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State of Victoria

AFFIDAVIT OF JEFFREY STEPHEN POPE

I, **JEFFREY STEPHEN POPE**, Assistant Commissioner, Intelligence and Covert Support Department, of 412 St.Kilda Road make oath and say:

1. I am aware of the identity of a person referred to within Victoria Police as Witness F. I became aware on Monday 24 October 2011 that Witness F has made allegations that she has had a sexual relationship with me. I am not aware of the specific details of those allegations. The following paragraphs outline my response to those allegations.
2. I have never had a sexual, personal or any sort of inappropriate relationship with Witness F.
3. I believe that I first met Witness F in about 1999 or 2000 when she was a practicing lawyer. I do not recall how I was introduced to her. Witness F, at that point, wanted to provide information to me about a solicitor that she believed was stealing money. I do not recall if I registered her as a human source as the level of the relationship never really got past assessing whether she should be a human source or not.
4. I believe that I met with Witness F on about 6 occasions. Given the passage of time the following is the best of my recollection. On every occasion that I would meet with her I would advise my supervisor and colleagues. I believe I had a colleague attend meetings with me or remain in a vicinity close by to observe the meetings. I only ever met Witness F in public places, during the day and during work hours. The only exception to this, as I recall, was when I attended a meeting with Detective Senior Sergeant Wayne Strawhorn and a few other members of the Drug Squad and Witness F. That meeting occurred late in the afternoon at the Emerald Hotel, South Melbourne. I left that meeting with Witness F continuing to talk to the members from the Drug Squad about drug related matters. I left that meeting alone. As I recall that meeting was effectively a handover from my perspective as Witness F wanted to give information about high level drug trafficking with potential corruption links that was well beyond my capability and remit as a Detective at the Asset Recovery Squad. I would have made notations in my Official Diary of all the meetings. I do not know where those Official Diaries



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are stored or if they still exist. I believe also that if I had gathered any intelligence from the meeting that I would have submitted an information report.

5. The last time I saw Witness F was when I saw her within the Melbourne Magistrates Court precinct. As I recall this was an unplanned meeting that occurred during the day. I remember having a brief conversation with her over a coffee as it had been a while since we had last spoken. I believe this occurred near or at the Metropolitan Hotel on Williams Street, Melbourne. As I recall this conversation was very different to the previous meetings and very different to any conversation I had with any other prospective informants. We spoke very little about crime related issues. I remember Witness F talking about how successful she was becoming and that she was getting lots of high profile cases and was earning lots of money but it wasn't making her happy. As I recall she had just booked or was about to book a holiday to the United States and was travelling alone and she said that she would pay for all of the expenses of another person to have the right companion go with her and that she wasn't looking forward to a holiday on her own. I recall a conversation about my age and she was curious as to whether the purpose of life becomes more meaningful after you turn 30 years of age. At the end of the conversation she asked whether our relationship was ever likely to develop into something more personal. I said no as I was happily married. As I recall that was the end of the conversation.
6. Since then I have never had any sort of contact with Witness F nor have I sought to contact her in any way.
7. I have never been to Witness F's house. I have never been in Witness F's vehicle. I have never been in a police car with Witness F. I have never met or spoken to Witness F outside of my work hours. I have never socialised with Witness F.
8. When I returned to Victoria Police I had a high level of expectation that in my role as Assistant Commissioner Intelligence and Covert Support that I would be managing matters relating to Witness F. I had this knowledge from my time at the Australian Crime Commission and from reading many media articles.
9. When I began in my substantive role I declared the nature of my relationship with Witness F, as detailed above, to Superintendent Tony Biggin and the other

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attendees at my weekly management meeting. I declared this to ensure complete transparency and trust.

10. When I was invited by Deputy Commissioner Sir Ken Jones to join the Petra Steering Committee I declared to him the nature of my relationship with Witness F, as detailed above, to ensure complete transparency and trust. We both agreed that there was no issue or conflict of interest.
11. When I became aware that Witness F was pursuing civil action against Victoria Police I declared the nature of my relationship with Witness F, as detailed above, to both the Director Legal Services, Mr. Findlay McRae and Superintendent Peter Lardner. Again this was to ensure complete transparency and trust and to give all concerned any opportunity to identify any potential issue or conflict of interest.
12. In my substantive role as Assistant Commissioner Intelligence and Covert Support Department and in my role on any internal steering committee (particularly Petra and Driver) where I have made or contributed to decisions with respect to Witness F, my comments, contribution and decisions have always been made in the best interest of Victoria Police and in the best interest of discharging any duty of care owed to Witness F by Victoria Police (that is – I always seek to discharge my professional duty).
13. I have always sought to be open and transparent with my colleagues and superiors about the nature of the relationship I had with Witness F, as detailed above, as I did not want there to be any criticism of me, my Department or of Victoria Police and there was nothing about the relationship that should not be declared to my colleagues and superiors.
14. The allegations made by Witness F are completely false. I seek and welcome a thorough investigation into these allegations.

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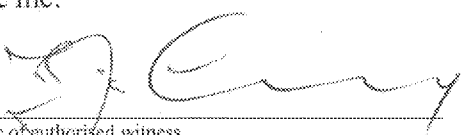
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Sworn at Melbourne
in the State of Victoria
this 2nd day of November 2011

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) Signature of deponent making this affidavit
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Before me:


Signature of authorised witness

Name **Tim Cartwright APM**
Acting Deputy Commissioner
Crime & Ops Support

Address
10/637 Funder St

Title under s 123C of the Evidence (Miscellaneous Provisions) Act 1958
Melbourne