

CHRISTOPHER JAMES GAWNE care of my solicitor's address at 114 William St,
Melbourne

STATE as follows: -

1. I am making this statement at the request of the Royal Commission as a result of receiving a written request dated 19th of March 2019 from the Royal Commission and pursuant to a Notice to Produce served on me by the Royal Commission.
2. in preparing this statement for the Royal Commission I have not had access to my old diaries or day books from Victoria Police. The events which I outline in this statement are based on my best recollection. My memory may be further refreshed if I am shown documentation produced at the relevant time of this Inquiry.

Personal Information

3. I finished secondary school in 1974 after which I worked as a barman/cellarman until April 1975 when I joined the Commonwealth Police until 30th April 1978.
4. I then joined Victoria Police on 1st May 1978 and graduated after recruit training on 15th September 1978.
5. After graduating I performed duties as detailed:-
 - Constable and Senior Constable in the Melbourne Metropolitan area at Collingwood, Russell Street and Frankston Police Stations.
 - April 1984 successfully completed the Prosecutor's Course and performed prosecution duties at Magistrates' Courts at Frankston and Mornington Peninsula locations.
 - 1984 I transferred to Swan Hill where I performed general uniform and prosecutor duties.
 - 1986 I transferred to Melbourne Prosecutions Office performing prosecution duties at Melbourne Magistrates' Court
 - December 1988 promoted to Uniform Sergeant Richmond Police Station. Performed general supervision duties.
 - 1989 successfully completed Sergeants Course
 - 1991 Transfer to Licensing Gaming & Vice Task Force. Perform plainclothes supervision duties relating to gaming, vice & licensing matters

- 1993 Licensing Gaming & Vice Task Force transferred to Crime Department. Investigation and supervision duties relating to gaming and vice matters including two periods of temporary duties Dandenong Criminal Investigation Branch. Supervision and investigation duties.
- December 1993 successfully complete Detective Training School
- 1996 transfer to Narre Warren Crime Investigation Unit. Supervision & investigation duties
- 2003 Promoted to Detective Senior Sergeant at Ethical Standards Department. Management & investigation duties
- 2009 promoted to Inspector. Staff officer duties to Deputy Commissioner (Crime).
- 2010 Inspector Western Region. Local Area Commander, Geelong
- 2011 Inspector Western Region. Community Response portfolio
- In October 2013 I retired from the Victoria Police due to ill health

Use of Ms Gobbo as a Human Source

6. I have never used Ms Gobbo as a human source.
7. In 2009 I was the Staff Officer to Deputy Commissioner SIR KEN JONES who I will refer to as Sir Ken. In the latter part of 2009 or early 2010 Sir Ken assumed responsibility for the Petra Task Force. This entailed Sir Ken being the Chairperson of the Petra Task Force steering committee.
8. As a result of Sir Ken's appointment as the Chairperson I assumed the secretariat role. My role as Secretariat included listing agenda items, taking and maintaining the minutes of meetings and scheduling meeting times in the respective calendars of steering committee members.
9. I would hand write the minutes in a notebook and then later type them out. The typed copies of the minutes were used at the following meeting as the minutes of the previous meeting and were saved on the relevant computer drive for the Deputy Commissioner (Crime) that I had access to.
10. From memory the steering committee consisted of Assistant Commissioner (ESD) then LUKE CORNELIUS and later EMMET DUNNE, Assistant Commissioner (Crime) DANNEY MOLONEY, Assistant Commissioner (Intelligence & Covert Support) JEFF POPE, Mr PAUL JEPTOVIC, Office of Police Integrity and inspector STEVE SMITH, Petra Task Force Manager or his delegate. Exactly who else attended I cannot

presently recall but it would be noted in the minutes which would be in the possession of Victoria Police.

11. When Sir Ken assumed the role of chairman of the Petra Task Force steering committee, he did not have access to any records or documentation relating to committee such as minutes of previous meetings. If they existed, they were not provided to Sir Ken or me.
12. Sir Ken asked me to make a search to see if I could locate any such documentation. At this time EMMETT DUNNE had become the Assistant Commissioner (ESD). Mr Dunne allowed me access to his office and the records therein.
13. I made a thorough search of filing cabinets and cupboards within the office, but I was unable to locate any documentation relating to the Petra Task Force Steering Committee. I asked Mr Dunne about where the documentation may be, and he advised me that he was not aware of any such documentation.
14. Sir Ken asked me to complete a report concerning the issues surrounding the lack of documentation pertaining to the governance of the Petra Task Force Steering Committee, which I did. Victoria Police would have that report.
15. As a result of my involvement with a Petra Task Force Steering Committee I became aware that Ms Gobbo was a witness in relation to that investigation and had provided a written statement.
16. I also became aware that there were ongoing negotiations to have Ms Gobbo enter witness protection however this was proving problematic and difficult. These negotiations with Ms Gobbo were being conducted by the Witness Security Unit on behalf of Victoria Police.
17. The Witness Security Unit attended Petra Task Force Steering Committee meetings on occasions to provide a briefing as to the current status of those negotiations. My recollection is that Ms Gobbo did not wish to give up her lifestyle and be subjected to the type of lifestyle that being in witness security required.
18. At this time, I was not aware that was Ms Gobbo was or had been a human source for Victoria Police.

19. Following the death of Carl Williams in 2010 the Petra Task Force was closed down and disbanded. The Driver Task Force was then established to look at all aspects surrounding the murder of Carl Williams and it absorbed responsibility for the Petra Task Force investigations.
20. One matter that Driver Task Force had taken over responsibility for was the prosecution of a brief of evidence in relation to charges of perjury against Paul Dale who is a former Detective Sergeant of Victoria Police. Those charges of perjury arose from hearings at the Australian Crime Commission.
21. Sir Ken told me he had read the brief. He asked me to read the brief and give him my opinion as to the viability of the charges to support a decision to prosecute Mr Dale. I read the brief of evidence and formed the opinion that there was a reasonable prospect of conviction for all the charges contained within the brief.
22. The informant in the matter and the detective who had compiled the brief was Detective Sergeant SOL SOLOMON from Petra Task Force.
23. Prior to a final determination being made about the charges contained within the brief of evidence, I recall attending a meeting along with Sir Ken, Detective Sergeant Solomon and other police at the offices of the Commonwealth DPP in relation to that brief of evidence.
24. The meeting was about the viability of the prosecution of Mr Dale in relation to charges of perjury.
25. From the discussions that were had, it was my belief that the Commonwealth DPP were going to proceed with the charges against Mr Dale and that Ms Gobbo was to be called as a witness.
26. There was discussion concerning Ms Gobbo's reluctant to give evidence in the matter and at some stage it was stated that Ms Gobbo had been excused, pardoned or indemnified by Chief Commissioner Simon Overland from giving evidence in the matter. I am not sure of the exact word used.
27. This was the first time that I, and I believe Sir Ken, had heard of Ms Gobbo being excused as a witness by Mr Overland. I recall Sir Ken being quite surprised and somewhat dismayed at this revelation. I recall Sir Ken being quite composed during

the meeting but afterwards saying to me words to the effect that he could not believe that Ms Gobbo had been given assurances by Mr Overland that she did not have to give evidence, that something did not seem right, it was a most significant matter and presented a very good opportunity to have Mr Dale brought to justice. I do not recall Sir Ken's words verbatim however this was the general tenor of what he told me.


Concerns in relation to use of Ms Gobbo as a human source

28. I am aware from what Sir Ken had told me that he had become increasingly concerned regarding the status of Ms Gobbo's role and relationship with Victoria Police and the reputational damage that could do. These concerns were brought about by the ongoing issues arising from the Driver Task Force investigation and the circumstances surrounding a writ Ms Gobbo had issued against Victoria Police.
29. A further issue that I am aware raised concern for Sir Ken was the fact that it had taken some time after his appointment for him to have been given responsibility for the Petra Task Force, even though the Task Force was within the Crime Department.
30. A further issue that I am aware was of concern to Sir Ken was the fact that the Office of Police Integrity had a seat at the steering committee of the Petra Task Force. Sir Ken told me he believed that this was a conflict of interest on behalf of the Office of Police Integrity.
31. As I understood it, Sir Ken's view was that the Office of Police Integrity needed to remain independent of Victoria Police in such circumstances as should there be any allegation of impropriety levelled against Victoria Police concerning the Petra Task Force or against the Task Force investigators the Office of Police Integrity would be caught up in those allegations when they should be the appropriate body to investigate or oversee any investigation should this need arise.
32. The writ referred to had been taken out by Ms Gobbo sometime in 2009 against Victoria Police. It settled in mid-2009. Sir Ken expressed his surprise and concern about the fact that the writ had been settled and the veracity of the allegations had not been tested in the court by Victoria Police.
33. Sir Ken was of the view that the allegations contained within the writ were baseless and that there was a strong prospect that if challenged in court the writ would be struck out.

34. Sir Ken has since told me that he believes the out of court settlement of the writ was used as an opportunity for those involved in the use of Ms Gobbo as a human source to provide her financial reward for her role as a human source

Other relevant matters

35. To the best of my recollection I've not had personal contact with Ms Gobbo. I knew of her from my time when I was a prosecutor at Melbourne Prosecutions Office and when I appeared in the Melbourne Magistrates Court. I do not recall ever appearing against Ms Gobbo.
36. I have received training during my police service at the Recruit Training, Retention Training, Prosecutor's Course, Detective Training School, Sergeant Course and Discipline Investigator's Course. All these courses deal with or touch on aspects of the rights of disclosure to an accused person or their legal representatives, prosecution agencies or the courts, right to silence of an accused person, the right of an accused person to a legal practitioner, legal professional privilege, public interest immunity and professional and ethical decision-making.
37. Other than the matters recorded above I am unable to think of any other matters that may assist the Commission



Christopher Gawne
Dated 7 November 2019