



7 September 2020

Alexandra Tighe
Solicitors Assisting the Royal Commission into the
Management of Police Informants
PO Box [REDACTED]
Melbourne VIC 3001

By email: [alexandra.tighe@\[REDACTED\]](mailto:alexandra.tighe@[REDACTED])

Dear Alex

Royal Commission into the Management of Police Informants (the Commission)
Our ref: Cameron Davey

1. We act on behalf of Mr Cameron Davey.
2. We refer to your letter dated 21 August 2020 and the draft version of Counsel Assisting's submissions enclosed. As you are aware, Counsel Assisting's complete submissions have now been made public (save for redactions) (**Submissions**).
3. Mr Davey takes this opportunity to make short submissions in response to the Submissions. These submissions are limited to responding to matters that were not raised by the Commission with our client during Commission hearings and therefore matters that Mr Davey was not offered the opportunity to respond to.

1 July 2004 – Interview with Ms Gobbo

4. In response to paragraphs 615 to 617 of the Submissions and the inference that Mr Davey's comments in the interview with Ms Gobbo on 1 July 2004 were "*an invitation to Ms Gobbo to provide anonymous information about criminals with whom she interacted; in much the same way as an informer might*", Mr Davey rejects the assertion that Ms Gobbo was invited to act in an 'informer-like' manner against the interests of her clients or to disclose any information subject to client legal privilege.

Ms Gobbo interview – 5 March 2008

5. In response to paragraph 3116 of the Submissions and the interview with Ms Gobbo by Mr Davey on 5 March 2008, Mr Davey does not recall the conversation alleged to have occurred by Ms Gobbo.
6. In response to paragraph 3126 of the Submissions and the same interview, Mr Davey denies he said the words alleged by Ms Gobbo.

Discussions with Gobbo regarding Dale recording

7. In response to paragraph 3387 of the Submissions and Ms Gobbo's reported contact with Mr Davey and Mr O'Connell regarding the Dale recording, Mr Davey refers to and repeats the evidence he has previously given at paragraph [19] of his first statement dated 13 May 2019 and at paragraph [10] of his supplementary statement dated 4 March 2020.

Melbourne

Level 40, 600 Bourke Street, Melbourne Vic. 3000

PO Box [REDACTED] Collins Street West, Melbourne Vic. 8007

t: [REDACTED] | f: [REDACTED] | DX [REDACTED] Stock Exchange Melbourne | www.sparke.com.au

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8. Mr Davey disputes Ms Gobbo's account of discussions with him and others in relation to the Dale recording, and in light of that the Commission should not make findings that the discussions occurred in the manner alleged by Ms Gobbo. In particular, he instructs that the following four points in paragraph 3387 of the Submissions are untruthful, and he disputes that he or others said such things to her as part of any discussion at which he was present:
- *they [Victoria Police] would do everything in their power to use her as a witness*
 - *she was told if she did not want to be a witness, she would be forced to give evidence at some kind of hearing , which caused her to cry*
 - *they discussed her recording the conversation with Mr Dale the following weekend, indicating they did not want to get a warrant*
 - *she raised the prospect that Mr Dale might consider any conversation privileged, and they said they would cross that bridge when it came to it; they wanted the evidence first and would consider what happened after that.*
9. Mr Davey instructs that the original conversation in relation to recording the conversation with Mr Dale occurred between Ms Gobbo and Detective Sergeant Solomon. Mr Davey denies that the meeting on 3 December 2008 occurred as alleged by Ms Gobbo. He further denies that the issue of a warrant was raised with Ms Gobbo.

Yours faithfully



Sam Jackson, Partner

e: [REDACTED]
t: [REDACTED]

Contact:

Sam Gray, Lawyer

e: [REDACTED]
t: [REDACTED]