

TONY HARGREAVES & PARTNERS LAWYERS

1 March 2010

Our Ref: TH:JE:90037

Mr Greg Elms
Victorian Government Solicitor's Office

BY EMAIL: [REDACTED]

Dear Mr Elms,

Re: Paul Dale

We are still considering the documents that have been provided by your office. Thank you for your assistance to date.

It seems to me that there must be more documents between the Victoria Police and the Australian Taxation Office relevant to the "arrangement" whereby Victoria Police agreed to pay the tax bill of George Williams in the sum of \$750,000.00. No documents have been provided in relation to the negotiations that took place.

I also note that in the most recent notes provided:-

- There have been substantial deletions to the transcript of the examination of Nicola Gobbo conducted on 19 July 2007 and 17 August 2007. What is the basis of those deletions?
- The most recent set of notes of Mr Davey refers to a conversation he conducted with Ms Gobbo on 8 February 2010 in which she refers to a series of letters that she has forwarded to your office. Are you prepared to release a copy, or do you wish me to issue a further Witness Summon for those documents?

I confirm that the credit of Mr Williams and Ms Gobbo are central to the defence case, and that the legitimate forensic purpose is obvious. We seek a copy of every document that exists in relation to any dealings between Ms Gobbo, Mr Williams and Victoria Police in relation to the investigation of Paul Dale, or any discussion or negotiation that has taken place that has played a role in either of them agreeing to give evidence for the Prosecution.

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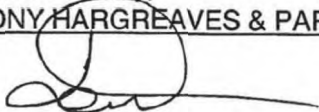
Tony Hargreaves & Partners ABN 70 102 998 740

Mr Greg Elms
Victorian Government Solicitor's Office

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I await your response.

Yours faithfully,
TONY HARGREAVES & PARTNERS



per: A. HARGREAVES

email:

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