

Royal Commission into the Management of Police Informants

Statement of ^{Black-O}

STATES:

- 136. I am making this second statement to complete my response to a request from the Royal Commission into the Management of Police Informants. These statements are produced in response to a Notice to Produce.
- 137. In accordance with the Royal Commission (Exhibit 81B), I am making this statement under my approved pseudonym. As circumstances are outlined in this statement, I have also substituted the identity of members or persons with their approved pseudonyms.
- 138. For the benefit of transcript, referencing and accuracy, I have continued with the paragraph numbering from my first statement.
- 139. I have again used the terms; informer, criminal informant, human source, community source and source in this statement which are corresponding terms that describe an individual who discreetly provides information to Police.
- 140. This response refers to registered human source 21803838, abbreviated to "HS3838", which was later strategically changed to reference number 11792958 for security purposes. For my responses, I will continue to refer to the human source as HS3838.
- 141. My intent in supplying this second statement to the Royal Commission is not to repeat matters that I have already addressed in my first statement. However, I will expand on some of my responses in order to refute allegations levied against the Source Development Unit (SDU).



INVESTIGATION PRINCIPLES

142. Every member of Victoria Police who specialises in criminal investigation is known as a Detective. To become a Detective every member must successfully undertake Detective Training School (DTS). DTS has a definition of what an investigation is and this definition is taught to every Detective:

“An investigation is a search for the truth in the interests of justice and in accordance with the law.”

143. Detectives are also mindful of the common law obligations to afford an individual procedural fairness and natural justice when decisions are made regarding an individual's rights, interests or expectations.

144. Procedural fairness usually involves two requirements:

- a) the fair hearing rule;
- b) the rule against bias.

The hearing rule requires a decision-maker to inform a person of the case against them and provide them with an opportunity to be heard.¹

145. On Tuesday 26th March, 2019, ^{Fox-O} and I, with the approval of Assistant Commissioner Neil PATERSON (A/C PATERSON), were afforded the opportunity to commence gaining access to the SDU material. This was initially isolated to the SDU material contained on the Operation Loricated database.

146. It was not long into our investigation that it became quite apparent that Victoria Police had been conducting assorted secret inquiries into the SDU management of HS3838 over many years.

147. During the first month of our access to the Loricated database, ^{Fox-O} and I quickly identified the enormity of the secret inquiries which included:

- a) 2012 – Covert Services Review;
- b) 2012 – COMRIE Report;

¹ Plaintiff S157/2002 v Commonwealth (2003) 211 CLR 476, 489 (Gleeson CJ).

- c) 2013 – Operation LORICATED;
- d) Op. LORICATED Steering Committee (Victoria Police Command);
- e) 2014 – Operation BENDIGO;
- f) Op. BENDIGO Steering Committee (Victoria Police Command).

148. These inquiries ultimately led to the IBAC hearings conducted by The Honourable Murray KELLAM. The final IBAC Report into the handling of HS3838 was published on 6th February 2015. The IBAC Report referenced a great deal of material from the COMRIE Report.

COMRIE REPORT (2012) – My Overview

149. It has taken Victoria Police 7 years to provide me with access to the COMRIE Report. In fact to this day, no member of the SDU has ever been consulted or given any opportunity to contribute to or inform to the draft or respond to the COMRIE Report. It has taken this Royal Commission for the COMRIE Report to be provided to the SDU members.

150. Not only is the COMRIE Report inaccurate in many aspects, it is littered with inflammatory language and subjective opinions. Mr. COMRIE's approach to writing his report is fundamentally flawed as he:

- a) failed to engage with any SDU member;
- b) failed to interview SDU members who authored much of the material he references;
- c) failed to locate many of the primary SDU documents;
- d) made assumptions on flawed or incomplete material;
- e) applied 2012 human source management policies, drawn from Victoria Police and the United Kingdom, to the management of HS3838 under the SDU during 2005 to 2009;
- f) failed to recognise the cultural change towards human source management being driven by the SDU across Victoria Police;
- g) failed to identify best practice in human source management being developed by the SDU regarding policy, training and tradecraft. This

work did not just apply to Victoria Police, but for other Law Enforcement Agencies across Australasia;

- h) failed to conduct a professional and unbiased investigation by not affording natural justice or procedural fairness to any SDU member;
- i) failed to identify that HS3838 had previously been registered by Victoria Police on two previous occasions:
 - i. Law Student – 1995 by Sgt ASHTON;
 - ii. Lawyer – 1999 by Detective Senior Constable POPE.

151. The inaccuracies contained within the COMRIE Report appear to have gone unrecognised and the report has been accepted in totality as being an accurate record of what happened.

152. Well, what did happen? The answer is no better demonstrated when one examines the three ways a Detective is taught to prove 'intent' in a criminal matter. Intent is proved through:

- a) Admissions;
- b) Similar Facts;
- c) Overt Acts.

153. Apparently, Victoria Police Command accepted the COMRIE Report. It was accepted in totality and then designated as a 'highly protected' document. This security classification automatically restricted the circulation of the report and attached automatic credibility to the COMRIE Report.

154. However, the chain of events leading to the 2012 publication of the COMRIE Report provide a contrasting hypothesis that these events prove the intent that the COMRIE Report was commissioned to do nothing less than to close the SDU. The failure to examine original documents or interview the SDU members, not only undermined our rights to procedural fairness and natural justice, but misrepresented many of the complex issues surrounding the management of HS3838 from 2005 to 2009. Mr. COMRIE failed to conduct a professional and thorough investigation by these omissions, deliberate or not

COMRIE REPORT (2012) – My Analysis**i. OVERVIEW HS REGISTRATION PROCESS** (excerpt Page 7)

“There are a number of processes involved in order to register and then utilise a human source. An application to register a human source drives a requirement for those applying (the handlers) to undertake a risk assessment process within [REDACTED]. Handlers are also required to compile what is known as an Acknowledgement of Responsibility (AOR). . . . Having completed risk assessments and AORs, handlers are to forward these to the nominated controller for comment and endorsement. The controller in turn forwards these to the Local Source Registrar for comment and endorsement and on-forwarding to the HSMU. Once these steps have been completed and subject to approval at each level, registration of the human source will be formally approved.”

155. Mr. COMRIE's assertion that a human source would not be registered until the Acknowledgement of Responsibilities (AOR) and risk assessment were completed is not correct.
156. The COMRIE Report is about a case review of HS3838. In accordance with proper process and accuracy, I need to point out that when HS3838 was registered by the SDU (DSU), Victoria Police were transitioning from the 2004 Chief Commissioner Instruction (CCI) to the 2005 CCI:
- a. Chief Commissioner Instruction 06/04 (Issued: 22 September 2004);
 - b. Chief Commissioner Instruction 03/05 (Issued: 20 September 2005).
157. On Wednesday 7th September 2005, Detective Inspector Bob HILL of the Major Drug Investigation Division (MDID) requested the SDU conduct an assessment of Nicola GOBBO with the intention of the SDU registering her as a human source and taking control of her management.
158. On Friday 16th September 2005, the SDU completed the registration for Nicola GOBBO. Detective Inspector Doug COWLISHAW endorsed the new registration and delivered it to the Central Source Registrar (CSR) - Superintendent Ian THOMAS (Sup't THOMAS) of the State Intelligence [REDACTED]

Division. Sup't THOMAS approved the registration of Nicola GOBBO and she was allocated a human source registration number of 21803838 (HS3838) by the Human Source Management Unit (HSMU).

159. Within a short period of time, Superintendent Mark PORTER (Sup't PORTER) took over the role of the CSR for Victoria Police.
160. Given the high-risk nature of the human sources under the management of the SDU, it was very common that a registration was approved by the CSR and allocated a human source registration number, well before the delivery of the AOR or a completed risk assessment. Part of the SDU tradecraft was to protect the identity of the human source. Referencing an individual by an allocated registered number afforded a consistent and auditable process to record the individual. This protected the individual from compromise and afforded the SDU sufficient time to complete the assessment process. The assessment determined the viability of the individual, their motivation to assist Police and the identification of risk.
161. In the case of HS3838, the SDU undertook five face to face meetings in order to complete the assessment.
162. On Friday 28th October 2005, ^{Sandy White-O} discussed themes from the AOR with HS3838 in one of the assessment meetings. [REDACTED] that entire meeting was covertly audio recorded.
163. On Tuesday 15th November 2005, ^{Peter Smith-O} completed a 7 page risk assessment on HS3838. At that time ^{Sandy White-U} was on leave and I was performing that role at the SDU until his return. On Wednesday 23rd November 2005, I reviewed and completed the risk assessment and hand delivered the completed document to Detective Acting Superintendent Doug COWLISHAW.
164. Mr. COMRIE states that Handlers are required to complete a risk assessment within [REDACTED] before registration is formally approved. This is not correct. In fact CCI 06/04 and CCI 03/05 are both silent on any specific time. [REDACTED]

165. The first mention of any specific time obligation is not until Victoria Police introduced a further change to human source policy on 7th May 2007. It wasn't until then that Victoria Police outlined human source management policy within the Victoria Police Manual (VPM). VPM 111-3 was the first time the policy dictated a specific [REDACTED] time period for the submission of the risk assessment.
166. This is another example where the accuracy of the COMRIE Report fails. On Friday 16th September 2005, when Victoria Police accepted the registration of HS3838, there was no policy requirement to undertake a risk assessment within [REDACTED].
167. Victoria Police are in possession of all human source policy documents and the 2005 risk assessment for HS3838.

ii. OVERVIEW HS REGISTRATION PROCESS (excerpt Page 7 to 8)

"The entire human source file is constructed and maintained on an IT application called Interpose, which is utilised by Victoria Police for investigation case management and intelligence processes.

Advice provided by Interpose management indicates that Interpose was not used at any time for the actual management of 3838 and that the 3838 file was maintained on stand-alone electronic holdings at the SDU. The 3838 file was fully migrated to Interpose in February 2009. Interpose management has also provided assurance that this migration process has not affected the validity of submission and validation dates reflected on the various records and allied correspondence in the 3838 file now on Interpose.

I have been advised that no hard-copy file was maintained for 3838 and that the entire electronic file has now been migrated to Interpose. Accordingly; in the absence of any hard copy file, the full Interpose electronic file for 3838 has been relied upon as the primary data source for informing this review."

168. Mr. COMRIE's assertion that the SDU managed HS3838 on a SDU stand-alone computer is correct. In fact HS3838 was never under the management [REDACTED]

of the SDU when the SDU commenced using the Interpose module for human source management.

169. Evidence held within SDU documents clearly indicate that during a SDU office meeting on Monday 3rd November 2008, the subject of the Interpose human source management module was discussed. This meeting was attended by Detective Inspector Andrew GLOW (D/I GLOW), ^{Sandy White-O} myself and other members of the SDU. With the approval of our Officer In Charge, D/I GLOW, it was decided that the SDU would commence using the Interpose module after the delivery of a ^{PII} [REDACTED] Human Source Management Course. This training course was schedule to be completed on Friday 5th December 2008.
170. Additional evidence held within SDU documents clearly indicate that during a Divisional management meeting on Wednesday 7th January 2009, the subject of the Interpose human source management module was again discussed. This meeting was held at our Divisional Office on the 6th Floor of the St. Kilda Road Police Complex. The meeting was jointly Chaired by Superintendent Tony BIGGIN (Sup't BIGGIN) and Sup't PORTER (CSR). The direction from Sup't PORTER was that the SDU would commence using the Interpose module from 1st February, 2009.
171. In any event, the SDU deactivated HS3838 on Monday 12th January 2009.
172. The SDU had no role or input into the migration of HS3838 records onto Interpose. In fact during the deactivation period of HS3838, other than Sup't BIGGIN, D/I GLOW and the SDU members, no person had access to the SDU Office, let alone the SDU stand-alone encrypted computer. It is my informed opinion the only way HS3838 records could have been migrated over to Interpose was to rely on the files on hand at HSMU. For example, the copies of the critical covert audio recordings of the face to face meetings with HS3838 were indeed filed at HSMU, but impossible to play as they were encrypted. Without the SDU password and specialist software, the recordings were impossible to copy or play.


This document has been redacted for Public Interest Immunity claims made by Victoria Police. These claims are not yet resolved.

173. The second concern as to the accuracy of the created Interpose record was the claim by Mr. COMRIE that there was no hard-copy file maintained for HS3838, therefore assuming that the entire electronic file had been migrated to Interpose. This assumption is wrong on three significant points:
- a) SDU did maintain a limited hard copy file on their human sources. This was usually created in the first instance from the initial Request For Assistance (RFA), through to a Handler's Work Sheet and assorted material received by / from or about the relevant human source. Such records were securely stored at SDU and readily available if appropriately requested. It is apparent that no such request was ever made of the SDU;
 - b) All SDU members maintained a manual diary and later, an electronic diary. In 2012, the electronic diaries were securely contained on the SDU stand-alone encrypted computer and available if appropriately requested. Yet again, it is apparent that no such request was ever made of the SDU for this material;
 - c) HSMU also maintained a limited hard copy file on most human sources. Having performed duties at the HSMU, I have first-hand knowledge of this process. Assorted safes at HSMU contain any hard copy records that relate to each individual human source for all of Victoria Police, past and present. In older human source files this may have included original registration forms through to copies of AOR through to matters like 'Letters of Assistance' (LOA) and receipts from reward payments. With the appropriate approval, these HSMU records were readily available if requested. I have previously discussed the HSMU hard copy records on file in my first statement at paragraph 39. It is apparent that no such request was ever made of HSMU.
174. Victoria Police are in possession of both sets of HS3838 records and I have previously requested that a copy is made available to the Royal Commission, after being subjected to Public Interest Immunity (PII) assessment.

175. A significant failing of the COMRIE Report is making the assumption that: *"in the absence of any hard copy file, the full Interpose electronic file for 3838 has been relied upon as the primary data source for informing this review."*
176. Given the serious allegations levied at the SDU by Mr. COMRIE, primarily that the SDU breached Legal Professional Privilege (LPP), you would have expected that a professional investigator would have:
- a) relied upon primary documents;
 - b) interviewed key stakeholders;
 - c) listened to all of the audio recordings between the SDU and HS3838.
177. It is quite apparent that no such threshold was ever reached and therefore fundamentally flaws the reliability of the COMRIE Report.

iii. THE INTERPOSE SYSTEM (excerpt Page 8)

"Interpose is an operational computer system that encompasses the actual application and a database. Interpose was introduced to Victoria Police in pilot form in 2005. The pilot was deemed successful and a production version was introduced in 2006. Victoria Police utilised this for management of the Melbourne Commonwealth Games."

178. Mr. COMRIE's assertion that Interpose was introduced in pilot form in 2005 is not correct. In fact I was asked to form part of the pilot in 2002 by one of the Interpose Project Managers, Detective Senior Sergeant Peter HARRINGTON. I was a Detective attached to the Crime Department and our team tested Interpose. We identified 23 critical faults with Interpose and worked with the Project Team over many months to resolve the issues. Interpose was so fundamentally flawed and unreliable, that it could not even perform a spelling check.
179. On 8th July 2002, the Interpose Project Team assisted the Homicide Squad during the investigation into a triple murder at the Salt Nightclub in South Yarra. There were only two Interpose modules developed at that time; 

investigation management and intelligence management. Both were used during that murder investigation and supported by the Interpose Pilot Team. Similar poor performance issues were identified by that particular Homicide Squad team during their use of Interpose.

180. As a matter of record, the Commonwealth Games commenced in Melbourne on Wednesday 15th March 2006.
181. It is quite apparent that Mr. COMRIE has either not interviewed the correct stakeholders or has been provided with flawed information regarding the Interpose pilot.

iv. MANAGERIAL RECORDS (excerpt Page 9)

“Separate to the ICR process another electronic document is compiled on Interpose which is called the Source Management Log (SML). The SML synthesises key issues from the ICRs and reflects management considerations and decisions related to the source. The SML also records considerations of a monthly source review process. This process is intended to both revisit strategies in place and to set future strategies for utilisation of the source.”

182. Mr. COMRIE is clearly of the belief that the Source Management Log (SML) is part of the Interpose human source management module. In fact Mr. COMRIE speaks further at great length of the detail and descriptive columns within the SML. Unfortunately, Mr. COMRIE fails to identify that the SML is not part of Interpose or Victoria Police human source policy.
183. The SML is a Microsoft 'Word' based document that the SDU created and utilised from about June 2005. The SML is a management tool that records all human source contacts and management decisions. The value of the SML was quickly realised and became a SDU management tool for SDU human sources. The SML has been described as a 'living' risk assessment. There was no other document available anywhere in Victoria Police that could

provide the reader with a précis of the management, risk and administration decisions relating to each of the SDU high-risk human sources.

184. Whilst the praise is accepted from Mr. COMRIE, it is unfortunate that Mr. COMRIE failed to identify or understand the origin of the document.

v. FULL INTERPOSE RECORD (excerpt Page 10)

"The file does not hold any corroborative media (such as audio recordings) that may assist in file audit, understanding and evaluation. Advice on file suggests that not all 3838 audio recordings can be located. Inquiries with the Interpose Business Support Unit suggests that the uploading of digital audio, video and photographs to Interpose is discouraged due to the massive increase in storage capacity potentially involved. I consider that ad-hoc arrangements for the storage of critical human source related material in a variety of places presents unacceptable risk, particularly in the case of high-risk human sources."

185. Victoria Police expended a quantity of money and technical expertise to build an encrypted standalone computer for the exclusive use of the SDU to hold highly sensitive human source material. This machine was commonly referred to as the SDU 'Z' Drive. It was a computer that was never connected to a network and operated [REDACTED] software, which encrypted the hard drives within the computer. It also operated with other security measures which ensured the integrity of the machine and all of the information contained on it. For operational reasons, I will not expand on the technical aspects of this computer.
186. On Monday 22nd November 2004, the Dedicated Source Unit (DSU) commenced the human source pilot. From December 2004, the DSU commenced to generate [REDACTED] from all 'face to face' meetings with human sources under the management of the DSU. These [REDACTED] were downloaded onto the Z Drive.
187. On Tuesday 31st May 2005, in response to space capacity on the Z Drive, enhancements were made to the process. I issued office instructions for the [REDACTED]

management of [REDACTED] [REDACTED]
 [REDACTED] and named with the human source number,
 followed by the [REDACTED]. Each month two copies of the
 [REDACTED]. Each [REDACTED]
 and therefore secure from any unauthorised use of the [REDACTED]. One copy
 remained on site within a security rated safe. The second copy was lodged
 each month at the HSMU Office located at the St. Kilda Road Police Complex.

188. On Thursday 9th June 2005, in support of the new management of the [REDACTED]
 [REDACTED] I created a [REDACTED]. The bound
 book was commonly referred to as the SDU "Code" Book. This register:

- a) logged the creation of the [REDACTED];
- b) tracked the movement of the [REDACTED];
- c) listed each [REDACTED] for that particular month;
- d) tracked the SDU members involved in the creation of the [REDACTED];
- e) logged the password relevant at the time when the [REDACTED] was created;
- f) tracked any technical issue with any of [REDACTED].

189. This system was highly secure and the Code Book provided a comprehensive
 audit trail of every [REDACTED] ever made by the DSU / SDU. Until the
 closure of the SDU in March 2013, an entire set of the [REDACTED] were
 housed and easily accessible at both the SDU and HSMU offices. The SDU
 maintained the standalone computer (Z Drive) and the Code Book, so
 [REDACTED] would have been as simple as putting
 the [REDACTED] back into the standalone computer and clicking on [REDACTED].

190. In about April 2019, Victoria Police located the SDU standalone computer and
 encrypted hard drives, but was unable to locate the SDU Code Book. On
 Friday 12th July 2019, [REDACTED] of HSMU located the
 Code Book and permitted ^{Fox-O} [REDACTED] and myself to view and validate the
 Code Book. The bound black and red coloured book was intact in its entirety.
 I have already requested that copies are made available to the Royal
 Commission, subject to PII assessment.

191. For someone charged with the responsibility to review a human source file and to do so without [REDACTED] to a single [REDACTED] is nothing short of gross negligence. In fact, in all of my experience as an investigator and managing high-risk human sources, the primary review material you would always seek are the [REDACTED]. Failure to seek, let alone [REDACTED] such a valuable piece of primary evidence again suggests the real intent of the COMRIE Report. It was never a search for the truth, but a report to close down a highly successful unit. For Mr. COMRIE to have noted that he was not supplied with any [REDACTED] yet continue with his review thus relying on second and third hand information, is preposterous. How can serious allegations be raised of breaching LPP, when there is evidence in existence that refutes such allegations. The only task required to access the [REDACTED] was to simply ask. It was, and still remains, that simple. The negligence of the COMRIE Report and the criticism of the SDU members is almost worthy of litigation.

vi. FULL INTERPOSE RECORD (excerpt Page 10 and 11)

"It is indicated that this 3838 file has already been subjected to a number of audits. Notwithstanding this, the 3838 file still appears to be missing certain records. The file remains in dire need of reconfiguration in order for it to make sense and present as a sequential and accountable record of the management of this human source. The disjointed state of the 3838 Interpose file served to complicate and protract the review process. It was a most cumbersome and time consuming exercise to comparatively analyse differing sets of electronic data that ostensibly deal with the same issues when they are not sequentially arranged or linked in any meaningful way."

192. On 15th June 2006, Superintendent Lucinda NOLAN (Sup't NOLAN) of the State Intelligence Division conducted an independent full audit of all human source holdings at the SDU, on behalf of Commander MOLONEY from Intelligence and Covert Support. The parameters of the audit included:
- a) examination of the human source file (previously known as the informer management file - IMF);
 - b) authorisation for registration by the Local Informer Register (LIR) [REDACTED]

- c) Informer registration application is within the IMF;
- d) risk assessment was completed at the time of registration;
- e) further risk assessments have been completed, when necessary;
- f) evidence on the Activity Log to indicate that the Handler has briefed the informer as to responsibilities and expectations (AOR);
- g) Information Reports (IR) are attached to the IMF;
- h) Contact Reports are attached to the IMF;
- i) Controller's Monthly Review;
- j) Handler has submitted quarterly reports detailing all contacts with informer and assessment of continuance of registration;
- k) Evidence of quarterly inspection conducted by LIR;
- l) Identity of the informer is not recorded anywhere within the IMF.

193. Victoria Police Command had already designated that HS3838 be subject to the same audit, but conducted by a different independent Officer. Sup't BIGGIN was allocated the task to audit the human source file of HS3838.

194. The four page report into the 2006 audit by Sup't NOLAN is in the possession of Victoria Police.

195. However the audit report from Sup't NOLAN stated:

"The audit revealed that the current management of human sources at the Source Development Unit is being conducted at a high level – in all three audit areas of procedural, ethical and value for money. Risk management of issues is exceptional, and documentation professional and concise. However, the appropriate management of files is clearly affected by the lack of administrative assistance. This lack of administrative assistance is impacting on the timeliness of report and form submission both at the local level as well as at the Informer Management Unit (see attached audit of received files by IMU, folios 18 to 25 refer). At this stage, the unit is managing, however if this is allowed to continue, then morale and work pressures may become evident. Given the high stress and risk nature of the unit, priority should be given to providing administrative support as soon as practicable."

196. On 28th April 2006, Sup't BIGGIN reported upon his audit of the human source file relating to HS3838. Victoria Police is in possession of that 3 page report.

197. Sup't BIGGIN made the following comments regarding his audit of the SDU (DSU) management of HS3838 and the human source management file:

- a) *"I have also had the opportunity to observe ^{Sandy White-O} & _{Peter Smith-O} interact with the source in an operational setting over the last weekend. I am aware that the members maintain extensive diary notes as well as documented contact / information reports."*
- b) *"Handlers are required to submit information/contact reports regarding the relationship, including a quarterly assessment as to status (active, inactive, unsuitable). It is clear these reports are being submitted by the handlers. Since registration on 16 September 2005, there have been 147 recorded contacts with the source. The last contact report perused was 021 which dated from 03/03/06 to 09/03/06; there are a number subsequent to this that require checking before filing."*
- c) *"The status of the source has been reviewed on 30/10/05, 28/11/05, 09/01/06, 14/02/06, & 27/03/06 & written risk assessments were updated."*
- d) *"It is clear within the file that the handlers & controller have been mindful of the risks associated with this human source. These considerations are regularly considered in documentation perused & the risk assessment documentation has been updated as required."*
- e) *"It is clear the risk associated with the source continues to remain high, but the risk is being managed at an appropriate level by the right people with the necessary training & attributes."*

f) *"The relationship between the handlers & the source is a full time role, it is clear that the handlers have to be rotated to keep them fresh & to maintain objectivity. This is occurring at regular intervals."*

g) *"It is clear the source can only be managed by the DSU. If the DSU were not managing this source, then in my view, the risks are too high for non-trained police to perform."*

198. These two physical audits were based on the files held and managed by the SDU. All human sources under the management of the SDU were designated as high-risk and were all subject of the same protocols. All SDU human sources were managed in accordance with the human source policy at the relevant time and subject to independent oversight by the HSMU. By 2006 when these two full independent audits took place, the SDU had evolved a robust management practice to ensure compliance and demonstrated reliable governance.

199. Part of that process was the secure record keeping. I have previously outlined some of the SDU processes in my first statement and expanded further in this second statement regarding the [REDACTED] of the SDU human sources. A very similar approach took place with the management of documents and electronic diaries. The logical order and the standardised SDU file naming conventions clearly assisted Sup't NOLAN and Sup't BIGGIN to conduct their full audits.

200. Examples of some of the SDU document naming conventions included:

a) **Contact Reports:**

'Source Number-ICR Number'

eg. 4328730-ICR001 = (ICR sequentially numbered)

b) **Information Reports:**

'IR Number-Date'

eg. SID211-120706

c) **Affidavit Certification for SPU:**

'Source Number-Certification-Date'

eg. 4328730-Certification-120706

d) Risk Assessment:

'Source Number-Risk Assessment-Date'
eg. 4328730-Risk Assessment-120706

e) Registration or Deactivation:

'Source Number-Registration or Deactivation'
eg. 4328730-Registration

201. All SDU databases had a search function for the discovery of keys words, documents and human source registered numbers. The strict protocols regarding the SDU document naming conventions ensured all relevant material was easily discoverable and accountable. Documents and files were easily discoverable through either a human source number or a relevant date. Each SDU human source had their own individual document folders; electronic file and a limited hard copy file.
202. Furthermore, in support of the governance processes, all electronic SDU material was rigorously backed up to secondary encrypted devices and stored at off-site secure locations. This continued to be the case until the SDU was closed in March 2013.
203. I am somewhat perplexed how Mr. COMRIE could write in his report that; *"the file remains in dire need of reconfiguration in order for it to make sense and present as a sequential and accountable record of the management of this human source."*
204. Given that no SDU members were ever engaged by Victoria Police Command or Mr. COMRIE, either at the commissioning of the report or at the time of its publication, I can only assume by the date of the published COMRIE Report (30th July 2012) that the SDU was still operational. I fail to understand that if Mr. COMRIE was hindered by the material Victoria Police Command supplied him with, then why not seek a copy of the primary documents. The entire SDU management file of HS3838 was encrypted, collated, managed, audited and housed at the SDU. This included every audio file of every face to face meeting between the SDU and HS3838. I fail to think of what other material an investigator would need to conduct a search for the truth in the interests of justice and produce an evidence based case review into HS3838.

205. If Victoria Police Command suspected some form of corruption or other illegal activity was being committed at one of the highest risk units within Victoria Police, then a professional investigator could have sourced a large portion of copies of the SDU material from the HSMU. This would have at least captured all of the audio recordings, Contact Reports and other human source related documents. The avoidance to engage with any of the SDU members is inexplicable.
206. However, I do accept that HSMU may not have had all of the required HS3838 material as supplied by the SDU. Despite HSMU having audit and compliance responsibilities for Victoria Police as outlined in human source policy, HSMU suffered from a constant change of staff. On occasions, this lack of continuity caused HSMU to misplace some human source related documents.
207. Towards the end of 2006 / early 2007, the SDU implemented a 'receipt' system that soon became a standing SDU requirement with external stakeholders. When copies of [REDACTED] contact reports or like documents were delivered, mostly to HSMU, a receipt was created containing a brief summary of the material delivered with corresponding signatures. When external stakeholders later claimed they were not supplied with a particular item, the SDU receipt system provided the SDU with a name of the member who received the material.
208. The SDU member would then file the completed receipt at the SDU Office in an appropriately labelled folder. Victoria Police will have those "SDU Receipt Folders" and I have already requested that copies are made available to the Royal Commission, subject to PII assessment.
209. As previously stated, HS3838 was deactivated on Monday 12th January 2009. During the time HS3838 was under the management of the SDU, a total of 53 covert audio recordings were created, which captured over 185 hours of conversation with HS3838. Over 3 weeks later, on Sunday 1st February 2009, the SDU commenced using the Interpose human source module. The SDU

had no part or input into the creation of the alleged Interpose record of HS3838. In fact, the first occasion that the SDU knew of such an Interpose record was upon being given access to the COMRIE Report in 2019 as part of this Royal Commission. It seems this Interpose record was created by someone who I suspect did not have access to the SDU primary documents and certainly not the Z Drive.

210. This may explain the commentary from Mr. COMRIE commencing at the bottom of Page 10, regarding the state and content of the human source file he was provided to review; *"The disjointed state of the 3838 Interpose file served to complicate and protract the review process. It was a most cumbersome and time consuming exercise to comparatively analyse differing sets of electronic data that ostensibly deal with the same issues when they are not sequentially arranged or linked in any meaningful way."*

vii. FULL INTERPOSE RECORD (excerpt Page 11 and 12)

"• A number of ICRs are not dated at all to indicate when they were submitted.

• Many ICRs are not validated / adopted at all by the controller.

• The file is not sequentially presented. Some examples of this include:

o (ICR Examples outlined)

• Despite indications that a number of file audits have been completed, it is apparent that records are still missing from this file albeit that there are no gaps in ICR numbering to reflect this. For example, there are no ICRs to account for the period from 16/09/06 until 27/09/06, although it is readily apparent from review of other ICRs that contact occurred during this period. It is reasonable to conclude that ICRs to account for contact within this period have not been submitted."

211. In response to that criticism, I decided to examine the claims made by Mr. COMRIE for the period 16-09-2006 to 27-09-2006. I commenced with the Operation LORICATED database.

212. Operation LORICATED ICR045 – Period 09-09-2006 to 15-09-2006

Handler: ^{Green-O}

Controller: ^{Sandy White-O}

This document has been redacted for Public Interest Immunity claims made by Victoria Police. These claims are not yet resolved.

New 07/05 VP1092A

INFORMER CONTACT REPORT *(For DSU Use Only)*

TO BE COMPLETED BY HANDLER IN CONSULTATION WITH CONTROLLER

Informer Registration No: 21803838

ICR No: 045

ICR Date Range From: 9/9/2006 To: 15/09/06

Handler's Name: [REDACTED] Rank & No: [REDACTED]

Any money / benefit given to Source? If 'Yes' specify [REDACTED]

DATE	TIME	DETAIL OF CONTACT AND RELEVANT INFORMATION	REF
Saturday 9/9/06	1110	Called by source – called back Horty – called from a kids party Has the wedding tonight nothing mentioned re source going - cancelled meeting does not want to risk driving	

New 07/05 VP1092A

DATE	TIME	DETAIL OF CONTACT AND RELEVANT INFORMATION	REF

Handler's Signature: [REDACTED] Date: 3/17

Controller's Signature: [REDACTED] Date: 12/02/07

213. Operation LORICATED ICR046 – Period 16-09-2006 to 27-09-2006.

Handler: Detective Peter SMITH Controller: Detective Sandy WHITE:

Updated 07/06 VP1092A

INFORMER CONTACT REPORT *(For SDU Use Only)*

TO BE COMPLETED BY HANDLER IN CONSULTATION WITH CONTROLLER

Informer Registration No: 21803838

ICR No: 046

ICR Date Range From: 15/09/06 To: 27/09/06 (Maximum 10 Day Period)

Handler's Name: [REDACTED] Rank & No: [REDACTED]

Controller Advised Prior To Contact: Yes No

Has the informer been tasked? Yes (Detail Below) No

Any money / benefit given to Source? If 'Yes' specify No

DATE	TIME	DETAIL OF CONTACT, RELEVANT INFORMATION & TASKING
15/09/06	1402	Briefed by <u>[REDACTED]</u> 3838
	1901	Obs 3838 ? & advise <u>[REDACTED]</u>
16/09/06	1154	Rec call 3838 & call back 1. 3838 read Transcripts two times and has not redacted 2. Also ?

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1518	Rec call 3838 & call back
218.	Advise re FLYNN speaking to the OPP & the enemy comment
219.	3838 wants to explain
220.	Handler cut 3838 off
221.	3838 annoyed to see FLYNN at court this Friday re [REDACTED]
222.	Got 12 years
223.	3838 will now be ? of anger (3838 predicts)
NOTE:	[REDACTED] advised
Handler's Signature:	[REDACTED] Date: [REDACTED]
Controller's Signature:	[REDACTED] Date: [REDACTED]

214. My attention was immediately drawn to the unusual format of Operation LORICATED ICR046 purported to have been completed by ^{Peter Smith-O}

^{Peter Smith-O}

. There were assorted irregularities:

- a) Starting date of the ICR was wrong. Should have been 16th September 2006, not the 15th September 2006 as printed;
- b) Lines within the ICR were numbered;
- c) Presence of question marks (?) in the body of the ICR;
- d) Narrative in the body of the ICR was unusually brief from the usual quality of the work ^{Peter Smith-O} produced;
- e) Missing date from the Handler when the ICR was completed;
- f) Missing name of the Controller.

215. Upon being given access to the SDU holdings which I had access to back in 2013 whilst attached to the HSMU (previously discussed in my first statement at paragraph 130), I commenced to search for ICR046. With very little trouble, I found a copy of the original SDU ICR046. The document was easily discoverable within the SDU holdings as part of ^{Peter Smith-O}'s unfinished work to complete a SDU human source reward application.

217. My comparison of the Operation LORICATED ICR046 and the SDU ICR046 identified several concerning differences:
- The SDU ICR date was different;
 - The SDU ICR had no line numbering within the ICR;
 - The SDU ICR had no question marks (?) in the body of the ICR;
 - The SDU ICR narrative in the body of the ICR contained much more detail and consistent with the usual quality of the work ^{Peter Smith-O} produced;
 - The SDU ICR did contain the date when the Handler completed it;
 - The SDU ICR did contain the name of the Controller.
218. My investigation concluded that the Operation LORICATED ICR046 has been created by someone other than ^{Peter Smith-O} or anyone attached to the SDU.
219. I have reviewed the metadata behind the Operation LORICATED ICR046 and discovered the following notation (PII edited in red):

Date ICR Submitted: Not submitted
 Controller Reviewed: NO
 Relevant Source Management Log: No source management log entries from 16-SEP-2006 to 27-SEP-2006 due to ICR not being submitted.
 Disseminations: N/A
 Audio Attachments: N/A
 Misc. Attachments: Original VP1092 / Digital VP1092 / **PS** PB13 (Pg 281) / **SW** PB13 (Pg 62)
 Imprest: N/A
 Project LORICATED Notes: This ICR was recorded in ^{Peter Smith-O} PB13, however had not been transposed into the original ICR.
 ICR created by Loricated project team.

220. This caused me to then commence a search for SDU ICR045. Again with very little trouble, I found a copy of the original SDU ICR045. The document was again easily discoverable within the SDU holdings and again part of ^{Peter Smith-O} 's unfinished work to complete a SDU human source reward application.

This document has been redacted for Public Interest Immunity claims made by Victoria Police. These claims are not yet resolved.

221. SDU ICR045 – Period 16-09-2006 to 27-09-2006

Handler: ^{Peter Smith-O} : Controller: ^{Sandy White-O}

INFORMER CONTACT REPORT (For SDU Use Only)				
TO BE COMPLETED BY HANDLER IN CONSULTATION WITH CONTROLLER				
Informer Registration No:				21803838
ICR No:				045
ICR Date Range	From:	16/09/06	To:	27/09/06 (Maximum 10 Day Period)
Handler's Name:	PII		Rank & No:	PII
Controller Advised Prior To Contact:	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Has the informer been tasked?	<input checked="" type="checkbox"/>	Yes (Detail Below)	No	<input type="checkbox"/>
Any money / benefit given to Source?	If 'Yes' specify	No		

27/09/06	1518	<p>Rec M/Call & Ph Bk</p> <p>\$\$\$\$\$\$\$ sentenced to 12 years minimum, HS says will now be brunt of his anger again.</p> <p>SDU Issues</p> <p>Adv. HS of FLYNN prev. contact w. OPP and their comment re HS being "The Enemy". HS wanted to explain why HS was not, Handler cut off HS explanation, already known and understood. HS annoyed at this. HS will be at Crt this Fri and speak to FLYNN then.</p> <p>HS has been in touch with neurosurgeon who says wait 24 Hrs and see if condition changes.</p> <p>Controller \$\$\$\$\$\$ adv of HS annoyance at Handler</p>	
Handler's Signature:	PII	Date:	28/09/06
Controller's Signature:	PII	Date:	

222. My comparison of Operation LORICATED ICR045, Operation LORICATED ICR046, SDU ICR045 and SDU ICR 046, quickly established the following sequence of events:



- a) ^{Green-O} was the Handler from 09-09-06 to 15-09-06;
- b) ^{Green-O} commenced recreational leave on 16-09-06;
- c) ^{Peter Smith-O} resumed Handler from 16-09-06 to 27-09-06;
- d) ^{Peter Smith-O} submitted SDU ICR045 on 28-09-06;

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- e) ^{Peter Smith-O} continued Handler from 28-09-06 to 08-10-06;
- f) ^{Peter Smith-O} submitted SDU ICR046 on 12-10-06;
- g) ^{Green-O} returned from recreational leave and the SDU commenced the delivery of a ^{PII} training course from 12-11-06;
- h) At the conclusion of the ^{PII} training course, the SDU commenced moving office locations;
- i) ^{Green-O} then completed a ICR for 09-09-06 to 15-09-06;
- j) ^{Green-O} numbered that SDU ICR as 045 on 03-01-07 and submitted for checking;
- k) ^{Sandy White-O} checked that SDU ICR on 12-02-07;
- l) The ^{Green-O} SDU ICR045 is then loaded onto the SDU Z Drive as SDU ICR045 and mistakenly copied over top of the ^{Peter Smith-O} ICR045 which was previously loaded onto the Z Drive.

223. In support of these reconstructed sequence of events, I have reviewed the metadata behind the SDU ICR 045 and SDU ICR 046:

 21803838-ICR045.doc	9/10/2006 17:14
 21803838-ICR046.doc	13/10/2006 11:38

224. The metadata confirmed my reconstruction of events and proved the SDU evidence regarding the creation dates of SDU ICR045 and SDU ICR046.
225. My discovery of the data and the supporting evidence was not a complicated process, even with my limited computer skills.
226. The accidental over-write was an issue with the SDU Z Drive as it was a manual system when dealing with human source documents. As previously discussed, the introduction of the Handler's Worksheet and IR Matrix were strategies to manage this deficiency. It must be remembered that Victoria

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Police did not have a computer based solution, until the introduction of the Interpose human source management module in 2009.

227. Additional metadata from within the Operation LORICATED database, demonstrates that Operation LORICATED created their own version of ICR046 on 16th August 2013:

21803838-ICR042.doc	17/10/2006 07:41
21803838-ICR043.doc	17/10/2006 08:55
21803838-ICR044.doc	17/10/2006 10:59
21803838-ICR045.doc	29/03/2007 19:06
21803838-ICR046.doc	16/08/2013 10:44
21803838-ICR047.doc	14/06/2013 07:08
21803838-ICR048.doc	14/06/2013 07:08
21803838-ICR049.doc	13/03/2019 14:38
21803838-ICR050.doc	14/06/2013 07:08

228. In fact the ICR's that follow ICR046, all display dates of 2013. ICR049 even has a modified date of 13th March 2019 on the Operation LORICATED database. I am unable to understand why these files have been changed.
229. It is now clear that Operation LORICATED assumed what was contained in the COMRIE Report was accurate; *"Despite indications that a number of file audits have been completed, it is apparent that records are still missing from this file albeit that there are no gaps in ICR numbering to reflect this. For example, there are no ICRs to account for the period from 16/09/06 until 27/09/06, although it is readily apparent from review of other ICRs that contact occurred during this period. It is reasonable to conclude that ICRs to account for contact within this period have not been submitted."*
230. Instead of Operation LORICATED properly searching the SDU database and locating both SDUICR045 and SDU ICR046, they decided to make up their own. However, a direct consequence of Operation LORICATED making this flawed decision, is that they got the date sequence wrong. The Operation LORICATED ICR046 covers the date period from 15-09-2006 to 27-09-2006.

As already demonstrated, SDU ICR046 covered the correct date period from 28-09-2006 to 08-10-2006.

231. Any investigator should have simply checked the primary database, being the SDU holdings, and would have easily discovered ICR045 and ICR046 from Peter Smith-O [The computer overwrite with SDU ICR045 from Green-O would have been quickly identified and resolved by simply re-numbering Peter Smith-O ICR045 to SDU ICR045B. No other changes were needed. The required change was that simple. It did not require anyone to re-create an ICR, because the ICR was always there in its original state and easily discoverable, but no one looked.
232. A further consequence of Operation LORICATED deciding to create their own ICR046 and getting the date sequence wrong, is that all ICR numbers recorded in the SDU Handler's diaries since, are one number different. Effectively Operation LORICATED has added one additional ICR.
233. Like many of the criticisms of the SDU within the COMRIE Report, all that anyone had to do was ask. Mr. COMRIE stated that; *"it is apparent that records are still missing from this file albeit that there are no gaps in ICR numbering . . ."* but failed to ask or make any reasonable inquiries. Mr. COMRIE had already identified that the Interpose record he was supplied with; *"remains in dire need of reconfiguration in order for it to make sense. . ."* but fails to take any corrective action, like to engage with the people (SDU) who wrote the primary material. Perhaps such a simple initiative of timely engagement with the correct stakeholders may have even avoided the need for Operation LORICATED.

viii. UTILISATION OF A LEGAL PRACTITIONER (excerpt Page 14)

"Whilst somewhat obscurely documented, the initial purpose for recruitment of 3838 as a human source seems related to the possibility of attempts being made to bribe Police and ongoing drug related criminal activity by criminals within the Mokbel clan, some of whom were recognised to be clients of 3838. However, review of ICR content makes it clear that discussions with 3838 were never restricted to such matters. 3838 would capture the attention of police by offering valuable information

on a wide range of matters. Some particular handlers seemed keen to take full advantage of 3838's capabilities by also seeking tactical advice about the best way to disrupt activities of certain clients of 3838 and even information about where points of vulnerability may lie for prosecutions."

234. What is quite apparent is that Mr. COMRIE formed his views and judgements from what was contained primarily in the Informer Contact Reports (ICR) that were provided to him. These ICR's appear to have been drawn from the flawed Interpose management record that was created post the SDU management of HS3838. The very Interpose record that Mr. COMRIE stated in his report that is "*missing certain records*" yet continued passing adverse judgements on the SDU. To use an analogy, Mr. COMRIE walked into a house under demolition without paying any attention to the warning signs and failed to look up.
235. There are three critical pieces of primary evidence not supplied to or requested by Mr. COMRIE. These matters were readily available and easily discoverable, if requested, but Mr. COMRIE:
- a) failed to speak with any of the SDU members;
 - b) failed to listen to any of the audio recordings;
 - c) relied on a flawed Interpose record constructed from secondary evidence;
 - d) made findings on a fraction of the available documents.
236. On Thursday 21st March 2019 at 0950 hours, I attended at Corrs Chambers Westgarth Lawyers, Floor 25 / 567 Collins Street, Melbourne. I met with some of the Victoria Police Lawyers; Barbara BELL, Daniel MARQUETT and John TUCK. I was in the company of ^{Fox-O} and our legal team; Geoff CHETTLE, Luci THIES & Tony HARGREAVES. This was the only place Victoria Police permitted us to view the Operation LORICATED database. Our primary objective was to commence reviewing the SDU covert audio recordings made with HS3838. This was the first opportunity we had to fully explore the Operation LORICATED database, as up until now it was kept a secret from the SDU. As a Detective who was about to review an investigation that had been at least 7 years in the making, I was shocked to

find that none of the SDU audio recordings had ever been transcribed. In fact, I was even doubtful that the Operation LORICATED database had all of the SDU audio recordings.

237. Only two days earlier, on Tuesday 19th March 2019, I finally managed to obtain a copy of the COMRIE Report through our legal team, after signing a confidentiality agreement. It now made sense why Mr. COMRIE never referred to any transcript material from the audio recordings. There were none ever made. Primary evidence never used in the COMRIE Report.
238. ^{Fox-O} and I spoke with members of the LANDOW Task Force who corroborated that none of the SDU Audio recordings had ever been fully transcribed.
239. On Thursday 28th March 2019, I requested that the LANDOW Task Force commence having all of the SDU audio recordings fully transcribed. This was in excess of the 50 listed meetings contained on the Operation LORICATED database and involved over 185 hours of conversation. I was informed this task was going to cost Victoria Police over \$60,000, but the LANDOW Task Force agreed it was an essential piece of work that needed to be completed.
240. How could one of the most obvious sources of primary evidence not be included in the COMRIE Report? This oversight is nothing short of gross negligence, whether deliberate or careless.
241. For reasons I still can't understand, Mr. COMRIE and those members of Victoria Police Command who commissioned the COMRIE Report failed to identify, understand or even disclose the importance of those audio recordings. This gross negligence, or perhaps bias, almost amounts to failing to disclose exculpatory evidence to the Courts. Mr. COMRIE noted the obvious; *"The file does not hold any corroborative media (such as audio recordings)"* but made a conscious decision to do nothing about it. He ignored the obvious missing primary piece of evidence within the Interpose record, being the SDU covert audio recordings with HS3838.

242. The professional failing of not reviewing any of the audio recordings caused Mr. COMRIE to primarily rely on the ICR. It is already apparent Mr. COMRIE himself is critical of the Interpose record, so the accuracy of what he was supplied by way of Mr. COMRIE's own observation therefore can only be described as questionable at best. How Mr. COMRIE can then commence to make the following ascertain without reviewing the audio recordings demonstrates deliberate and reckless bias; "*Some particular handlers seemed keen to take full advantage of 3838's capabilities by also seeking tactical advice about the best way to disrupt activities of certain clients of 3838 and even information about where points of vulnerability may lie for prosecutions.*"
243. During this Royal Commission there will be direct evidence provided by the former SDU members who, since April 2019, commenced a professional review of the SDU activities in light of the allegations raised in the COMRIE Report. Those members have reviewed the covert audio recordings and actually listened to the conversations between the SDU and HS3838. It is professionally insulting that this was never done by Mr. COMRIE. SDU have now also reviewed all of the ICR's and are able to put context around the content of each ICR, simply because they wrote the documents and were there. They don't fall foul of assumptions, beliefs or flawed perceptions as they were the very people engaging with HS3838 and documenting the conversations.

ix. RISK ASSESSMENTS (excerpt Page 21)

"Whilst I consider that the risk assessment process utilised for 3838, as a recognised high-risk human source, had failings on many fronts."

244. In my first statement on page 20, paragraph 55(d), I have previously addressed the origin of the risk assessment developed by Victoria Police, particularly the DSU / SDU.
245. In May 2006, Assistant Commissioner Simon OVERLAND authored a "Progress Report of the Australasian Human Source Working Group" in

response to assorted items for approval by the Australasian Crime Commissioners' Forum.

246. This report was authored by A/C OVERLAND and outlined the work that the AHSWG had jointly undertaken in the development of a human source risk assessment framework. The informed and supportive view of the proposed risk assessment was:

Risk Assessment is the cornerstone to effective management of Human Sources. A Human Source Risk Assessment framework was developed at the 2004 AHSWG meeting. This framework has been further developed out of sessions into a proposal for an Australasian Human Source Risk Assessment Model. The model has been piloted in Victoria. The AHSWG examined the model and agreed that the model be adopted as the Australasian guidelines for the risk assessment of Human Sources. A copy of the agreed model is attached at Appendix 'B'.

247. Every Australasian Crime Commissioner endorsed the recommendation. This was the same human source risk assessment framework that HS3838 operated under.
248. This report is contained within the existing SDU holdings. Subject of a PII assessment, a copy of the 5 page report should be made available to the Royal Commission.

CONCLUSION

249. In summary, if Mr. COMRIE or any member of the 2012 Victoria Police Command had bothered to listen to the audio recordings or engage with any of the SDU members, they would have quickly established that:
- a) SDU had a clear understanding of Legal Profession Privilege (LPP);
 - b) SDU repeatedly told HS3838 that we did not want matters subject of LPP;
 - c) SDU understood that ultimately lawyers own the issue of conflict of interest;

- d) Like the Community, the SDU had an expectation that lawyers always act in the best interests of their clients;
- e) SDU were not targeting material that was subject to LPP;
- f) If the SDU were told of matters subject to LPP, it was not disseminated;
- g) SDU certainly targeted and disseminated intelligence regarding ongoing or future serious crime not before the Courts.

250. However, the greatest injustice is the commentary within the COMRIE Report that the members of the SDU interfered with criminal trials and the justice system. It just didn't happen.



Black-O

01-08-2019