

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

## SUBMISSION TO THE ROYAL COMMISSION INTO THE MANAGEMENT OF POLICE INFORMANTS

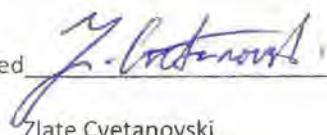
12 March 2019

I, Zlate CVETANOVSKI, prisoner at Middleton Prison, Castlemaine, Victoria, submit and request that:

- [REDACTED]
2. This is a preliminary submission and my legal representative will make further submissions.
  3. On 3 December 2018 I was notified by the Director of Public Prosecutions Victoria (DPP) Ms Kerri Judd SC that "between 16 September 2005 and 12 January 2009 Victoria Police extensively used a legal practitioner as a registered human source (otherwise known as Police Informer)" and "EF acted as a lawyer for a person who made statements against you during the period when she was a registered informer".
  4. On 1 March 2019 police informer (aka Lawyer X, aka EF) was publically identified as Ms Nicola Gobbo.
  5. Ms Gobbo is well known to me. I regularly met Ms Nicola Gobbo for legal advice between 2005 and 2009 and during this period I was arrested and charged for various drug trafficking and deception offences.
  6. I frequently discussed my charges and my wife's charges (Mrs Alexandra Cvetanovski) with Ms Gobbo and she represented both of us at our committal hearing in December 2007.
  7. I have been in custody since 27 February 2009.
  8. I was convicted and sentenced for drug and deception offences in the County Court between 2011 - 2014.
  9. I am currently serving a 15 year sentence with a non-parole period of 11 ½ years.
  10. I am one of the "Convicted Persons" cited in the High Court of Australia, Matter No. M73/2018., AB v CD & EF v CD [2018] HCA 58 in which the court found that "the prosecution of each Convicted Person was corrupted in a manner which debased fundamental premises of the criminal justice system".
  11. Mr Cooper [REDACTED] is well known to me. He is one of the "Convicted Persons" that gave evidence against me in 2011. Mr [REDACTED] together with Ms Gobbo acted [REDACTED] to commit offences for their personal and financial benefit.
  12. I was arrested and charged as a result of the same chain of evidence that led to the arrest and charge of Mr Cooper. In Strathmore, Ms Gobbo supplied police information that led to my arrest while acting as both lawyer and informer.
  13. Following my arrest and before I was interviewed, Ms Gobbo advised me not to speak to police.
  14. Ms Gobbo and Mr [REDACTED] conspired to lure me into criminal activities between 2005 and 2009 for their personal and financial advantage.
  15. Mr [REDACTED] received favourable treatment from Victoria Police whilst he was in prison and received inducements prior to and after giving evidence against me.

16. I want the Royal Commission to investigate the relationship and dealings between Ms Gobbo, Mr Cooper and police between 2003 when she got him out on bail for the third time up to and including his release from prison in [REDACTED] to ascertain if their activities were unlawful and that of [REDACTED] including certain members of the Purana Taskforce; in particular, Mr Dale Flynn, Mr Jim Coughlan, Mr Craig Hayes, Ms Tamara Chippindal and Mr Jim O'Brien were either duped by Mr [REDACTED] and Gobbo or themselves acted dishonestly to secure my conviction, despite having undertaken to discharge their duties faithfully and according to law.
17. I believe that certain individuals within the OPP, the DPP and the Judiciary, knew Ms Gobbo was a police informer and helped Victoria Police to secure my conviction by deception (abuse of process), despite the fact that I would be jailed for a very long time and forfeit my assets to the Crown upon conviction.
18. My arrest, charging and prosecution was an abuse of the judicial process.
19. If I had known of Ms Gobbo's dual roles prior to being arrested and charged I would have sought to explore the circumstances that led to the provision of key evidence against me and the disclosure would provide the opportunity to argue the veracity of all the evidence against me and argue its exclusion.
20. To summarise I contend that my arrest, prosecution was;
- a. an elaborate conspiracy orchestrated by Nicola Gobbo and Mr Cooper and perhaps individuals from Victoria Police in order to secure my conviction for their mutual benefit and reward; and
  - b. an abuse of process.

Signed



Zlate Cvetanovski