

**Royal Commission
into the Management of Police Informants**

STATEMENT OF PAUL DAVID ROWE

1. My full name is Paul David Rowe. I am a Detective Sergeant at Victoria Police, currently assigned to the Homicide Squad.
2. I make this statement in response to a request from the Royal Commission into the Management of Police Informants dated 19 March 2019. This statement is produced to the Royal Commission in response to a Notice to Produce.
3. In preparing my statement, I have had access to my official diaries from the relevant periods as well as the documents referred to below. I have had access to my email archive from late 2007 onwards.

Educational background and employment history (Q1)

4. I commenced employment with Victoria Police in 1998 and graduated from the Victoria Police Academy in 1999. A summary of my employment history since that time is as follows:
 - a) 1999; Constable; Melbourne East Police Station;
 - b) 2000; Constable; Melbourne West Police Station;
 - c) 2001 – 2002; Constable; Transit Safety Division;
 - d) 2003; Senior Constable; Transit Divisional Response Unit;
 - e) 2004 – 2005; Detective Senior Constable; Major Drug Investigation Division;
 - f) 2005 – 2009; Detective Senior Constable; Purana Taskforce;
 - g) 2009 – 2013; Detective Senior Constable; Homicide Squad;
 - h) 2013 – 2015; Sergeant; Melbourne East Police Station; and
 - i) 2015 – present; Detective Sergeant; Homicide Squad.
5. I hold a Diploma of Police Studies and have undertaken a number of Victoria Police qualifications and training in my time at Victoria Police, including:
 - a) Field Investigators Course (2001);
 - b) Detective Training School (2005);
 - c) Brief Quality Assurance Course (2012); and
 - d) Advanced Detective Training School (2018).
6. I also recall that I completed an online course in management of informers (Level 1) but I cannot recall when I completed this course and I cannot locate any records about it.



Involvement or association with any investigation which had dealings with Ms Gobbo (Q2)

Initial contact with Ms Gobbo

7. My first contact with Ms Gobbo was in August 2005, when I was a Detective Senior Constable at the Major Drug Investigation Division (MDID). I was the primary investigator for Operation Quills, which was an investigation targeting drug manufacturing by Tony Mokbel and his associates, including **Mr Bickley**.
8. At the time, Detective Sergeant Steve Mansell was my crew Sergeant, while Detective Senior Sergeant Jim O'Brien was the head of the unit. Detective Senior Constables Craig Hayes and Liza Burrows were also part of my crew.
9. On 15 August 2005 **Mr Bickley** was arrested by other members of the MDID. Early on the morning of 16 August 2005, I conducted a record of interview with **Mr Bickley**. I became the informant in relation to **Mr Bickley**'s investigation and prosecution. During the interview **Mr Bickley** asked to speak to Ms Gobbo. I called Ms Gobbo's number and left a message for her to call back.
10. At this time, I do not believe that I had met Ms Gobbo personally. Ms Gobbo and other lawyers were suspected of having personal relationships with Tony Mokbel and had reputations for providing protection for him through their role as lawyers. My view was that Ms Gobbo and others would assist him to influence the criminal justice process and in turn help him to avoid prosecution.
11. The suspicion was that T. Mokbel encouraged and paid for Ms Gobbo to represent those whom assisted him with his criminal enterprise. In this role she would advise them against co-operating with police, establish the means by which the accused had been implicated, establish the existence and strength of evidence against T. Mokbel, seek to identify informers, and ensure those charged would resolve their matters without implicating him. It was suspected that information was sought on his behalf and fed back to him.
12. On 31 August 2005, there was a bail application listed for **Mr Bickley** at the Melbourne Magistrates' Court. At 8.30am Ms Gobbo called me about the bail application. I took detailed notes in my diary of this conversation.
13. Ms Gobbo stated that she had listened to the record of interview and acknowledged that T. Mokbel's name was mentioned in the interview. She enquired whether the bail application would prove to be embarrassing for her should T. Mokbel's name be mentioned.
14. Ms Gobbo also stated that she did not want to represent **Mr Bickley** as it was not in his best interests and she had a conflict of interest, but she was being compelled to do it by

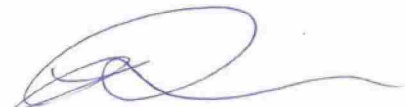


- T. Mokbel. I understood the conflict arose because **Mr Bickley** could provide evidence about T. Mokbel's involvement, but T. Mokbel was paying and pressuring her to look after his interests instead. Ms Gobbo again asked whether any evidence would be given at the bail application which may embarrass her or cause her problems.
15. I informed Ms Gobbo I would not comment on the other parties involved in the operation. I also told her that bail would be vigorously opposed. I suggested to her that DS Mansell and I would be at court early and could discuss the matter in person.
 16. It was highly unusual for a barrister to have a conversation like this with me. It was also unusual because I did not know Ms Gobbo. In my mind, this conversation confirmed for me what had long been suspected of her association with T. Mokbel.
 17. I informed DS Mansell of this conversation straight away and we both spoke to DSS O'Brien. After speaking with DSS O'Brien, the decision was made to record our conversation with Ms Gobbo, in part to see if she would repeat to me what she had said on the phone about being compelled by T. Mokbel to represent **Mr Bickley** in a way that was against **Mr Bickley**'s interests.
 18. At 9.30 am, DS Mansell and I spoke to Ms Gobbo at court. This conversation occurred in the entry area outside two court rooms. Ms Gobbo told us that **Mr Bickley**'s bail application could not proceed as a jail order had not been arranged by her instructing solicitor, Zarah Garde-Wilson.
 19. My recollection is that Ms Gobbo spoke to me and DS Mansell for about five minutes. I can't recall precisely what she told us, but my best recall of that discussion follows. I recall she spoke to us about each of these topics, but can't be sure whether these were covered at the conversation at court or later that day.
 20. Ms Gobbo told us that she said she felt great pressure from T. Mokbel to represent **Mr Bickley**. She spoke in a general sense about her relationship with T. Mokbel and the way in which he used her. Ms Gobbo was very open and candid about the ways in which she obtained information for T. Mokbel about his associates and was forced to represent them in a way that suited T. Mokbel's interests, rather than their own. She told us that she was concerned about her reputation within the criminal justice system and about whether she had committed any criminal offences herself in assisting T. Mokbel. She mentioned suffering health problems which she associated with the pressure she was under. She seemed worried and cried during the conversation.
 21. I recall that towards the end of the conversation, DS Mansell said something like "you should get on board". This was the first mention of her cooperating. It was not something that had occurred to me and I don't recall DSS O'Brien talking to us about this. I recall that Ms Gobbo responded by saying something like "if anyone finds out I'd end up dead". I think I respond that this would be something we'd have to manage.



22. I remember being surprised by what Ms Gobbo was telling us and uncomfortable that this conversation was occurring in a public area. I recall that DS Mansell said that we could call her to talk more. She then gave her phone number to DS Mansell and said we could speak further later that afternoon. DS Mansell and I then returned to the St Kilda Road Police Complex.
23. Once back at the office, DS Mansell updated DSS O'Brien about our conversation with Ms Gobbo. We were instructed to record our subsequent meeting. As this point, the decision was made to have an open conversation with Ms Gobbo to understand what information she might be able to provide and if she was interested in cooperating. There was a need to be cautious because we did not fully trust Ms Gobbo, given her associations with T. Mokbel and others.
24. At this time I'd had very limited experience in dealing with human sources. I'd had dealings with at least one human source who was being managed by DS Mansell. I had not registered a human source before and had not referred a potential source to be assessed by the Dedicated Source Unit (DSU) (which later became known as the Source Development Unit (SDU)).¹ Despite this, I believe that we dealt with Ms Gobbo appropriately and in accordance with Victoria Police training and policy that existed at that time.
25. My diary records that at 12.27 pm, DS Mansell and I collected Ms Gobbo from the Melbourne CBD area. DS Mansell had arranged this with Ms Gobbo. After picking up Ms Gobbo, we drove to a car park in the inner west of Melbourne.
26. The conversation at court and in the car were both covertly recorded but I am informed that these recordings cannot be located. I remember the general tone of the conversation and the topics covered, and have set out below my best recollection of the meeting and what was discussed.
27. We made small talk until we parked, but once we arrived Ms Gobbo spoke for about an hour about a number of different topics. She talked openly and she seemed to be venting to get a lot of information off her chest. She covered a lot of different topics, without going into great detail on all of them. Ms Gobbo did the vast majority of the talking and DS Mansell and I did not ask many questions. I recall that we just let her talk about what she wanted to talk about.
28. Ms Gobbo described her relationship with T. Mokbel, and how people she didn't know would contact her because T. Mokbel had said that they had to use her if they were arrested. She said she was expected to represent them but, in doing so, ensure they did not cooperate with police. She said she was also expected to tell T. Mokbel about their charges, the evidence against them and whether T. Mokbel himself might be exposed.

¹ I can't recall exactly when the DSU became known as the SDU, however, during my initial dealings with the unit they were the DSU.

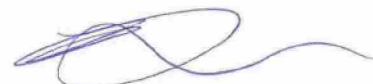


She said that Zarah Garde-Wilson was also involved in a similar relationship with T. Mokbel.

29. She also spoke about how T. Mokbel's assets had been concealed and how he laundered money. She expressed concern that she was being paid with money that she knew had been earned by dealing drugs, and that she might be committing criminal offences by helping T. Mokbel. She was also concerned about how continuing to represent T. Mokbel and others was giving her a bad name in the legal profession.
30. Ms Gobbo spoke about **Mr Bickley**. She felt conflicted because T. Mokbel expected her to ensure **Mr Bickley** did not cooperate with police, which she felt was against **Mr Bickley**'s own interests. I recall that she believed **Mr Bickley** should be given an opportunity to consider cooperating with police, given the evidence and the charges against him. Ms Gobbo was still adamant that she did not want to represent **Mr Bickley**. She told us that she was going to be acting for **Mr Bickley**, co-accused, Grzegorz Kot, and that she would use this to avoid having to represent **Mr Bickley**.
31. She spoke about how this arrangement with T. Mokbel was putting her under a lot of pressure and causing her stress, which she was concerned was affecting her health. She saw aligning herself with police as her way out of her arrangement with T. Mokbel.
32. Toward the end of the conversation, we talked about the process involved in cooperating with police. I recall that Ms Gobbo again said something like "she would be killed" if people found out she cooperated and wanted assurances that she would be looked after if she did give police information. We told her that if she did cooperate, she would be managed by other officers who were specialists. By the end of the conversation, I felt that Ms Gobbo had already made up her mind to cooperate with police. Neither DS Mansell or I pushed or pressured her to do so.
33. At no point during this conversation did Ms Gobbo tell us that she had previously assisted police. I didn't know this until it was recently published in the media.
34. At 2.00 pm, DS Mansell and I dropped Ms Gobbo off in the Melbourne CBD area. DS Mansell and I returned to the office and updated DSS O'Brien. I recall that DSS O'Brien then called DSS Jones at the DSU.
35. I burnt the recordings of the two meetings onto a DVD and then deleted the files from my computer. The usual process for covert recordings at the MDID was to place them in a central filing cabinet. Given the sensitivity of these recordings, I did not consider it appropriate to store them in the central filing cabinet and I believe they were secured in a separate safe within the office of DSS O'Brien.

Days following initial contact with Ms Gobbo

36. In the days after our initial contact with Ms Gobbo I was occupied on other court matters and was not involved in further discussions about Ms Gobbo becoming a



human source. Apart from seeing her at court a few times as set out below, I didn't speak with her in person or on the phone.

37. On 1 September 2005, I was at the Melbourne Magistrates' Court for a contested committal hearing. Ms Gobbo approached me and said that T. Mokbel had asked her why **Mr Bickley**'s bail application did not go ahead the day before. This confirmed for me what she had told me about T. Mokbel using her to get information about how **Mr Bickley**'s case might affect T. Mokbel's interests.
38. On 2 September 2005, I visited **Mr Bickley** at the Melbourne Assessment Prison. My diary states that when I first arrived to see **Mr Bickley** I had to wait because **Mr Bickley** was meeting with his solicitor, Theo Magazis.
39. On 6 September 2005, I attended the Melbourne Magistrates' Court for **Mr Bickley**'s bail application. I gave evidence at the hearing and bail was granted. My diary does not record whether Ms Gobbo appeared and I don't remember if she did. Ms Garde-Wilson was in the body of the courtroom watching the proceedings.
40. On 7 September 2005 I attended the Melbourne Magistrates' Court for the bail application of [REDACTED] Ms Gobbo appeared on behalf of [REDACTED]. We had a brief conversation during which Ms Gobbo said that [REDACTED] wished to make a statement against **Mr Bickley**. I took a statement from [REDACTED] on 14 September 2005.

Referral of Ms Gobbo to the DSU

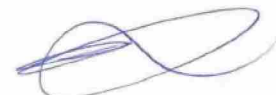
41. On 8 September 2005 I attended a meeting with Detective Acting Superintendent Hill, Detective Inspector White, DS Steve Mansell, and members of the DSU, who I believe were DSS Jones and DS Brennan. As my diary records, the outcome of the meeting was that the DSU were going to meet with Ms Gobbo and assess her suitability as a human source.
42. My diary also records a note "Will have no involvement with **Mr Bickley**", which I believe was a reference to Ms Gobbo no longer representing **Mr Bickley** in his current criminal prosecution.
43. On 16 September 2005 DS Mansell and I met with DS Jones, DS Brennan and Ms Gobbo. The meeting was recorded by the DSU members and I have reviewed a transcript of this recording.² DS Mansell and I were present at this meeting to introduce Ms Gobbo to the DSU members.
44. Apart from my attendance at the meeting on 16 September 2005, I was not involved in the assessment by the DSU of Ms Gobbo's suitability as a human source, or the authorisation or registration of her. To this date, I don't know exactly when Ms Gobbo

² VPL.0005.0037.0014.



was officially registered as a human source or precisely who was involved in the authorisation and registration process.

45. My understanding was that the DSU were the specialists in assessing and managing high risk human sources. While I was not aware of the detailed assessment processes undertaken by the DSU, I understood that members of the DSU would undertake detailed background enquiries as part of their assessment process and would consider the potential information the person had to offer as well as the risks and other difficulties as part of their process.
46. The risk to Ms Gobbo's safety by reason of her association with T. Mokbel as well as the complexities created by her profession as a barrister meant that she was a prime candidate for referral to the DSU. I believed that these issues would be considered as part of the assessment process undertaken by the DSU and those who were responsible for authorising and approving Ms Gobbo's registration.
47. In my mind, if Ms Gobbo was to be registered as a human source, I thought that she would be able to provide information to police about how T. Mokbel was manipulating the criminal justice system to try and protect himself against prosecution for crimes that we were investigating and information on those who were assisting him to do so. I didn't anticipate or consider at the time that Ms Gobbo might give wide-ranging information about other people and other offending.
48. At this time, my superiors DS Mansell and DSS O'Brien knew about Ms Gobbo's potential registration as a human source, as did DI Adrian White and DAS Robert Hill. I recall that DSC Burrows was also aware, but I cannot recall how or when she became aware. I believe it was shortly after our first meetings with Ms Gobbo. My recollection is that DSC Hayes was not aware at this time.
49. I had no role in managing Ms Gobbo as a human source after she was introduced to the DSU. I am aware that she was being handled by members of the DSU. I understood and expected that the DSU were responsible for managing potential issues that may arise by reason of Ms Gobbo's profession including decisions around clients that she could and could not act for due to information that she was providing.
50. As an investigator, when I received information that I suspected had originated from Ms Gobbo, I believed that systems were in place to ensure that it was appropriate for me to receive and use that information. By the time the information reached the investigation team, it had been filtered through the DSU and the senior officers that were briefing me. I expected that the information had been scrutinised and sanitised so that it was appropriate for me to receive and use.
51. Because the DSU were responsible for managing Ms Gobbo, I understood that if I was to deal with her, it would be on the basis that she was a lawyer acting for her client. When I later investigated threats made against her, I dealt with her as the victim of the crimes that I was investigating.



52. I was always careful to keep Ms Gobbo's status as a human source strictly confidential, including from other members of investigating teams who received intelligence that I suspected had come from Ms Gobbo. I understood that Ms Gobbo was at risk of great harm if it became known that she was a human source.

Information received from the DSU

53. On 27 September 2005 I attended a DSU briefing at which information was provided by the DSU that I suspected originated from Ms Gobbo. The information is detailed in my diary but in summary involved [REDACTED] Mark Lanteri and T. Mokbel. The information regarding T. Mokbel indicated that he was desperate to find out what had happened with Mr Bickley and was willing to bribe a corrupt police member to find out. At this briefing, DAS Hill informed us that a new operation would be formed to investigate allegations of money laundering and bribery by T. Mokbel.
54. My diary records that I attended further briefings on 29 and 30 September 2005 concerning Operation Quills and investigations associated with information about T. Mokbel. At some point around this time, my crew were informed that we were moving from MDID to the Purana Taskforce.
55. I had significant periods of leave around this time. I was on leave from 19 to 28 November 2005 and 5 December 2005 to 9 January 2006.

Purana Taskforce

56. When I returned from leave a number of operations had been moved from MDID to the Purana Taskforce. Purana was continuing to investigate T. Mokbel but the focus had broadened to include his associates and broader criminal syndicate. I understood that some of the information we would use during those investigations would come from Ms Gobbo.
57. The approach taken by the Purana Taskforce was aimed at stopping gangland murders by disrupting the drug trade that had helped violent organised crime syndicates to flourish. The focus shifted to investigating and disrupting drug trafficking to prevent organised crime murders, rather than reacting to and investigating those murders after they had occurred. Part of the investigation aimed at disrupting drug dealing by these criminal syndicates was known as Operation Posse.
58. When I received information which I suspected had come from Ms Gobbo, I believed that it was appropriate to act on this information because of the processes that were in place. These included the approval of Ms Gobbo's registration and the filtering through the DSU and my superior officers of information before it was provided to me. In addition, senior officers sitting above the investigative teams were regularly briefed on the direction of Purana investigations, including Assistant Commissioner (Crime) Simon Overland.

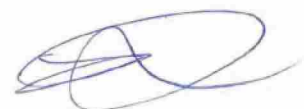


59. On 9 January 2006, I spoke to DS Brennan from the DSU, who provided me with information about [REDACTED] [REDACTED] From my perspective, information like this was background information designed to build up a picture of the larger group of T. Mokbel's associates to understand how the syndicate operated.
60. I am informed that a record in the Loricated database³ states that on 18 January 2006, I received a call from DS Brennan from the DSU informing me that Rob Karam was currently at a restaurant in Lygon Street, Carlton. I have no record of this call in my diary, but do not believe that I did anything in response to receiving this information.
61. On 19 January 2006 I spoke to DS Brennan from the DSU. DSC Burrows was with me and took notes of what was discussed. I have no recollection of what occurred at this meeting, but I am informed that the information related to Rob Karam being in possession of a large quantity of drugs and that he had asked Ms Gobbo if she could put him in contact with someone who could assist him to sell it. I recall that another team within Purana was responsible for investigating Karam and I do not recall doing anything with this information.
62. On 20 January 2006 I spoke to DS Brennan from the DSU. He provided me with the registration details of H. Mokbel's vehicle and a mobile telephone number for **Mr Bickley** which was most likely used and/or filed as intelligence.
63. On 10 February 2006, my diary records that I gave information to DS Brennan. I cannot recall what this relates to.

Arrest of [REDACTED]

64. Between [REDACTED] 2006 my diary records that I was undertaking various investigative tasks relating to Operation [REDACTED] targets, [REDACTED]. I was regularly briefed by DAI O'Brien and DASS Flynn and undertook investigative tasks directed towards this investigation.
65. During this time, I suspected that Ms Gobbo had provided information to the DSU about the location of [REDACTED]. However, I was not sure to what extent or what specific information, as there were various other sources of information about [REDACTED] activities at this time, including surveillance and telephone intercepts. I recall knowing that Ms Gobbo was close friends with [REDACTED]. I can't now recall whether or not I knew at that time if Ms Gobbo was acting for [REDACTED].

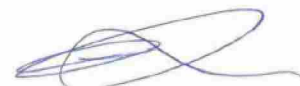
³ See VPL.2000.0003.1709.



66. On 14 April 2006, my diary records that, along with DAS Griffin and DSC Hayes, I was briefed with information about the possible location of [REDACTED] at a location in [REDACTED]. Ultimately, this was not where [REDACTED] was located.
67. On [REDACTED] 2006, I was informed that DASS Flynn had identified the location of [REDACTED] in [REDACTED] over the weekend. Once [REDACTED] had been located, various investigative processes followed.
68. On [REDACTED] 2006, I prepared an application for a search warrant and an affidavit, which was ultimately sworn by DASS Flynn.⁴ The affidavit referred to information provided by a registered human source who was identified with Ms Gobbo's registration number.
69. On [REDACTED] 2006, [REDACTED] were arrested. I was not at work at the time of their arrest, but was contacted by DASS Flynn at 3.30 pm who told me that [REDACTED] had been arrested and were in custody. I returned to work and arrived at the Purana Taskforce office at 4.15pm.
70. My diary records that when I arrived, DASS Flynn and DS Kelly briefed me on what had occurred up to that point. I was informed that Ms Gobbo was present, had spoken to [REDACTED] and that records of interview had commenced.
71. I recall that a number of us within my crew had discussed the issue of Ms Gobbo acting for people that she had given information to the DSU about. I can't be specific on when these conversations occurred, but I was of the understanding that Ms Gobbo was being told by the DSU that she would need to remove herself from these situations by making herself unavailable. I recall it being a constant battle to keep Ms Gobbo out of proceedings. This was being managed between the DSU and Ms Gobbo.
72. My diary records that at 6:50 pm, DASS Flynn and DAI O'Brien went with [REDACTED] to the Purana Offices on the 16th floor. I did not go with them but remained on the 14th floor where the interview rooms were located.
73. My diary records that at 7:25 pm, DASS Flynn, DAI O'Brien, [REDACTED] and Ms Gobbo were discussing [REDACTED] participating in a further interview. I wasn't present for this discussion. At this time I was interviewing and processing [REDACTED].
74. At 9:00 pm DASS Flynn told me that [REDACTED] was going to participate in a further interview. DASS Flynn conducted the interview and I was present during the interview.⁵

⁴ See VPL.0005.0035.1204.

⁵ See VPL.0005.0011.1004.



75. Subsequently, I took [redacted] PII to the [redacted] PII and they appeared at a filing hearing. I cannot recall whether Ms Gobbo appeared for [redacted] during the filing hearing, however, I have a note in my diary of talking to Ms Gobbo about custody welfare issues for [redacted]
76. On 28 April 2006, I spoke to Ms Gobbo on the telephone regarding service of [redacted] record of interview.
77. On [redacted] PII 2007 my diary records that I spoke with Tony Hargreaves about [redacted]
78. On [redacted] PII 2007 I spoke with Ms Gobbo about the status of [redacted] PII pending proceedings, which were listed for a committal mention the following day.
79. On [redacted] PII 2007 [redacted] had a plea hearing at the Melbourne Magistrates' Court and on [redacted] PII 2007 he was sentenced. My diary does not record who appeared on those dates.
80. On [redacted] PII 2007 Ms Gobbo appeared for [redacted] PII at a filing hearing and on [redacted] PII 2007, she appeared for him at a plea hearing. My diary records that [redacted] PII was sentenced on [redacted] PII 2007 but does not record whether Ms Gobbo appeared. Ms Gobbo also emailed me 12 months later on [redacted] PII 2008 to tell me that [redacted] PII was asking for some of [redacted] PII personal items to be returned.

[redacted]

81. After the further record of interview, [redacted] PII consented to remain in police custody to assist police in relation to Operation [redacted] PII. I don't know when this arrangement was decided and was not involved in the decision.

82. [redacted] PII

83. Subsequently, on 23 May 2006, [redacted] assisted police to identify an address in Toolern Vale as the site of a former clandestine lab.

Arrest of Milad Mokbel



84. On 25 April 2006 I arrested Milad Mokbel. Following his arrest M. Mokbel asked to contact Ms Gobbo and spoke to her on the telephone.
85. M. Mokbel was then taken back to the St Kilda Road Police Complex, where he was processed. Steve Cvetanovski had also been arrested by other officers and had been conveyed to St Kilda Road.
86. Ms Gobbo attended at St Kilda Road. My diary records that I first spoke to her at 2:00 am about both Cvetanovski and M. Mokbel, but my diary does not record any details. I do not recall this conversation, but I believe the conversation would have been about what her clients had been arrested for and what the police attitude was to bail.
87. The initial interview with M. Mokbel started at 2:28 am. My diary records that he asked to speak to Ms Gobbo so we suspended the interview so he could do that. Ms Gobbo spoke to M. Mokbel privately for 20 minutes.
88. After that, I spoke with Ms Gobbo. Although this is not recorded in my diary, I recall that Ms Gobbo said to me that she had told M. Mokbel that she could not represent him because she was already representing [REDACTED]. Ms Gobbo told me that M. Mokbel wasn't happy about her refusing to act for him.
89. At that time, it was my understanding that Ms Gobbo had been told by the DSU that she could not represent M. Mokbel. I further understood that the arrangement that had been made with the DSU was that Ms Gobbo was to tell M. Mokbel that she couldn't act for him due to a conflict.
90. About half an hour later, M. Mokbel asked to speak with me and I covertly recorded the conversation. I have not located or reviewed the recording in preparing this statement. As my diary records, M. Mokbel said that he wanted to plead guilty at the first opportunity. It seemed to me that M. Mokbel wanted simply to get his charges dealt with as quickly as possible. I did not believe, and nothing suggested to me, that Ms Gobbo had influenced M. Mokbel into saying that he wanted to plead guilty. He was simply articulating a desire to have the matter finished as soon as possible. I recall that M. Mokbel also told me he would make a "no comment" record of interview and would not be providing any assistance to police.
91. A little later, both M. Mokbel and Cvetanovski made "no comment" records of interview.

Other arrests

92. On 17 May 2006, I arrested Dominic "Vince" Barbaro. He was charged with trafficking a large commercial quantity of drugs. I recall that this charge related to Barbaro's involvement with the manufacture of drugs [REDACTED]



[PII] I was the informant in Barbaro's prosecution. I recall that he ultimately pleaded guilty. I do not believe that Ms Gobbo had any involvement in representing Barbaro, as I recall he was represented by solicitors and counsel from New South Wales.

93. On 18 May 2006, DASS Flynn and I arrested John Kelegouris and Paul Kelegouris at a property in Preston. [PII]

[PII] I was not the informant in their prosecutions and I do not recall if I had any further involvement in investigating the charges against them. I understand they ultimately pleaded guilty. I do not know whether Ms Gobbo was involved in their defence.

94. I understand that Alan Richardson was ultimately arrested and charged in relation to the clandestine lab in Toolern Vale. I was not the informant in Richardson's prosecution and was not involved further in investigating charges against him. I understand that he ultimately pleaded guilty. I do not know whether Ms Gobbo was involved in his defence.

Mr Bickley

95. On 13 June 2006, I arrested **Mr Bickley** for drug related offences. At the time of the arrest, **Mr Bickley** was on bail for other offences.

96. I recall that very shortly after his arrest, **Mr Bickley** was adamant that he couldn't go back to jail and indicated a willingness to co-operate with police. We had previously had discussions with him about this. I recall he said this either at the site of the arrest or shortly after he was placed into the car. I do not have a note of this in my diary.

97. My diary records that sometime after **Mr Bickley** was arrested, he briefly called Ms Gobbo on his mobile phone and spoke with her. **Mr Bickley** also spoke to Ms Gobbo between 1:56 pm and 2:15 pm when he was in an interview room.

98. I did not prevent Ms Gobbo speaking to him, because I understood that I could not refuse a person in custody's request to speak to a lawyer of his choice. I understood, however, that the DSU and Ms Gobbo had made arrangements to prevent Ms Gobbo from acting for individuals involved with T. Mokbel. Further, Ms Gobbo had always been adamant that she would not represent **Mr Bickley**.

99. **Mr Bickley** also spoke with DAI O'Brien and DASS Flynn about providing information to assist police.

100. On 14 June 2006, **Mr Bickley** commenced making a statement to police. I had further dealings with **Mr Bickley** on 3, 13 and 20 July 2006 as recorded in my diary.



101. Despite efforts to have **Mr Bickley** represented by other lawyers, in the period from January 2007 to May 2008, Ms Gobbo became involved informally in providing advice to **Mr Bickley**.
102. On 4 January 2007, I spoke to Ms Gobbo by phone and asked her about the status of **Mr Bickley**'s upcoming committal. I understood Ms Gobbo was informally advising **Mr Bickley** at this stage, so I contacted her.
103. A few days later, on 9 January 2007, I met with **Mr Bickley**.^{P11} As my diary records, it was agreed **Mr Bickley** assist to arrange new legal representation for **Mr Bickley**.
104. On 30 January 2007, I spoke with **Mr Bickley**'s new solicitor Margaret Macaulay. The detail of that conversation is in my diary but, in summary, concerned the discount **Mr Bickley** may receive for his cooperation with police.
105. I am informed that a record in the Loricated database states that on 31 January 2007⁶, Ms Gobbo reported to her SDU handlers that **Mr Bickley** was putting pressure on her to represent him because he did not have confidence in his new solicitor. That record also states that on 4 February 2007, Ms Gobbo told the SDU that **Mr Bickley** wanted to speak with me regarding a variation to his bail. I have no record of speaking with **Mr Bickley** regarding a bail variation and do not remember doing so. My diary records that on 7 February 2007, the Magistrate granted **Mr Bickley** bail on the same terms and conditions as had previously been imposed.
106. On 5 February 2007, I spoke to DS **Mr Bickley**.^{P11} My diary records our conversation but, in summary, he told me that **Mr Bickley** would represent himself with informal help from Ms Gobbo.^{P11}
107. My understanding was that her SDU handlers had told Ms Gobbo she was not to represent **Mr Bickley**. She had also been adamant at an earlier stage that she did not want to represent **Mr Bickley**, however, **Mr Bickley** had been difficult throughout the process and repeatedly sought Ms Gobbo out for assistance. My understanding of the situation was that Ms Gobbo did not want to accept that she could not continue to provide assistance or informal representation to **Mr Bickley**.
108. On 14 March 2007, I met with Tamara Heffernan from the OPP and the Director of Public Prosecutions, Paul Coghlan QC. The meeting is referred to in my diary but, in summary, it related to likely sentencing outcomes for **Mr Bickley**. I have been shown a memorandum from Ms Heffernan to Mr Coghlan that was prepared for this meeting.⁷ The memorandum states that Ms Gobbo may have had a conflict of interest in

⁶ See VPL.0009.0002.0436 (see Loricated VPL.2000.0003.2204).

⁷ See VPL.0012.0002.2102.



representing **Mr Bickley** because she had previously acted for T. Mokbel. My diary doesn't record whether issues about such a potential conflict were discussed at the meeting and I don't remember if they were.

109. On 19 March 2007, **PII** **Mr Bickley** was refusing to cooperate due to the likelihood that he would receive a jail sentence. The next day **PII** **Mr Bickley**. As my diary records, I asked to meet with Ms Gobbo regarding **Mr Bickley** but **PII** **Mr Bickley** and would wait for Ms Gobbo to contact him about **Mr Bickley**. I informed DASS Flynn about this.

110. Around this time Ms Gobbo stopped advising **Mr Bickley**. He was ultimately represented at his plea hearing in May 2007 by Philip Dunn QC.

111. In early May 2007, Ms Gobbo contacted me because Mr Dunn wanted to subpoena Ms Gobbo to give evidence at **Mr Bickley**'s plea to the effect that **Mr Bickley**'s decisions when first charged were being influenced by Zarah Garde-Wilson on behalf of T. Mokbel. As my diary records, Ms Gobbo did not want to give this evidence and I suggested that I could do so instead. Ms Gobbo and I agreed that she would send an email to Mr Dunn stating I was willing to assist, but that she would send it to me first. I received and replied to Ms Gobbo's email on 7 May 2007. I no longer have a copy of these emails.

112. On 9 May 2007, I gave evidence at **Mr Bickley**'s plea about his assistance. The plea was conducted in closed court. Mr Dunn QC appeared for **Mr Bickley**.

113. Later that year, on 1 November 2007, I spoke to **Mr Bickley** after Ms Gobbo had passed on certain information to him. This conversation is recorded in my diary.

114. In December 2007 and January 2008, **Mr Bickley** was due to give evidence at a committal hearing. Ms Gobbo was concerned at this time that it would become widely known that she had given **Mr Bickley** legal advice at the time of his arrest in June 2006, which might suggest that she was also a person who was cooperating with police.

115. I am informed that records in the Loricated database state that Ms Gobbo's SDU handlers told me about this concern on 7 December 2007⁸ and again on 20 January 2008 shortly before the committal⁹. A further record indicates that after the committal had finished on 24 January 2008, I called DS Brennan at the SDU and informed him that Ms Gobbo had not been referred to during the committal¹⁰.

⁸ See VPL.0009.0001.4154 (see Loricated VPL.2000.0003.3079).

⁹ See VPL.2000.0003.5617.

¹⁰ See VPL.0009.0001.0798 (see Loricated VPL.2000.0003.3197).

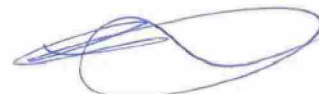
116. On 5 February 2008, Ms Gobbo called me to say she was displeased when **Mr Bickley** had approached her in front of another solicitor, Alistair Grigor. As my diary records, she said **Mr Bickley** had asked when she would catch up for dinner with him. I advised her that if **Mr Bickley** contacted me I would mention it to him.
117. I am informed that a record on the Loricated database¹¹ states that on 29 May 2008, DS Bourne at the SDU told me about a conversation Ms Gobbo had with Alistair Grigor about T. Mokbel. T. Mokbel had apparently told Grigor that T. Mokbel had a recording and statement made by **Mr Bickley** where he denied T. Mokbel's involvement in any offending. I was already aware of this and, as the record states, I told DS Bourne that.

Concerns expressed by Ms Gobbo regarding briefs of evidence

118. On occasions Ms Gobbo expressed concerns that the content of briefs of evidence might disclose her identity as a human source.
119. I am informed there is a record in the Loricated database that states that on 6 October 2006, Ms Gobbo reported to her SDU handlers that she and I discussed the content of the brief in the [REDACTED] matter when I was at court for Dominic Barbaro's bail application.¹² The record states that she was concerned that the [REDACTED] brief contained telephone intercept recordings of her, and that DS Brennan then called me and I confirmed there were no materials in the brief mentioning her. I have no recollection of discussing this with Ms Gobbo or DS Brennan. Nor do I have any note in my diary regarding a conversation with Ms Gobbo on 6 October 2006.
120. I recall Ms Gobbo being concerned that [REDACTED] brief would reveal that he was arrested several days prior to being lodged at the Melbourne Custody Centre, and that [REDACTED] spoke to her on the day of his arrest. As part of her arrangement with T. Mokbel, Ms Gobbo was expected to tell T. Mokbel and other members of the Mokbel family information like that and she was concerned that if T. Mokbel found out, he would suspect her of hiding things from him and become enraged.
121. On 30 October 2006, my diary records that I met with the SDU and gave them a brief "for reviewing". I did not record what this related to, but I believe that the SDU was seeking to understand what was in the briefs so that they could manage any risks to Ms Gobbo's safety before the briefs were delivered to the accused. The primary concern was about T. Mokbel and others finding out that Ms Gobbo had alerted them to [REDACTED] arrest.

¹¹ See VPL.2000.0003.3598.

¹² See VPL.0009.0001.1122 (see Loricated at VPL.2000.0003.4476).



122. I am informed that an entry in the Loricated database¹³ states that on 30 October 2006, the SDU provided five volumes of the briefs of evidence in the Ahec, Barbaro, and M. Mokbel matters to Ms Gobbo, and that she made a number of comments that were apparently passed on to DS Flynn. I have also been informed that the SDU's meeting with Ms Gobbo was recorded and transcribed, but I have not reviewed the recording or transcript of that meeting in preparing my statement.
123. On 31 October 2006, I had a debrief with the SDU regarding "brief amendment". I have been shown part of a document from the Loricated database which contains a list of the suggestions that Ms Gobbo apparently made to the SDU about the brief.¹⁴ I can categorically say that I did not make any of these changes to the brief. I considered that it was not Ms Gobbo's role to provide feedback as to the preparation of briefs of evidence and that the only reason that she was provided with these briefs was for the SDU to deal with any safety concerns. Further, as my diary records, the debrief with the SDU was at 9:00 am and I submitted the briefs of evidence to DI O'Brien for authorisation at 10:30 am, which meant the material in my briefs was final. My diary also records that the briefs were served on the defence a few days later, on 3 November 2006.

Investigation of threats made to Ms Gobbo

124. From late 2006 onward, Ms Gobbo received numerous threats. The investigation into these threats was known as Operation Gosford.
125. From 26 February 2007 until 30 June 2008 (when I was temporarily assigned to the Homicide Squad), I was the primary investigator with respect to these threats. I took over this investigation from DSC Hayes.
126. On 16 April 2008, Ms Gobbo's car was set alight in South Melbourne. I was also the primary investigator of the arson, which was known as Operation Vortex.
127. From around April 2007 until June 2008, I was one of a number of officers scheduled to remain available on a rotating roster after usual duty hours to respond to any threats that Ms Gobbo received. I understand this meant there was always an officer available 24-hours to respond if Ms Gobbo received a threat.
128. I recall that when I left for the Homicide Squad in June 2008, then-DSC Hantsis took over as the primary investigator in relation to threats and was Ms Gobbo's point of contact. I recall that sometime later the Petra Taskforce took over protecting Ms Gobbo and investigating any threats against her.

¹³ See VPL.2000.0002.5290.

¹⁴ See VPL.2000.0002.5290.



129. I remember speaking to one of my superiors, possibly DS Flynn, about whether I was able to contact Ms Gobbo directly when investigating the threats. I believe advice was obtained and I was told that I was permitted to contact her directly.

130. My diary records that Ms Gobbo received the following threats while I was the primary investigator assigned to Operation Gosford:

- a) On each of 18, 20 and 28 March 2007, Ms Gobbo received a new threatening text message. Each time, DS Flynn informed me of the threat the day of the threat or shortly after;
- b) On 13 July 2007, Ms Gobbo received a threatening text message. I was informed of this threat on Monday 16 July 2007;
- c) On 25 July 2007, Ms Gobbo received threatening phone calls;
- d) On 15 October 2007, a written threat in an envelope was left in Ms Gobbo's letterbox at her home. The envelope also contained two rounds of ammunition;
- e) On 29 October 2007, Ms Gobbo received another threatening text message sent from a phone box;
- f) On 5 November 2007, Ms Gobbo received a verbal threat by phone from a private number. I was informed of this threat on 7 November 2007;
- g) On Christmas Eve 2007, I received a phone call from Ms Gobbo reporting that she had received three threatening text messages during the night. She said she was not able to contact DS Brennan at the SDU. I called DS Brennan and left a message for him to contact Ms Gobbo. When he called me back, I advised him of the messages Ms Gobbo had received;
- h) On 4 February 2008, Ms Gobbo reported that a large stuffed dog toy had been left outside Ms Gobbo's mother's house, which Ms Gobbo interpreted as a threat against her;
- i) On 27 February 2008, Ms Gobbo received abusive and threatening texts from Simon Khoury referring to her as a "dog". The details of the messages she received are set out in my diary;
- j) On 5 March 2008, received an abusive phone call from Tony Bayeh. She arranged by email to fax me notes that she took of the calls, and showed me the text messages she received; and
- k) On 6 March 2008, Ms Gobbo received further threats by text message. The details of the messages are set out in my diary.

131. Throughout this time I was investigating the threats against Ms Gobbo, her ongoing safety was being handled by the SDU. I was concerned about her safety and she often spoke to me openly about these issues. I understood that the SDU were aware of all of these threats, as I was aware that Ms Gobbo spoke with them regularly and in great detail.

132. I also spoke with members of the SDU including DS Bourne and DS Brennan about security arrangements for Ms Gobbo and how the investigation into the threats was progressing.



133. For example, by November 2007, Victoria Police had arranged for Ms Gobbo a **device** equipped with a monitored duress alarm system. I recall that it was the Purana Taskforce that arranged to provide this **device**. When the duress alarm was activated, police officers would immediately attend her location unless she positively confirmed she did not need assistance. In late November 2007, I spoke with SDU members a number of times about setting up a process for responding to the duress alarm.
134. Ms Gobbo was often difficult to manage with safety measures like the duress alarm, despite the serious threats she was receiving. She did not want to use the **device** Victoria Police gave her because she liked her existing **device** and did not want to replace it. She did not readily accept measures to protect her safety and often pushed back strongly against them.
135. On other occasions, the SDU provided me with information relevant to the threats against Ms Gobbo. For example, I am informed that a record on the Loricated database¹⁵ states on 24 November 2007, DS Bourne at the SDU told me that one of the threats Ms Gobbo had received earlier that month may have been a joke by Alistair Grigor who called while he was intoxicated at the races. As my diary records, I met Ms Gobbo at her chambers two days later on 26 November 2007 and she also told me about how the call may have been a joke.
136. Further, on 19 February 2008, the SDU told me about a proposal for Ms Gobbo to record a dinner meeting between her and a person suspected of making threats against her. It was proposed that Ms Gobbo record the meeting so that any threat against her could be caught on tape. As my diary records, the dinner on 20 February 2008 was ultimately not recorded because Ms Gobbo refused to use a recording device. That was consistent with her approach when I was investigating these threats, in that she had the last word on what she was willing to do about her safety.
137. On 16 April 2008, Ms Gobbo's car was set on fire near Clarendon Street, South Melbourne, while she was attending a dinner with Jacque El Hage and Alistair Grigor. The arson took place while I was on leave.
138. When I returned from leave on 21 April 2008, I began investigating the arson. I spoke with SDU members to obtain information relevant to my investigation.
139. On the morning of 22 April 2008, I spoke with Ms Gobbo at her home about the arson. The details of that conversation are in my diary. I then emailed a brief draft witness statement to Ms Gobbo, which she signed that afternoon after making some changes.
140. On 28 April 2008, I interviewed Alistair Grigor about the arson. The details of the interview are in my diary.

¹⁵ See VPL.2000.0003.5486.



141. On 30 April 2008, I interviewed Jacque El Hage about the arson. I covertly recorded this conversation. I have not located or reviewed a copy of this recording in preparing my statement, but my diary records that I saved it to the Purana computer system.
142. I am informed that records on the Loricated database state that the SDU provided me with information that Ms Gobbo had given to the SDU about my interviews with Grigor and El Hage¹⁶. It appears that Ms Gobbo had separately spoken with Grigor and El Hage after their interviews with me. I am informed that records in the Loricated database also state that the SDU gave me information about Ms Gobbo's suspicions that El Hage knew she was a human source¹⁷ and Ms Gobbo's concerns that journalists were calling her about the arson¹⁸. The SDU gave me this information because it was relevant to my arson investigation. The arson was a dramatic escalation of the threats against Ms Gobbo and she spoke to the SDU in great detail about things relevant to that investigation.
143. My diary records that on 23 April 2008, I discussed a list of people who had visited M. Mokbel at Barwon Prison with DS Bourne of the SDU to attempt to identify individuals who might have been responsible for the arson. I am informed that a record on the Loricated database states that two days later on 25 April 2008, DS Bourne passed on to me Ms Gobbo's views on the individuals who had visited M. Mokbel.¹⁹
144. Other aspects of my investigation recorded in my diary include meeting with Ms Gobbo on 5 May 2008 so that she could give me the dates of her recent contact with Grigor and El Hage, confirming on 13 May 2008 that a person who contacted her was a bona fide insurance assessor and speaking to Ms Gobbo on 15 May 2008 about the potential involvement of Tony Bayeh.
145. In the period immediately following the arson, the SDU also informed me about a concern Ms Gobbo raised with them that one of her client's signed statements in an unrelated drug matter referred to the fact that Ms Gobbo and Jim Valos had advised the client to provide a statement assisting police.²⁰ As my diary records, on 28 April 2008 I spoke to the police informant who had taken the statement and the responsible solicitor at the OPP and asked them to redact references to Ms Gobbo and Jim Valos from the statement. The next day I spoke to Jim Valos who advised me that he had shredded the unredacted version.
146. On 20 June 2008, Ms Gobbo received a threatening text message, which she was able to identify as coming from Tony Bayeh. I was informed of this new threat by DS Hantsis. As my diary records, I met with Ms Gobbo on 20 and 24 June 2008 about this threat.

¹⁶ See VPL.2000.0003.0972.

¹⁷ VPL.2000.0003.1006.

¹⁸ VPL.2000.0003.1026.

¹⁹ See VPL.2000.0003.0949.

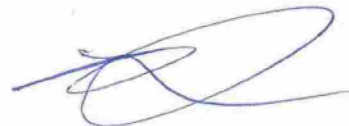
²⁰ See VPL.2000.0003.0932.



Contact with Ms Gobbo as a barrister

147. Around the time that I was investigating threats against Ms Gobbo, I also had contact with her on a number of occasions about ongoing court matters.
148. Dealing with her as a lawyer could be difficult because Ms Gobbo did not operate like many other barristers, in that she often did not have an instructing solicitor acting for her and so she would be the point of contact rather than a solicitor.
149. On 7 February 2007, I attended Ms Gobbo's office with DS Flynn when he served a number of documents in relation to an unrelated MDID operation.
150. In relation to M. Mokbel, my diary records that on 29 May 2007, I called Ms Gobbo to ask whether M. Mokbel would provide a voluntary DNA reference sample. I recall that another crew within Purana wanted to compare M. Mokbel's DNA for another investigation, and it was usual practice to ask a person's lawyer if they would voluntarily give a sample before applying for a court-ordered sample. I do not recall how I was aware that Ms Gobbo was acting for M. Mokbel around this time. I recall that it was only for a short period because he was struggling to pay legal bills and she was assisting him as a favour. Ms Gobbo ultimately did not represent him at his plea.
151. I remember being concerned that she was acting for M. Mokbel, especially given the threats she was receiving and the lengths she had gone to not to assist him when he was arrested in May 2006. It seemed to me that she refused to pull herself away from M. Mokbel and others she had acted for, in that she kept agreeing to help them out when they asked. I did not raise these concerns further because I understood that it was still the SDU's role to manage issues about who she appeared for. I knew they were in close contact with her day-to-day and it was their job to manage her as a source. These issues were occurring regularly.
152. I am informed there is a record on the Loricated database which states that on 25 June 2007, Ms Gobbo told her SDU handlers that she wanted to discuss M. Mokbel's plea with me because she was "confident that she can turn him around and get him to plea", despite understanding that it was best for her not to represent him²¹. I believe that I never spoke to her about M. Mokbel's plea. I have no reason to believe that she had any involvement in him pleading guilty. I recall that Ms Gobbo did not represent him for his plea.
153. I also had some incidental contact with Ms Gobbo on other matters. On 5 June 2007, while executing a search warrant in relation to T. Mokbel's criminal activities, an occupant of one of the houses searched called Ms Gobbo. This occurred on the day that T. Mokbel had been arrested in Greece. Ms Gobbo spoke with DS Flynn. I do not believe that I spoke to her.

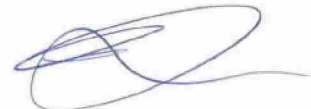
²¹ VPL.0009.0001.1371 (see Loricated VPL.2000.0003.2512).



154. My diary records that on 12 June 2007 I spoke to Ms Gobbo. My diary records that I would "have answer re Barbaro this afternoon". I do not recall who or what this related to. It could have related to Dominic Barbaro, as I was the informant in his prosecution. However, I recall that Ms Gobbo had no involvement in representing him, as he was represented by solicitors and counsel from New South Wales.
155. On 29 June 2007, I was in the vicinity of the Melbourne Magistrates Court and met with DS Flynn who had gone to see Ms Gobbo. I remember that DS Flynn was meeting with her and I simply met him near her chambers. I do not believe that I spoke with her.

Obtaining AFP brief regarding T. Mokbel

156. My diary records that on 31 January 2007, I obtained a copy of materials relating to Operation Orbital from Jamie Fletcher of the Australian Federal Police (AFP). I reviewed the brief and incorporated the material into a brief of evidence for Operation Quills.
157. Operation Orbital was an AFP investigation about the importation of illicit drugs by Abdullah Radi and T. Mokbel. Victoria Police was investigating the same targets in relation to the subsequent manufacture and sale of those drugs, which was part of Operation Quills.
158. I recall that the AFP material contained evidence from telephone intercepts or evidence about drugs located at Radi's house. I recall that the AFP only gave me a small amount of material and that it was not all of the information they had.
159. By late May that year, I was part of a team within the Purana Taskforce that was making urgent preparations for the arrest of T. Mokbel in Greece. DI O'Brien was coordinating the preparation of the material. At the time, I was working essentially full time to prepare material for T. Mokbel's arrest.
160. This process was urgent because once T. Mokbel was arrested, there were tight deadlines for putting material before the Greek courts in the extradition proceedings. I recall that the material had to be comprehensive because if evidence of certain offences was not included in the extradition materials, then we may not have been able to charge T. Mokbel with those offences. The material also had to be obtained in sufficient time to allow for translation into Greek.
161. On 29 May 2007, I spoke to Glen Morrison of the AFP about getting access to further material that the AFP had for Operation Orbital. As my diary records, he was going to seek approval from his manager in the Melbourne office and advise. I recall that I was looking for copies of material that had already been prepared and collated into a brief of evidence that had been served on the defence.



162. On 5 June 2007, T. Mokbel was arrested in Greece. That same day, I followed up and spoke to Jamie Fletcher of the AFP about the release of the brief of evidence regarding Operation Orbital. As my diary records, he stated that a formal request process needed to be followed.
163. By 19 June 2007, the AFP had still not provided the information. I approached DI O'Brien and informed him of my intention to obtain a copy of the AFP brief about T. Mokbel from Ms Gobbo. As my diary records, I sought the brief for reference purposes only, pending release of the material by the AFP. I cannot remember why she had a copy of this brief or how I knew that she had it. It is likely that she had represented a co-accused or T. Mokbel himself in relation to Operation Orbital charges before T. Mokbel had absconded overseas.
164. DI O'Brien was in charge of preparing the extradition material. He understood the urgency in getting the material and the challenges in obtaining that material from the AFP. As my diary records, DI O'Brien gave me approval to obtain the brief from Ms Gobbo.
165. On 21 June 2007, I spoke to Ms Gobbo and arranged to collect the brief from her the next day. I do not believe that she asked why I wanted the brief. I collected the brief on 22 June 2007 and returned it on 18 July 2007.
166. I did not see any issue with obtaining a copy of a brief that the prosecution had given Ms Gobbo in these circumstances. The brief was simply a defence copy of the brief as it had been served by the prosecution. I recall that the brief did not contain any notes or instructions from her client or anything similar.
167. As my diary records, I continued with efforts to obtain the brief from the AFP. On 26 June 2007, Jarrod Ragg from the AFP initially refused to provide a copy of the brief and then requested that a further request be sent through. On 30 July 2007, I spoke with DSS O'Brien regarding obtaining the Orbital brief. My diary records that DSS O'Brien was to speak with the Victorian DPP to raise the issue with the Commonwealth DPP.
168. The next day, DSS O'Brien informed me that a Superintendent within Victoria Police had spoken to a senior member of the AFP and arranged us access to the brief. Even then, I was allowed only to inspect the brief to request specific items for copying.
169. Ultimately, the AFP provided some material on 2 August 2007 and further material on 3 and 6 August 2007. Once I had the AFP material, I added relevant parts of that material to the Operation Quills brief.

Move to homicide and subsequent contact with Ms Gobbo

170. On 30 June 2008, I moved to the Homicide Squad full time on temporary duties. After that time, I had a few sporadic contacts with Ms Gobbo regarding her welfare, a further potential threat and in relation to matters that I was involved in at the time.



171. While I was at Homicide, DSC Hantsis took over contact with Ms Gobbo in relation to any ongoing threats. I am informed that records in the Loricated database indicate that Ms Gobbo received further threats while I was at the Homicide Squad – namely, text messages on 6 July 2008²², a bullet fired through the window of a carwash that she part owned on 12 or 13 July 2008²³, threats by members of the El Kheir family in court²⁴ and a threat from Tony Bayeh at court²⁵. Apart from the car wash incident, I do not recall any of these incidents. I was not involved in investigating these matters and did not contact Ms Gobbo about them.
172. On 25 July 2008, Ms Gobbo emailed me to congratulate me on my role at the Homicide Squad and to ask for my contact number, which I gave to her. I didn't expect ongoing contact with her but I had no issue with her contacting me if she wanted to.
173. In early August 2008, John Higgs came up as an associate of a person of interest in an ongoing homicide investigation. I wanted to speak with Higgs because a partner of his had been closely associated with the deceased. Around this time, Higgs was one of a number of people arrested by the AFP in relation to the large-scale importation of drugs hidden in tomato tins.
174. On 11 August 2008, I emailed Ms Gobbo to ask if she acted for any of the individuals who had been arrested by the AFP. Even though I did not state it in my email, my intention was to get information about John Higgs, if I could. I was not enquiring about the tomato tins investigation or looking to obtain information about it.
175. On 12 August 2008, I met with Ms Gobbo with DS Hantsis at Wheat Restaurant in the Melbourne CBD. As my diary records, we discussed Ms Gobbo's safety concerns and her overall welfare. I recall that she was stressed and feeling under pressure because of the AFP arrests in relation to the tomato tin drug importation. She was worried about her safety because she thought she might be suspected of informing on others. I recall that we spoke about John Higgs.
176. I am informed that a record on the Loricated database²⁶ states that Ms Gobbo says I was interested in "Higgs and RK" at our meeting, which might be a reference to Rob Karam, who I know was another person arrested in relation to the tomato tins drug importation. I was not actively enquiring about Karam and was not involved in investigating the tomato tin drug importation.
177. I sent further emails to Ms Gobbo in that week and shortly after. On 14 August 2008, I emailed her stating "Good result". I do not recall what this was a reference to, but

²² See VPL.0016.0016.0143 (see Loricated VPL.2000.0001.0098).

²³ See VPL.2000.0003.1227.

²⁴ See VPL.0009.0001.0950 (see Loricated VPL.2000.0003.1238).

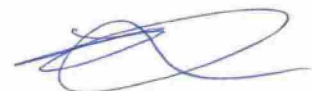
²⁵ See VPL.0009.0001.0968 (see Loricated VPL.2000.0003.3757).

²⁶ See VPL.0009.0001.0993 (see Loricated VPL.2000.0003.3783).



I think it would be a reference to someone arrested in relation to the tomato tins arrest being denied bail, which was a good result because she was stressed about certain individuals being released on bail. In replies to that email she mentioned she had "two big secrets", but I never found out what she was referring to.

178. On 18 and 19 August 2008, I exchanged emails with Ms Gobbo about a non-Purana related legal issue. At the time, I was involved in a trial and had been advised by the OPP that the search warrant might be ruled invalid because of a legal technicality. I asked Ms Gobbo for her thoughts on it because I wanted a defence barrister's view of this issue, and she was a barrister that I had had contact with over the last few years. Ms Gobbo had no connection to the trial. I recall that the prosecution ultimately lost the argument and the search warrant was ruled invalid, but the evidence obtained in the search was ultimately admitted based on the Court's discretion.
179. On 10 September 2008, I emailed Ms Gobbo to see if I could obtain an address for John Higgs. I first asked if she had acted for him in his bail application. I do not recall if she ultimately gave me the address. She then mentioned leaving me an envelope to collect, which I collected a few days later. I don't believe I asked for anything, but collected it from her as a courtesy. I do not remember what was in the envelope, but I don't believe it was anything important. My email on 15 September 2008 refers to "summaries" so it is possible that the document was a bail summary in a recent bail application.
180. I returned to the Purana Taskforce on 31 October 2008. The next contact I had with Ms Gobbo was on 3 January 2009, when I spoke to Ms Gobbo on the phone because she had reported that her mailbox had been forced open. I do not believe I did anything in response to this.
181. I had a significant period of leave from 6 February 2009 to 30 March 2009. I recall that when I returned from leave, I was instructed that no one was to contact Ms Gobbo and that she was now being managed by the Petra Taskforce.
182. The only further contact I recall with Ms Gobbo was at a meeting in a hotel room in East Melbourne arranged by Ms Gobbo's handlers at the Petra Taskforce. I cannot remember when this meeting occurred, but I recall that it was a few months after she had become a witness and she was under police protection. I believe that DS Hantsis attended the meeting with me.
183. I recall being told that the meeting was arranged because Ms Gobbo was upset and had demanded to speak with me and DSC Hantsis. I recall that she vented during the meeting and spoke about how her life had changed and that she complained that she wasn't able to have contact with the people that she used to.
184. The only other time I have seen Ms Gobbo since then was when I was in a car and saw her walking down Lonsdale Street accompanied by Rob Karam near the County Court building. I was surprised to see her in the court precinct and even more surprised to see her with Rob Karam, given the efforts that had been made to protect her.



My impressions of Ms Gobbo

185. I have been asked about my impressions of Ms Gobbo. From my initial contact with her in late 2005 onwards, I formed the strong impression that she always wanted to feel needed. It seems to me that this led her to try and do everything possible for her clients beyond what a barrister would usually do, and to refuse to pull herself away from clients when they asked her to help, even when she was advised not to and appreciated that she should not represent them.

186. I am certain that her decision to approach Victoria Police in August 2005 was to protect her own interests, in that she saw cooperating with police as the way of getting out of the situation she had created for herself with T. Mokbel. Based on those conversations, I believe that she was motivated to approach Victoria Police in order to protect her reputation, to remove herself from situations where she might commit further offences and to relieve the pressure she felt had built up around her.

187. Throughout my interactions with her, Ms Gobbo always seemed to be pursuing whatever she thought was in her own interests at that particular time and doing whatever it took to chase those interests down.

How I learned, or were given reason to believe, Ms Gobbo was providing information to police (Q3)

188. I became aware that Ms Gobbo was giving information to police during my initial conversations with her on 31 August 2005.

Awareness of others and the authorisation of Ms Gobbo as a human source (Q4 & Q5)

189. I refer to my answer to question 2.

Personal contact with Ms Gobbo (Q6)

190. I refer to my answer to question 2.

Information and assistance received (Q7 & Q8)

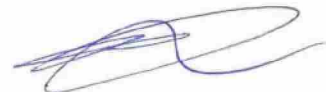
191. I refer to my answer to question 2.

Concerns raised as to the use of a legal practitioner – and Ms Gobbo – as a human source (Q9 & Q10)

192. I refer to my answer to question 2.

Disclosure (Q11)

193. I am not aware of any discussions about the obligation of disclosure in relation to Ms Gobbo.



194. Victoria Police training, policy and practice had always emphasised to me the requirement to protect the existence and identify of any human sources.

Other human sources with obligations of confidentiality or privilege (Q12)

195. ^{PII}



Training (Q13)

196. I have not reviewed in detail the courses and training that I have completed with Victoria Police, beyond what I have set out in answering Question 1 above. I recall that many of the matters listed in Question 13 were covered in Detective Training School. However, I do recall that:

- a) Obligations of disclosure were covered in DTS and I think they were covered again in the Brief Quality Assurance Course I completed more recently;
- b) The right of an accused person to remain silent was covered in detail in the Academy, and reinforced whenever I gave a caution upon arresting someone, which I have done many times in my career;
- c) The right of an accused person to a lawyer was also a fundamental topic covered at the Academy and reinforced whenever I gave a caution;
- d) Legal professional privilege was covered in the Academy;
- e) Public interest immunity has arisen a number of times in course of my duties; and
- f) Professional and ethical decision making was covered in the Academy and I am aware of the SELF framework that is to guide decision making in the course of my duties.

Other relevant matters (Q14)

197. I have nothing further to add.

Dated: 25 June 2019

A handwritten signature in blue ink, appearing to read 'Paul David Rowe', written over a dotted line.

Paul David Rowe

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