

RELEASE DISCHARGE AND INDEMNITY

IN CONSIDERATION of the STATE OF QUEENSLAND through the Department of Communities paying to me JOSEPH ALLAN KIERMAN (Applicants Name) of REDACTED (Applicants Address) an amount of seven thousand dollars (\$7000.00) in full and final satisfaction and discharge of all claims whatsoever which I or my executors or administrators may have against the State of Queensland arising as a result of an incident described in the Schedule (the circumstances), subject to my right to apply for and pursue a claim for a Level 2 payment under the "Redress Scheme".

I hereby:

1. Release and forever discharge the State of Queensland and its current and former employees, servants and agents from all actions claims costs or demands whatsoever which I may have arising from the incident.
2. Agree that the payment which I have accepted from the State of Queensland is made without any admission of liability or negligence by the State of Queensland.
3. Agree to indemnify and keep indemnified the State of Queensland against any loss, cost or amount which the State of Queensland may become legally required to pay, with respect to or in any way connected with the incident.
4. Agree that this Release Discharge and Indemnity may be pleaded as a bar to any proceedings instituted by me or on my behalf at any time, with respect to or in any way connected with the incident.
5. Agree to keep the facts of the amount of the payment made to me by the State of Queensland and the terms and conditions of this Release Discharge and Indemnity confidential.

SCHEDULE

1. The circumstances or any incident which may have occurred in respect of any time I spent as a child in a Queensland Government or non-government institution established, registered or licensed under the *State Children Act 1911, Children's Services Act 1965, Juvenile Justice Act 1992 or Infant Life Protection Act 1905*, before 31 December 1999.
2. Any matters relating to any Supreme, District or Magistrates Court claim I may have commenced against the State of Queensland prior to today's date arising from the circumstances in Schedule item 1 above.
3. Any matters relating to any Ombudsman complaint arising from the circumstances in schedule item 1 above I may have commenced prior to today's date.
4. All matters inchoate with respect to or pertaining to the circumstances mentioned in schedule items 1, 2 and 3 herein.

Signed: Joseph Kierman

JOSEPH KIERMAN
(Print Name)

Witness: [Signature]

KATRINA MAREE PEDERSEN
(Print Name) **Katrina Maree Pedersen**
Solicitor of Supreme Court of Qld

DATED this 28th day of OCTOBER 2008.

