

## VICTORIAN GOVERNMENT SOLICITOR'S OFFICE

## RECORD OF ATTENDANCE / FILE NOTE

FILE Driver subpoena. Date 13. / 9. / 2011

TT	TF
AI	AO

Author WJMeeting w G Maguire, Mick Frewen  
x Boris Buick Time 3pm

→ material has gone to prosecution to determine whether relevant for prosecution disclosure obligations

→ if they say it's relevant then must disclose (can have protective confidentiality arrangements) - terrorism trial. We won't win fight on non-disclosure.

→ Hargreaves seeking non-controversial material at this stage.

- Nicola needs to give evidence that her conversation w Dale not covered by LPP.  
She says she wasn't his lawyer.

- 22 binders not just about Nicola.  
Early next week can be sorted.

But controversial docs not in 22 binders.

This is in material in relation to diff subpoena not provided (Carl's prosecution).

Boris doesn't have anything about Nicola not relating to her engagement ~~of~~ as witness in Dale prosecution.

Prob held by Human Source Management  
if The SDU hold file - this  
is what we need to protect.

Human Source.

\* Need to identify work units who have NG docs.

Need to speak to Civil Litigation

about Settlement. except settlement of lit<sup>4</sup>



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They will try to show that NA paid to give evidence.

Part of master plan.

BB- concerned about it coming out when she started being a source in 04. Life in danger.

But if we argue this - shows she was playing both sides. But this buttresses Dale's argument

that he thought she was his lawyer.

Simple position- she gave statement when asked to.

in Dale's interest not for NA to be killed - her statement will go in if she does - exemption to hearsay.

How do we ring-fence her prior relationship w VP?

Need to know what relationship was.

Need to look at info

she is a HS

Need to find out what is relevant or not.

Just want to know what Civil Lit<sup>m</sup> has. x HSD & WHSec. x Drug Squad.

Find out from Dave Ryan whether we acted for Vicpol or State.

① Look at info in binders relevant to gobbo.

② Look at what was almost released in Williams.

③ Ask work units if they have a holding - not what they have.

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- Need to also talk to handlers from Petra.  
- investigators from Bnars  
re: documents. whether they have any.

⊗ Speak to Peter Lardner about being central repository. Speak to Fin McKrae.

● Need to protect organisation - may jeopardise other proceedings / convictions