APPEAL PANEL OF RACING NEW SOUTH WALES

IN THE MATTER OF THE APPEAL OF REGISTERED OWNER & BREEDER KIM MARINA DULHUNTY

Heard at Racing NSW Offices

Appeal Panel:	**Mr L. Vellis - Convenor**; **Mrs S. Skeggs**; **Mr C. Tuck**
Representatives:	**Racing NSW - Mr M. Cleaver, Operations Manager - Integrity**
	Appellant – Self represented
Date of Hearing:	**4 February 2026**
Date of Reasons and Orders:	**10 April 2026**

REASONS FOR DECISION

1. In July 2025, Racing NSW Officials commenced an investigation into the care and welfare of afforded to thoroughbred horses in the care of registered owner and breeder Ms Kim Marina Dulhunty (the **Appellant**).

2. On 25 July 2025, Racing NSW Officials attended the property of the Appellant for the purpose of assessing the health and welfare of thoroughbred horses. Upon arrival at the location, Officials inspected thoroughbred horse *Maximus Fortius,* who they observed had very poor body condition.

3. As a result of the inspection, Racing NSW Officials issued directions to the Appellant with respect to the ongoing care and welfare of *Maximus Fortius.* Racing NSW Veterinarian Dr Rose Bensley and private Veterinarians conducted follow up inspections and completed relevant reports.

4. On 29 October 2025, Racing NSW Stewards opened an inquiry at Scone Racecourse into the care afforded to *Maximus Fortius*. A brief of evidence compiled by Racing NSW Investigator Ms Nikki Burke was tendered, oral evidence was taken from the Appellant and Veterinarians, including Racing NSW Official Veterinarian, Dr Rose Bensley.

5. Additional evidence was taken with respect to the euthanasia of thoroughbred horse *Destiny's Rose.* The inquiry was adjourned to allow the Appellant to provide relevant veterinary reports relating to the euthanasia of *Destiny's Rose.*

6. On 5 November 2025, the Appellant provided Stewards with veterinary reports relating to the euthanasia and subsequent post mortem of *Destiny's Rose.*

7. On 26 November 2025, Racing NSW continued the inquiry. The additional veterinary report provided on 5 November 2025 was tendered, and oral evidence was taken from the Appellant

and Veterinarians, including Racing NSW Veterinarian Dr Rose Bensley. It was identified that *Desitny's Rose* was in very poor body condition prior to its euthanasia.

8. After considering the evidence, Stewards issued two charges under AR 231(1)(b)(iv) and AR231(1)(b)(i)(B) of the Australian Rules of Racing (the **Rules**) against the Appellant.

9. The Appellant entered pleas of not guilty to charge 1 (AR 231(1)(b)(iv)) and guilty to charge 2 (AR 231(1)(b)(i)(B)). The inquiry was adjourned to allow sufficient opportunity for the Appellant to make submissions. On Tuesday 9 December 2025, the Appellant provided submissions, which were considered by Stewards.

10. On 11 December 2025, after considering submissions, Racing NSW Stewards determined the charges in the following manner:

    Charge 1 | AR 231(1)(b)(iv) | Care and welfare of horses

    a. AR 231(1)(b)(iv) is in the following terms:

       A person must not, if the person is in charge of a horse – fail at any time, to provide and ensure that the horse is ingesting proper and sufficient nutrition.

    b. The details of the charge being that, as at 25 July 2025, Ms Dulhunty was the person in charge of thoroughbred horse *Maximus Fortius.* Racing NSW Officials and a Veterinarian assessed the health and welfare of *Maximus Fortius* at this time and found it to have body condition score of 0.5/5. Ms Dulhunty did fail to provide and ensure that *Maximus Fortius* was ingesting proper and sufficient nutrition. The lack of proper and sufficient nutrition was either entirely or in part a contributing factor to the poor body condition.

    a. Ms Dulhunty pleaded not guilty and was found guilty of this charge.

    Charge 2 | AR 231(1)(b)(i)(B) | Care and welfare of horses

    a. AR 231(1)(b)(i)(B)) is in the following terms:

       A person must not, if the person is in charge of a horse – fail at any time, to exercise reasonable care, control or supervision of the horse so as to prevent the horse's body condition from declining to, in the opinion of the Stewards based on veterinary advice, an unacceptable level.

    b. The details of the charge being that, as at 24 June 2025, Ms Dulhunty was the person in charge of thoroughbred horse *Destiny's Rose.* A Veterinarian assessed the health and welfare of *Destiny's Rose* at this time and found it to have an estimated body condition score of 1-2/9 (*on the Henneke (1983) Body condition scoring system).* Ms Dulhunty did fail to exercise reasonable care, control and supervision of *Destiny's Rose* to prevent the horse's body condition, based on veterinary advice, declining to an unacceptable level.

c. Ms Dulhunty pleaded guilty to this charge.

11. The following orders were made in relation to penalty:

    a. Charge 1 AR 231(1)(b)(iv) – penalty of 6 months disqualification; and

    b. Charge 2 AR 231(1)(b)(i)(B) – penalty of 12 months disqualification, reduced to 9 months.

12. In total, the Appellant was disqualified for a period of 15 months, to commence on 11 December 2025 and expire on 11 March 2027.

13. On or around 16 December 2025, the Appellant was granted a stay of proceedings with respect to this matter.

14. The Appellant has appealed to the Panel as follows:

    a. Charge 1 AR 231(1)(b)(iv) – appeal against finding of breach and penalty; and

    b. Charge 2 AR 231(1)(b)(i)(B) – appeal against penalty.

15. The Appellant was self-represented, and Mr M. Cleaver, Operations Manager - Integrity, appeared for Racing NSW.

16. The Appeal Book was tendered as Exhibit A. In addition, written submissions were provided by the Appellant (before the hearing) on 29 January 2026 and (after the hearing) on 5 February 2026, and Mr Cleaver also provided written submissions (prior to the hearing) on 2 February 2026.

Submissions & Determination

17. Mr Cleaver generally relied upon his written submissions in support of his submissions that the finding of a breach for Charge 1 was appropriate and that the penalties for Charges 1 and 2 were also appropriate and should not be disturbed.

18. With respect to Charge 1, Mr Cleaver referred to the Appellant's submission that AR 231(1)(b)(iv) erroneously imposes a strict liability obligation, and submitted that this construction had been confirmed by the Appeal Panel in *Wayne Carrol*[1]*l* where the Panel concluded that intention or fault is not an element of the offence. The Panel agrees with this interpretation.

19. Mr Cleaver then addressed the Appellant's submission that Charge 1 was defective because the Stewards did not identify a discrete "relevant time period", and submitted that this is without merit as AR 231(b)(iv) imposes a continuing obligation on a person in charge of a horse not to fail "at any time" to provide and ensure ingestion of proper and sufficient nutrition. The Panel again agrees with Mr Cleaver's submission, in that the words in AR 231(1)(b)(iv)

[1] Racing NSW Appeal Panel, 5 June 2023 [27].

clearly state that a person in charge of a horse must not "*fail at any time, to provide and ensure that the horse is ingesting proper and sufficient nutrition",* which is an obligation that is ongoing, and not confined to a single moment of breach.

20. Mr Cleaver referred to the decision in *Joshua Morrow*[2], where it was held to be sufficient for the charge to identify the period during which the applicant was in charge of the horses and during which their condition deteriorated, notwithstanding that no precise date of failure could be isolated. Mr Cleaver submitted that the Queensland Racing Appeal Panel confirmed in *Joshua Morrow* that the "failing" occurs over time and that a breach may be established where the evidence demonstrates sustained deterioration while under the person's care.

21. Mr Cleaver submitted that the issue for determination is not whether the Appellant intended to feed *Maximus Fortius,* nor exclusively whether feed was available, but rather, the Panel needs to consider whether the Appellant ensured the horse was in fact ingesting proper and sufficient nutrition at all times it was in her charge. Mr Cleaver also referred to the Panel's decision in *Samantha Murphy*[3], in which the Panel considered materially similar welfare failures involving prolonged neglect and inadequate oversight, and the Panel held in that matter that the Appellant was "not in any way absolved" by surrounding circumstances which contributed to the horse's decline.

22. With respect to the finding of a breach for Charge 1, Mr Cleaver submitted that this finding of a breach should be confirmed and referred to the following matters in support of such finding:

    a. On 25 July 2025, Racing NSW veterinarian Dr Rose Bensley assessed *Maximus Fortius* as having a body condition score of 0.5/5, being extreme emaciation (Appeal Book, page 56);

    b. This assessment is corroborated by contemporaneous photographic evidence taken during the inspection, which depicts prominent ribs, spine, hips and tail head, consistent with extreme loss of condition (Appeal Book, pages 68–72);

    c. In her property inspection report, Dr Bensley noted that (Appeal Book, pages 52–54):

        i. adequate or nutritionally appropriate ground cover was not present in any paddock or yard;

        ii. paddocks contained scant ground cover consisting largely of weeds;

        iii. all horses on the property required supplementary feeding;

        iv. no hay or other source of roughage was present in paddocks or yards at the time of inspection; and

        v. evidence of supplementary feeding was minimal and inconsistent.

[2] Queensland Racing Appeal Panel, 1 September 2023 at [104]–[105].
[3] Racing NSW Appeal Panel, 1 February 2026.

d. Subsequent veterinary investigations excluded disease, parasitism, or systemic illness as the cause of *Maximus Fortius*' condition, including (Appeal Book, pages 81–83) that:

   i. faecal egg counts were unremarkable;

   ii. blood work identified anaemia consistent with low body condition rather than a primary disease process; and

   iii. no clinical signs of infectious or metabolic disease were identified.

e. On 6 August 2025, the attending veterinarian reported (Appeal Book, pages 81–84) that "*Maximus Fortius*' poor body condition is most likely due to lack of ability to prehend and chew feed, alongside too little/inappropriate feed being provided." The veterinarian recommended that the feeding regimen be altered and warned that, if weight gain could not be achieved within a reasonable time, euthanasia would be required on welfare grounds.

f. On 25 July 2025, Racing NSW issued a formal direction requiring increased supplementary feeding for all horses, including *Maximus Fortius*.

g. Following implementation of increased and targeted feeding, a further inspection on 11 September 2025 recorded measurable improvement in *Maximus Fortius*' body condition and by 2 October 2025, the horse had improved to approximately 2/5 body condition.

h. The improvement in *Maximus Fortius*' body condition is evidence that prior to that intervention, *Maximus Fortius* was not being provided and/or ingesting sufficient nutrition. This submission is supported by both Dr Bensley, and Dr Jeffrey who stated "*our only real abnormal marker was…anemia…most likely due to his reduced body condition*" (Appeal Book, page 14 [254]);

i. Dr Bensley gave expert evidence regarding the timeframe required for a horse to deteriorate to such a condition, stating that for a horse in moderate body condition to decline to the point of extreme emaciation and loss of strength would ordinarily require approximately 60 to 90 days of feed deprivation (Appeal Book, page 43 [483]);

j. The severity of *Maximus Fortius*' condition was inconsistent with a transient feeding issue arising shortly before inspection. Rather, the condition demonstrated a sustained failure over many weeks to ensure ingestion of proper and sufficient nutrition;

k. The deterioration in *Maximus Fortius'* condition was not sudden or unforeseeable. Dr Jeffrey had observed the horse to have a low body condition score as early as December 2023 (Appeal Book, page 16 [324]). This demonstrated that the horse had longstanding vulnerability and that the Appellant was, or ought to have been, aware of the need for close nutritional monitoring and proactive management well prior to the July 2025 inspection. In this context, the horses emaciation reflected a failure, over an extended

period, to respond adequately to known risk factors affecting the horse's ability to maintain condition; and

l. During the inquiry the Appellant accepted that there were occasions on which *Maximus Fortius* did not come up for feed (Appeal Book, page 27 [612]; page 115 [11]) and that additional feeding measures were introduced only after directions were issued. These concessions are inconsistent with the existence of any effective system to ensure regular and adequate intake of nutrition prior to July 2025, and reinforce the finding that earlier arrangements were reactive rather than compliant.

23. The Appellant's submissions with respect to Charge 1 could be summarised as falling into two categories, firstly that *Maximus Fortius* had a litany of pre-existing health conditions that likely caused the deterioration of his condition and secondly, that the Appellant had identified the issue with respect to the worsening condition of *Maximus Fortius* and had proactively taken steps to correct the issue.

24. In addition, the Appellant made the following submissions with respect to Charge 1 and her contention that she was not guilty of a breach of AR 231(1)(b)(iv):

    a. Insufficient weight was given by the Stewards to evidence that *Maximus Fortius*, aged 23 years, had lost many teeth and had lost his position in the hierarchy, which was the cause of his weight loss. The Appellant also referenced Dr Bensley's comments that a change in hierarchy can prevent a horse from being able to access food being given to a horse (Appeal Book, page 21);

    b. The Stewards disregarded the evidence that steps had already been taken to remove *Maximus Fortius* from the group and place him on his own so that he could access his full ration of food, despite confirmation by Dr Bensley that *Maximus Fortius* had been removed from the group when she and Ms Burke first attended the property on 25 July 2025 (Appeal Book, page 21);

    c. *Maximus Fortius* had in fact been removed from the group on 30 June 2025, wormed and put on a course of ProN8ure, with the Stewards disregarding evidence that the Appellant had identified the problem and taken action to address the problem;

    d. *Maximus Fortius* had been away from the group for 25 days when Dr Bensley and Ms Burke attended the Appellant's property;

    e. The Stewards failed to understand that changes in a horse's condition, increases or decreases, do not occur overnight;

    f. It is clear that the action the Appellant took resulted in *Maximus Fortius's* improved condition, which continued to improve when Dr Bensley and Ms Burke attended the Appellant's property on 14 August 2025 and 11 September 2025;

g. At all times *Maximus Fortius* was receiving the same amount of hard feed both before he was removed from the group and after his removal from the group, with the Appellant. crushing the hard feed to make it easier for him to eat. The only material change has been that *Maximus Fortius* now gets two meals of lucerne chaff rather than a biscuit of lucerne hay as he has difficulty eating the stalkier biscuits of lucerne hay;

h. The Stewards erred in seemingly applying AR 231(1)(b)(iv) as a strict liability provision without notice; and

i. The Stewards failed to indicate or define what constitutes "the relevant time periods" and the evidence does not support a finding that the Appellant was not providing *Maximus Fortius* with proper and sufficient nutrition or ensuring that *Maximus Fortius* was ingesting proper and sufficient nutrition. Rather, the evidence supports the opposite conclusion in that the Appellant identified the problem and took steps to rectify the problem which has resulted in *Maximus Fortus's* much improved condition.

25. Based on the evidence provided and the written submissions on behalf of both parties, the Panel substantially agrees with the submissions of Mr Cleaver with respect to Charge 1, in that there has been a breach of AR 231(1)(b)(iv) (Charge 2) by the Appellant.

26. With respect to Charge 1, the Panel is comfortably satisfied that the Appellant was in charge of or had in her possession, control or custody a horse (in this case an Eligible Horse, which was *Maximus Fortus*) and did not ensure that such horse was provided at all times with proper and sufficient nutrition and water.

27. The Panel is unanimous in its view and considers the evidence presented to be compelling. While it is clear that the Appellant cares for horses in her care and it is not suggested that there was any intent to harm *Maximus Fortus*, the evidence overwhelmingly supports the conclusion that *Maximus Fortus's condition* was very poor and the Appellant did fail for a period of time to provide and ensure that the horse was ingesting proper and sufficient nutrition.

28. Many of the submissions put forward by the Appellant are better considered as either mitigating factors that do not alleviate guilt or reactive actions that have since improved the condition of *Maximus Fortus.* For example, the Appellant, in her submissions mentioned herd hierarchy, bullying, and dental disease as explanations for the horse's condition. These matters do not negate liability, but as noted by Mr Cleaver in his submissions are actually circumstances that require greater intervention, not less. Where a horse may be facing such factors that may impact its ability to ingest nutrition, compliance with AR 231(1)(b)(iv) requires steps to be taken to ensure horses are both provided with sufficient nutrition, but are also ingesting that nutrition.

29. While the Appellant correctly submitted that her subsequent actions caused the improvement in the condition of *Maximus Fortius,* this appears to have at least been partly triggered

(although the Appellant disputes this) by the intervention of Racing NSW, and the improvement supports the evidence that prior to such steps being taken by the Appellant, *Maximus Fortius* was not being provided and/or ingesting sufficient nutrition.

Penalty

30. With respect to penalty, Mr Cleaver submitted that civil penalties like those arising under the Rules are imposed primarily for the purpose of general and specific deterrence, with the purpose being not to punish the Appellant, but rather, to protect the image and integrity of the sport and industry of racing. Amongst the matters that inform the assessment of penalty are the objective seriousness of the contravening conduct and any matters specific to the contravener. These submissions are well known to the Panel and are generally accepted as being key considerations of the Panel in assessing penalties.

31. Mr Cleaver also submitted that the Panel is not bound to follow precedent decisions, as it remains the position that *'no two cases are ever factually identical, and that what must be achieved in determining consistent application of principle, as opposed to numerical equivalence'*[4]. The Panel also accepts this submission, which is also relevant to the Panel's decision with respect to penalties for Charges 1 and 2 in this matter.

32. Previous decisions were referred to by Mr Cleaver, in particular:

    a. *Joshua Morrow*, in which Mr Morrow received a 21-month disqualification for four charges under AR 231(1)(b)(iv) and the Queensland Racing Appeal Panel noted that "*One of the paramount considerations for maintaining that social licence is the issue of animal welfare and ensuring that animals are appropriately fed, maintained, and cared for by participants in the industry*" and that "*Misconduct in relation to the care and welfare of horses by licensed participants risks the reputation and standing of the industry and the social licence under which it operates*"; and

    b. *Samantha Murphy*, in imposing a 9-month disqualification for like offending, the Panel determined that such a penalty was appropriate having regard to the "*serious detrimental impact on the image and integrity of the racing industry".*

33. The Panel accepts and endorses the submissions made by Mr Cleaver with respect to the seriousness of the issue of animal welfare and the detrimental impact on the image and integrity of the racing industry when animal welfare matters arise. It is a fundamental tenet of the racing industry that participants will prioritise the care and welfare of the horses upon which the very industry is based.

34. Mr Cleaver submitted that the present matter is materially more serious than a single, isolated welfare breach as the Appellant was found guilty of two distinct contraventions involving two separate horses, each of which suffered significant deterioration in body condition while

[4] Egan v Racing NSW (Racing Appeal Tribunal) 28 October 2024 [76].

under her care. In respect of *Maximus Fortius*, the breach under AR 231(1)(b)(iv) involved failure to ensure the ingestion of proper and sufficient nutrition, resulting in extreme emaciation. In respect of *Destiny's Rose*, the breach under AR 231(1)(b)(i)(B) involved a failure to exercise reasonable care and supervision, culminating in the mare becoming recumbent and requiring euthanasia on welfare grounds.

35. It was submitted by Mr Cleaver that the coexistence of these breaches demonstrates systemic deficiencies in the Appellant's management and oversight of animal welfare, rather than an isolated lapse affecting a single horse, with such conduct representing a serious departure from the standards expected of registered owners and breeders.

36. Mr Cleaver submitted that any penalty should serve as a strong deterrence to both the Appellant and other participants in the industry. Mr Cleaver submitted that the 15 month disqualification (6 months for Charge 1 and 9 months for Charge 2) imposed by the Stewards was appropriate and saw no reason for the penalties for these charges to be served concurrently.

37. The Appellant's submissions with respect to penalty focussed on the Stewards' decision to have the periods of disqualification for Charges 1 and 2 served consecutively rather than concurrently. The Appellant was of the view that the total period of disqualification should therefore be 9 months, not 15 months. With respect to this submission, the Panel reiterates the position that Stewards (and the Panel for that matter) are not required to require that penalties are served concurrently, it is a discretion that can be exercised if deemed appropriate to do so.

38. The Appellant also made submissions with respect to her genuine remorse over the welfare issues encountered by *Maximus Fortius* and *Destiny's Rose*, including a regret that maybe more could have been done to avoid the euthanasia of *Destiny's Rose*. In addition, the Appellant submitted that her efforts in improving the condition of *Maximus Fortius* through a renewed program of feeding and care was evidence of her affection for horses in her care and her ability to ensure the welfare of horses in her care.

39. A further submission was made by the Appellant regarding steps she has taken to ensure a repeat of the animal welfare issues previously encountered. Such steps can be summarised as follows:

    a. The Appellant researching and pricing security cameras to be implemented on the property to better monitor behavioural and feeding habits;

    b. Since June 2025 the Appellant reclaiming sole control and responsibility for making up all hard feeds. This was delegated to others at times and may have resulted in incomplete or less communication regarding animal welfare issues;

    c. Since taking back the preparation of all feeds solely by herself, the condition of all horses has improved. The Appellant also carefully supervises that the correct feeds are given

to the correct horses. If the Appellant needs to go away, it is usually only overnight so she can prepare the feeds before leaving and return the next day in time to prepare the next set of feeds. If the Appellant is to be away for a longer period she consider sending horses away to agist elsewhere during this time to ensure they are cared for in the manner required;

d. The Appellant is maintaining smaller groupings of horses. This works much more harmoniously than larger groupings even though it puts more pressure on the pasture as it limits resting and rotation of paddocks until further fencing is completed. When there have been larger groupings of horses is when there have been problems even with significant spacing of feeds;

e. Possibly putting in some temporary yards/paddocks using hotwire until additional paddocks can be built so that horses can be isolated away from bullies to be fed to ensure that they get their full ration of feed; and

f. The Appellant is more closely monitoring hierarchical changes after horses have been away and then return home. Some maintain their position but some are moved down the hierarchy from where they were originally and regrouping may be required.

40. The Appellant also submitted that she has had a long standing career working with horses and has always prioritised their care and welfare. The Appellant noted that she has been around horses since we was five years old, has been breeding horses for 25 years and has previously been a show-rider, participated in polo competitions and broken in and conditioned horses.

41. Another factor the Appellant submitted was relevant was the ages of *Maximus Fortius* and *Destiny's Rose* at the time of the offending, which were 23 years and 20 years old. The Appellant submitted that having horses of this age in of itself demonstrated her care for her horses, having nursed these two horses through injuries and illness previously.

42. In considering the appropriate penalties, the Panel generally agrees with the submissions made by Mr Cleaver, however, we have reached a different view with respect to the penalties to be issued.

43. As the Panel noted in *Wayne Carroll,*[5] albeit in dealing with a different subsection under AR 231, the "*Rules relating to the welfare of horses are amongst the most important in the Australian Rules of Racing. Welfare standards must be high, and breach of these rules is likely to lead to substantial penalties*". It is clear that the Appellant failed in her duty to care for *Maximus Fortius* and *Destiny's Rose* and that a period of disqualification is appropriate.

44. It is similarly clear to the Panel that the Appellant has a genuine care for her horses in her care, is genuinely remorseful for deterioration in condition and health suffered by *Maximus*

[5] Racing NSW Appeal Panel, 5 June 2023 [27].

Fortius and *Destiny's Rose*, and the Appellant has demonstrated such remorse and care by taking active steps to improve the feeding arrangements on her property, to the point that it is acknowledged by all parties in this matter that there has been a material improvement in the condition of *Maximus Fortius*, which given *Maximus Fortius*'s age is no small feat.

45. Having considered the matters previously raised in the evidence, in the written submissions and in the hearing, as well as the the totality of the conduct, the nature of the offending and supporting mitigating factors, the Panel has unanimously determined that the penalty to be imposed upon the Appellant for Charge 1 is a disqualification of 4 ½ months, rather than 6 months, and the penalty to be imposed upon the Appellant for Charge 2 is a disqualification of 6 months, rather than 9 months.

46. This results in a total period of disqualification of 10 ½ months rather than 15 months, although the Panel is also unanimously of the view that (among other reasons discussed in these reasons, including but not limited to, the Appellant's remorse and significant remedial steps in the intervening period) given Charges 1 and 2 relate to similar animal welfare matters on the same property within approximately one month from each other, a period of concurrency with respect to the penalties to be served. The Panel has determined that 2 ½ months of the penalties for Charges 1 and 2 will be served concurrently such that the total period of disqualification will be 8 months.

Orders

47. The orders of the Panel are:

    a. Charge 1 (AR 231(1)(b)(iv)) – appeal against finding of breach dismissed;

    b. finding of a breach of AR 231(1)(b)(iv) confirmed;

    c. Charge 1 (AR 231(1)(b)(iv)) – appeal against severity of penalty upheld, with the penalty reduced from 6 months disqualification to 4 ½ months disqualification;

    d. Charge 2 (AR 231(1)(b)(i)(B)) – appeal against severity of penalty upheld, with the penalty reduced from 9 months disqualification to 6 months disqualification;

    e. The penalties for Charges 1 and 2 are to be served partially concurrently, with 2 ½ months of the penalty for each of these charges to be served concurrently and the remainder of the penalties for Charges 1 and 2 to be served cumulatively;

    f. In total, Ms Dulhunty is disqualified for a period of 8 months, commencing on 13 April 2026 and expiring on 13 December 2026; and

    g. Appeal deposit to be refunded.

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