

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

**STATEMENT OF OFFICER GRAHAM EVANS**

1. My pseudonym for the purpose of this Royal Commission is Officer Graham Evans. I am a [REDACTED] with the [REDACTED], responsible for human source management. I am currently on leave for an indefinite period of time. My identity and my identity as a human source handler has been exposed in documents published on the Royal Commission's website and by email. As a result, my ability to work covertly as a handler of confidential human sources has been compromised and I have been put at personal risk.
2. I make this statement in response to a request to the Royal Commission into the Management of Police Informants dated 23 May 2019.

**Educational background and employment history (question 1)**

3. I graduated from the Victoria Police Training Academy in [REDACTED] 1995. A summary of my education and employment history with Victoria Police is set out in Annexure A to this statement.

**Involvement or association with any investigation which had dealings with Ms Gobbo (question 2)**

4. My contact with Ms Gobbo occurred over two main periods:
  - (a) first, as a member of the Purana Taskforce between around April 2006 and January 2008 when I was responsible (together with others in my crew) for managing [REDACTED] <sup>Mr Cooper</sup> who was providing statements to Victoria Police and for whom she was acting. I was not directly responsible for taking statements from [REDACTED] <sup>Mr Cooper</sup> though I did accompany (then) Detective Senior Sergeant Dale Flynn to meet with [REDACTED] <sup>Mr Cooper</sup> on multiple occasions, including some occasions on which DSS Flynn obtained statements from [REDACTED] <sup>Mr Cooper</sup>. Rather, I assisted in managing [REDACTED] <sup>Mr Cooper</sup> welfare during that time; and

(b) from around 3 March 2009, after she had signed a statement in relation to Paul Dale, until August or September 2010, when I was instructed to and did cease all contact with Ms Gobbo. During this period, I was acting effectively as her handler, although she was a crown witness who required management at this time and not a human source. My contact with Ms Gobbo over this period is generally detailed in:

- i) my diaries for the relevant period;
- ii) contact reports;
- iii) in a very small number of instances, in information reports; and
- iv) transcripts of audio-recordings.

5. I have had no contact with Ms Gobbo since around September 2010. Prior to that date, I may have had some additional, very minimal contact with her outside of these two main periods. I have set out my contact with Ms Gobbo to the best of my recollection in my answer to question 6 below.
6. I have been informed that relevant emails to my Victoria Police email address have been produced to the Royal Commission. I have also been shown some emails from a [REDACTED] email address which I used to correspond with Ms Gobbo between March 2009 and August 2010. I no longer have access to that [REDACTED] email address.
7. I do not recall exactly when I first met Ms Gobbo. I believe it would have been at or around the courts. I may have first met her as early as 2001, but do not recall having engaged with her directly until some years later.
8. I provide further detail in my answer to question 6 below.

**Provision of information or assistance by Ms Gobbo to Victoria Police (question 3)**

9. I do not recall exactly when I first learned that Ms Gobbo was a human source, but it was early on in my time at the Purana Taskforce [REDACTED] 2005 to [REDACTED] 2008). During my time at Purana, I was never officially told that Ms Gobbo was a human source, but it became obvious to me who the source of certain information we received was. It was also clear to me that the other members of my crew knew (whether officially or unofficially) and knew that I knew.



10. In [REDACTED] 2009, I was officially informed of Ms Gobbo's history as a registered human source between 2005 and 2009, when I joined the Petra Taskforce in order to manage Ms Gobbo as a Crown witness.

11. I provide further detail in my answers to questions 4 and 6 below.

**Awareness of others (question 4)**

12. I believe or expect that the following people knew that Ms Gobbo was a human source prior to the end of 2012:

- (a) members of the Purana Taskforce;
- (b) some members of the Petra Taskforce;
- (c) members of the SDU and the Human Source Management Unit, which sat above the SDU;
- (d) members of Witness Security (**WitSec**); and
- (e) a number of high-ranking members of Command, including Luke Cornelius, Jeff Pope, Simon Overland, Graham Ashton and Tony Biggin.

13. From at least [REDACTED] 2009, I was aware that the SDU kept a list of members who were aware of, or may have been aware of, Ms Gobbo's assistance. I do not believe I ever saw this list. I was briefed in respect of this list because it was necessary for me to understand who may have been aware of Ms Gobbo's assistance for the purpose of assessing risk.

**Authorisation of Ms Gobbo (question 5)**

14. I do not now recall who precisely may have been involved in authorising the use of Ms Gobbo as a human source. However, I am aware that responsibility for authorising the use of a source sits with the Officer in Charge of the particular workgroup, the Local Source Registrar, and is ultimately approved by the Central Source Registrar.

15. I believe that the Petra Steering Committee would have been responsible for authorising the use of Ms Gobbo as a Crown witness from 2009-2010.



**Personal contact with Ms Gobbo (question 6)**

16. In my roles at the Drug Squad from [REDACTED] to [REDACTED], it is possible that I had some very minimal contact with Ms Gobbo in her capacity as a defence lawyer, but I cannot specifically recall.
17. In my roles at the Major Drug Investigation Division (MDID) between [REDACTED] and [REDACTED], I had contact with Ms Gobbo, primarily because I was involved in Operations [REDACTED] and [REDACTED], which were underway over a long period of time. On [REDACTED] 2005, my crew from MDID, headed by DSS [REDACTED], commenced with Purana Taskforce. The other members of DSS [REDACTED] crew at Purana were DSC [REDACTED] DSC [REDACTED] and DSC [REDACTED].

MDID

18. Between February and April 2003, I was involved in [REDACTED] [REDACTED], Victoria, and then on [REDACTED] 2003, arresting <sup>Mr Cooper</sup> [REDACTED] and another target with DSS Flynn and DSC David Bartlett. Following the arrest, <sup>Mr Cooper</sup> [REDACTED] was remanded in custody and I returned to [REDACTED] to assist with processing the scene. I have no record, nor any recollection, of any contact with Ms Gobbo at that time.
19. I was also involved in the arrest of <sup>Mr Bickley</sup> [REDACTED] on 15 August 2005. I recall <sup>Mr Bickley</sup> [REDACTED] asking for Ms Gobbo while he was in custody. He spoke about the Mokbels and said that she would ultimately be "allocated" to him. I do not recall whether Ms Gobbo came to see <sup>Mr Bickley</sup> [REDACTED] in custody. I do not believe I had any contact with her at the time.
20. On 21 October 2005, I attended a bail application at the Melbourne Magistrates' Court. My diary records that Ms Gobbo was representing the accused. I do not recall whether I had any conversation with Ms Gobbo that day.

Purana Taskforce

21. In [REDACTED] 2005, I commenced at the Purana Taskforce, which I understood to be a taskforce primarily targeting the operations of Tony Mokbel. I was aware from, or from shortly after, this time that Ms Gobbo was providing information to police which was critical to Purana's investigations. I was never told this officially, but I guessed it very early on. I believe DSS Flynn and I would have discussed it from [REDACTED]

time to time. To the best of my knowledge, any information that was provided to Purana would have come from the SDU via Detective Inspector Jim O'Brien (or someone acting in his role). He would then tell us that information had been received from a human source.

22. My diary records indicate that on 17 January 2006, I attended a meeting with DSS Cruze, Officer Sandy White and chaired by Detective Acting Inspector Jim O'Brien regarding Operation Posse. I do not independently recall that meeting, but I am sure that no one identified Ms Gobbo as a human source at that meeting.
23. On [REDACTED] 2006, I was briefed by DAI O'Brien to assist with looking for a [REDACTED] in the [REDACTED] area. My recollection is that, while I was not officially aware that the information as to the [REDACTED] was provided by Ms Gobbo, it was obvious to me that she was the source of the intelligence.
24. In the following days, I assisted with surveillance of <sup>Mr Cooper</sup> [REDACTED] and further enquiries regarding a potential [REDACTED].
25. On [REDACTED] 2006, <sup>Mr Cooper</sup> [REDACTED] was arrested with [REDACTED]. I was not involved with execution of search warrants and making arrests, but I assisted with processing <sup>Mr Cooper</sup> [REDACTED] and [REDACTED], including that I took them to the [REDACTED] Police Station to be lodged in the cells at around 1.15am the following morning.
26. Between [REDACTED] 2006 and [REDACTED] 2006, I assisted other members of the crew in dealing with <sup>Mr Cooper</sup> [REDACTED]. During this time, I conveyed <sup>Mr Cooper</sup> [REDACTED] between the [REDACTED] Police Station, where he was lodged in the cells overnight, and the St Kilda Road Police Headquarters; I bought meals, [REDACTED] and toiletries for <sup>Mr Cooper</sup> [REDACTED] and <sup>Mr Cooper</sup> [REDACTED]; I got changes of clothes for them; and I sat with <sup>Mr Cooper</sup> [REDACTED] for periods of time. I recall, at one point, finding a television for him. My diary records that at 11.30am on [REDACTED] 2006, I contacted a FMO (forensic medical officer) to examine <sup>Mr Cooper</sup> [REDACTED] as he appeared to be <sup>Mr Cooper</sup> [REDACTED]. While he was at St Kilda Road, <sup>Mr Cooper</sup> [REDACTED] was lodged in a secure interview room. My role was to look after him.
27. I recall DSS Flynn, DAI O'Brien and other members speaking to <sup>Mr Cooper</sup> [REDACTED] and encouraging him to assist police. I remember speaking to him throughout this time, while I spent many hours sitting with him, but the conversation was mainly in very [REDACTED]

general terms. I do recall a number of conversations about <sup>Mr Cooper</sup> family and about doing the right thing. I mainly left it to my superior officers to work on getting him to agree to sign a statement.

28. I was aware of a plan being formulated in the background which involved [REDACTED] <sup>Mr Cooper</sup> to go to [REDACTED] with a view to obtaining information which may lead to further arrests. I do not know whether Ms Gobbo was involved in any of these discussions. Ultimately, <sup>Mr Cooper</sup> agreed to [REDACTED]. My diary records steps that I took to assist with this operation.
29. I recall <sup>Mr Cooper</sup> and [REDACTED] both asking for Ms Gobbo. My diary records that on [REDACTED] 2006 at 9.35pm, <sup>Mr Cooper</sup> requested that Ms Gobbo attend to see him the following day. I recall Ms Gobbo coming to see <sup>Mr Cooper</sup> at St Kilda Road. I have not recorded in my diary exactly when this was. I believe that I went down in the lift to collect her and bring her up to the room <sup>Mr Cooper</sup> was in. I knew that Ms Gobbo was <sup>Mr Cooper</sup> lawyer, so I did not stay with them when she met with him.
30. On [REDACTED] 2006, at around 6.30pm, I <sup>Mr Cooper</sup> was [REDACTED] so as to [REDACTED] <sup>Mr Cooper</sup>. My diary records that [REDACTED] phoned Ms Gobbo "*re legal advice*" at 7.35pm.
31. I was aware that DSS Flynn started taking a statement from <sup>Mr Cooper</sup> around this time, but I was not directly involved in obtaining that statement. My diary records a statement being taken from <sup>Mr Cooper</sup> from 7.50pm and that I attended to meals and security for <sup>Mr Cooper</sup> at this time.
32. My diary records that at 3.45am on [REDACTED] 2006, [REDACTED] arrived at St Kilda Road from [REDACTED] <sup>Mr Cooper</sup> and [REDACTED] were sent to court together later that day. DSS Flynn, DSC Rowe and I took them to the custody centre at the Melbourne Magistrates' Court together to lodge them for a filing hearing.
33. On [REDACTED] 2006, I served charges and tapes in respect of <sup>Mr Cooper</sup> and [REDACTED] on Ms Gobbo outside Wheat restaurant on behalf of DSC Rowe. I recall that she was representing both of those targets. To the best of my recollection, I was asked to serve those items on Ms Gobbo because I was already in the area and she knew me as a member of DSS Flynn's crew.

34. My diary records an extensive briefing on [REDACTED] 2006 by DSS Flynn in respect of information which may have come from <sup>Mr Cooper</sup> [REDACTED]
35. On [REDACTED] 2006, I attended the Melbourne Magistrates' Court for [REDACTED]. I do not have any record of Ms Gobbo being at Court that day.
36. I visited <sup>Mr Cooper</sup> [REDACTED] on a number of occasions, mostly with DSS Flynn. I do not recall going with anyone other than DSS Flynn. I believe the first of these visits was on [REDACTED] 2006. I do not recall Ms Gobbo ever being present when I went <sup>Mr Cooper</sup> to visit [REDACTED]
37. My diary also records, on [REDACTED] 2006:
- *Signing of original stms [statements] (Sunday with O'BRIEN) J O'B mentioned [REDACTED]*  
*Knowing through GOBBO he is on [REDACTED] charges set bells off in my head. Then [REDACTED] next week & says S/T [spoke to] to [REDACTED] asked him does he know of any future purchaser of large amounts of [REDACTED] tabs & if so to have him prepare \$ as he has something big in works coming. (That's all [REDACTED] knows)*  
 ...  
*GOBBO also mentions that [REDACTED] has had gut full of [REDACTED] trying to make contact with him & [REDACTED] has become infuriated with sending people in order to meet with [REDACTED] a frequent basis (pressure to [REDACTED])*
38. This is a diary entry in which I have recorded what <sup>Mr Cooper</sup> [REDACTED] has said to me and DSS Flynn as he said it. To the best of my recollection, <sup>Mr Cooper</sup> [REDACTED] was conveying information to us that he had received from another [REDACTED] while DSS Flynn and I were [REDACTED] so that DSS Flynn could take his statement. I would have made this note solely to assist DSS Flynn with the statement taking process.
39. On [REDACTED] September 2006, my diary records that I received a telephone call at 9am from a person who had been arrested in relation to a non-[REDACTED] operation. My diary note states "wants to meet up next week with possible information. Comm. Mention [REDACTED] Will arrange time then." Ms Gobbo's name and a mobile phone number are recorded next to this entry. I believe I have note Ms Gobbo's name simply because she was [REDACTED]

representing that person. That person never actually provided information and I had no contact with Ms Gobbo in relation to that "possible information."

40. My diary records that on [REDACTED] September 2006, I attended a committal mention at the Melbourne Magistrates' Court and that at 12pm, DSS Flynn and I met Ms Gobbo at Wheat restaurant. I made the following note in my diary:

*1200 Met at Wheat Restaurant with Nicola GOBBO & FLYNN. \$10.00 expended by me.*

*Discussion re:-*

*- [REDACTED]*

*- Matters re Op POSSE. Full notes taken by FLYNN*

41. I believe that the discussion regarding [REDACTED] was in relation to him not wanting to give a DNA sample. Ms Gobbo was acting for Mr [REDACTED]. [REDACTED] was also a person who had also been arrested in relation to [REDACTED] operation some time earlier when I was at [REDACTED]. Ms Gobbo did not give us information on that day. To the best of my recollection the conversation was about
- Mr Cooper welfare and about wanting to separate from [REDACTED] and [REDACTED]. Neither I nor DSS Flynn indicated to Ms Gobbo that we were aware she had given information to police and, likewise, Ms Gobbo did not make any indication to us.

42. On [REDACTED] October 2006, I received a telephone call from Ms Gobbo, in her capacity as [REDACTED] barrister, indicating that Mr [REDACTED] would contact me to arrange to give a DNA sample.

43. My diary records the following note at 12.30pm on [REDACTED] October 2006:

*Horty, Halim, Habib MOKBEL from Maria - Prison*

*Horty told Zarah to tell Roberta to pull heads in on GOBBO/Heliotis money. Carl pissed off*

*Roberta meet with Horty. Animosity*

*D/A/S/Sgt Kelly informed*

44. I believe this is a record of a call I received from someone at the prison where Horty Mokbel was incarcerated. My diary indicates that I passed this information on to DASS Jason Kelly.
- [REDACTED]

45. Over the coming months, a number of arrests were made and a number of premises searched based on information provided by <sup>Mr Cooper</sup> [REDACTED]. During this time, I was <sup>Mr Cooper</sup> [REDACTED] regularly with DSS Flynn, who was taking statements from <sup>Mr Cooper</sup> [REDACTED].
46. One of the persons arrested, partly on the basis of <sup>Mr Cooper</sup> [REDACTED] information in November 2006, was [REDACTED]. On [REDACTED] November 2006, DSS Flynn and I spoke to [REDACTED] who was considering giving a statement. To the best of my recollection, Ms Gobbo never acted for [REDACTED].
47. On 5 January 2007, I received a phone call from Alistair MacDougall at the ACC, who wanted to meet with <sup>Mr Cooper</sup> [REDACTED] regarding a statement he had made about [REDACTED]. <sup>Mr Cooper</sup> [REDACTED] I made arrangements for Mr MacDougall and DSC Hantsis to visit <sup>Mr Cooper</sup> [REDACTED] and I faxed a copy of <sup>Mr Cooper</sup> [REDACTED] relevant statement to Mr MacDougall, as sanctioned by DSS Flynn. I do not recall Ms Gobbo having any involvement in this matter.
48. On [REDACTED] February 2007, I went to [REDACTED] with DSS Flynn to obtain [REDACTED] signed statement. My diary records that we had a conversation regarding the use of solicitors and the potential for a discount. The discount refers to a sentencing discount. I believe the conversation regarding solicitors related to the need to be careful about who is representing who, given that solicitors available to [REDACTED] may also have been acting for other accused persons whose interests may conflict with [REDACTED] interests. This was a standard conversation, which we had with many accused persons. I do not specifically recall having a conversation like this about Ms Gobbo, though I knew Ms Gobbo was connected with the Mokbels and other targets and accused persons.
49. My diary contains a note on [REDACTED] June 2007, which states:
- GOBBO* <sup>Mr Cooper</sup> [REDACTED]  
*Queens Birthday weekend.*
50. I do not recall why I made this entry or what it relates to.
51. On [REDACTED] 2007, I attending the Melbourne Magistrates' Court for [REDACTED] sentencing. I recorded in my diary that Ms Gobbo acted for [REDACTED]. I do not recall speaking to Ms Gobbo that day. [REDACTED]

52. On [REDACTED] June 2007, DSS Flynn and I met with Ms Gobbo at Wheat restaurant regarding [REDACTED] Mr Cooper. According to my diary notes, this was a short conversation of approximately 10 minutes. I expect we were discussing [REDACTED] Mr Cooper welfare, prior to an in-camera hearing regarding [REDACTED] Mr Cooper at 9.30am that day in the County Court.
53. I have been informed there is a reference in an ICR which suggests that information was disseminated to me that Ms Gobbo's client, [REDACTED], was "ready to roll". I do not have any recollection of receiving this information, nor do I have a note in my diary.

Secondment to Petra Taskforce – Operation Adobe

54. On [REDACTED] 2009, I commenced as [REDACTED] at the [REDACTED] [REDACTED] on promotion to [REDACTED] from [REDACTED]. On that first day, I received a call at around 11.55 am asking me to attend the Petra Taskforce the following day. When I attended the Petra Taskforce on [REDACTED] 2009, I was informed I would be seconded to the Petra Taskforce, effective immediately, directed by Chief Commissioner Overland. At this point, I was officially briefed – together with Detective Sergeant Lloyd – regarding Ms Gobbo, including that she had been a human source prior to this time and that she was now a Crown witness. Ms Gobbo signed a statement in relation to Paul Dale on 7 January 2009.
55. DS Lloyd and I were told we had been chosen because Ms Gobbo was a high-risk witness and had previously been a human source. Although neither of us had worked at SDU in the past, we both had source-handling experience and had completed training [REDACTED] in relation to the handling of human sources. This training was required in order to be eligible to [REDACTED] human sources. At that time, there were only a few Victoria Police members with the necessary training and we were chosen specifically for the role. DI Smith and DSS O'Connell had very limited, if any, training in relation to the handling of human sources and none in relation to [REDACTED] human sources. We were instructed to use the same tradecraft and methodology for Ms Gobbo as if she had been a registered human source.
56. I recall being told that it was important that there be a separation between Ms Gobbo and the SDU as she was no longer a human source, but that there should also be the same controls and protections in respect of Ms Gobbo now that she was a witness.

Ms Gobbo went from being a person of extreme risk, managed by a fully resourced SDU, and then the expectation was she was managed using the same tradecraft and methodology as a Crown witness by myself and DS Lloyd. DSS O'Connell and DI SMITH openly told us they both had limited experience in the field of Human Source Management and that we should adopt practices we saw fit that was in our area of expertise. It was for this reason that DS Lloyd and I adopted the practices I have detailed below.

57. I recall being informed that my role had two important parts: firstly, to protect Ms Gobbo and ensure that she got safely to the trial of Paul Dale (to whom her statement related); and secondly, that she be encouraged to enter witness security. I was given a credit card to use for arrangements for Ms Gobbo's safety and her expenses. From time to time I used my own credit card if the budget was exhausted and was reimbursed. All of this expenditure was recorded in my diaries and authorised by [REDACTED] or the Petra Steering Committee. The operation was known as Operation Adobe.
58. During this time, DSS O'Connell and DI Smith and others were involved in attempting to negotiate a memorandum of understanding with Ms Gobbo, which would set out the security measures that would be taken and compensation that would be given to Ms Gobbo as a Crown witness (MOU). At times I was present for these discussions but I did not take an active role in those discussions. Although I was not directly involved in these negotiations, Ms Gobbo often talked to me about this and I recall her often saying, *"I don't want to be any worse off than I am now."*
59. I believe that the MOU was never finalised, but a number of steps were taken in the interim to provide compensation and, of course, security to Ms Gobbo. For instance, I was responsible for arranging payments of \$1,000 per week to Ms Gobbo in respect of a living allowance. Sometimes I [REDACTED] a [REDACTED] and other times I [REDACTED] to Ms Gobbo and asked her to sign [REDACTED]. The [REDACTED] provided to me by [REDACTED]. These were [REDACTED], rather than [REDACTED] so as not to leave [REDACTED] that might compromise Ms Gobbo's security by indicating her assistance to police. I was also authorised to reimburse Ms Gobbo [REDACTED] for living expenses and she frequently provided receipts to me for this purpose; often for quite small amounts. I recall on one occasion that I obtained authorisation to reimburse Ms Gobbo for Pink concert tickets which she [REDACTED]

had purchased. The reason it was necessary to reimburse Ms Gobbo is that the Petra Steering Committee deemed it too great a security risk for her to attend a concert in Melbourne, where she was well known. I documented all reimbursements to Ms Gobbo in my diary as they happened.

60. It was important for managing Ms Gobbo's security that she spend as little time as possible [REDACTED]. Clear instructions were conveyed to me by DI Smith and DSS O'Connell from the Petra Steering Committee to keep her [REDACTED] as much as possible. As a result of this, I made arrangements for [REDACTED] [REDACTED] in [REDACTED] usually [REDACTED] and for a period of time [REDACTED]. I have summarised these measures at paragraphs 79 to 85 below.

Process in relation to handling Ms Gobbo as a Crown witness

61. I worked primarily with DS Lloyd, who was co-handler for Ms Gobbo. We were supervised in this role by DSS Shane O'Connell and DI Steve Smith. DSS O'Connell effectively assumed the role of controller in respect of Ms Gobbo. Neither DSS O'Connell, nor DI Smith had training in human source management that I was aware of. Where DS Lloyd and I required direction or authorisation, DSS O'Connell would refer such a request to the Petra Taskforce Steering Committee, via DI Smith which was the relevant chain of command. DSS O'Connell or at times, DI Smith would usually brief us verbally in relation to any direction or authorisation. I do not recall ever attending before the Steering Committee myself.
62. Because Ms Gobbo was not a human source, I was not formally required to make contact reports when I spoke to her. However, given Ms Gobbo's high-risk status as a witness, I considered it prudent to make audio-recordings and prepare contact reports in respect of all of my contact with her where possible. [REDACTED]  
[REDACTED] I considered it appropriate to [REDACTED]  
[REDACTED] in relation to Ms Gobbo. I sensed that if anything was to ever happen to Ms Gobbo there needed to be a concise and accurate record of how she was managed if we were ever held to account. As a result, 208 contact reports<sup>1</sup> were made in respect of Ms Gobbo between 4 March 2009 and 6 August 2010. [REDACTED] I would review audio-recordings I had made in order to make a contact report and to make sure I had not missed anything during the conversation. Sometimes DS Lloyd

<sup>1</sup> Contact Reports go from 1/09 to 201/10 with two reports numbered 03/09.

or DSS O'Connell would review my audio-recordings and prepare the contact report for me. I generally only included short summaries of my conversations with Ms Gobbo in the contact reports because the conversations were usually quite lengthy and I relied on the audio recordings. Occasionally, an audio-recording failed or a recording device was unavailable. In those instances, I made a record that the communication was not recorded in contact reports that I prepared.

63. I did not make audio recordings when I travelled out of the jurisdiction to Bali because I did not know whether to do so would be in breach of local laws in relation to audio-recordings.
64. All of these contact reports and audio-recordings were uploaded and stored on a database on a secure hard drive. The audio-recordings and contact reports were also linked to one another on the hard drive as relevant. Given the importance of this information, I also backed up a complete copy of this database onto a second secure hard drive, in case the first drive ever failed. To the best of my recollection, only DS Lloyd, DSS O'Connell and I had access to this database. When I made audio-recordings, I would lock the recording devices in my safe. I have been told that the audio-recordings have now been transcribed. I have been shown some of these transcripts in preparing this statement.
65. I also made diary entries in respect of my contact with Ms Gobbo. I referred to her as Witness F in these records as it is usual in respect of human sources to not record information as to the identity of the source. I did this notwithstanding my notes would be discoverable at some stage if Ms Gobbo was to give evidence at trial. This was necessary in order to protect Ms Gobbo in the meantime.
66. Additionally, I set up [REDACTED] email address ([REDACTED]) which I used for corresponding with Ms Gobbo. I also used this account for [REDACTED] [REDACTED] Ms Gobbo and police officers who [REDACTED] [REDACTED] from time to time. DS Lloyd also had access to this account and DSS O'Connell may have had access. Ms Gobbo also set up [REDACTED] email address under the name [REDACTED] [REDACTED] [@bigpond.com](mailto:[REDACTED]@bigpond.com)), which she used for corresponding with us.
67. For communicating with Ms Gobbo by phone, I used a phone provided by Victoria Police. I may have purchased the SIM card [REDACTED] but I do not

recall. I also communicated with Ms Gobbo by SMS using this phone. I often recorded SMS messages in contact reports. I saved all of the SMS messages on the database on the secure hard drive.

68. It is usual practice to update [REDACTED] after each meeting [REDACTED]. Accordingly, I briefed DSS O'Connell (or DI Smith in his absence) daily on my contact with Ms Gobbo (although I was generally speaking with her several times a day). Ms Gobbo often told me about meetings she had with various underworld figures. It was necessary for me to know this information so that I could consider risks to Ms Gobbo's safety and any necessary steps for her protection. From time to time, Ms Gobbo volunteered information to me. Occasionally, it appeared to me to be necessary to pass on information that Ms Gobbo told me, which I did as detailed below. Usually this dissemination was done verbally, but on a few occasions, I prepared an information report.
69. While it is usual practice to perform regular risk assessments in respect of human sources, we did not specifically do this in respect of Ms Gobbo in the standardised forms. We were regularly assessing risk on a daily basis, recording details on Contact Reports and regularly updating DSS O'Connell and DI Smith who would convey updates to the Steering Committee. Furthermore, we were working closely with WitSec in relation to ongoing arrangements for Ms Gobbo's safety. WitSec had its own processes for assessing risk. A thorough assessment of risk must have already been made in relation to Ms Gobbo at the time of deciding to use her as a Crown witness. It is policy that a thorough risk assessment be undertaken at the time of deactivating a registered human source. Further, the Petra Steering Committee would have had to consider various risks in determining to use Ms Gobbo as a Crown witness. Those assessments would have been in relation to risk to Ms Gobbo, risk to the community, risk related to the information itself, risk to those police members in contact with her and risk in relation to Victoria Police as an organisation. I assumed that this risk had been considered by those who made the decision to use Ms Gobbo as a Crown witness, including the Petra Steering Committee.
70. Similarly, I understood that any consideration about whether the information contained in Ms Gobbo's statement was privileged or otherwise confidential would have been undertaken by those responsible for taking Ms Gobbo's statement. I knew [REDACTED]

Ms Gobbo was a barrister, but I did not believe that she had acted for Paul Dale. She also told me on several occasions that she did not represent him.

71. As to Ms Gobbo's time as a human source, I thought that any consideration about whether she was providing information that was privileged or otherwise confidential would have been at the time that information was provided.

Summary of contact with Ms Gobbo – Petra Taskforce

72. Doing the best I can with the records and time available to me, the following is a summary of much of my contact with Ms Gobbo. My diaries, contact reports, audio-recording transcripts, SMS records and other documents produced to the Commission contain full detail of my contact with Ms Gobbo.
73. On 4 March 2009, I was introduced to Ms Gobbo as her handler by Shane O'Connell.
74. On 5 March 2009, I phoned DSS Flynn and told him about my new role and asked for his advice in dealing with Ms Gobbo in these circumstances. I recorded this phone call in my diary.
75. On 6 March 2009, I met with Ms Gobbo and made a note of discussions with Ms Gobbo about Darren Bednarski giving evidence at Tony Mokbel's committal hearing that day and nominating Ms Gobbo as the person who had convinced him to give evidence.
76. On 9 March 2009, I met with Ms Gobbo to introduce her to DS Lloyd.
77. On 12 March 2009, DS Lloyd, Officer Sandy White and I met with Ms Gobbo. I recall that this meeting was arranged largely to address Ms Gobbo's concerns about needing to relocate for her safety and her concerns about having different handlers to those from the SDU. Officer White came along to assist with easing this transition.
78. DS Lloyd and I had frequent contact with Ms Gobbo after this time; often several times a day. Our contact with her is recorded in the contact reports, our diaries, transcripts of audio-recordings of our conversations with her and copies of SMS messages, all of which have been (or are in the process of being) produced to the Royal Commission.

 trips and Operation Briars

79. In accordance with my firm instructions from the Petra Taskforce Steering Committee, I made arrangements whenever necessary to provide [REDACTED] [REDACTED] for Ms Gobbo [REDACTED]. She spent a significant amount of time in [REDACTED] throughout this time. It was often necessary to send police members to wherever she was to provide security and support for her. These [REDACTED] were necessary while she was refusing to enter witness security. When she had to [REDACTED] from time to time [REDACTED]  
[REDACTED]  
[REDACTED]
80. If police members were required to travel to where Ms Gobbo was, [REDACTED]  
[REDACTED]
81. This travel and the arrangements I made for it is recorded in my diary and in the contact reports. Travel, accommodation and all associated expenses were always authorised by the Petra Steering Committee. Some further detail is provided below.
82. Between about 29 March 2009 and 5 April 2009, DI Smith, DSS O'Connell, DS Lloyd and I travelled to Bali. I travelled to Bali other times after this date which is recorded in my diary and in Contact Reports. To the best of my recollection, the first time we travelled to Bali, Ms Gobbo was on holiday there at the time with her sister. I informed DSS O'Connell and DI Smith and it is my recollection that they conveyed this information to the Steering Committee. We were then told by DI Smith and DSS O'Connell to follow her to Bali to provide support, security and protection. This order had come from the Steering Committee. DI Smith and DSS O'Connell were also in the process of attempting to agree to the form of the MOU with Ms Gobbo at the time.
83. Later in 2009, while discussing accommodation arrangements with Ms Gobbo, she told me that rather than [REDACTED] she wanted to go back to Bali. I recall her telling me that if I ran the numbers, it would be [REDACTED]  
[REDACTED] She told me to take the proposal to the Petra Steering Committee. I did so and the proposal was approved. I believe this is what is referred to in Contact Report 32/09 in a call I received at 4.46pm on 14 April 2009.  
[REDACTED]

84. At around this time, Ms Gobbo had also indicated that she wished to make a statement to the Briars Taskforce. I recall this possibility being discussed over some days or weeks. An example is a discussion at a meeting between DSS O'Connell, me and Ms Gobbo on 15 May 2009. There are also references to the Briars statement in various contact reports and other conversations with Ms Gobbo. It was agreed that when Ms Gobbo went to Bali, [REDACTED] variously by me, DS Lloyd, DI Smith and DSS O'Connell. We would rotate so that none of us was there the entire time, but shared the work. It was also arranged that DSS Ron Iddles and DI Stephen Waddell would come to Bali to meet with Ms Gobbo and take her statement in relation to Briars Taskforce.
85. Consequently, between about 22 and 30 May 2009, I and the other police members mentioned above travelled to Bali. The purpose of this trip was, firstly, to keep Ms Gobbo [REDACTED] where she was well-known and at high risk, and secondly, for Ms Gobbo to meet covertly with DSS Iddles and DI Waddell for the purpose of giving a statement to the Briars Taskforce. Contact Report 53/09 details [REDACTED] Ms Gobbo spent some time with DSS Iddles and DI Waddell, both during and after [REDACTED] but to my knowledge a statement was never actually signed.

Rob Karam

86. On 12 March 2009, Ms Gobbo telephoned me at around 10.10pm and told me that she had just spoken to Rob Karam, who was meeting at that time at the Paper Shop Deli with two people in breach of his bail conditions. I noted on the Contact Report 09/09 that Detective Sergeant Jason Kelly would be notified of this. My diary shows that I made a telephone call to DS Kelly at 6am the following morning, providing an update regarding Operation Kennels from Witness F and providing a new mobile number Ms Gobbo had given me for Mr Higgs, one of the people meeting Mr Karam.
87. Passing on Mr Higgs' mobile phone number assists investigators [REDACTED] [REDACTED] This, in turn, helps to protect the human source (in this case, witness) by making it easier [REDACTED] potential threats.
88. I do not know what further steps, if any, were taken in relation to this information. I do not believe an information report was created in respect of this information. There was not real utility in an information report in relation to this information because by the time I was able to convey it to DS Kelly the following morning, there [REDACTED]

would have been little he could have usefully done with the knowledge that Mr Karam may have breached his bail conditions the previous evening. I was also aware that Ms Gobbo was talking to DS Kelly around this time about a statement to be made by [REDACTED]

- [REDACTED]
89. On 2 June 2009, I recorded in a Contact Report that Ms Gobbo had received information from an acquaintance of hers<sup>2</sup> that [REDACTED] was currently cooking 20-40 pounds of amphetamine per week in a factory on the outskirts of the metropolitan area. I noted in the contact report that investigators Richards and McIntyre in the Clandestine Laboratory Squad would be notified, without revealing the source of the information. I knew that DSS McIntyre had been involved in investigating [REDACTED] in the past. I initially disseminated the information to him verbally, rather than by way of information report as I was trying to protect Ms Gobbo's identity.
  90. Subsequently, on 22 June 2009, DSS McIntyre phoned me and asked me to prepare an information report. I then phoned DSS O'Connell (who was an Acting Inspector at that time) and he authorised me to create an information report without mentioning Ms Gobbo, due to security concerns for her. I then prepared and submitted IR no. INT09IR334811 with special instructions for dissemination to DSS McIntyre only. I do not know what, if anything, was done with this information.
  91. I have been shown Contact Reports 104/09, 105/09 and 126/09 which also relate to information about [REDACTED] CR104/09, dated 16 August 2009, records "*Information to pass on to [Sandy White] re [REDACTED]*" and CR105/09, dated 17 August 2009, records "*Intell re [REDACTED] to be passed on [to Officer White]*". I do not have a note in my diary of this information and I have not found a record of passing that information on to Officer White. Ms Gobbo would often tell me things and ask me to pass them on to Officer White. I believed that she was doing this to try to reinstate her relationship with Officer White. It is likely I did not pass on any information to Officer White on this occasion.
  92. CR126/09, dated 13 September 2009, was likely prepared by DSS O'Connell or DS Lloyd as I was on leave for several weeks from (and including) 12 September 2009.

<sup>2</sup> I explain the relevant detail of this acquaintance in my Confidential Statement.

This contact report refers to a matter regarding [REDACTED] being dealt with in an email. I have no recollection of this matter and have not found any email in respect of [REDACTED] around that date.

93. I have been shown an email dated 10 November 2009 from Ms Gobbo [REDACTED] [REDACTED] to me [REDACTED] using the email addresses referred to at paragraph 62 above, in which Ms Gobbo states that she has never actually met [REDACTED]

Murder of Carl Williams

94. On 19 April 2010, Carl Williams was murdered in prison. My diary records that I was on sick leave that day.
95. My diary records that on 20 April 2010, I received a telephone call from DI Smith, who instructed me to contact Ms Gobbo regarding information passed to DSS Jason Kelly about the Williams Murder. I assume that this means Ms Gobbo had contacted DSS Kelly. It had been some time since I had had contact with Ms Gobbo, as detailed at paragraphs 108 to 109 below.
96. A contact report dated 20 April 2010 records that:
- (a) I made calls to Ms Gobbo as instructed by DI Smith after information was received by DSS Kelly;
  - (b) Ms Gobbo "*Claims to have intel re the Carl Williams murder and other stuff. Wants to meet with Homicide*";
  - (c) Ms Gobbo provided "*Contract killing info re Carl Williams*"; and
  - (d) Ms Gobbo "*Claims to have been told she has contract killing on her head of \$150,000*".
97. Naturally, I could not ignore this information. My diary records that at 8am the following day I provided updates to DI Smith and DS Stuart Bailey, Homicide Squad. At 12.30pm that day, I called Ms Gobbo to arrange a meeting with DS Bailey. My diary indicates that I made this call in the presence of DS Bailey and that I then briefed DS Bailey regarding Ms Gobbo. I then attended a meeting with Assistant Commissioners Cornelius and Dunne with DI Smith and others, at which "*future direction*" was discussed. I do not independently recall this meeting. [REDACTED]


98. My diary and the contact reports record frequent contact with Ms Gobbo over the following days including the following:
- (a) On 21 April 2010 at approximately 4pm, DS Bailey and I meet with Ms Gobbo at [REDACTED] recorded in CR185/10. DS Bailey took notes of this meeting and I made an audio-recording of the meeting.
  - (b) On 24 April 2010, I spoke to Ms Gobbo, recorded in CR189/10. The contact report indicates that we discussed, among other things, the potential contract on Ms Gobbo's life and the Williams murder. I made an audio-recording of that phone call. I do not believe I did anything with this information as I was aware that DS Bailey was investigating it;
  - (c) On 28 April 2010, DS Bailey and I met with Ms Gobbo at 4.10pm, recorded in CR192/10. The contact report records, "*Intell re Williams murder. IR to be submitted by Bailey re Taskforce Driver.*"
99. I have been shown information reports which relate to this matter, numbered INT10R376825, INTMK022197, INTMTK022247 and INTMTK022492 and a Tasking Log numbered INTMTK022769.<sup>3</sup> I believe I did not submit any of these reports myself, though I am referred to in them. It appears that INT10R376825 was submitted by DS Bailey following our meeting with Ms Gobbo on 21 April 2010 and INTMTK022492 was submitted by DS Bailey following our meeting with Ms Gobbo on 28 April 2010.
100. The information reports dated 21 and 28 April 2010 record that:
- (a) Ms Gobbo provided information on 21 April 2010 that:

[REDACTED]

<sup>3</sup> VPL.0005.0038.0305

<sup>4</sup> I address this in my Confidential Statement.


[REDACTED]



(f) After the meeting on 28 April 2010, DS Bailey and I were directed to have no further contact with Ms Gobbo until further notice.

101. A contact report dated 29 April 2010 records that I informed Ms Gobbo that I had been instructed not to have any contact with her until further notice from AC Cornelius. I also recorded this in my diary. I do not know what, if any, further steps were taken in relation to the information provided by Ms Gobbo.
102. Tasking Log numbered INTMTK022769 contains an entry on 17 May 2010, stating "*D/Sgt BAILY to liaise with [Graham EVANS] to ensure all lines of inquiry are exhausted.*" My diary indicates that I was on leave on 17 May 2010 and returned to work on 24 May 2010.
103. I commenced at the [REDACTED] for a short time after I finished with the Petra Taskforce in around [REDACTED] 2010. I do not have any recollection of acting on the information provided by Ms Gobbo in April 2010 while at the [REDACTED]

Other contact

104. Ms Gobbo would often tell me about discussions she had had or was having with investigators and about things she had done in the past, including assertions about people she had acted for, information she had provided and persons she had encouraged to assist police. I generally did not do anything with the content of these discussions as they were not relevant to my role in relation to Ms Gobbo. From time to time, I would help to arrange meetings or phone calls between Ms Gobbo and investigators, because I was directly in contact with Ms Gobbo most days.
- 

105. When Ms Gobbo made assertions to me about things she had done in the past, including assertions about assisting police, I generally took those statements with a grain of salt and rarely did anything with the information as it was not relevant to my particular role.
106. From a review of my diaries and contact reports within the time available, I have identified the following entries that suggest information may have been provided by Ms Gobbo.
107. On 8 May 2009, I met with DSS O'Connell and Officer Sandy White about Ms Gobbo. I told Officer White that Ms Gobbo had told me about three members she thought were corrupt, whom she said she had previously reported to Officer White. Officer White told me that all of those issues had been canvassed and referred to the Ethical Standards Department (**ESD**), where appropriate. I met with Ms Gobbo later that day and I believe I told her then that those issues had been dealt with.
108. On 7 July 2009, I received an email from Ms Gobbo, which forwarded an email from Mick Gatto to a large number of recipients. I believe Ms Gobbo sent this email to me because she believed the contact details would be of interest to the police. Contact details of Mick Gatto's associates were relevant to my work to the extent that the assisted me to be aware of the movements of anyone who might pose a threat to Ms Gobbo's safety. I have been shown an email by which I forwarded the email from Ms Gobbo to the Petra Taskforce. This information would not have warranted an information report or other formal means of dissemination as it only contained contact details which may have been of interest to investigators.
109. On about 7, 16 and 17 July 2009, I put a number of names to Ms Gobbo to ask her if she knew them. I believe this may have occurred because Ms Gobbo had received threats and those names had been identified by officers investigating those threats. I have been shown:
- (a) an email dated 31 May 2009 from Ms Gobbo to me, in which she sets out threats she has received via SMS;<sup>5</sup>
  - (b) a transcript of my conversation with Ms Gobbo at 1.40pm on 6 July 2009, during which I informed her that Brent Fisher was investigating threats

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<sup>5</sup> VPL.0100.0172.0192

which came to Ms Gobbo's phone and that he had had investigated some of the relevant phone numbers and found that one of them had also made contact with a phone owned by Jim Valos a few days prior to Ms Gobbo receiving threats on her phone. Although the transcript says "*Vlahos*", I believe this should be "*Valos*";

- (c) a Contact Report dated 7 July 2009, which records that I asked Ms Gobbo about Operation Quezy and some Asian names;
- (d) an email dated 16 July 2009 at 9.12am from Brent Fisher to DS Lloyd (who forwarded the email to me), naming persons of interest;<sup>6</sup> and
- (e) an email dated 16 July 2009 at 10.48pm from Ms Gobbo to me, which sets out some information about the persons of interest.<sup>7</sup>

- 110. I believe I would have forwarded the information provided by Ms Gobbo to Brent Fisher to assist his investigation, but I have not found a record of having done so.
- 111. On 14 July 2009, Ms Gobbo asked me to remind DSS O'Connell about withdrawing a charge in relation to [REDACTED] on the basis that she had convinced that person to give a statement. I do not independently recall this conversation.
- 112. My diary records that at around 7.20pm on 25 August 2009, I made a telephone call to Officer Sandy White regarding intelligence to be disseminated from Ms Gobbo. I have been informed that Officer White's diary refers to information provided to Ms Gobbo by an acquaintance<sup>8</sup> about an offer [REDACTED] to kill Mick Gatto. A contact report for the same day does not mention this information. I believe that the contact report was prepared by DSS O'Connell.
- 113. On 26 August 2009 at around 11.55am, I spoke to Ms Gobbo regarding her movements, then I handed the phone to DSC Cameron Davey, one of the Petra Taskforce investigators. I stopped the recording at the time I handed the phone to DSC Davey. I do not know what they discussed. We occasionally acted as a conduit between Ms Gobbo and investigators, but did not get involved in their discussions, so I turned the recording device off.

<sup>6</sup> VPL.0100.0172.0072 at .0094

<sup>7</sup> VPL.0100.0172.0072 at .0087

<sup>8</sup> I explain the relevant detail of this acquaintance in my Confidential Statement.

114. My diary records that I had been instructed by DI Smith on 20 November 2009 not to contact Ms Gobbo as legal action by her was pending. Following that time, I made contact reports on 23 November and 8 December 2009 detailing notes I had put in the mail to Ms Gobbo for the purpose of updating her as to reimbursements made to her. A number of contact reports between 4 and 25 February 2010 also record contact that I had with Ms Gobbo at that time. I believe that contact had been re-established with a view to negotiating and arranging for Ms Gobbo to enter witness security. I also had some SMS, email and phone communications with Ms Gobbo's sister during January 2010, generally, regarding Ms Gobbo's health and welfare and arrangements to be made for Ms Gobbo.
115. My diary records that, on 26 February 2010 I was instructed by DSS O'Connell not to contact Ms Gobbo at the request of her solicitor. My diary records that Ms Gobbo attempted to contact other police members during this time. For example, my diary records the following on 3 March 2010:

*1545 ... Also notified by members re contact attempt by Witness F.*  
*- Paul ROWE. Witness F requested number for Ron IDDLES. ROWE believed he may have been recorded. Complaining re treatment by VicPol & usual issues. ROWE believed F would already have had IDDLES number but just wanted an excuse to S/T him.*  
*- Dale FLYNN. Witness F claimed to have mended bridges with <sup>Mr Cooper</sup> Another excuse for contact.*

116. As set out above, I had some contact with Ms Gobbo in April 2010 after Carl Williams was murdered.
117. I have been shown an email from AC Cornelius on 12 May 2010, directing that I be appointed as Ms Gobbo's handler. Thereafter I had some contact with Ms Gobbo, which is generally recorded in my diaries and in the contact reports.
118. On 28 June 2010, my diary records that I briefed DI Smith and DSS O'Connell that I had received a SMS from Ms Gobbo over the weekend and that she requested urgent contact by Officer Sandy White. I was instructed by DI Smith that all liaison with Ms Gobbo was to go through me and that she was to have no contact with other police members. I have been shown a record of a SMS message which I believe I sent on 28 June 2010, which reads:



*I have just been instructed that the status quo remains and [Officer White's] office are to have nothing further to do with these matters. Please contact me with your concerns re your safety and ill notify my superiors*

119. The Tasking Log numbered INTMTK022769 records some further communication from Ms Gobbo to various police members. This includes, on 25 June 2010, "*Witness F wishing to speak with HARRINGTON. [EVANS] to ascertain why and advise suitability asap.*" The Tasking log also contains an email from me on 29 June 2010 stating:

*Nothing further Harro. I've had a bit of SMS contact with her and she seems to have dropped it.*

*I reckon she's fishing for allies again. Her usual MO. I keep you updated if she brings anything further up again unless you want me to specifically bring anything up.*

120. Contact reports in July 2010 indicate that Ms Gobbo informed me by SMS just after midnight on 16 July 2010 that she had received a death threat from a phone box. I phoned Ms Gobbo a few minutes later. My diary records that I briefed DAI O'Connell in relation to the threats the following morning and updated the Driver Taskforce about the information. I also created Information Report numbered INT10IR389956. That Information Report appears to have been updated with further information from investigators. I believe I created the report originally, but did not enter most of the information in that report.

121. A contact report dated 20 July 2010 records a phone call at 9.30pm with Ms Gobbo as follows:

*"Claims to have information re a large importation pending in the next 2 weeks. Unsure about passing on the information due to current relationship with Vic Pol. (Enquiries to be made with SDU [Officer Richards] to see if this information is being obtained from another source).*

122. My diary records that on 21 July 2010, I briefed DAI O'Connell and spoke to <sup>Anderson-DS</sup> Anderson-DS who said he would get back to me. On 22 July 2010, <sup>Anderson-DS</sup> Anderson-DS told me he had no knowledge of the large importation Witness F had mentioned. I then updated DAI O'Connell, who told me not to obtain further intelligence from Ms Gobbo given her health concerns.



123. I had some further contact with Ms Gobbo up until 6 August 2010. The contact report I prepared on that date records that I told Ms Gobbo that Cameron Davey would be her contact point while I was on leave.
124. Around the time I returned from leave on 5 September 2010, I received emails indicating a settlement had been reached with Ms Gobbo in relation to her civil action against Victoria Police. I also received a direction dated 17 August 2010 to members of the Petra Taskforce that members of the taskforce were prohibited from initiating any contact with Ms Gobbo and that if Ms Gobbo were to make contact, we would advise her that she must only contact the Manager of the SDU and that no information, intelligence or evidence was to be solicited or taken from Ms Gobbo.
125. I did not have any contact with Ms Gobbo after that date. I also returned the phone I had used to contact Ms Gobbo and the credit card [REDACTED] I had been authorised to use in respect to the management and handling of Ms Gobbo and also for the payment of associated expenses.

**Information & assistance received (Q7 & Q8)**

126. I refer to my answer to question 6 above.

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

127. I do not recall any such concerns being raised. As to concerns in my own mind, I refer to my answer to question 6 above.

**Awareness about disclosure in relation to Ms Gobbo (Q11)**

128. I am not aware of any such discussions. I assumed that when the decision was made to use Ms Gobbo as a Crown witness, consideration was given to the fact that material relating to her history as a registered human source would be discoverable.

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

129. I am aware that there is another lawyer who was a registered human source at some stage and that person is now [REDACTED] PII. I do not know anything about the circumstances or information provided by this person. Otherwise, I am not aware of [REDACTED]

any other human sources that have provided information or assistance to Victoria Police who were subject to legal obligations of confidentiality or privilege.

**Training (Q13)**

130. I completed a number of courses during my time at Victoria Police. I recall receiving specific training in relation to public interest immunity in the [REDACTED] Human Source Management course. I received training in relation to all of the other categories set out in question 13 at Detective Training School and Advanced Detective Training School.
131. My knowledge and learning in relation to the topics in question 13 was also gained from and supported by experience on the job, particularly during my time with the Purana Taskforce, [REDACTED] and [REDACTED]

**Other information (Q14)**

132. I have nothing further to add in response to question 14.

Dated: 6 October 2019

[REDACTED]

.....

Officer Graham Evans

## Annexure A

### Employment history

1. From [REDACTED] 1995, I was at the Victoria Police Training Academy undertaking Recruit Training.
  2. From August 1995 to August 1997, I was a Trainee Constable performing general duties at the [REDACTED] Police Station.
  3. From August 1997 to May 1998, I was a Constable performing general duties at the [REDACTED] Police Station.
  4. From May 1998 to September 1998, I was seconded to the [REDACTED] Criminal Investigation Branch as Constable – Investigator.
  5. From September 1998 to June 2000, I was seconded to the [REDACTED] Regional Response Unit as Senior Constable – Investigator, and was upgraded to Acting Sergeant for a period during this time.
  6. From June 2000 to November 2000, I was seconded to the [REDACTED] Criminal Investigation Unit as Senior Constable – Investigator.
  7. From November 2000 to February 2001, I was a Senior Constable performing general duties at the [REDACTED] Police Station.
  8. From [REDACTED] 2001 to [REDACTED] 2001, I was seconded to the Victoria Police Drug Squad as an Investigator.
  9. From [REDACTED] 2001 to [REDACTED] 2001, I was a Detective Senior Constable – Investigator with the Major Drug Investigation Division.
  10. From October 2001 to November 2002, I was a Detective Senior Constable – Investigator with [REDACTED], Crime Department.
  11. From [REDACTED] 2002 to [REDACTED] 2005, I was a Detective Senior Constable – Investigator with the Major Drug Investigation Division, including 19 weeks of upgrading to Detective Acting Sergeant – Supervisor during this time.
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12. From [REDACTED] 2005 to [REDACTED] 2008, I was a Detective Leading Senior Constable – Investigator with Purana Taskforce.
13. From January 2008 to March 2009, I was a Detective Leading Senior Constable with the [REDACTED], including 30 weeks of upgrading to Detective Acting Sergeant – Supervisor during this time.
14. On 2 March 2009, I was promoted to Detective Sergeant with the [REDACTED] [REDACTED] as a [REDACTED]
15. On [REDACTED] 2009, I was seconded to Petra Taskforce as Detective Sergeant as directed by A/C Overland.
16. From September 2010 to December 2010, I was seconded to [REDACTED] Taskforce as Detective Sergeant.
17. From [REDACTED] 2010 to [REDACTED] 2011, I was seconded to the Human Source Management Unit as a Detective Sergeant responsible for governance and training relating to all human sources managed by Victoria Police. I held this position on a permanent basis from [REDACTED] 2011 to [REDACTED] 2015.
18. From [REDACTED] 2015 to [REDACTED] 2016, I was a Detective Sergeant in charge of the Human Source Management portfolio at the [REDACTED]  
[REDACTED]
19. Since March 2016, I have been with [REDACTED]  
[REDACTED], responsible for the Human Source Management portfolio – Recruitment and Management of Medium-High Risk Sources within [REDACTED]  
[REDACTED]

#### **Education & Training**

20. I hold the following qualifications:
  - (a) Breathing Apparatus Course – Metropolitan Fire and Emergency Services Board, 2005;
  - (b) Confined Space Entry – Gordon Institute of TAFE, 2008;

- (c) Certificate IV Training and Assessment – Northern Melbourne Institute of TAFE, 2008; and

21. I have completed a number of internal training courses, including:

- (a) Evidence Preparation Course, 1996;
- (b) Drug Law and Investigation Course, 1999;
- (c) Field Investigators Course, 1999;
- (d) Detective Training School, 2002;
- (e) [REDACTED]  
Certification Course, 2003;
- (f) [REDACTED] Accreditation Course, 2004;
- (g) [REDACTED] Human Source Handler's Course, 2004 (Pilot Program);
- (h) [REDACTED] Human Source Handler's Course, 2007;
- (i) Leading Senior Constable Leadership Course – Police Academy, 2007;
- (j) Advanced Diploma of Police Supervision, 2010;
- (k) Human Source [REDACTED] Course, (approx. 2012);
- (l) Advanced Diploma of Investigation, (approx. 2012).

22. Since 2012, I have completed a number of other internal and external training courses, however as I am on extended leave, I do not currently have access to my training records so am unable to list them here.

#### **Awards**

23. I have received the following awards:

- (a) Victoria Police Service Medal 10 years, 2005;
- (b) Crime Department Commendation Citation, 2009;



- (c) Victoria Police Service Medal 1<sup>st</sup> Clasp 15 years, 2010;
- (d) Victoria Police Medal for Merit, 2011;
- (e) National Medal 15 years, 2011;
- (f) National Police Service Medal, 2016;
- (g) Victoria Police Service Medal 2<sup>nd</sup> Clasp 20 years, 2017.

