

**Royal Commission  
into the Management of Police Informants**

**STATEMENT OF RODNEY GRAHAM WILSON**

1. My full name is Rodney Graham Wilson.
2. I retired from Victoria Police in February 2019. When I retired, I held the rank of Superintendent.
3. I make this statement in response to a request from the Royal Commission into the Management of Police Informants dated 19 March 2019. This statement is produced to the Royal Commission in response to a Notice to Produce.

**Educational background and employment history (Q1)**

4. I graduated from the Victorian Police Academy in 1976. Details of my progression through the ranks and relevant training are contained in Annexure A to this statement.

**Involvement or association with any investigation that dealt with Ms Gobbo (Q2)**

5. I have been involved with two investigations that dealt with Ms Gobbo. The first was Operation Khadi in around June and July 2006, while I was a Superintendent at the Ethical Standards Department (ESD). The second was the Briars Taskforce.
6. I also was involved in negotiations with Ms Gobbo from June to November 2009 about the terms for her [REDACTED]. At that time, I was the Chief of Staff to the Chief Commissioner of Police, Simon Overland.

Operation Khadi

7. Operation Khadi was an ESD investigation into allegations of serious misconduct by Victoria Police members stationed at Brighton Police Station. Detective Inspector Lindsay Attrill was the investigator who conducted Operation Khadi. DI Attrill prepared a Final Report for Operation Khadi dated 23 November 2006<sup>1</sup>. The Final Report was addressed to me and sets out the allegations and findings in detail.
8. Operation Khadi followed from the dismissal of Senior Sergeant Richard Shields, a Victoria Police member who had been stationed at the Brighton Police Station. I served a s 68 notice of dismissal and detailed supporting material on S/Sgt Shields. By then he was stationed at Moorabbin Headquarters. The notice and supporting material had been prepared by ESD over

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<sup>1</sup> VPL.0005.0147.0001.

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a significant period of time. I recall <sup>P/I</sup> [REDACTED] allegations against S/Sgt Shields included that he had an inappropriate relationship with Ms Gobbo.

9. Around the time that I served the notice on S/Sgt Shields, I was aware that Ms Gobbo was a criminal defence lawyer. I do not believe I had met Ms Gobbo at that point. I recall that I first learned that Ms Gobbo also had ongoing relationships with police when I read the allegations about her relationship with S/Sgt Shields. As set out in response to Question 6 below, I believe that I first met Ms Gobbo at an AFL match on 31 March 2006.
10. In a memorandum dated 10 April 2006, DI Attrill recommended both that a number of allegations about Brighton members be brought to my attention and that the Office of Police Integrity (OPI) be briefed to oversight the ongoing investigations<sup>2</sup>. One of the allegations in the memorandum is that S/Sgt Shields [REDACTED] [REDACTED] supplied by S/Sgt Shields.
11. I recall that there were discussions around this time about obtaining assistance from the OPI with the investigation, including using the OPI's compulsory questioning powers to interview some individuals involved, including Ms Gobbo. My diary records that DI Attrill and I met with the OPI investigators on 24 May 2006 and that a joint agency agreement with the OPI was signed on 5 June 2006.
12. My diary records that the next morning, 6 June 2006, I was briefed by Deputy Commissioner Simon Overland that Ms Gobbo was a human source. DC Overland told me that I would need to coordinate with Officer Sandy White in relation to any issues to do with a coercive hearing involving Ms Gobbo. I knew at that time that Officer White was a member of the Source Development Unit.
13. The same diary record indicates that I attended a meeting regarding Operation Khadi with DC Overland, Supt Phil Masters (from the ESD Techs) and "AC", which I believe refers to the Assistant Commissioner then in charge of ESD, Assistant Commissioner Luke Cornelius. I do not now recall whether AC Cornelius and Supt Masters were with me with when DC Overland briefed me about Ms Gobbo's status, but they could have been. I knew that human source identities should only be disclosed on a strict need-to-know basis. I needed to know because I might be making decisions about whether Ms Gobbo would be coercively questioned. I do not recall any clear need why Supt Masters would need to know. Equally, AC Cornelius may not have needed to know. Even though he was my superior officer, rank was not necessarily a reason to be told of a human source's identity.

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<sup>2</sup> VPL.0005.0147.0175.

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14. I was very surprised that Ms Gobbo was a human source because I knew of her connections to significant criminal figures, including Tony Mokbel, and did not think she would be cooperating with police. I was not told about the information she was providing as a human source or who that information related to. I did not ask about this because there was no need for me to know about that for my ESD investigations. I did not know about the information she was to provide. I did not make further inquiries because if I did, then I would need to be fully briefed about all the circumstances of her role, which was not part of my role at ESD. I assumed that those managing her took necessary steps to properly manage a lawyer as a human source.
15. My diary records that I spoke to Officer Sandy White later that day and arranged to meet. I met with Officer Sandy White with DI Attrill on 15 June 2006. My diary does not record the detail of what we discussed, but I have been shown an entry from a Source Management Log for 15 June 2006<sup>3</sup>. That entry accords generally with my recollection of what we discussed at the meeting.
16. I have been shown an Information Report from 16 June 2006, which records an allegation that Officer John Brown stole money from Azzam Ahmed during an arrest in August 2004<sup>4</sup>. I do not know whether I have seen this Information Report before, but I am certainly aware of its content. I believe that Ms Gobbo was involved in this matter because she was acting for Ahmed at a bail application and had mentioned the allegation of theft to the OPP counsel, Jack Vandersteen, outside court.
17. On 19 June 2006, I spoke with Officer Sandy White. My diary records that an "Operation Khadi witness", which refers to Ms Gobbo, was willing to speak with Detective Inspector Phil Swindells. I then called DI Swindells to arrange that meeting. As my diary records, I did not disclose her status as a human source to DI Swindells. I did not disclose that fact because I knew to keep the identity of sources secret and I did not know if DI Swindells was aware Ms Gobbo was a source. I recall that DI Swindells knew Ms Gobbo through the work of the Purana Taskforce.
18. On 21 July 2006, DI Attrill and I met with investigators from the OPI about the questions that we would ask Ms Gobbo. The meeting with the OPI is described in an Information Report submitted by DI Attrill on 25 July 2006<sup>5</sup>. I did not tell anyone from the OPI that Ms Gobbo was a human source.

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<sup>3</sup> VPL.0005.0099.0001 at 0037.

<sup>4</sup> VPL.0005.0147.0151.

<sup>5</sup> VPL.0005.0147.0119.

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19. My diary records that later that day I informed DI Swindells that an interview with Ms Gobbo would take place at 9:00am on Monday 24 July 2006.
20. On 24 July 2006, I met with DI Swindells and DI Attrill at 11:45 am after their meeting with Ms Gobbo. As my diary records, Ms Gobbo was distressed and raised some issues. I do not now recall what issues Ms Gobbo raised were. DI Attrill's Information Report submitted on 25 July 2006<sup>6</sup> indicates that Ms Gobbo expressed a fear that she would be harmed if required to make a statement or appear before a hearing. I spoke with Officer Sandy White later that afternoon and arranged to meet the next day.
21. On 25 July 2006 at 12:30 pm, I briefed AC Cornelius about the meeting with Ms Gobbo. My diary does not record what we discussed but I believe we would have discussed Ms Gobbo's security concerns. I do not recall discussing concerns in the context of her being a human source.
22. At 5:00 pm that day, I met with Superintendent Tony Biggin, Officer Sandy White and Officer Peter Smith regarding Ms Gobbo. My diary records that ESD was happy to withdraw her from the investigation and brief DC Overland about doing so.
23. The reason for withdrawing Ms Gobbo was the risk to her health and safety if her role assisting police was disclosed. I believe there were also other avenues of inquiry in the investigations to address the allegations raised. I do not believe that Ms Gobbo played any further part in the Operation Khadi investigation.
24. My diary entry for 5:00 pm on 25 July 2006 also records that I needed to deal with Graham Ashton from the OPI on the issues relating to Ms Gobbo. I believe at some point the OPI were informed Ms Gobbo would not be compulsorily questioned but I do not recall when. At no point did I inform anyone from the OPI that Ms Gobbo was a human source. I do not recall any indication from anyone from the OPI that they were aware Ms Gobbo was a human source.
25. On 27 July 2006, AC Cornelius briefed me about the OPI wishing to coercively question Ms Gobbo regarding "Dale/Hodson" and that I briefed DI Attrill regarding this. I do not know whether this occurred. I did not expect that I would be told if it did because I was not part of investigating those issues.

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<sup>6</sup> VPL.0005.0147.0119.

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Briars Taskforce

26. Briars Taskforce began in around February 2007 to investigate the murder of Shane Chartres-Abbott. The taskforce was a joint investigation with the OPI, with its offices located in the OPI building.
27. I recall that at the time the taskforce's investigation began, we had evidence to indicate [REDACTED] and Evangelos Goussis had been arranged to murder Chartres-Abbott. The taskforce was established to investigate the involvement of a number of others, including Dave "Docket" Waters and Peter "Stash" Lalor. One issue in particular was how [REDACTED] and Goussis had obtained an address for Chartres-Abbott.
28. I was the Superintendent overseeing the taskforce. The investigation was run day-to-day by a Detective Inspector, Steve Waddell. Detective Senior Sergeant Ron Iddles was the other primary investigator. The oversight of the investigation was managed by a Board of Management (BOM). As the Superintendent overseeing the taskforce, I reported to the BOM, which comprise DC Overland, AC Cornelius and Graham Ashton from the OPI.
29. On 18 July 2007, DC Overland briefed me that Ms Gobbo was to be subpoenaed to be examined by the OPI in relation to the Petra Taskforce's investigations. My diary records that I was to be told if anything was relevant to Briars and DC Overland would brief the BOM at the next meeting. I have been shown the weekly update<sup>7</sup> and the minutes<sup>8</sup> for the next BOM meeting on 23 July 2007 and they do not refer to matters to do with Ms Gobbo. I do not recall if any matters relating to Ms Gobbo were discussed at that meeting. I do not believe that Ms Gobbo was examined by the OPI regarding Petra. If it did occur, I would expect to be told about it.
30. However, around that time in August and September 2007, a number of other individuals were examined by the OPI, including Waters and Lalor. With the benefit of my diary and certain records from the Loricated database, I now recall that in September 2007, Waters and Lalor met with Ms Gobbo after their OPI hearings. Ms Gobbo was then tasked to obtain further information from Waters.
31. I have been shown a record from the Loricated database<sup>9</sup>, which indicates that on Saturday 8 September 2007, Waters contacted Ms Gobbo to meet with her in Richmond and that Lalor also attended their meeting. I recall this information being passed onto me at the time and

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<sup>7</sup> VPL.0100.0048.1564.

<sup>8</sup> VPL.0100.0048.1537.

<sup>9</sup> VPL.2000.0001.3058 at 3080-3083.

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I believe it would have come to me from DSS Iddles. Briars was separately aware at the time that Waters was arranging to meet Ms Gobbo that day.

32. I prepared an update for the Briars Taskforce BOM for 10 September 2007<sup>10</sup>, which referred to "Tasking of 3838" as part of an ongoing investigation strategy. The copy I have been shown has handwritten notes, which I am informed are written by AC Cornelius. I have also been shown paragraph 70 of a witness statement prepared by AC Cornelius for the Royal Commission, noting AC Cornelius' recollection that there was discussion at this meeting that Officer Sandy White would ask Ms Gobbo [REDACTED] with Lalor and Waters<sup>11</sup>.
33. Based on the update and my recollection of the information in the Loricated record from 8 September 2007, I believe the tasking referred to in my update document related to Ms Gobbo being tasked to speak further to Waters and Lalor regarding their involvement in the Chartres-Abbott murder.
34. I also recall that there were discussions at some point about Ms Gobbo [REDACTED] Waters. My recollection is that I was told Ms Gobbo was confident that [REDACTED] Waters based on their existing relationship. However, I do not recall who told me this or when these discussions took place.
35. I have been shown a record from the Loricated database from 12 September 2007 that indicates that Ms Gobbo was tasked to speak further with Waters<sup>12</sup>. I believe this tasking would have followed from the discussions at the BOM meeting two days earlier. I do not believe I would have known at the time when and how the tasking took place.
36. On 12 September 2007, there were meetings with the management of the Briars taskforce. I recall that these meetings related to moving forward the arrest phase of Briars. I do not believe they concerned Ms Gobbo.
37. On 20 September 2007, I was briefed by DSS Iddles with information he had received regarding Waters and Lalor. As my diary records, DSS Iddles had been told that Waters had told Ms Gobbo that Lalor had not gotten Chartres-Abbott's address from the LEAP database. This was a significant piece of information for Briars because it related to the key issue of how Chartres-Abbott's address had been obtained and provided to those who shot him. Waters also asked Ms Gobbo if she knew where [REDACTED] was [REDACTED]

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<sup>10</sup> VPL.0100.0048.1578.

<sup>11</sup> VPL.0014.0057.0001 at 10.

<sup>12</sup> VPL.2000.0003.2796 at 2797-2798.

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38. I have been shown records from the Loricated database from 19 September 2007 recording Ms Gobbo's discussions with her SDU handler about this meeting with Waters<sup>13</sup>. These records generally accord with my recollection of the information that DSS Iddles told me on 20 September 2007.
39. My diary records that I spoke with AC Cornelius later that day, who indicated that DC Overland would speak to Ms Gobbo's handler to see what could be done to assist Briars. As my diary records, I informed DI Waddell about Ms Gobbo's information the next morning, 21 September 2007.
40. I was then on leave from 22 September 2007. I returned to duties on 8 October 2007.
41. The day after I returned from leave, 9 October 2007, I spoke to DI Waddell regarding Ms Gobbo and a potential coercive hearing. My diary records that there was a need to discuss the matter further with DC Overland. Later that day, I spoke with AC Cornelius about the Briars Taskforce. My diary records that I wanted to further discuss Ms Gobbo. I believe that this would have related to a potential coercive hearing for Ms Gobbo. I do not believe Ms Gobbo was ultimately coercively questioned.
42. I have no diary record of further discussions regarding Ms Gobbo until July 2008. I have no recollection of anything further to do with Ms Gobbo happening in this period.
43. I have been shown an Information Report that indicates DI Waddell and DSS Iddles interviewed Ms Gobbo at her chambers on 14 January 2008<sup>14</sup>. The information report indicates that Ms Gobbo had heard that [REDACTED] had killed Chartres-Abbott. It indicates that Ms Gobbo said she had been told this by a solicitor, Jim Valos, who had learned it from a client of his.
44. I do not recall being told of this information or that DI Waddell and DSS Iddles interviewed Ms Gobbo. I was on leave at this time from 22 December 2007 until 21 January 2008. When I returned from leave until 15 February 2008, I was Acting Assistant Commissioner of ESD, taking up AC Cornelius' role.

Chief of Staff to Chief Commissioner

45. On 3 July 2008, I transferred to a role as Chief of Staff to Chief Commissioner Christine Nixon. I remained in this role when Simon Overland took over as Chief Commissioner. As set out below, I left this position in late November 2009.

<sup>13</sup> VPL.2000.0003.2817 at 2819-2820.

<sup>14</sup> VPL.0100.0019.1487.

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46. While in this position, I continued to attend meetings of the Briars Taskforce BOM and maintain general oversight and awareness of what was occurring with the operation. DI Waddell continued to run the Briars investigation day-to-day.
47. On 17 July 2008, I discussed the Briars Taskforce with DC Overland, including the potential use of Ms Gobbo. I do not recall what we discussed. The next meeting of the Briars Taskforce BOM meeting was on 21 July 2008. The update for this meeting does not refer to Ms Gobbo<sup>15</sup> and I do not recall any discussion about her at the meeting.
48. On 4 September 2008, I received an email from DI Waddell (copied to Officer Sandy White) attaching four letters sent to and from inmates at Barwon Prison, including one letter sent by Ms Gobbo to Joe Manella<sup>16</sup>. One of these is a letter from Carl Williams, in which Williams recounts allegations about Ms Gobbo giving ██████████ and ██████████ advice to assist with police, and that Ms Gobbo had a conflict in acting for Faruk Orman<sup>17</sup>. I do not recall reading these letters. I do not know if I read them at the time. I did not recall the content of these letters when I read them in preparing my statement.
49. My diary records that the next day, 5 September 2008, I briefed DC Overland regarding Ms Gobbo and an interview with ██████████. I do not recall what we discussed. It is possible that DI Waddell wanted to use Ms Gobbo in the Briars investigation and the letters had prompted him to have me ask DC Overland to consider using Ms Gobbo. However, I do not have a specific recollection of what we discussed.
50. I recall that by late 2008, the Briars Taskforce was beginning to wind down. On 8 October 2008, I spoke to DI Waddell regarding Taskforce Briars and "re-integration strategy". I believe this related to the winding down of the taskforce, with its members returning to their permanent positions.
51. On 21 October 2008, I met with the Jeremy Rapke, Geoff Horgan and Andrew Tinney from the OPP with DC Overland, DI Waddell and DSS Iddles regarding the Briars Taskforce. I recall the meeting was to seek their views on the evidence put together by Briars to date. I recall generally that they believed successful convictions would be difficult on the basis of the evidence put together.

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<sup>15</sup> VPL.0100.0048.1634.

<sup>16</sup> VPL.6025.0003.3581; VPL.6025.0003.3585; VPL.6025.0003.3589; VPL.6025.0003.3593;  
VPL.6025.0003.3582.

<sup>17</sup> VPL.6025.0003.3592.

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52. On 19 November 2008, I met with the Briars personnel and discussed relocation and re-integration. Shortly after, I met with AC Moloney regarding the Briars staff, which I believe would have involved me informing him that staff would be returning to the Crime Department.

Reactivation of the Briars Taskforce

53. My diary records that on 16 March 2009, I attended a meeting of the Briars BOM. The next day, 17 March 2009, I spoke with Assistant Commissioner Dannye Moloney regarding the need to reactivate the Briars Taskforce.
54. I do not recall why the Briars Taskforce was reactivated. I believe I knew at some point around this time that Ms Gobbo had taped Paul Dale and provided a statement to the Petra Taskforce. I have been informed that Ms Gobbo signed a statement for the Petra Taskforce in early-January 2009. I do not recall if this was related to Briars reactivating.
55. I have also been shown paragraph 32 of DI Waddell's statement to the Royal Commission<sup>18</sup>, which notes that Briars was reactivated because another witness (not Ms Gobbo) had come forward. I am aware of who this witness is. Even with the benefit of reading that paragraph, I do not recall why the Taskforce was reactivated.
56. On 25 March 2009, I received an email from DI Waddell attaching a supplementary investigation plan for the Briars Taskforce investigation<sup>19</sup>. DI Waddell's email also sets out a conversation that he had had with Officer Sandy White about a witness, which I believe is Ms Gobbo. Reading that email now, my understanding of DI Waddell's email is that Ms Gobbo was not willing to provide the same information she previously had and that Officer Sandy White was going to speak with Superintendent Tony Biggin about accessing existing notes and tapes from the SDU to use in preparing a statement with her. I do not know whether this took place. I do not know that the reference to "historical activities" refers to.
57. DI Waddell's references to an [REDACTED] relate to a [REDACTED] relating to [REDACTED]. I do not recall any discussions with DI Waddell or the BOM regarding Ms Gobbo transitioning from human source to witness. I expect this was because Ms Gobbo had already provided a statement to the Petra Taskforce.
58. My next diary record relating to Ms Gobbo is 29 May 2009, where DI Waddell and DSS Iddles told me about taking a statement from Ms Gobbo. I recall that at some point, DI Waddell and DSS Iddles went to Bali to speak with Ms Gobbo about the Briars investigation. I have been

<sup>18</sup> VPL.0014.0055.0001 at 0006.

<sup>19</sup> VPL.6115.0057.2684; VPL.6115.0057.2685.

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informed that DI Waddell and DSS Iddles were in Bali with Ms Gobbo in the days before speaking to me on 29 May 2009.

59. My recollection of this discussion is that DSS Iddles said that, in speaking with Ms Gobbo, his view was that she was not to be believed and that there would not be any value in further pursuing Ms Gobbo's assistance with the investigation. I was not shown any documents or notes of any discussions they had had with Ms Gobbo.
60. As my diary records, after my discussion with DI Waddell and DSS Iddles, I briefed AC Cornelius about safety issues to do with Ms Gobbo, which I recall related to concerns about Ms Gobbo being overseas. I believe I also told AC Cornelius about Ms Gobbo's information being of no value to the Briars investigation. I then briefed Chief Commissioner Overland regarding the same.

Negotiations with Ms Gobbo as Chief of Staff to Chief Commissioner Overland

61. Around this time, I became involved in negotiations with Ms Gobbo surrounding her [REDACTED] the [REDACTED]. These negotiations followed on from her transition to a prosecution witness for the Petra Taskforce.
62. By the time I became involved, the working relationship between Ms Gobbo and the [REDACTED] had become strained. I was involved essentially as a negotiator to attempt to come to an agreement between Ms Gobbo and [REDACTED] so that she could be brought [REDACTED]. I was also there to represent Chief Commissioner Overland, as Ms Gobbo had insisted that the Chief Commissioner himself attend. As far as I know, Chief Commissioner Overland did not meet with Ms Gobbo.
63. I was never authorised or in a position to make any decisions about whether or on what terms Ms Gobbo would [REDACTED]. Those issues had to be decided by the [REDACTED].
64. As part of this negotiation process, I met with Ms Gobbo in person three times – 5 June 2009 with Fin McRae, 13 July 2009 with, I believe based on my diary record, DSS Shane O'Connell and 9 October 2009 with DI Steve Smith and Ms Gobbo's sister, Catherine Gobbo. These meetings are recorded in my diary.
65. In the months following the meeting Ms Gobbo and her sister, sent emails back and forth with Catherine Gobbo on many occasions. I recall speaking on a number of occasions with lawyers from VGSO, with [REDACTED] and Mr McRae regarding the [REDACTED] and the ongoing negotiations. Throughout the process, I briefed Chief Commissioner Overland at a general

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level regarding the progress of negotiations and the issues being discussed. Correspondence in this process included the following:

- (a) On 14 October 2009, Catherine Gobbo emailed me regarding our discussions at the meeting on 9 October 2009<sup>20</sup>. I forwarded this email to Isabel Parsons at VGSO, Fin McRae and AC Cornelius<sup>21</sup>. I then replied too Catherine Gobbo later that day<sup>22</sup>.
- (b) On 20 and 22 October 2009, Catherine Gobbo and I emailed about drafts of agreement documents<sup>23</sup>.
- (c) On 27 October 2009, Catherine Gobbo emailed me regarding a memorandum of agreement between Ms Gobbo and Victoria Police<sup>24</sup>.
- (d) Later that day, 27 October 2009, Catherine Gobbo emailed me regarding concerns that Ms Gobbo had about evidence that Karl Khoder had given in court that day and her concern that Victoria Police was not monitoring evidence that was being given about her<sup>25</sup>.
- (e) On 5 November 2009, I sent an email to Catherine Gobbo concerning proposals for Ms Gobbo's long term accommodation and she replied later that day<sup>26</sup>.
- (f) On 10 November 2009, Catherine Gobbo sent a lengthy email in reply to my email sent on 5 November 2009<sup>27</sup>. This email indicated that unless all negotiations had concluded by 20 November 2009, Ms Gobbo would issue proceedings.
- (g) On 20 November 2009, Ms Gobbo's lawyer sent me a letter informing me that Ms Gobbo had provided instructions to commence proceedings<sup>28</sup>. VGSO sent a letter in reply the same day<sup>29</sup>.
- (h) On 20 November 2009, I sent an email noting that I had received a fax from Ms Gobbo's lawyer and that VGSO had replied, but that Victoria Police would be willing to continue

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<sup>20</sup> VPL.6115.0047.9312.

<sup>21</sup> VPL.6115.0072.1509; VPL.6115.0072.1598; VPL.6115.0072.2052.

<sup>22</sup> VPL.6115.0072.2028.

<sup>23</sup> VPL.6115.0048.1423.

<sup>24</sup> VPL.0100.0237.4191.

<sup>25</sup> VPL.6115.0047.7905.

<sup>26</sup> VPL.6115.0031.0093.

<sup>27</sup> VPL.6115.0030.8898.

<sup>28</sup> VPL.0005.0003.6802.

<sup>29</sup> VPL.6115.0030.7854.



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without prejudice negotiations<sup>30</sup>. VGSO had sent me a draft of this email earlier that day<sup>31</sup>.

66. On 25 November 2009, I sent an email to Catherine Gobbo about ongoing matters to do with the negotiation<sup>32</sup>. As that email noted, I had by then transferred out of the Chief Commissioner's office to a position at North West Metro. My replacement in the Chief Commissioner's office was Superintendent Stephen Leane. The content of this email concerning the Petra Taskforce had been drafted by DI O'Connell and I had received advice from Mr McRae that that part of the email should be sent<sup>33</sup>.
67. From this point onward, I was not part of negotiations with Ms Gobbo. Catherine Gobbo sent a further email to me on 29 November 2009, which I forwarded to Mr McRae and AC Cornelius<sup>34</sup>. I am aware that Ms Gobbo ultimately commenced legal proceedings. I have been informed that the proceedings settled in August 2010. I was not part of any negotiations and do not know the terms of that settlement.
68. I am not aware of who took over negotiations with Ms Gobbo. It may have been Supt Leane as Chief as Staff or Mr McRae. My only further involvement in proceedings related to Ms Gobbo was limited to meeting with Victoria Police's lawyers on 9 July 2010 to answer their queries about my involvement in the process. This meeting is noted in my diary.
69. During the earlier negotiations, on 28 October 2009, I received an email in which Ms Gobbo and Catherine Gobbo reported concerns about references to Ms Gobbo in a Court of Appeal judgment. They reiterated to me an earlier request they had made to DI Smith regarding access to submissions of the Crown Prosecutor in that case, Gavin Silbert SC<sup>35</sup>. That request had been denied earlier in the month.
70. I have been shown an email from DI Steve Smith to DI Edwards and Officer Sandy White sent on 29 October 2009 indicating that I had spoken to DI Smith about formulating a strategy to monitor issues that arose concerning Ms Gobbo's safety when evidence was given in ongoing trials and committals<sup>36</sup>. I do not recall the discussion DI Smith and I do not know what strategies, if any, were put in place to monitor issues to do with Ms Gobbo's safety.

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<sup>30</sup> VPL.0005.0003.6805.

<sup>31</sup> VPL.0005.0003.6807; VPL.0005.0003.6808.

<sup>32</sup> VPL.6115.0072.0765.

<sup>33</sup> VPL.6115.0030.8338.

<sup>34</sup> VPL.0100.0237.4317.

<sup>35</sup> VPL.6115.0030.9325.

<sup>36</sup> VPL.0100.0237.4322.

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**How I learned, or was given reason to believe, Ms Gobbo was providing information (Q3)**

71. I refer to my response to Question 2.

**Awareness of others (Q4)**

72. Based on my responses to Question 2, I believe I was aware that:

- (a) Officer Sandy White, DC Overland, DI Attrill were aware by June 2006;
- (b) DSS Iddles was aware by around September 2007 and DI Waddell may have been aware of this at that time;
- (c) Mr McRae and DI Smith would have known by the time of negotiations in June 2009. I assume some lawyers from VGSO were also aware at this time;

73. This is based upon my own understanding of the issues and context. But I did not openly disclose or discuss with others the fact that Ms Gobbo was a human source.

**Authorisation of the use of Ms Gobbo as a human source (Q5)**

74. I have no knowledge of these matters.

**Personal contact with Ms Gobbo (Q6)**

75. I refer to the meetings I had with Ms Gobbo set out in response to Question 2 above.

76. I recall meeting Ms Gobbo on one other occasion. I was invited by a journalist from The Age to attend an AFL game at Docklands Stadium in The Age's corporate box. I received the invite late in the afternoon on the day of the game. I knew journalists from The Age from my work at the Homicide Squad. I have been shown a record from the Loricated database that indicates this occurred on 31 March 2006<sup>37</sup>.

77. I recall that Ms Gobbo arrived during the second half of the game. She arrived with two other police members. I did not know who they were. Ms Gobbo seemed to be quite drunk. I did not know she was invited before she arrived.

78. During the game, Ms Gobbo approached me and said to me that there had been nothing wrong with her teaching Richard Shields about the law. I recall saying something like this wasn't the place to have this discussion, which was the end of our conversation.

79. The corporate box was crowded, and Ms Gobbo spoke to me loudly and in a fairly aggressive tone of voice, so others may have heard the conversation. I also saw her speaking with

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<sup>37</sup> VPL.2000.0003.1793 at 1805.

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journalists later in the game. I did not speak to anyone about matters to do with Richard Shields and did not speak to Ms Gobbo again.

80. This was the first time I had met Ms Gobbo, although before this I was generally aware that she was a criminal defence lawyer. I do not know how Ms Gobbo knew who I was.

81. Ms Gobbo may have known who I was because I had served Richard Shields with his dismissal notice. The notice included concerns that he had an inappropriate ongoing relationship with Ms Gobbo, including that she had arranged free tickets to the races for them both and that she had given him lessons for a course he was taking. I assume this is what Ms Gobbo was referring to when she approached me.

**Information & assistance received (Q7 & Q8)**

82. Save for some information related to Operation Khadi and the information relevant to the Briars Taskforce, I was not aware of any information or assistance that Ms Gobbo provided.

**Concerns raised as to use of a legal practitioner (Q9) or Ms Gobbo (Q10) as a human source**

83. I am not aware of any concerns being raised, but those concerns would not have been raised with me.

**Awareness about disclosure in relation to Ms Gobbo (Q11)**

84. I was not a part of any discussion around disclosure of Ms Gobbo's role as a human source. If I were an informant in a prosecution involving Ms Gobbo, I would have worked with the OPP with a view to making a claim of public interest immunity relating to Ms Gobbo's role. But if that claim was not successful, Ms Gobbo's role might need to have been disclosed to the court or she might be withdrawn as a witness.

**Other human sources with obligations of confidentiality or privilege (Q12)**


85. I have no knowledge of these matters.

**Training (Q13)**

86. I have received training in the topics set out from Detective Training School and Advanced Detective Training School and have also had experience with all of them in the course of my duties.

**Other information (Q14)**

87. I have nothing further to add.



Statement of Rodney Graham Wilson

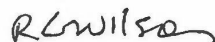
Dated: 19 November 2019

*RG Wilson*

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Rodney Graham Wilson

**Annexure A**

1. A summary of the major roles I have undertaken and my progression through the ranks is as follows:
  - (a) 1976 – 1980: Constable, Brunswick Police Station;
  - (b) 1980 – 1981: Senior Constable and Detective Senior Constable, Carlton CIB;
  - (c) 1981 – 1987: Detective Senior Constable, Homicide Squad;
  - (d) 1987 – 1989: Sergeant, Police Communications Division;
  - (e) 1989: Detective Sergeant, Investigator, South Melbourne CIB;
  - (f) 1989 – 1996: Detective Senior Sergeant, Homicide Squad;
  - (g) 1996 – 1998: Inspector, Witness Security Unit;
  - (h) 1998 – 2004: Detective Inspector, Security Intelligence Group;
  - (i) 2004 – 2005: Acting Commander, Intelligence and Covert Support Division;
  - (j) 2005 – 2008: Superintendent, Ethical Standards Department;
  - (k) July 2008 – November 2009: Superintendent, Chief of Staff to Chief Commissioners of Police, Christine Nixon and Simon Overland.
  - (l) November 2009 – 2013: Divisional Superintendent, North West Metro Region;
  - (m) 2014: Long service leave;
  - (n) 2015 – 2016: Detective Superintendent, Crime Command;
  - (o) 2016 – 2019: Superintendent, Forensic Services Department.
  
2. I have undertaken Victoria Police qualifications and training including:
  - (a) Detective Training School (1981);
  - (b) Sub-Officers' Course (1987);
  - (c) Advanced Detective Training School (1989);
  - (d) Inspectors' Course – Airlie (1996).
  
3. I also hold the following qualifications:
  - (a) Graduate Certificate, Public Sector Management, Flinders University (2003);
  - (b) Graduate Diploma, Executive Leadership (2006);
  - (c) Cranlana Colloquim, Cranlana Centre for Ethical Leadership (2009).



Statement of Rodney Graham Wilson