On 8 May 2023, I met with Dr Hallahan and Dr Alicja Smiech, Chair of the SLHD Medical Staff Executive Council to discuss Dr Smiech attending the Concord MSC meetings to monitor proceedings.

24. On 10 May 2023, I received a letter from Dr Hallahan advising that the MSC could not conduct meetings without management or executives being present and to cease this. I emailed Dr Hallahan on that same day requesting permission to send his letter to MSC members to which he responded advising that he was “not comfortable” with this occurring. I responded, informing Dr Hallahan that I would read relevant sentences from his letter verbatim to the MSC at our next meeting. Annexed hereto and marked “**T**” is a copy of this correspondence.

#### **F. Votes of No Confidence**

25. On 8 June 2023, the Concord MSC held its Annual General Meeting, at which I was re-elected as Chair.

26. On 15 June 2023, the MSC Secretary sent an email to the MSC members announcing a meeting to discuss a vote of no confidence in Dr Anderson as the Chief Executive of SLHD. That email was sent at my direction. As set out in that email, I decided to take that step because I had formed the view that the approach to the management of the SLHD under the then Chief Executive was not consistent with the expectations of many of the Concord Repatriation Hospital Staff, and its patients. Annexed hereto and marked “**U**” is a copy of this email.

27. On 22 June 2023, the MSC held a meeting regarding the proposed vote of no confidence. Annexed hereto and marked “**V**” is a copy of the meeting minutes. A counter vote of no confidence in myself as MSC Chair was proposed by Dr Ilona Cunningham, Stream Director for Haematology, and seconded by Dr Judith Trotman, Director of Haematology. Statements from Dr Belinda Hokin and Dr Lloyd Ridley were also read out at this meeting.

28. On 29 June 2023, the MSC met to consider the no-confidence motions in relation to Dr Anderson and myself. Annexed hereto and marked “**W**” is a copy of the meeting minutes. It is noted that the reference to an “AGM” on the front page of the minutes is a typographical error. The vote of no confidence in Dr Anderson was passed 109

(60%) for to 73 (40%) against. The vote of no confidence in myself as Chair was defeated 37 (20%) for to 151 (80%) against.

29. On 30 June 2023 I wrote to the SLHD Board informing them of the vote of no confidence in Dr Anderson and requesting a meeting to inform the SLHD Board of the reasons for the vote of no confidence. Annexed hereto and marked "**X**" is a copy of this letter.
30. On 4 July 2023, I received a letter in response from Mr Ajaka, informing me that the Ministry of Health would commission an 'independent review of workplace culture', that the Board would not meet with the MSC until after the review was complete, and that the Board continued to have confidence in Dr Anderson. Annexed hereto and marked "**Y**" is a copy of this letter.
31. On 5 July 2023, I responded to Mr Ajaka. Annexed hereto and marked "**Z**" is a copy of this email.
32. On 6 July 2023, I received a letter from Mr Ajaka arranging a meeting on 27 July 2023 between himself, Phil Minns, Deputy Secretary of People Governance and Culture at the Ministry of Health, and me, which I agreed to. Annexed hereto and marked "**AA**" is a copy of this letter.
33. On 9 July 2023, I sent a letter to Ryan Park, Minister for Health, requesting he meet with staff representatives of Concord Hospital so that he could be briefed on the issues at Concord Hospital that culminated in the vote of no confidence in Dr Anderson. Annexed hereto and marked "**BB**" is a copy of this letter.
34. On 11 July 2023, I sent an email to the MSC regarding the correspondence from the SLHD Board dated 4 July 2023. That same day, I received an email from Dr Hallahan. Rosalba Cross, Former MSC Secretary, was copied into the email from Dr Hallahan and subsequently, responses were exchanged between Ms Cross and Dr Hallahan. Annexed hereto and marked "**CC**" is a copy of this correspondence.
35. On 20 July 2023, I received a letter from John McDonald, CEO of ProActive Resolutions, regarding that company's engagement by the Ministry of Health to

mediate between staff and senior management at Concord Hospital. Annexed hereto and marked “**DD**” is a copy of this letter, and the covering email.

36. Also on 20 July 2023, the MSC met with Concord Hospital and SLHD executives. Annexed hereto and marked “**EE**” is a copy of the meeting minutes. The document is watermarked as a draft, although I recall it being the final version.
37. On 21 July 2023, I sent a letter to Mr Ajaka and the SLHD Board requesting the Board to reconsider its decision, communicated to me in Mr Ajaka’s letter of 4 July 2023 referred to (at [30] above), not to meet with the MSC members. In my letter of 21 July 2023, I referred to and re-attached the letter from the MSC Chair to the Board dated 12 October 2022 (see para [7] above). Annexed hereto and marked “**FF**” is a copy of my letter of 21 July 2023. Subsequently, a meeting was scheduled for 27 July 2023.
38. On 21 July 2023, I emailed Mr McDonald asking for confirmation that ProActive Resolutions would not be investigating the MSC concerns. Mr McDonald replied to this email on 24 July 2023, confirming that ProActive Resolutions was contracted to mediate only. Annexed hereto and marked “**GG**” is copy of this email.
39. On 25 July 2023, I wrote to Mr Ajaka and Mr Minns regarding our meeting scheduled for 27 July 2023, giving a brief timeline of events and attaching supporting documentation. Annexed hereto and marked “**HH**” is a copy of this letter.
40. On 25 July 2023, I also received a letter from Minister Park, responding to my letter of 9 July 2023. Annexed hereto and marked “**II**” is copy of this letter.
41. Later that day, I received a letter from Mr Ajaka proposing to cancel the meeting between the MSC and the Board on the advice of Mr McDonald. Annexed hereto and marked “**JJ**” is copy of this letter.
42. On 26 July 2023, I received an email from Mr McDonald indicating that the Board Chair had agreed to a meeting between the Board, MSC and concerned staff which the Ministry of Health would also attend, to be held on 9 August 2023. Annexed hereto and marked “**KK**” is a copy of this email.

43. Later on 26 July 2023, I emailed Mr McDonald agreeing to the meeting and arranging for 10 speakers to present. Annexed hereto and marked "LL" is copy of this email.
44. On 4 August 2023, I sent an email to Isy Zuliani, whose role included providing administrative support to the nursing staff, for the purpose of it being distributed to the nursing staff at Concord Hospital, inviting nursing staff to attend the meeting with the SLHD Board and Ministry of Health on 9 August 2023. I extended this invitation so that nursing and allied health staff could voice any concerns they had directly with the SLHD Board. As I understand it, the invitation to attend the meeting was forwarded to nursing and allied staff approximately 10-15 minutes before the meeting was to commence.
45. At 3:00pm on 9 August 2023, a meeting was held between the SLHD Board, MSC, nursing and allied health staff, Mr Minns, and Mr McDonald. The following staff presented at this meeting:
- a. Dr Belinda Hokin of the Emergency Department;
  - b. Dr Lloyd Ridley of the Radiology Department;
  - c. Mojgan Soltanifard of Concord Nursing (General);
  - d. Dr Raoul Pope of the Neurosurgery Department;
  - e. Stuart Cook of Concord Nursing (ICU);
  - f. Dr Mark Joseph of the Surgery Department;
  - g. Dr Fergus Davidson of the Anaesthetic Department;
  - h. Dr Liz (Elizabeth) Veitch of the Respiratory Department; and
  - i. Glenda Glynn, Patient Advocate, and Quality and Safety.
46. No formal minutes were taken in this meeting, although the meeting was conducted according to the agenda. Annexed hereto and marked "MM" is a copy of the agenda. Annexed hereto and marked **MM.1 – MM.6** are the speech notes for Dr Hokin, Dr Ridley, Ms Soltanifard, Dr Pope, Mr Cook and Ms Glynn respectively. My



recollection is that there was limited interaction from the members of the SLHD Board who were present.

47. On 11 August 2023, I received a letter from Mr Minns, in which he explained the purpose of the engagement of Mr McDonald. Annexed hereto and marked "**NN**" is a copy of that letter.
48. On 24 August 2023, the MSC met with Concord Hospital and SLHD executive team members. Annexed hereto and marked "**OO**" is a copy of the minutes from this meeting.
49. On 25 August 2023, I wrote to Mr Ajaka and the SLHD Board, formally requesting that the Board arrange an independent investigation into the concerns raised by staff. Annexed hereto and marked "**PP**" is a copy of this letter. That same date, I wrote to Susan Pearce, Secretary of NSW Health, and Mr Minns, also formally requesting an independent investigation. Annexed hereto and marked "**QQ**" is a copy of this letter.
50. On 29 August 2023, I received a letter from Mr Minns. Annexed hereto and marked "**RR**" is a copy of that letter. The letter was copied to Ms Pearce and Mr Ajaka.
51. On 6 September 2023, I sent a letter to Mr Ajaka and the SLHD Board formally requesting confirmation that the Board would not be arranging an independent investigation. Annexed hereto and marked "**SS**" is a copy of that letter. On that day, I also sent a letter to Ms Pearce, formally requesting confirmation that NSW Health would not be arranging an independent investigation either. Annexed hereto and marked "**TT**" is a copy of that letter.
52. On 8 September 2023, I received a letter from Mr Minns, on behalf of Ms Pearce, encouraging the MSC to provide accounts to the NSW Ombudsman. Annexed hereto and marked "**UU**" is a copy of that letter.
53. On 11 September 2023, I received a letter from Mr Ajaka, concurring with Mr Minns. Annexed hereto and marked "**VV**" is a copy of that letter.

54. The issues complained of by staff were, in my view, consistent with the People Matter NSW Public Sector Employee Survey 2023. The Health Portfolio Report was based on results from a survey period between 21 August and 15 September 2023. The survey for the entire NSW Health portfolio revealed that in the last 12 months, 26% of respondents had witnessed bullying, 16% had experienced bullying, 17% were aware of any misconduct in the organisation, and 12% had experienced threats or physical harm. Annexed hereto and marked "**WW**" and "**XX**" are a copy of the results for the entire NSW Health sector and for Concord Hospital respectively.
55. On 25 September 2023, I sent an email to the MSC, announcing that two additional proposed votes of no confidence were to be considered at a subsequent meeting. One in relation to the SLHD Board, and one in relation to the NSW Health leadership team. Annexed hereto and marked "**YY**" copy of this email.
56. On 28 September 2023, the MSC met with the Concord Hospital and SLHD executive team. Annexed hereto and marked "**ZZ**" is a copy of the minutes for this meeting.
57. The vote of no confidence in the SLHD Board, referred to at [56] above was formally proposed at the MSC meeting on 12 October 2023. Annexed hereto and marked "**AAA**" is a copy of the minutes from this meeting.
58. As part of the discussion at the meeting on 12 October 2023, I raised a document titled 'Workforce Factsheet: Core Values Behaviours' which includes examples of 'above the line' and 'below the line' behaviours, which I take to be references to behaviour on the part of SLHD staff that SLHD considers to be either appropriate or not appropriate. Annexed hereto and marked "**BBB**" is a copy of the document titled 'Workforce Factsheet: Core Values Behaviours'.
59. As one example, that document states that "Making the best use of available resources and experience" is listed as 'above the line' while "complaining about resource limitations and constraints rather than striving to work creatively within available resources and looking for innovative solutions" is listed as 'below the line'.

60. On 26 October 2023, the MSC met and passed a vote of no confidence in the Board of the SLHD, with 59 votes to 42. Annexed hereto and marked “**CCC**” is a copy of the minutes from this meeting.
61. On 27 October 2023, I wrote to Mr Ajaka and the SLHD Board informing them of the results of that vote. Annexed hereto and marked “**DDD**” is a copy of this letter. I also wrote to Minister Park regarding the same on 1 November 2023. Annexed hereto and marked “**EEE**” is a copy of this letter.
62. On 9 November 2023, the MSC met with Concord Hospital and SLHD executives. Annexed hereto and marked “**FFF**” is a copy of the minutes from this meeting.
63. On 22 November 2023, I received a letter from Dr Ajaka, acknowledging my letter dated 27 October 2023, and urging staff to cooperate with the ‘intervention’ by ProActive Resolutions. Annexed hereto and marked “**GGG**” is a copy of this letter.
64. On 30 November 2023, I sent an email to Mr McDonald, requesting a progress report from ProActive Resolutions and a summary on the mediation process for reference in the next MSC meeting. Mr McDonald replied stating that he would like to present this information in person to the MSC. Annexed hereto and marked “**HHH**” is a copy of this correspondence.
65. On 14 December 2023, the MSC met with the Concord Hospital and SLHD executives. Mr McDonald presented at this meeting. Annexed hereto and marked “**III**” is a copy of the minutes from this meeting.
66. On 4 January 2024, the Sydney Morning Herald reported on radiology staff burnout at Concord Hospital on its front page.
67. On 9 January 2024, I received a letter from Minister Park regarding the vote of no confidence in the SLHD Board. Annexed hereto and marked “**JJJ**” is a copy of this letter.
68. On 15 January 2024, Dr Joseph Jewitt, the General Manager of Concord Hospital sent a memorandum to staff via email outlining that ProActive Resolutions would be

running Covid-19 reflection sessions. Annexed hereto and marked "**KKK**" is a copy of this memorandum.

69. Between 13 February 2024 and 5 April 2024, I emailed John McDonald several times to ask for a written summary of ProActive Resolution's major achievements and major breakthroughs at Concord Hospital since starting its review process. Annexed hereto and marked "**LLL**" is a copy of this correspondence.
70. On 26 April 2024, I had a phone call with John McDonald confirming that ProActive Resolutions would not be providing a written report to the MSC of its review of Concord Hospital, and that the review officially ended in March 2024. On 29 April 2024, I wrote an email to John McDonald to confirm this conversation. Annexed hereto and marked "**MMM**" is a copy of this email.
71. On 2 May 2024, Susan Pearce, Secretary, NSW Health and John Ajaka sent a memo to all staff in the SLHD announcing that Dr Anderson had been assigned the Chief Executive role in the Single Digital Patient Record Implementation Authority. Annexed hereto and marked "**NNN**" is a copy of this memorandum.
72. On 27 June 2024, the MSC met with the new SLHD Chief Executive and other Concord and SLHD Executives. Eleven speakers provided presentations or gave speeches on the problems in their departments. The speeches indicated ongoing distress in the Radiology and Emergency Departments. Annexed hereto and marked "**OOO**" is a copy of the meeting minutes.

#### **F. Workplace investigation**

73. On 10 November 2023, I received a letter from Juliette Rex, SLHD Employee Relations Manager in relation to concerns raised regarding my behaviour during the MSC meeting with the Executives on 12 October 2023. Annexed hereto and marked "**PPP**" is a copy of this letter.
74. Between 13 and 22 November 2023, Ms Rex and I exchanged emails regarding a potential meeting to discuss the concerns raised. I declined to attend without having

taken legal advice. Annexed hereto and marked "**QQQ**" is a copy of this correspondence.

75. On 22 November 2023, I also received an email from Ms Rex attempting to arrange a meeting and stating that in the absence of a written response, an assessment of my conduct would be finalised on the available information. I replied to this email that same day, advising that I was waiting for a response from a lawyer. Annexed hereto and marked "**RRR**" is a copy of this correspondence.

76. On 21 December 2023, I sent a letter to Ms Rex in relation to the investigation. Annexed hereto and marked "**SSS**" is a copy of this letter.

77. On 3 January 2024, I received an email from Ms Rex. This email attached a letter from Ms Rex and its own attachments. Annexed hereto and marked "**TTT**" is a copy of the email, letter, and attachments.

78. On this date, Wilma Finlayson, Senior Workforce Advisor at Concord Hospital, sent an all-staff email informing staff that Concord Workforce would be running a series of information sessions via Microsoft teams on Bullying and Harassment over the course of January. Annexed hereto and marked "**UUU**" is a copy of this email.

79. On 4 January 2024, I responded to Ms Rex's email of 3 January 2024, advising that I would not meet with her until I had received legal advice. Annexed hereto and marked "**VVV**" is a copy of this email.

80. On 9 February 2024, I wrote to Ms Rex responding to her letter dated 3 January 2024. Annexed hereto and marked "**WWW**" is a copy of that letter.

81. On 27 February 2024, I received a letter from Gina Finocchiaro, Director, Workforce and Corporate Operations, SLHD (signed by Nathan Rudd) regarding the outcome of the Initial Assessment of allegations raised against me in relation to the meeting held on 12 October 2023, referred to at [73] above. The allegations were found not to constitute misconduct, bullying or harassment, but were found to be contrary to the NSW Health Core Values and my obligations under the NSW Health Code of

Conduct. I was advised to apologise to Dr Hallahan and told that a mediation would be arranged. Annexed hereto and marked “**XXX**” is a copy of that letter.

82. On 12 April 2024, my legal representatives wrote to Ms Finocchiaro. Annexed hereto and marked “**YYY**” is a copy of this letter.

83. On 30 April 2024, Ms Finocchiaro provided a formal response to this letter, stating that she believed that the findings made by Ms Rex were appropriate having considered the concerns raised and proposing to advance the suggested mediation between Dr Hallahan and myself. Annexed hereto and marked “**ZZZ**” is a copy of her letter.

84. On 8 May 2024, my legal representatives then replied to this by letter, asserting that the matter would require an independent investigator. Annexed hereto and marked “**AAAA**” is a copy of that correspondence.

85. On 13 May 2024, Ms Finocchiaro replied by email, declining to comment further and asking to be informed of any request for external review. Annexed hereto and marked “**BBBB**” is a copy of this email.

86. On 21 May 2024, my legal representatives wrote to Ms Finocchiaro regarding making a formal complaint about her conduct. My legal representatives also noted (among other things) that I was lawfully exercising my right to make complaints about industrial matters. Annexed hereto and marked “**CCCC**” is a copy of this letter.

87. I have received no further correspondence from the SLHD in relation to this issue.

#### **G. NSW Ombudsman and ICAC**

88. On 28 October 2023, I wrote to Paul Miller, the NSW Ombudsman, making a formal complaint and request for an independent and external investigation by the NSW Ombudsman’s Office into matters including those set out in this statement.

89. From October 2023 to the present time, I have engaged with staff of the NSW Ombudsman’s Office in relation to this complaint and request.

Signature: *Wm*

Name: Clinical A/Professor Winston Cheung

Date: 16/7/2024