

Royal Commission
into the Management of Police Informants

STATEMENT OF DALE STEPHEN FLYNN

1. My full name is Dale Stephen Flynn. I am a serving member of Victoria Police and hold the rank of Inspector.
2. I make this statement in response to a request from the Royal Commission into the Management of Police Informants. This statement is produced to the Royal Commission in response to a Notice to Produce.

Educational background and employment history (q 1)

3. I graduated from the Police Academy in 1988. A summary of my progression through the ranks is set out in Annexure A.

Involvement or association with any investigation which had dealings with Ms Gobbo (q 2)

4. I refer to my answer to question 6 below.

Provision of information or assistance by Ms Gobbo to Victoria Police (q 3)

5. I first learned that Ms Gobbo was considering or intending to provide information or assistance to Victoria Police on 15 September 2005. The details are set out in my answer to question 6 below.

Awareness of others (q 4)

6. I believe that the following people knew that Ms Gobbo was a human source prior to the end of 2012: DSS Jim O'Brien, Major Drug Investigation Division (MDID) members, Dedicated Source Unit/Source Development Unit (DSU/SDU) members, and senior members of the Crime Department, Commander Terry Purton and Detective Acting Superintendent Robert Hill, who were in attendance at the meetings on 30 September 2005 and 5 October 2005 (which are referred to below).

Authorisation of Ms Gobbo as a human source (q 5)

7. I believe that members of the DSU/SDU authorised and continued to authorise Ms Gobbo's use as a human source.

Personal contact with Ms Gobbo (q 6)

8. On 11 February 2002, I commenced as a Detective Sergeant at the MDID. I reported to DSS O'Brien, Detective Inspector Paul Newman and Detective Superintendent Anthony Biggin.
9. The day after starting at the MDID, on 12 February 2002, I was involved in the arrest and charging of Rosa Medici on drug offences. Nicola Gobbo appeared for Ms Medici at her mention hearing on 13 June 2002. To the best of my recollection, that was the first time that I met Ms Gobbo. I remember meeting her on that occasion because I recall her saying to me in a confident way that she was intending to have "some fun" with a witness. I understood her to be referring to how she intended to cross-examine a witness.
10. In the first few days after starting at the MDID, on [REDACTED] 2002, I was also involved in the arrest of [REDACTED]. He was charged with drug offences [REDACTED] Charges).
11. [REDACTED] for underworld figures, Carl Williams, the Mokbel family and others. [REDACTED] had a [REDACTED] personal relationship. She spent time [REDACTED] She [REDACTED] [REDACTED] That request was refused.
12. On 13 June 2002, an operation within the MDID called 'Operation [REDACTED] commenced. It was an operation into medium level drug trafficking. My team quickly identified a link to [REDACTED] PII At the time, [REDACTED] PII was already facing [REDACTED]
13. Also around this time, 'Operation [REDACTED] commenced. It was an operation that targeted drug trafficking, and had a particular focus on [REDACTED] PII and others.
14. By [REDACTED] 2002 [REDACTED] PII was represented by [REDACTED] in relation to the [REDACTED] Charges.
15. By [REDACTED] 2002, I commenced conducting surveillance on [REDACTED] PII as part of Operations [REDACTED]

16. On [REDACTED] 2002, there was a committal mention hearing in relation to [REDACTED] [REDACTED] Charges. Ms Gobbo appeared for [REDACTED] To the best of my recollection, that was the first time that I became aware of Ms Gobbo acting for [REDACTED]
17. On [REDACTED] 2003, as part of Operation [REDACTED] my team located premises [REDACTED] where drugs [REDACTED] [REDACTED] and others. We located the premises through physical surveillance. We then used further surveillance devices to obtain intelligence over a period of time. The devices captured the [REDACTED] and the involvement of various people, including Carl Williams and members of the Mokbel family.
18. After a period of surveillance, on [REDACTED] 2003, my team arrested and charged [REDACTED] [REDACTED] and others in relation to [REDACTED] operation in [REDACTED] [REDACTED] Charges). I was not involved in their interviews on the day of the arrests. On [REDACTED] 2003, [REDACTED] [REDACTED] appeared in the Magistrates' Court and they did not seek bail.
19. On [REDACTED] 2003, [REDACTED] [REDACTED] was in court in relation to his drug charges. My day book records that [REDACTED] [REDACTED] appeared for [REDACTED] on both days.
20. During the weekend of 27 September 2003, I was on standby to assist with a drug operation called 'Operation Galop'. This is the operation that concerned the house in Dublin Street in Oakleigh. DS Paul Dale was in charge of the operation. The target was Adam Ahmed. During the weekend, I received a call from DS Dale informing me that the operation had been compromised and that police member David Miechel had been arrested. He asked me to assist with the execution of a warrant in relation to the operation. My focus was on locating Mr Ahmed. We located him on 28 September 2003 and executed a warrant and arrested him.
21. On [REDACTED] 2003, [REDACTED] [REDACTED] made an application for bail before Magistrate Cottrell. My diary records that Ms Gobbo appeared for [REDACTED]. Bail was refused.
22. On [REDACTED] 2003, [REDACTED] [REDACTED] made a further application for bail. My diary records that both [REDACTED] [REDACTED] and Ms Gobbo appeared for him and that he was granted bail.
23. Moving into 2004, it appears that there is only one reference to Ms Gobbo in my day book for that year and no entries in my diary. My day book records that on 15 September 2004,

I was in the Magistrates Court for a matter when I bumped into Ms Gobbo. I cannot now recall our discussion. My day book records the topics that she mentioned in discussion.

24. On [REDACTED] 2005, the committal proceeding commenced in relation to the charges that had been laid following Operation [REDACTED]. Ms Gobbo appeared for [REDACTED] PII. My diary records that the committal proceeding was fixed for 4 days but that it concluded after 2 days and that [REDACTED] indicated an [REDACTED]. The matter was then adjourned to [REDACTED] 2005 in the County Court. My diary records that I had coffee with Ms Gobbo [REDACTED] [REDACTED] during the committal proceeding.
25. On [REDACTED] 2005, I spoke to Ms Gobbo by telephone about [REDACTED]. It appears that she contacted me to discuss whether [REDACTED] could negotiate a plea deal. My diary records that she explained his circumstances, namely that he had [REDACTED] and was unstable and irrational. I told her that I would speak to the OPP and my command.
26. On [REDACTED] 2005, I spoke to Ms Gobbo again. She raised [REDACTED]. [REDACTED] said that he was considering providing assistance to police as part of a plea deal. That was of interest to me because I knew that [REDACTED] would have information in relation to the involvement of the Mokbel family in serious drug offences.
27. On 17 August 2005, I spoke to Ms Gobbo. My diary records that she:
- (a) was critical of me for not having returned an earlier call from her about a defendant, George Cancer, who she was representing;
 - (b) complained that she had not been contacted when Mr Bickley was arrested a few days earlier; and
 - (c) criticised a particular solicitor for acting for three co-accused. She said that the solicitor was acting for them for the purpose of protecting Tony Mokbel and that the solicitor was perverting the course of justice.
28. I told Ms Gobbo that I would follow up the last matter if a complaint was made and I then informed DSS O'Brien and DDI Shawyer.
29. About one month later, on 15 September 2005, I was asked by DS Steve Mansell to assist DSC Paul Rowe to introduce Ms Gobbo to [REDACTED] Sandy White-O [REDACTED] who worked in

¹ See exhibit 81 (list of pseudonyms).

the DSU. I was asked because DS Mansell was not available and Ms Gobbo was comfortable with me. I do not recall being told why Ms Gobbo was being introduced to ^{Sandy White-O} Given his location at the DSU, it was apparent to me that Ms Gobbo was considering or intending to provide information to police. I did not know what the information was in relation to.

30. The following day, on 16 September 2005, I contacted Ms Gobbo to arrange the meeting. However, DS Mansell ended up being available and so I did not attend the introductory meeting and I do not recall being briefed about what occurred at the meeting.
31. On 30 September 2005, I attended a meeting about members of my team at the MDID joining the Purana Taskforce. My diary records that at the meeting, ^{Peter Smith-O} of the DSU/SDU, informed those present about some information provided by a human source. To the best of my recollection, he did not name the human source. However, based on the nature of the information (being information about [REDACTED] and members of the Mokbel family), I believed, at the time, that it had been provided by Ms Gobbo. I recall initially feeling surprised about that. However, I dismissed that feeling after thinking through in my mind that: (a) Ms Gobbo was a smart and educated person who would know what information she could and could not provide; (b) she had a personal relationship with ^{PI} [REDACTED] and may have known the information through that relationship; and (c) the DSU's expertise was in handling human sources and it had received the information and was passing it on so there must not be any impediment to doing so.
32. I have reviewed my diaries for entries recording information provided to me by members of the DSU/SDU where it appears that the source of the information was or may have been Ms Gobbo. I have referred below to the diary entries that I have located. I have been informed that Victoria Police has created a database called 'Loricated' which records contact that the SDU had with Ms Gobbo and the dissemination of information provided by her to investigators. Therefore, each of the instances of dissemination recorded in my diary should also be captured in the Loricated database. I am informed that the Loricated database records instances where information was purportedly disseminated to me but which has not been identified in my diaries. There are several possible explanations for this. One explanation is that the information was provided to me when I did not have

² ibid.

immediate access to my diary and I have not later recorded it in my diary. Another is that the information was of no relevance to my investigative work and so I did not make a note of it. A third explanation is that the information was disseminated to a different investigator and that my name has been erroneously recorded in the Information Contact Report (ICR).

33. To the best of my recollection, I do not recall receiving written Information Reports from the DSU/SDU, or anyone else in Purana, containing information provided by Ms Gobbo. I believe that all information was disseminated to me verbally by DSS O'Brien, members of Purana and members of the DSU/SDU.
34. The next relevant entries in my diaries are ^{to} [REDACTED] 2005. My diary records ^(INCLUSIVE) that members of the SDU contacted me with information in relation to the Mokbels [REDACTED] [REDACTED] who I was investigating. While it was never confirmed to me, I was confident the source of that information was Ms Gobbo.
35. On [REDACTED] 2005, I attended the County Court in relation to the [REDACTED] Charges. [REDACTED] were represented by Ms Gobbo. She indicated that they both intended to plead guilty. My diary records that the matter was adjourned to [REDACTED] 2006. My diary also records that I spoke to Ms Gobbo at court and that she was upset. I have a memory of seeing her upset on one occasion and so I expect that this was it. She always presented as a confident and strong person and so this occasion stood out to me. There is a summary of my conversation with her in my diary. It records that, amongst other things, Ms Gobbo was worried that Tony Mokbel was going to ask her to lie for him and that she was concerned about her welfare if she did not do as she was told. She also said that she had not been paid for her work. My diary records that I informed ^{Peter Smith-O} and DSS O'Brien about my conversation with Ms Gobbo.
36. By [REDACTED] 2005, an operation subsequently called 'Operation Posse' was underway and the targets were the Mokbels. My diary records that on 1 November 2005, ^{Peter Smith-O} gave me information in relation to this operation, namely that a human source may approach ^{PJ} [REDACTED]. I do not recall him telling me the name of the human source but I believed that it was Ms Gobbo.



37. On 21 November 2005, I then transferred from the MDID to the Purana Taskforce. I moved across with some members of my crew. *On 22 November 2005 I attended a*
38. After arriving at the Purana Taskforce, I continued to receive information from the SDU *briefing with Jim O'Brien & Graham Ryan which detailed the objectives of the task force.* relevant to Operation Posse. Some information also came from members of my crew and DSS O'Brien. My diary records the provision of information on:
- (a) [redacted] 2006 (provided by DSC Rowe and DSS O'Brien);
 - (b) ^{PII} [redacted] 2006 (provided by DSS O'Brien); and
 - (c) [redacted] 2006 (provided by ^{Peter Smith-O} [redacted] ^{Graham Evans-O} [redacted] and DSS O'Brien).
39. The information provided to me by DSS O'Brien and ^{Graham Evans-O} [redacted] on [redacted] [redacted] 2006, was that ^{PII} [redacted]. It did not enter my mind that this was information that police could or should not act upon. It was information that a serious crime was being committed at a particular location. My focus was on apprehending ^{PII} [redacted].
40. Over that [redacted] 2006, I drove to [redacted] to see if I could locate [redacted]. I thought it might be [redacted]. I walked around and came across a building where I could hear the sound of a hammer drill. I took the registration number of a car parked in the rear yard of the building.
41. On [redacted] 2006, I had the registration number checked and the car was registered to someone associated with ^{PII} [redacted]. I then believed that I had found the place where [redacted]. I spoke to the State Surveillance Unit to organise immediate surveillance on the property.
42. In preparing this statement, I have found an entry in my diary for the next day [redacted] 2006, which records a briefing about Operation [redacted] with ^{Sandy White-O} [redacted] a senior sergeant from the State Surveillance Unit, DS Jason Kelly, DSS O'Brien and a member from the Technical Support Unit. It appears from my diary entry that we discussed several issues, including a strategy for the interview of ^{PII} [redacted] following his arrest. I do not have a specific memory of this meeting. However, I do recall discussion leading up to [redacted].

³ ibid.

arrest about [REDACTED] that we thought might persuade him to start assisting police following his arrest. We had planned to put to him that he would get a significantly reduced jail sentence for assisting [REDACTED]

43. As I don't remember the specific meeting on [REDACTED] 2006, I cannot recall why [REDACTED] ^{Sandy White-O} was present at the meeting. I suspect that [REDACTED] ^{Sandy White-O} attended because of his expertise in handling sources and could, therefore, provide input on the approach to take to [REDACTED] ^{PII} in persuading him to assist police and then on how we should handle him if he agreed to provide assistance.
44. In preparing this statement, I have also found an entry in my diary on [REDACTED] ^{PII} 2006 that records a further briefing about Operation [REDACTED] ^{PII} with members from the Technical Surveillance Unit and State Surveillance Unit and DSU/SDU about the "I/V [interview] strategy". I do not have a specific memory of this meeting. I have been informed that an ICR in the Loricated Database appears to refer to this meeting. It refers to an "I/V [Interview] plan".⁴ I assume that the meeting involved discussion about the approach that we were to take to the interview of [REDACTED] ^{PII}. I do not have any memory of there being a documented plan for the interview. My only memory of the matters that we proposed to put to [REDACTED] ^{PII} during his interview are those identified in paragraph 42.
45. The surveillance on the [REDACTED] property captured [REDACTED] ^{PII} and others coming and going from the property.
46. On [REDACTED] 2006, Victoria Police obtained a search warrant to search the [REDACTED] ^{PII} property, and the properties of other suspects in our investigations. An affidavit was prepared in support of the application for a search warrant.⁵ The affidavit was compiled by a member(s) of my crew, and records information obtained in the investigation, including information provided by Ms Gobbo to the SDU. I believe that the affidavit was compiled from a number of sources, such as members' diaries and an investigation chronology.⁶

⁴ VPL.2000.0003.1835.

⁵ VPL.0005.0011.0900.

⁶ VPL.0005.0035.1112 (Exhibit RC120).

0005-0035.1204 

47. Our surveillance captured ^{PII} [REDACTED] entering the property at [REDACTED] 2006 and remaining in the property overnight.
48. On the morning of [REDACTED] 2006, I spoke to DSS O'Brien. We decided that as ^{PII} [REDACTED] and his associates had been in the property overnight they were probably [REDACTED]. We decided to move to the arrest stage. At 2.21pm, the Special Operations Group arrested ^{PII} [REDACTED] (Charges). I then attended the scene at 2.25pm. I read ^{PII} [REDACTED] his rights to contact a friend or relative and a legal practitioner. He asked me to contact [REDACTED] and Ms Gobbo. At that time, I refused the request because of a concern about fabrication and destruction of evidence. It was not unusual at that time for such requests to be refused when high level drug offenders were arrested and there were still warrants to be executed and others to be arrested.
49. [REDACTED] was then taken back to the St Kilda Road police station. Once we got back, I then allowed ^{PII} [REDACTED] request to contact a legal representative, being Ms Gobbo. [REDACTED] also asked to speak to Ms Gobbo. At 4.00pm, I facilitated telephone calls between [REDACTED] and Ms Gobbo and [REDACTED] and Ms Gobbo. I was not present during the calls which concluded at 4.10pm. From 4.14pm to 4.19pm, I conducted my first interview with ^{PII} [REDACTED]. He gave a no comment interview.
50. At 4.25pm, Ms Gobbo arrived at the police station. I recall thinking at this point that her arriving to see [REDACTED] was complex. I knew that she was the person who had told police that [REDACTED] was committing the crime for which he had just been arrested. I do not recall having a discussion with anyone about that issue. However, I have a very vague recollection of someone saying that perhaps [REDACTED] should be told that Ms Gobbo is uncontactable. I think that was something discussed prior to the day of the arrests. If someone did suggest that, then obviously that approach wasn't taken because Ms Gobbo came to see him when he asked for her.
51. Ms Gobbo first spoke [REDACTED] she then spoke to [REDACTED] and she left the police station at 5.45pm. My diary records that we then attended to some administrative matters.

52. My diary records that at 6.35pm, ^{Peter Smith-O} arrived at the police station to assist us with the pitch we were to make to ██████████ as to why he should start co-operating and assisting. At 6.50pm, ^{Peter Smith-O} DSS O'Brien and I starting talking to ██████████ about reasons why it was in his best interests to start co-operating. Those reasons were reduced jail time and his family. ██████████ then told us that he wanted to speak to Ms Gobbo again at the police station. I then contacted Ms Gobbo and she said that she would return. I note that my diary entry states "discussed options". I think that is simply a reference to the discussion we were having with ██████████ rather than a reference to something that Ms Gobbo and I discussed on the telephone.
53. Ms Gobbo then attended the police station. I cannot recall exactly what happened after she arrived. I have been informed that an ICR in the Loricated database refers to me having a conversation with both ██████████ and Ms Gobbo. I do not recall that conversation but I have no reason to doubt that we spoke. I expect that I spoke to them about what ██████████ had to gain by co-operating with police, namely a significantly reduced sentence. ██████████ did ultimately agree to co-operate and my diary records that he agreed to be re-interviewed. At 9.08pm, I then re-interviewed him with DSC Paul Rowe. Ms Gobbo was not present for the interview. He made admissions in relation to the ██████████ and spoke about his ██████████. The interview concluded at 11.27pm. ██████████ then agreed to remain ██████████ for several days to ██████████ I understood that DSS O'Brien had obtained legal advice that we could ^{PII} ██████████ after he had been charged while he was ██████████ over a few days.
54. The following day, on ██████████ 2006, ^{PII} ██████████
██████████ ██████████ SDU ██████████
██████████
55. Over ██████████ 2006 ██████████ recall that ██████████ asked to speak to Ms Gobbo at times during this period which we facilitated. I have been informed that an ICR in the Loricated database refers to contact between me and the SDU over this period. I do not recall the conversations and I have not at this stage been able to identify entries in my diary. I recall that during this time I was completely focussed on ^{PII} ██████████

56. During this period, we facilitated [REDACTED] meeting with [REDACTED] and [REDACTED]. We obtained recordings of them discussing the supply of drugs. My diary records that on [REDACTED] 2006, I attended a debrief. I have been informed that an ICR⁷ in the Loricated database refers to the debrief being with DSS O'Brien, ^{Peter Smith-O} and ^{Sandy White-O} I have no memory of this debrief. I suspect that I updated them on the meeting between [REDACTED]
57. On [REDACTED] 2006, I also attended a debrief with DSS O'Brien, Detective Superintendents Grant, Steedham and Biggin.
58. I have been informed that an ICR in the Loricated database seems to refer to the SDU providing me with information that Ms Gobbo had provided to them about how to spark conversation between [REDACTED] when they met. I have no memory of the SDU providing that information to me. I have not been able to find a record of it in my diary. If I did receive the information then I suspect that I dismissed it because I would not have thought it necessary to spark conversation.
59. On [REDACTED] 2006, I attended a further briefing with DSS O'Brien, Detective Superintendents Grant and Steedham and the arrest crews. Shortly thereafter, we arrested [REDACTED]
[REDACTED]
60. After we had taken [REDACTED] to St Kilda Road police station, he asked to speak to Ms Gobbo which was facilitated. She then attended. My diary records that she told me that [REDACTED] wants to plead guilty to trafficking a large commercial quantity of drugs. [REDACTED] ended up giving a no comment interview. His filing hearing was later that day. My diary records that Ms Gobbo said that she was worried about ^{PII} [REDACTED]. She said that [REDACTED]
[REDACTED]
61. On [REDACTED] 2006, Mr Zlate (Steve) Cvetanovski was also arrested with drug offences but his arrest was by another crew. He also asked for Ms Gobbo which was facilitated.
62. I recall that I thought that the situation had got even more complex now that Ms Gobbo was acting for [REDACTED] and Mr Cvetanovski. I do not recall raising this situation with DSS O'Brien

⁷ VPL.2000.0003.1835.

or the SDU. As SDU members were handling Ms Gobbo, I believed that they would have considered the issue of her acting for [REDACTED] and Mr Cvetanovski prior to her doing so and taken any necessary steps. My focus was on running the investigation.

63. On [REDACTED] 2006, Ms Gobbo contacted me and, amongst other things, complained that police were not looking after [REDACTED]. I said that I would speak to [REDACTED]. She also appeared for him the following day in the Melbourne County Court in relation to the [REDACTED] Charges.
64. On [REDACTED] 2006, Ms Gobbo contacted me complaining that [REDACTED] needed money for basic supplies in prison. The following day, on [REDACTED] 2006, I went to see [REDACTED] in prison. Ms Gobbo later called me about personal belongings that [REDACTED] wanted in prison.
65. On [REDACTED] 2006, DAI O'Brien, DS Kelly, DSC Bartlett, SC Farrer and I met for a briefing about taking statements from [REDACTED]. On this day and the next, Ms Gobbo also contacted me about assets seized from [REDACTED]. He was unhappy about the seizure.
66. On [REDACTED] 2006, I commenced taking more statements from [REDACTED]. During this process, he told me that Ms Gobbo had told him that she felt threatened by a call she received from Milad. I then called Ms Gobbo to obtain further information.
67. I continued taking statements from [REDACTED] on [REDACTED] 2006. My diary records contact with Ms Gobbo during the process. She also visited [REDACTED] on one of the days that we were taking statements. I do not have any recollection of her reviewing the statements or providing comments but it appears from my diary entry on [REDACTED] 2006 and ICRs in the Loricated database⁸ that she may have reviewed them. She may have reviewed them in her capacity as [REDACTED] lawyer or to check that she was not identified as his lawyer due to concerns about retribution from [REDACTED].
68. From 15 May 2006 through to the end of the year, I had frequent contact with Ms Gobbo about [REDACTED] welfare and the prosecutions against him, and about other clients she was acting for, such as Frank Ahec and Paul Duncan. On occasions, she would also talk about other people. I have set out below some key events and otherwise I refer to my diaries for details of contact that I had with Ms Gobbo.

⁸ VPL.2000.0002.9857; VPL.2000.0002.9851; VPL.2000.0002.9857.

69. On [REDACTED] 2006, [REDACTED] was arrested mostly as a result of assistance provided by [REDACTED].
70. By [REDACTED] 2006, solicitor Tony Hargreaves was acting for [REDACTED]. [REDACTED] were in the County Court in relation to the [REDACTED]. The matter was adjourned. There is a note in my diary that Mr Hargreaves was reading [REDACTED] unsigned statements. My memory is that most, if not all, of my contact with Ms Gobbo from this time onwards was about Ms Gobbo trying to look after [REDACTED] in prison and she would ask me to facilitate visits by her.
71. On [REDACTED] 2006, I attended prison with DSS O'Brien to have [REDACTED] read and sign his statements.
72. On 2 November 2006, I was tasked by DSS O'Brien to speak to [REDACTED] about a meeting that he claimed to have attended during which Ms Gobbo, two particular solicitors, a barrister, [REDACTED] and [REDACTED] had discussed a plan to fabricate evidence. A statement was taken from [REDACTED] about the matter. We investigated the allegation which included serving a search warrant on Ms Gobbo, the other barrister and one of the solicitors. The warrant was for documents relevant to the meeting at which the alleged fabrication of evidence was discussed. Whilst I do not have any memory of doing so, my diary records that I served the search warrant on Ms Gobbo. The investigation was assisted by another enforcement agency. The details of this investigation are recorded in my diary from [REDACTED] 2006.
73. On 15 December 2006, there was a committal mention for those people charged following Operation [REDACTED]. There is a note in my diary that I spoke to Ms Gobbo on the day who showed me a threatening SMS that she had received. The threat was concerning. I expect that I would have informed DSS O'Brien and the SDU about it. I believe that I would have done the same in relation to the subsequent threats that she reported on 23 February 2007, 18, 20 and 28 March 2007, 14 and 25 July 2007, 15 and 29 October 2007 and 7 November 2007. My diary records contact with Ms Gobbo about the threats. My crew's role was to investigate the threats which was called 'Operation Gosford'. At the end of 2007, DSC Rowe took over the investigations. I understood that the SDU was addressing Ms Gobbo's safety and welfare issues. I was present when the SDU provided Ms Gobbo a telecommunication

device to improve her safety. I do not know what other safety and welfare measures were provided by the SDU.

74. In 2007, I continued to have contact with Ms Gobbo in relation to welfare issues concerning [REDACTED]. I also had contact with Ms Gobbo in relation to people she was representing. This contact is recorded in my diary. I have set out below some of the key events in 2007.
75. On [REDACTED] 2007, [REDACTED] I gave evidence about the assistance that [REDACTED] had provided. Ms Gobbo did not appear.
76. On [REDACTED] 2007, [REDACTED] were sentenced. Ms Gobbo did not appear.
77. On [REDACTED] 2007, DSS O'Brien and I met with Ms Gobbo in her chambers to discuss Milad Mokbel and his wife Renata. She said that Milad wanted to assist police if it would keep his wife out of prison. His wife was facing court over surety matters in relation to Tony Mokbel fleeing overseas during his trial. I had further discussions with Ms Gobbo about Milad's desire to protect his wife on 30 April, 14 May, 28 May and 22 August 2007. I also spoke to solicitor, Alex Lewenberg, about this issue on 8 and 12 June 2007. These discussions are recorded in my diary.
78. On [REDACTED] 2007, I went to Barwon Prison to interview Horthy Mokbel. While I was there I visited [REDACTED] to ascertain whether he would assist with the Operation Galop investigation. I do not recall what prompted me to visit him and I cannot find a relevant entry in my diary. However, my diary records that I spoke to Ms Gobbo later that day. She said that she had received a call from him and that she wanted to know what assistance police wanted from [REDACTED]. I told her that we were looking for assistance in relation to Tony Mokbel and others involved in Operation Galop.
79. On [REDACTED] 2007, I visited [REDACTED] in prison again with DSS Shane O'Connell to introduce him to [REDACTED].
80. There is an entry in my diary on [REDACTED] 2007 that ^{Fox-O} [REDACTED] contacted me with information provided by Ms Gobbo, including that [REDACTED] wanted to assist police in relation to Tony Mokbel.
81. I received another call from ^{Fox-O} [REDACTED] the next day, on [REDACTED] 2007, telling me that Ms Gobbo had received a call from Tony Bayeh. I knew him to be a dangerous criminal who

was Horty Mokbel's right hand man. I have a note in my diary that around this time, on 17 August 2007, Ms Gobbo contacted me and was upset and that then, in a subsequent call, she apologised for calling me. I cannot now recall these telephone calls. However, on 31 August 2007, my diary records that Ms Gobbo and Tony Bayeh were to meet and that Ms Gobbo intended to record the conversation because she suspected that he was behind the threats that she had been receiving. My diary records that they spoke on 4 September 2007 and that she recorded the conversation. I referred the matter to DS Kelly who was investigating the threats against Ms Gobbo.

82. On 3 December 2007, Kabalan Mokbel was sentenced after pleading guilty to drug charges. [REDACTED] was to be a witness against him.
83. On 21 January 2008, I moved out of Purana and to the Drug Taskforce. Ms Gobbo continued to contact me occasionally and the contact is recorded in my diary. I refer to some key events below.
84. By 8 April 2008, barrister Stephen Shirrefs was acting for Milad Mokbel. I was present with him and prosecutors from the OPP to discuss a plea by Milad. On 17 December 2008, Milad was sentenced.
85. On 16 April 2008, Ms Gobbo contacted me extremely upset because her car had just been destroyed by fire. She told me that she was having dinner at a restaurant with Jacques El-Hage (who was one of the targets in Operation Matchless) and a solicitor when her car caught on fire. Ms Gobbo told me that police were at the scene. I then contacted ^{Fox-O} in the SDU, DI Edwards and DS Kelly. The next day, I spoke to Ms Gobbo again about the fire and her suspicion as to who may have been behind it.
86. On 22 and 23 July 2008, I spoke to Ms Gobbo about her client, Mr El-Hage. We discussed arrangements for his arrest by appointment on drug matters.
87. By 2009, I was having very little contact with Ms Gobbo. It is recorded in my diary. I have set out some key events below.
88. On [REDACTED] 2009, the committal proceeding of those people charged following Operation [REDACTED] commenced. Ms Gobbo did not appear for any of the accused. My diary records

that [REDACTED] cross-examined [REDACTED] about Ms Gobbo. The cross-examination was about Ms Gobbo's role in [REDACTED] deciding to become a Crown witness. I do not have the transcript of the cross-examination. Attempts can be made to find a copy of the transcript if the Royal Commission would be assisted by having it.

89. On 28 December 2009 and 5 January 2010, Ms Gobbo sent messages to me about her being in hospital. I think that she had leg related health issues. On 6 January 2010, I returned her messages with a telephone call. I recall that it was a long telephone call in which she vented about a range of matters. I have recorded the matters in my diary.
90. [REDACTED] 2010, Ms Gobbo contacted me about [REDACTED]. She raised a number of matters, including a letter that [REDACTED] had written to me in which he threatened that he would not give evidence in outstanding proceedings unless he was looked after better in prison. Based on my review of my diaries, this appears to be the last time I spoke to Ms Gobbo.
91. On 1 June 2010, I was contacted by DI Hughes about a civil claim that Ms Gobbo had brought against Victoria Police. He sought information from me relevant to the claim.
92. On 7 July 2010, I received a call from ^{Graham Evans-O} [REDACTED].¹⁰ He said that he had listened to recordings of telephone calls between [REDACTED] and Ms Gobbo. The details are recorded in my diary.
93. On 17 March 2011, DSC Hayes informed me that Mr Cvetanovski had been found guilty of fraud charges.
94. On [REDACTED] 2011, I received another call from DSC Hayes about Mr Cvetanovski's drug trial. He told me that there was to be a conference with prosecutor John Champion. I then attended the conference because I understood that it concerned [REDACTED]. The attendees are listed in my diary. We discussed allegations made by Mr Cvetanovski, including that Ms Gobbo had conspired with [REDACTED] and/or police for [REDACTED] to make false statements. There was discussion about the possibility of Ms Gobbo being called to give evidence after [REDACTED] had finished giving his evidence.

¹⁰ See exhibit 81 (list of pseudonyms).

95. On 18 June 2012, I moved out of the Drug Taskforce and joined the Briars Taskforce which was investigating the murder of Shane Chartres-Abbott.
96. On [REDACTED] 2012, I received a call from a contact at [REDACTED] prison about [REDACTED] pending release on parole. The contact told me that one of the Parole board conditions was that he was not allowed to live with [REDACTED]. On [REDACTED] 2012, I met with [REDACTED] in the Remand Centre and we discussed that his application to live with [REDACTED] had been refused.
97. On 1 and 21 May 2014, I was contacted in relation to Operation Loricated. Information was being collected in relation to Ms Gobbo's use as a human source. I was asked about Ms Gobbo having reviewed a Brief of Evidence in relation to Operation [REDACTED].
98. I had no involvement in arranging for Ms Gobbo to review any Brief of Evidence and do not know why she reviewed it.
99. I have been informed that there is an ICR in the Loricated Database for 30 October 2006 that refers to the SDU passing onto me comments that Ms Gobbo had made on the Brief of Evidence against Milad Mokbel, Ahec and Barbaro.¹¹ I have located an entry in my diary on 31 October 2006 that refers to me having a conversation with ^{Peter Smith-O} [REDACTED] about the Operation [REDACTED] Brief of Evidence and that I updated DI O'Brien. I do not have any memory of discussing a Brief of Evidence with ^{Peter Smith-O} [REDACTED] and DI O'Brien, but given by diary entry and the ICR, I do not have any reason to doubt that it happened. I do have a vague memory of a discussion with DSC Rowe in which he mentioned comments. I vaguely recall him mentioning comments that Ms Gobbo had made on a Brief of Evidence and him being dismissive of them.
100. Towards the end of 2014, I was involved in a formal inquiry about Ms Gobbo's use as a human source. I am informed that my solicitors are enquiring with the Commission as to whether the Commission has the documentation in relation to that matter.
101. [REDACTED] has maintained contact with me. He occasionally rings me for a general chat about family, work and other things in his life.

Information and assistance provided by Ms Gobbo (q 7 and 8)

102. I refer to my answer to question 6 above.

¹¹ VPL.2000.0003.2104.

Concerns about use of human sources (q 9)

103. I do not recall any such concerns being raised.

Concerns about use of Ms Gobbo as a human source (q 10)

104. I refer to my answer to question 6 above.

Awareness about disclosure in relation to Ms Gobbo (q 11)

105. I am not aware of any such discussions.

Use of other sources with obligations (q 12)

106. I am not aware of any such human sources.

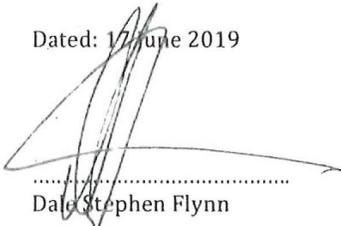
Training (q 13)

107. Such training has been provided throughout my career, both in a formal sense and through experience on the job.

Other information (q 14)

108. Nil.

Dated: 17 June 2019



Dale Stephen Flynn

Annexure A

1. Between 1987 and 1992, I was in various uniform positions.
2. In 1992, I moved to the Drug Squad. I held the rank of Detective Senior Constable.
3. Between 1994 and 1999, I was a Detective Senior Constable at the CIB in Parkdale.
4. In 1999, I was a Sergeant at the Elsternwick Police Station.
5. In 2000, I was the Acting Detective Sergeant at the CIU in Caulfield.
6. In 2001, I was the Sergeant at Moorabbin Regional Response Unit.
7. In 2002, I held the rank of Detective Sergeant and was located at the Major Drug Investigation Division.
8. In 2005, I moved to the Purana Taskforce. I was initially there as a Detective Sergeant but, from June 2007, I held the rank of Detective Senior Sergeant.
9. In 2008, I moved to the Drug Task Force.
10. In 2012, I held the rank of Acting Inspector at the Briars Taskforce.
11. In 2014, I moved to the State Emergency and Support Command (SESC) in the rank of Inspector.
12. Since 2016, I have held the rank of Inspector at the SESC (Southern Metro Region).
13. I have completed a number of Victoria Police training courses, including:
 - i) Detective Training School (1992);
 - ii) Investigators Management Course (2002);
 - iii) AFP - Management of Serious Crime (2008); and
 - iv) ██████████ Human Source Management Unit (2009)
14. I have received the following awards:
 - (a) In 2005 - Departmental Commendation for Operation Rakus;
 - (b) In 2011 - Departmental Commendation for Purana Task Force; and
 - (c) In 2012 - Ethical Leadership Award.

15. After secondary school, I commenced a Diploma – Architectural Drafting. I had various jobs before starting at the Police Academy when I was 25 years old.