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Ms. Debbie Jones
Manager
Ethics & Investigations
Victorian Bar
Owen Dixon Chambers
205 William Street
MELBOURNE, VIC. 3000

Dear Ms. Jones,

Re: Alleged complaints by Williams

I understand that Williams is entitled to a copy of my response.

I further understand that there is presently an investigation by the Purana Taskforce in relation to Williams' recent behaviour towards myself.

For these reasons I intend to respond in brief terms.

1. I have never acted for [REDACTED] in relation to the matters of [REDACTED]. I appeared for him in an unrelated plea for unrelated matters. Williams has obtained a copy of the transcript of that plea and is aware the matter did not relate to the murder charges.
2. I have never acted for, nor have I ever appeared for [REDACTED]
3. I was briefed for [REDACTED] in circumstances in which the Learned [REDACTED] Judge, Justice Betty King, the Purana Taskforce, Director of Public Prosecutions, the Crown Prosecutor, Mr. Geoff Horgan SC, [REDACTED] his solicitor James Valos, the instructing solicitors from the O.P.P. and those acting for Williams took no objection and saw no issue of conflict. All concerned understood that my brief for [REDACTED] was limited in that I was never going to appear at any committal or trial in which [REDACTED] was a witness.

Each of these persons above-mentioned will confirm that this is correct.

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4. The Learned [REDACTED] Judge, Justice King did not say what is asserted by Williams. She never said that I “had a conflict of interest and should not have any involvement in this matter whatsoever.” On [REDACTED] 2006, Counsel for Williams, Mr. Faris QC told the Court that he had instructions from Williams to apply to disqualify me from appearing at a plea for [REDACTED] and if I didn’t withdraw, that he would commence civil proceedings seeking a Supreme Court injunction against me to stop me appearing. He raised the issue in the context of explaining why Williams had written directly to Her Honour complaining about me acting for [REDACTED]

As a matter of precaution, I contacted Paul Willee QC from the Ethics Committee. I did so because when Faris raised the issue of me appearing for [REDACTED] in the Supreme Court on 7 August 2006, Her Honour Justice King, indicated that whilst it was a matter for me, I may wish to seek clarification from the Ethics Committee. This occurred during a Mention for Williams and in my absence. Upon being advised by Mr. Horgan SC that this had been raised by Justice King, I then spoke to [REDACTED]

The view taken was that there was no conflict that meant I could not appear at a plea for [REDACTED] however there would be a potential if not actual conflict were I to appear for [REDACTED] in circumstances where a contested hearing with cross-examination were to occur.

Subsequent to this, I was then threatened with the injunction by [REDACTED] and upon discussing the matter with my instructing solicitor, it was then thought that it was not in the best interests of [REDACTED] that upon his plea (to be heard two days later), he be confronted with all these issues including injunction proceedings. Accordingly, I returned the brief for the plea.

At no time did Her Honour state that I should not be involved in appearing for [REDACTED]

[REDACTED] has undertaken to give evidence against Williams at his trial and/or trials. It would appear to be Williams’ mistaken belief that if I am not involved in acting for [REDACTED] then he will not give evidence against Williams.

5. I have never acted for Williams in any relevant matter.
6. I have recently received telephone calls from members of the Williams’ family in which I was told that I should not interpret the call as a “threat” or as anyone “being mean to me” but that I should not be acting for [REDACTED]

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I have also received correspondence from the Department of Justice on behalf of the Office of Corrections wherein I was advised that personnel at [REDACTED] Prison had concerns for my safety and were putting in place arrangements to ensure that Williams could not contact me at all. This communication from the Department of Justice occurred two days after I received a telephone call from Williams in which he told me that he'd "never do anything to hurt me" and that he was "disappointed as he considered me a friend". I note that his call to me came after he filed his first complaint against me.

7. I am concerned that Williams appears to be keeping tabs on my attendances at [REDACTED] Prison and who I speak to or with whom I confer. It is my suspicion that this information is being conveyed to Williams by a solicitor who is able to check the visitors' register at the entrance to the Prison (which all professional visitors are required to sign upon entry) although I have no proof. Whilst this remains a security issue for the prison itself and perhaps for the Purana Taskforce, Williams has no right to seek to control, to interfere with, to monitor or to try to stop me visiting any prisoner in Victoria on a professional basis.

Finally, whilst I do not intend to approach or request confirmation of the matters raised herein from the following persons, I invite you in the course of your investigation to make any enquiry you consider appropriate should you consider it necessary to do so with the following:

1. Office of Public Prosecutions
 - Mr. Paul Coghlan QC
 - Mr. Geoff Horgan SC
 - Ms. Vaile Anscombe, solicitor
2. Purana Taskforce
 - Det. Sgt. Stuart Bateson [REDACTED]
 - Inspector James O'Brien (Officer in Charge of Taskforce)
3. Mr. James Valos, solicitor
4. Mr. Con Heliotis QC (previous Counsel for Williams)
5. Her Honour Justice Betty King
6. Ms. Debra Coombs, Principal Solicitor, Corrections Victoria (Department of Justice)

Yours faithfully,



Nicola Gobbo.