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Your reference

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1 May 2020

By email: howard.rapke@rcmpi.vic.gov.au
Howard Rapke
Solicitors Assisting the Royal Commission
into the Management of Police Informants
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Melbourne VIC 3001

Contact
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Dear Howard

Royal Commission into the Management of Police Informants

We refer to your email dated 27 April 2020 with the subject '██████████ – Urgent', and our response dated 28 April 2020. We also refer to your email sent on 29 April 2020 requesting statements.

This letter provides the update foreshadowed in our letter dated 28 April and makes some minor corrections to that letter. The same headings are used below for ease of reference.

1 Request made by a solicitor acting for Mr Cvetanovski

Discovery of the relevant materials - correction

Our 28 April 2020 letter identified that between 15 and 19 April 2020 enquiries revealed 43 call or SMS message summaries referring to the name 'Nic', 'Nicola' or 'Nick'.

This should read 37 summaries.

How the TI material is stored

We confirm that a member of the SPU is progressing a statement to be provided to the Royal Commission which will address the storage of TI material.

Victoria Police's approach to responding to NTPs 002 and 311

A member of Taskforce Landow is also progressing a statement which will address Victoria Police's approach to NTPs 002 and 311, as requested in your email of 29 April 2020.

2 Explanation as to location and production

We confirm that statements from Jim O'Brien, Dale Flynn and Paul Rowe are also being progressed, as requested in your 27 April 2020 email. Tim Johns and Russell Fletcher are also progressing statements, as requested in your 29 April 2020 email.

We anticipate that there may be other Victoria Police members who have relevant information in connection with the Other Warrants (item 4, below) and will prepare statements from them in due course. It may not be possible to provide these statements before the hearing on 7 May 2020.

1 May 2020
Howard Rapke
**Royal Commission into the Management of Police
Informants**



3 Warrant

Call summaries concerning TI material under warrants D02675-00 and D02704-00 were produced to the Commission on Monday, 27 April 2020. Audio of TI material under warrant D02675-00 was also produced on Monday and further material will be produced today (calls that may be about Ms Gobbo). Audio of TI material under warrant D02704-00 was produced to the Commission on Thursday, 30 April 2020.

4 Other warrants

We are instructed that there are no identified SPU holdings in relation to Akl Hammoud, that is, as a target, or, in other warrants.

Victoria Police has prioritised a review of any TI materials located that were obtained under the TI warrants produced in response to NTP311. The collation of relevant call summaries is underway and will be produced as soon as possible.

As identified in our correspondence of 28 April, the SPU is responsible for management of TI materials obtained under warrant. Victoria Police is continuing to make enquiries about the existence of any LD materials obtained under other warrants and will provide an update about any existing materials in due course.

As all of these enquiries are continuing as a matter of urgency, we will provide a further update on Tuesday 5 May 2020.

5 Officers aware of the warrant(s)

We refer to our response to item 2 above.

6 Explanation regarding warrant

We refer to our comments above about the preparation of statements under items 1, 2 and 5.

Who had, or was likely to have had, access to that material - correction

We are instructed that this will also include SPU Evidence Preparation Section staff.

As to the other questions raised, we refer to our explanation set out under items 2 and 5 above, noting that we are carrying out further work to confirm these matters.

7 Disclosure

We refer to our explanation set out under items 2 and 5 above, noting that we are carrying out further work to confirm these matters.

8 Other Matters

Finally, your email sent 29 April 2020 requested production of any Landow Contact Reports relating to inquiries about the production of TI materials in response to item 7(e) (or LD materials in response to item 7(f) of NTP 002).

We are instructed that all Contact Reports have been previously produced on a weekly basis by Landow in response to NTP 105. There are no further Landow Contact Reports to produce. Inquiries to identify any other documents that are relevant to this request are underway.

If you have any queries, please contact us.

1 May 2020
Howard Rapke
**Royal Commission into the Management of Police
Informants**



Yours faithfully
Corrs Chambers Westgarth

A handwritten signature in blue ink, appearing to read 'abigail'.

Abigail Gill
Partner

Non-PDF and Non-Image File

Document ID: VPL.0005.0291.0008

Page Number: 4

Page Label: Text

File Name: VPL.0005.0291.0008.txt