



Local Government Standards Panel

Complaint Number	20260005
Legislation	<i>Local Government Act 1995</i>
Complainant	Councillor Gemma Johnston
Respondent	Councillor Leonie de Haas
Local Government	Shire of Esperance
Regulation	Regulation 22 of the <i>Local Government (Model Code of Conduct) Regulations 2021</i>
Panel Members	Ms Erin Gauntlett (Presiding Member) Councillor Peter Rogers (Member) Ms Elanor Rowe (Deputy Member)
Heard	24 February 2026 Determined on the documents
Outcome	One breach of Regulation 22

FINDING AND REASONS FOR FINDING

01 April 2026

DEFAMATION CAUTION

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Summary of the Panel's decision

1. The Local Government Standards Panel ("the Panel") found that Councillor Leonie de Haas ("Cr de Haas"), an elected member for the Shire of Esperance ("the Shire") committed one breach under the *Local Government Act 1995* (WA) ("the Act") and Regulation 22 of the *Local Government (Model Code of Conduct) Regulations 2021* ("the Regulations") when she failed to declare an interest in an Item considered at the Council Meeting held on 28 October 2025.

Jurisdiction and procedural fairness

2. The Act makes provision for the circumstances in which a council member commits a minor breach.¹
3. On 23 December 2025, the Department of Local Government, Industry Regulation and Safety ("the Department") received a Complaint of Minor Breach Form ("Complaint"). The Complaint was signed by Councillor Gemma Johnston, ("the Complainant") and contained one allegation of a breach of the Regulation 22 by Cr de Haas.
4. On 21 January 2026, the Department advised Cr de Haas of the Complaint and invited her to respond. The Department sent Cr de Haas copies of the original Complaint and all the supporting documents provided by the Complainant.
5. Under the Act the Panel is required to consider a complaint of a minor breach and make a finding as to whether the alleged breach occurred.² On 24 February 2026 the Panel convened to consider the Complaint.
6. The Panel:
 - (a) accepted the Department's advice, based on information from the Western Australian Electoral Commission, that Cr de Haas was a councillor at the time of the alleged breach, and was still a Councillor when the Panel met on 24 February 2026;
 - (b) was satisfied the Complaint had been made within six months after the alleged breach was said to have occurred;
 - (c) was satisfied the Complaint had been dealt with in accordance with the administrative requirements in the Act for dealing with complaints of minor breaches³; and
 - (d) was satisfied that the Department had provided procedural fairness to Cr de Haas.
7. If a councillor has previously committed two or more minor breaches, the Panel may send the complaint to the Chief Executive Officer of the department assisting the relevant Minister at the time instead of considering the Complaint itself.⁴ Cr de Haas had not previously been found to have committed any breaches of the

¹ Section 5.105 of the Act.

² Section 5.110(2)(a) of the Act.

³ Sections 5.107, 5.108, 5.109 of the Act.

⁴ Sections 5.110(2)(b), 5.111(1) of the Act.



Regulations. Therefore, the Panel decided to not send the Complaint to the Chief Executive Officer of the Department.

8. Based on the information referred to above, the Panel found it had jurisdiction to determine whether Cr de Haas had breached the Regulations in connection with the Complaint.

Panel's role

9. The Panel is not an investigative body. It determines complaints of minor breaches solely upon the evidence presented to it.
10. Any finding, that a councillor has committed a minor breach, must be based on evidence from which it may be concluded that it is more likely than not that the breach occurred than that it did not occur (the required standard of proof).⁵
11. In order to find the allegation, proposition or conduct has been established, and where direct proof is not available, the Panel must be satisfied from the evidence that it is more probable than not that it has occurred. The Panel cannot make a finding that the alleged fact, proposition or conduct occurred if the evidence merely supports two or more conflicting but equally possible inferences.⁶
12. For a finding that a councillor has breached a particular regulation, the Panel must be satisfied that every element of the particular regulation has been established to the required standard of proof.

Regulation 22

13. *Regulation 22 provides:*

"22. Disclosure of interests

(1) In this clause —

*(a) **interest** means an interest that could, or could reasonably be perceived to, adversely affect the impartiality of the person having the interest; and*

(b) includes an interest arising from kinship, friendship or membership of an association.

(2) A person who has an interest in any matter to be discussed at a council or committee meeting attended by the member must disclose the nature of the interest —

(a) in a written notice given to the CEO before the meeting; or

(b) at the meeting immediately before the matter is discussed.

⁵ Section 5.106 of the Act.

⁶ *Bradshaw v McEwens Pty Ltd* (1951) 217 ALR 1, paragraph 5.

- (3) *Subclause (2) does not apply to an interest referred to in section 5.60 of the Act.*
- (4) *Subclause (2) does not apply if a council member fails to disclose an interest because the council member did not know -*
- (a) *that they had an interest in the matter; or*
- (b) *that the matter in which they had an interest would be discussed at the meeting and the person disclosed the interest as soon as possible after the discussion began.*
- (5) *If, under subclause (2)(a), a council member discloses an interest in a written notice given to the CEO before a meeting, then —*
- (a) *before the meeting the CEO is to cause the notice to be given to the person who is to preside at the meeting; and*
- (b) *at the meeting the person presiding must bring the notice and its contents to the attention of the persons present immediately before any matter to which the disclosure relates is discussed.*
- (6) *Subclause (7) applies in relation to an interest if –*
- (a) *under subclause (2)(b) or (4)(b) the interest is disclosed at a meeting; or*
- (b) *under subclause (5)(b) notice of the interest is brought to the attention of the persons present at a meeting.*
- (7) *The nature of the interest must be recorded in the minutes of the meeting.”*

Elements of Regulation 22(2)

14. The essential elements of a breach of Regulation 22(2) are that it is more likely than not that:

- a person who is a current council member (“member”);
- subject to Regulation 22(3), had a private or personal interest (“relevant interest”) in a matter (“matter”) that is more likely than not a conflict of interest or a bias (apparent or real) that does adversely affect, or might adversely affect the member’s impartiality in considering the matter, and includes an interest arising from kinship, friendship, membership of an association, or another circumstance;
- the member attended at the council or committee meeting concerned and was present when the matter under consideration came before the meeting and was discussed;
- the member did not disclose the nature of the relevant interest in the matter in either of the two ways required by Regulation 22(2)(a) or 22(2)(b); and



- Regulation 22(4) does not apply.

Substance of the Complaint

15. The Complainant alleged that Cr de Haas failed to declare an impartiality Interest in *Agenda Item 17.3 Employee Legal Assistance* ("Item 17.3") which was considered at the Council Meeting held on 28 October 2025 ("Council Meeting").
16. According to the Complainant, Mrs Chantelle Hoffrichter ("Ms Hoffrichter") had been the Chief Executive Officer's "*Secretary*" since January 2024. Ms Hoffrichter had sought legal assistance from the Shire (the subject matter of Item 17.3).
17. A close personal friendship existed between Cr de Haas and Ms Hoffrichter at the time of the Council Meeting.
18. On 25 August 2025, Ms Hoffrichter had referred to Cr de Haas as "*my friend*" in an affidavit. That helped to confirm that a friendship existed between the parties.
19. In addition, Cr de Haas had previously declared an impartiality interest in an Agenda Item at the Council Meeting held on 26 March 2024: *Item 12.1.2 – The Proposed Road Dedication*. At that meeting, Cr de Haas stated:

"I would like to declare an impartiality interest in Item 12.1.2 - Proposed Road Dedication, as this family are friends of mine".
20. Cr de Haas had a long-term affiliation and friendship with Ms Hoffrichter's family which she had mentioned to the Complainant on several occasions, and which she should have declared at the Council Meeting.

Cr de Haas's Response

21. On 21 January 2026, the Department requested comment on the allegations from Cr de Haas. On 1 February 2026, Cr de Haas submitted a response in which she confirmed that she did not accept the information as detailed in the Complaint and denied that she had committed the alleged misconduct:
 - a. Ms Hoffrichter was a valued member of the Shire's staff whom Cr de Haas had the utmost respect for. She was known by everyone at the Shire.
 - b. Cr de Haas would not have described her relationship with Ms Hoffrichter in the same way as the Complainant. Cr de Haas interacted with all staff in a friendly manner, and particularly with those who were helpful and treated her in the same way.
 - c. Cr de Haas had socialised with Ms Hoffrichter on one occasion as a work colleague. Her husband had collected her afterwards.
 - d. Cr de Haas confirmed as follows:
 - Steven and Deb Hoffrichter were friends of hers. She met them through work.



- Cr de Haas knew Mr Steven Hoffrichter's mother and sister through work.
- She had not met Ms Hoffrichter until Ms Hoffrichter had started work as the Shire's Executive Assistant (not the CEO's "secretary").

22. Cr de Haas considered her position to be one of a case of an "*interest in common*". Therefore, she had no need to declare an interest at the Council Meeting. Any decision made by her on the day would have been the same, interest declared or not.

Panel's Consideration

23. The Panel finds that the essential elements of Regulation 22(2) have been satisfied:

- a. Cr de Haas was a councillor at the time of the alleged breach and at the time the Panel considered the Complaint.
- b. The relevant matter (Item 17.3) was discussed at the Council Meeting, at which Cr de Haas was present.
- c. Ms Hoffrichter was directly affected by Item 17.3.
- d. A friendship existed between Cr de Haas and members of the Ms Hoffrichter's immediate family. Cr de Haas had previously declared that at the Council Meeting held on 26 March 2024.

6.3 Declarations of Impartiality Interests – Admin Regulations Section 34c

Cr de Haas declared a Impartiality Interest in item 12.1.2 as the person requesting this is a personal friend.

- e. There was nothing to indicate that the friendship had ceased to exist; rather, in her Response, Cr de Haas confirmed that it did still exist.
- f. The existing relationship could cause a fair-minded informed observer to reasonably apprehend or perceive that there might be a conflict of interest or a bias of some kind with respect to the subject matter of Item 17.3. Therefore, the requirement to declare was triggered.
- g. The requirement to declare is to be assessed objectively and not based on the Councillor's personal belief.
- h. Regulations 22(3) and 22(4) did not apply. Cr de Haas knew, or at least should have known, that she had a declarable interest in the matter.
- i. It was clear from the Minutes of the Council Meeting that Cr de Haas had not declared any interest after the introduction of Item 17.3.
- j. The elements required to find a breach of Regulation 22 have been met.



Findings

24. Accordingly, for the above reasons, the Panel finds that Cr de Haas had breached Regulation 22 in relation to the Complaint.

Signing

Erin Gauntlett (Presiding Member)

Elanor Rowe (Deputy Member)

Peter Rogers (Member)



Local Government Standards Panel

Complaint Number	20260005
Legislation	<i>Local Government Act 1995 (WA)</i>
Complainant	Councillor Gemma Johnston
Respondent	Councillor Leonie de Haas
Local Government	Shire of Esperance
Regulation	Regulation 22 of the <i>Local Government (Model Code of Conduct) Regulations 2021</i>
Panel Members for Penalty Consideration	Ms Erin Gauntlett (Presiding Member) Ms Emma Power (Member) Mr. Peter Rogers (Member)
Heard	24 February 2026 Determined on the documents
Penalty Considered	22 May 2026
Outcome	Public Censure and Public Apology

DECISION AND REASONS FOR DECISION

3 June 2026

DEFAMATION CAUTION

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Introduction

1. At its meeting on 24 February 2026, the Panel found that Councillor Leonie de Haas, a councillor for the Shire of Esperance (**“the Shire”**), committed a breach under the *Local Government Act 1995 (WA)* (**“the Act”**) and Division 4 and Regulation 22 of the *Local Government (Model Code of Conduct) Regulations 2021* (**“the Regulations”**) when she failed to disclose an impartiality interests in an item consider at the Council Meeting of 28 October 2025 (**“the Minor Breach”**).

Jurisdiction and Law

2. The Panel convened on 22 May 2026 to consider how it should deal with the Minor Breach.
3. The Panel accepted the advice of Department of Local Government, Industry Regulation and Safety (**“the Department”**) that on this date there was no available information to indicate that Cr de Haas had ceased to be, or was disqualified from being, a councillor.
4. If the Panel finds that a councillor has committed a minor breach, it must give the councillor an opportunity to make submissions to the Panel about how it should deal with the breach under section 5.110(6).¹
5. By a letter dated 1 April 2026, Cr de Haas was:
 - a. notified of the Panel’s finding of the Minor Breach;
 - b. provided with a copy of the Panel’s Finding and Reasons for Finding; and
 - c. offered an opportunity to make submissions as to how the Minor Breach should be dealt with under section 5.110(6) of the Act.

Possible Sanctions

6. Section 5.110(6) of the *Local Government Act 1995 (WA)* (**“the Act”**) provides that the Panel is to deal with a minor breach by:
 - (a) *ordering that no sanction be imposed; or*
 - (b) *ordering that —*
 - (i) *the person against whom the complaint was made be publicly censured as specified in the order;*
or
 - (ii) *the person against whom the complaint was made apologise publicly as specified in the order;*
or
 - (iii) *the person against whom the complaint was made undertake training as specified in the order;*
or

¹ *Local Government Act 1995 (WA)*, s 5.110(5).



- (iv) *the person against whom the complaint was made pay to the local government specified in the order an amount equal to the amount of remuneration and allowances payable by the local government in relation to the complaint under Schedule 5.1 clause 9;*
- or
- (c) *ordering 2 or more of the sanctions described in paragraph (b)."*

Cr de Haas' Submissions

7. By an email dated 24 April 2026 the Department received a response from Cr de Haas.
8. Cr de Haas following comments as summarised by the Panel:
 - a. It is Cr de Haas' preference that the Panel should order that "no sanction be imposed" for the following reasons:
 - i. there was no verbal contact with Cr de Haas at all during this process;
 - ii. Cr de Haas did not realise that knowing the family of Ms. Chantelle Hoffrichter's ex-husband or having one drink with her would be construed as a friendship.
 - b. Definition of friendship: A voluntary relationship between two or more people that is relatively long-lasting and in which those involved tend to be concerned with meeting the others needs and interests as well as satisfying their own desires.

Panel's Consideration

9. Section 5.110(6) is about penalty. The Panel does not have the power to review any finding of a breach.
10. The Panel may order under section 5.110(6)(a), that no sanction be imposed, not to reverse the Panel's finding of a breach, but to indicate that in all the circumstances the relevant councillor should not be penalised further.
11. Guidance as to the factors which the Panel may consider in determining the appropriate penalty to impose include, but are not limited to, the following:
 - a. the nature and seriousness of the breaches;
 - b. the councillor's motivation for the contravention;
 - c. whether or not the councillor has shown any insight and remorse into his/her conduct;
 - d. whether the councillor has breached the Act knowingly or carelessly;
 - e. the councillor's disciplinary history;
 - f. likelihood or not of the councillor committing further breaches of the Act;
 - g. personal circumstances at the time of conduct, and of imposing the sanction;
 - h. need to protect the public through general deterrence and maintain public confidence in local government; and



- i. any other matters which may be regarded as aggravating conduct or mitigating its seriousness².
12. The Panel notes that Cr de Haas does not accept the Panel's decision.
13. Firstly, the Panel notes that under the Act the complaint process is undertaken wholly on documentation supplied.
14. Although Cr de Haas does not at this time consider that her relationship with the Hoffrichter's to constitute a "friendship" it is noted that the same was considered a close enough association for Cr de Haas to make a prior disclosure of such association.
15. In the circumstances that Cr de Haas previously considered that she had a close enough association to that family to make a prior impartiality declaration, it should be a reasonable exception that the same association should be declared in subsequent matters.
16. The fact that Cr de Haas has referred to an "interest in common" in her response indicates that she was fully aware that some kind of declarable interest existed.
17. The Panel considers Cr de Haas' conduct to be serious as, in the context of her prior impartiality disclosure, her failure to disclose was either deliberate or reckless.
18. In these circumstances, the Panel considers that the appropriate sanctions are that Cr de Haas:
 - a. is publicly censured; and
 - b. provides a public apology.
19. A censure is a public statement of disapprobation of a councillor's conduct. This is an appropriate penalty in this case to send a message to the community and other councillors, that Cr de Haas' conduct was improper and that the conduct was deserving of a serious penalty.
20. The Panel further considers that it is appropriate that Cr de Haas make a public apology. Making a public apology is a significant sanction, being a personal admission by the individual of wrongdoing³. It is a suitable and appropriate penalty when a councillor's conduct:
 - a. adversely affects particular individuals⁴; and/or
 - b. does not meet the standards other councillors seek to uphold.
21. The disclosure of impartiality interests is a serious obligation for all councillors. Failure to declare negatively affects the perception of credibility and transparency held by fellow councillors and the public.
22. In this case, the Panel considers it is not necessary for Cr de Haas to be further sanctioned to bear to cost of the Shire's costs in respect to the minor breach complaint.

² *Chief Executive Officer, Department of Local Government and Communities and Scaffidi [2017] WASAT 67 (S)*

³ *Treby and Local Government Standards Panel [2010] WASAT 81 (Pritchard J).*

⁴ *Treby and Local Government Standards Panel [2010] WASAT 81 [127] (Pritchard J).*



Panel's decision

23. The Panel orders pursuant to section 5.110(6)(b)(i), section 5.110(6)(b)(ii) and section 5.110(6)(c) of the Act that, in relation to the Minor Breach of regulation 22 of the Regulations, Cr de Haas:
- a. be publicly censured in terms of the attached Orders; and
 - b. publicly apologise as specified in the attached Orders.

Signing

Erin Gauntlett (Presiding Member)

Emma Power (Member)

Peter Rogers (Member)



ORDER

3 June 2026

DEFAMATION CAUTION

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THE LOCAL GOVERNMENT STANDARDS PANEL ORDERS THAT:

1. Councillor Leoni de Haas, a councillor for the Shire of Esperance:
 - a. be **publicly censured** as specified in paragraph 2 below; and
 - b. **publicly apologise** as specified in paragraph 3 OR failing compliance with paragraph 3 within the specified timeframe, then paragraph 4 shall apply.

Public Censure

2. Within the period falling between 29 days to 43 days from the day following the date of service of this Order on Councillor Leoni de Haas the Chief Executive Officer of the Shire of Esperance shall arrange for the following Notice of Public Censure to be published, in no less than 10 point print or font:
 - a. on the Facebook Page, and any other social media page or account, of the Shire of Esperance (if any);
 - b. on an appropriate page of the website of the Shire of Esperance; and
 - c. in every Shire of Esperance public or community newsletter (whether in electronic or print copy) (if any).



Government of Western Australia
Local Government Standards Panel

NOTICE OF PUBLIC CENSURE

The Local Government Standards Panel has found that Councillor Leoni de Haas, a Councillor of the Shire of Esperance breached regulation 22 of the *Local Government (Model Code of Conduct) Regulations 2021 (WA)* when, at the Council Meeting of 28 October 2025 she failed to make a declaration of an impartiality interest in a matter before



Council relating to Agenda Item 17.3
Employee Legal Assistance.

The Panel censures Councillor Leoni de
Haas for the breach of regulation 22 of
the *Local Government (Model Code of
Conduct) Regulations 2021 (WA)*.

**LOCAL GOVERNMENT
STANDARDS PANEL**

Public Apology

3. On the ordinary council meeting of the Shire of Esperance first occurring after the expiration of **28 days** from the date of service of this Order on her, Councillor Leoni de Haas shall:
- attend the relevant ordinary council meeting;
 - ask the presiding person, or acting presiding person, for his or her permission to address the meeting to make a public apology to the public;
 - make the apology immediately after Public Question Time or during the Announcements part of the meeting, or at any other time when the meeting is open to the public, as the presiding person thinks fit; and
 - address the Council and public as follows, without saying any introductory words before the address, and without making any comments or statement after the address:

"I advise this meeting that:

- A complaint was made to the Local Government Standards Panel, in which it was alleged that I contravened Regulation 22 of Division 4 of the *Local Government (Model Code of Conduct) Regulations 2021* when, at the Council Meeting of 28 October 2025 I failed to make a declaration of an impartiality interest in a matter before Council relating to Agenda Item 17.3 Employee Legal Assistance.
- I acknowledge that in failing to make the declaration I failed to uphold the standard of conduct which is expected of elected members.
- I now apologise to my fellow councillors, the Shire and the community."

4. If Councillor Leoni de Haas fails to, or is unable to, comply with the requirements of paragraph 3 above in the required time frame THEN, within the next **28 days** following the ordinary council meeting referred to in paragraph 3 above the Chief Executive Officer of the Shire of Esperance shall arrange for the notice of public apology to be published:
- on the Facebook Page and any other social media pages of the Shire of Esperance in no less than 10 point font size; and



- b. in an appropriate place on the website of the Shire of Esperance in no less than 10 point font size; and
- c. in the next occurring issue of any Shire of Esperance public newsletter (if any) whether in electronic or print copy) in no less than 10 point font size.

PUBLIC APOLOGY BY COUNCILLOR LEONI DE HAAS

A complaint was made to the Local Government Standards Panel, in which it was alleged that I contravened Regulation 22 of Division 4 of the *Local Government (Model Code of Conduct) Regulations 2021* when, at the Council Meeting of 28 October 2025 I failed to make a declaration of an impartiality interest in a matter before Council relating to Agenda Item 17.3 Employee Legal Assistance.

I acknowledge that in failing to make the declaration I failed to uphold the standard of conduct which is expected of elected members.

I now apologise to my fellow councillors, the Shire and the community

Appeal

- 5. In the event that, prior to the date for compliance with the above Orders, Councillor Leoni de Haas:
 - a. commences an appeal the decision of the Standards Panel to the State Administrative Tribunal in accordance with section 5.125 of the *Local Government Act 1995*; and
 - b. notifies the Complaints Officer of the Shire of Esperance of such appeal in writing,
THEN:
 - c. compliance with such Orders may be delayed until the State Administrative Tribunal has made a finding in respect to the decision; and
 - d. such Orders may be amended by an order of the State Administrative Tribunal.



NOTICE TO THE PARTIES TO THE COMPLAINT

RIGHT TO HAVE PANEL DECISION REVIEWED BY THE STATE ADMINISTRATIVE TRIBUNAL

The Local Government Standards Panel (the Panel) advises:

- (1) Under section 5.125 of the *Local Government Act 1995* the person making a complaint **and** the person complained about each have the right to apply to the State Administrative Tribunal (the SAT) for a review of the Panel's decision in this matter. In this context, the term "decision" means a decision to dismiss the complaint or to make an order.
- (2) By rule 9(a) of the *State Administrative Tribunal Rules 2004*, subject to those rules an application to the SAT under its review jurisdiction **must be made within 28 days** of the day on which the Panel (as the decision-maker) gives a notice [see the Note below] under the *State Administrative Tribunal Act 2004* (SAT Act), section 20(1).
- (3) The Panel's ***Breach Findings and these Findings and Reasons for Finding – Sanctions***, constitute the Panel's notice (i.e. the decision-maker's notice) given under the SAT Act, section 20(1).

Note:

- (1) This document may be given to a person in any of the ways provided for by sections 75 and 76 of the *Interpretation Act 1984*. [see s. 9.50 of the *Local Government Act 1995*]
- (2) Subsections 75(1) and (2) of the *Interpretation Act 1984* read:
 - "(1) Where a written law authorises or requires a document to be served by post, whether the word "serve" or any of the words "give", "deliver", or "send" or any other similar word or expression is used, **service shall be deemed** to be effected by properly addressing and posting (by pre-paid post) the document as a letter to the last known address of the person to be served, and, **unless the contrary is proved, to have been effected at the time when the letter would have been delivered in the ordinary course of post.** [Bold emphases added]
 - (2) Where a written law authorises or requires a document to be served by registered post, whether the word "serve" or any of the words "give", "deliver", or "send" or any other similar word or expression is used, then, if the document is eligible and acceptable for transmission as certified mail, the service of the document may be effected either by registered post or by certified mail."
- (3) Section 76 of the *Interpretation Act 1984* reads:

"Where a written law authorises or requires a document to be served, whether the word "serve" or any of the words "give", "deliver", or "send" or any other similar word or expression is used, without directing it to be served in a particular manner, service of that document may be effected on the person to be served —

 - (a) by delivering the document to him personally; or
 - (b) by post in accordance with section 75(1); or
 - (c) by leaving it for him at his usual or last known place of abode, or if he is a principal of a business, at his usual or last known place of business; or



- (d) *in the case of a corporation or of an association of persons (whether incorporated or not), by delivering or leaving the document or posting it as a letter, addressed in each case to the corporation or association, at its principal place of business or principal office in the State.”*