

From: Waddell, Stephen
Sent: Tue, 18 May 2010 09:15:25 +1000
To: Hogan, Abbey
Subject: statement
Attachments: WITNESS D.doc

Hi Abbey,

Statement as discussed. There are highlighted bits which I intended reconvening with the witness when I next spoke to her. Just after an assessment as to the value of the statement in respect of Waters in particular. If Andrew takes the view that it is marginal then it is probably not worthwhile pursuing given the relationship between Vicpol and this witness. Let me know what you think.

Regards

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STATEMENT

Name:

STATES:

My name is I am a Barrister and Solicitor admitted to practice in the State of Victoria. I reside at an address known to the police. My first year as a barrister was 1998 and it was in that year that I started going out with Steven Campbell. At the time Campbell was a Victorian police officer stationed at the Embona Task Force at St Kilda. It was through Campbell that I met David Waters. Waters is generally referred to by his nickname of docket. I am aware that Waters is also an ex police officer, although at the time I first met him I don't think he was working. My relationship with Campbell ended the same year or in early 1999 and resumed again in 2001 or 2002. At the time that relationship recommenced I was aware that Campbell was under investigation in respect of drug trafficking. Campbell was charged in relation to that investigation **in early 2002**. Waters and others had also been charged from the same investigation. Campbell was suspended from the police force when he was charged. After my relationship with Campbell ended we still remained friends. I would characterise my relationship with Waters as being a friend. **I did not see Waters independently of Campbell until after I appeared for Waters in a 56A application in respect of the Strawhorn matter.** I initially appeared with Waters at Melbourne Magistrates Court on the 6th of October 2003 and subsequently on the 28th of October 2003. I cannot recall, without referring to records, as to when this was. This was the only time that I acted for Waters. At some point during 2002 I was briefed by ^{Solicitor 1} [REDACTED] to act for [REDACTED]

[REDACTED] My contact with the two on a social basis increased during this period of time and intensified after the serving of those briefs. I spoke to ^{Solicitor 1} [REDACTED] before taking on [REDACTED] case about a possible conflict of interest and he indicated to me that he didn't consider my relationship with Campbell as a problem. On the 14th of January 2008 investigators from Taskforce Briars came and saw me at my chambers in respect of the murder of Shane Chartres-Abbott in June of 2003. As a consequence I am now making this statement. I am familiar with the Canada Hotel in Swanston Street Melbourne. I rarely went there, I think only on or about 3 or 4 occasions. The only times I went there was to meet Campbell and invariably on those occasions Waters was also present. I recall that I went to a function at the Canada Hotel on the

evening of Campbell and Waters acquittal. I have been asked if I know [REDACTED]. I met him when I acted for Peter Pilarinos in 1996 or 1997. I have seen [REDACTED] Waters and Campbell together at the Canada Hotel on a least one occasion. More often than not Peter Alexander and Glen Saunders were also present. This was all before their acquittal. I know Bob Hodgkin, who is also a police officer. I have also seen him at the Canada, although I cannot say when that was or who else was present; although as I have said, I only went to the Canada when Campbell was present and Waters was there on each occasion. I also know Robert, Bluey Bob, Mather. I have seen this person at the Canada on a couple of occasions in the company of Waters. Waters introduced me to him as Bluey Bob at the Canada Hotel on one of those occasions. I have met Peter Lalor. I am aware that he is a police officer and I was introduced to him by Waters at the Exchange Hotel in Melbourne. He told me his nickname was Stash. This occurred about 2 months before the arrest of one of my clients, Simon Sayfe, either in 2006 or 2007. (Arrest was 7/9/06) Subsequent to that arrest Lalor rang me about Sayfe and it was apparent that he thought he knew me. When I met Lalor at the Exchange he told me that he had previously been introduced to me by Waters, however I cannot recall when or where this was. I have been asked if I know Chris Gorrison. I am not sure if I have ever been introduced to him, or come across him professionally, however I do know the name as a result of a conversation I have had with Waters about that person. I will detail that conversation in due course. On the occasions that I was at the Canada Hotel I was not privy to any conversation about [REDACTED] and a warrant of apprehension. I had heard that [REDACTED] had killed Chartres-Abbott. To the best of my recollection this came about as a result of a discussion I was privy to at the offices of Jim Valos. Jim Valos is a lawyer who operates a practice in Lonsdale Street Melbourne. I had a professional relationship with Valos; he would often brief me. I also consider Jim Valos a friend. I am aware that a person by the name of Mark Perry is a suspect in the murder of Shane Chartres-Abbott. I am also aware that Mark Perry is and has been a client of Jim Valos. I am aware through Jim that Perry came to him as a client through a close friend of Jim's, Bill Saris. More often than not I would go to Jim's office for conferences in respect of clients. On one occasion I went to Jim's and there was a guy present, who was introduced to me as Mark Perry. I cannot recall now if I was there to provide advice to Perry, although I recall that I have provided advice to him previously. I believe that advice was in respect of the crimes compensation application by Perry's girlfriend. I have certainly acted for his brother, Lee Perry. I prepared a form 8A for him and wrote the invoice for that on the 11th of November 2002. At some point during that encounter with Perry, Valos was engaged in a telephone call and Perry started telling me of his involvement in the murder of Shane Chartres-Abbott. He told me that he had arranged

for Chartres-Abbott to be murdered in retribution for the rape of a girlfriend or ex girlfriend. He also told me that ██████████ had actually carried out the murder. This conversation came up in the context of talking about drug trafficking and police corruption arrests. I have since had a conversation with Valos in which he tells me that I have never met Mark Perry, however my recollection of events is how I have detailed them in this statement.

I have been specifically asked if I recall if I visited the Canada Hotel in May of 2003. I have checked my diary for that period and it is possible that I went to the Canada on the 23rd of May 2003. I say that because the trial I had running was not sitting and I only had a mention committal on in the morning, so it is possible that I would have gone to lunch that day, given that it was a Friday. I believe that I did go to the Canada Hotel on the afternoon of the 28th of May 2003. My diary records that I had lunch with a client Danny Gatea in Chinatown on that date and I recall that the lunch was not a late one. I can recall talking about Gatea's acquittal with Waters because he knew Gatea as well. Aside from Waters, Campbell was there and I think that is the date I saw ^{Mr Gregory} there. I have a recollection of him entering the hotel from the side door on that date with another male. I can say that I had dinner with Campbell on the 29th of May 2003 as my diary records that I had an 8.00 p.m. date with him at O'Connells in South Melbourne. I had the Lewis Moran bail application the following day and I remember Waters asking me about it. I think Waters came and saw me the morning of that application at court.

In the years from 2005 until very recently I would see Waters from time to time. I will now detail some of the conversations I had with him in that period of time that related to the murder of Shane Chartres-Abbott.

On the 1st April 2007, I met with WATERS and Bob HODGKIN at the South Melbourne Anglers Club. The purpose of the meeting was never raised, it was just he rang me and said come for a drink. I needed the services of a Doctor for court purposes and I was provided with the phone number of Dr John JORY by HODGKIN. JORY is an associate of WATERS. During this meeting WATERS stated to me that he was concerned about what ██████████ had been saying. WATERS said that whatever ██████████ was saying would be all crap, unless it could be corroborated. WATERS then stated that ██████████ had killed the vampire for a fee. He went on to say that this would come out at the GOUSSIS trial.

On the 31st August 2007, WATERS came to my chambers and asked me if I had been called to the OPI. I advised him I could not say. He wanted to warn me that Bob HODGKIN had been called to an OPI hearing and that anyone connected to him (WATERS) maybe called.

On the 8th September 2007, I again met WATERS and had a conversation with him about an OPI hearing that he had attended. This meeting came about as a result of a previous arrangement to meet him at a building site in Kent Street, Richmond. He advised me his hearing was part heard and it was adjourned to the following Wednesday. He told me that my name had popped up during the hearing, and he planned not to answer any more questions. WATERS expressed the thought that all the OPI hearing was based upon a lot of shit ██████████ had said; it was a lot of bullshit. WATERS indicated he did not care and would not cooperate anymore. WATERS told me that Peter ALEXANDER, Peter LALOR and Bob HODGKIN had all been called to OPI hearings. Although I did not speak to them, I saw Mick CREEHAN and Peter LALOR at the site that day. This conversation I had with WATERS occurred outside the building site.

On 13th September 2007, WATERS again visited me in my Chambers unannounced. During this visit he was being very cautious, he appeared very paranoid and thought he might have been followed. He did not want to talk in my office. WATERS took me to a stair well adjoining my office where we had a conversation about his appearance at the OPI the day before. He informed me that he had not had a chance to talk to LALOR about what had happened at this hearing. I advised him that I had got some "mail" and that was that ██████████ was to be charged with another murder within two or three weeks. That ██████████ had made a statement implicating WATERS and LALOR in the preparation of the murder and was prepared to give evidence. I had advised him the murder had something to do with a Vampire and that ██████████ had mentioned something about an address, which WATERS and LALOR had obtained for him. I further advised him that if investigators established what computer base, or where the address came from then they were confident of charging WATERS and LALOR. ██████████ had been told that he was going to be charged, and he was making a statement about the others. When I was telling WATERS about the address he indicated to me that he could not think what that was about and he did not appear to understand that that was about. WATERS indicated that LALOR had done a check on LEAP in respect to a car sitting off a property. I took that to mean this check some how

related to the murder. WATERS informed me that LALOR had spoken to a Solicitor; Tony HARGRAVES who had subsequently rung Ron IDDLES to establish what was going on. Apparently LALOR had rung IDDLES to ask if he wanted to interview him for a murder and IDDLES had indicated that he was happy to interview him if was going to talk, rather than give no comment answers. Waters then spoke to me about what he knew concerning the murder of CHARTRES-ABBOTT. He told me that it was [REDACTED] [REDACTED] who did the murder but that [REDACTED] was trying to blame it on Ange GOUSSIS and another person. He stated the OPI were trying to allege something about a warrant that had been altered to give [REDACTED] an alibi. WATERS said that it was a ludicrous suggestion as the arrest of [REDACTED] had occurred at 3pm, and how could someone know when the murder was going to happen, to alter the warrant. He went on to say that originally [REDACTED] had asked him to help him out with an old drink drive warrant; they tried to arrange it on a certain day but for some reason it did not work out. Later Bernie BALMER got involved and had [REDACTED] turn up at Stonington Police Station to have the warrant executed and this is when "Stash" got involved in the execution of the warrant at 3pm on the day in question. WATERS stated that the murder had happened in the morning of that day outside the victim's home as he was on his way to Court. WATERS then said he was very worried about what Bernie BALMER might have said at the OPI and he had not had a chance to talk to him about that. I formed the impression that WATERS was very worried and fixated about this issue. At the conclusion of this conversation WATERS thanked me very much for the "mail" and told me he was heading straight off to organize a meeting with LALOR to talk about things.

On the 19th September 2007 I had a long talk to WATERS at a hotel (Mitre Tavern???) in a laneway off Collins Street in the block between Queen and William Street. The hotel is near Chris McLennan's office. Present at times during this conversation was Warren PEACOCK otherwise known as Wazza; he is WATERS Solicitor on the record. WATERS was speaking a lot of shit, but at some point during the conversation he asked me if I knew where [REDACTED] was being kept. I gave him a non committal answer. Throughout the talk WATERS was big noting himself about the potential of charges but he stated he did not have anything to worry about. He told me that a police officer by the name of Peter TRICHIAS was seeing [REDACTED] a lot. WATERS told me that he had something over TRICHIAS and if he needed to find out anything about the investigation he could find it out through him. WATERS indicated that he did not believe [REDACTED] would be charged with the murder as he believed [REDACTED] did not do the murder. WATERS stated he had spoken to "Stash" and he was very calm to and he told me "STASH" had confirmed that he did not access the computers to get the address so there was nothing to worry about there. The way this was said to me led

me to the conclusion that Lalor had got the address, but not that way. He went on to say that on the previous Monday he, WATERS, had rung the Magistrates Court and pretended to be a Solicitor. He told me he had rung from a public phone box in a shopping centre and had obtained CHARTRES-Abbott's address over the phone. He said that he was thinking of doing this check again on his own phone to demonstrate on the telephone intercept to investigators that anyone can get an address if they want. He believed that his phone was the subject of a telephone intercept. He said again that "STASH" had assured him he had not accessed LEAP or any other database to get the address. Again the clear inference I took was as I had previously outlined. He went on to say he did not think this had anything to do with a car or a rego check LALOR had done as he had previously discussed with me. At one point WATERS whispered to me about trying to find out about where [REDACTED] was. He clearly did not want PEACOCK to know or hear about this.

In October 2007 I was again contacted by WATERS and he spoke about someone called [REDACTED] WATERS believed that [REDACTED] had gone to the OPI about the Vampire murder and he was interested in what he might have said. WATERS was saying that Police think [REDACTED] was the shooter in the murder.

On the 11th October 2007 WATERS arrived at my office unannounced again. We then went to the "Wheat Café" and spoke. WATERS appeared worried but more confused than anything else. His confusion centred on what [REDACTED] could have said to the Police to provide them with enough evidence to be in a position to charge him. He told me that he did not believe the police would have any evidence to charge him. I asked him why LALOR had not made any attempt to sue newspapers for defamation if he had nothing to do with it. WATERS stated that LALOR had been advised by a Solicitor not to do so. This was around the time of the huge Age article concerning this matter. In respect to himself WATERS stated he was going to consult Bernie BALMER and LALOR in respect to defamation action on his behalf. Again WATERS during this meeting outlined his understanding of the circumstances surrounding the murder of CHARTRES – ABBOTT. WATERS told me that he understood that [REDACTED] had a Warrant of Apprehension outstanding for failing to appear on a .05 charge. That this issue was discussed at the pub one night and Peter ALEXANDER subsequently rang Prahran Police to try to get the Warrant executed. He then understood that Bernie BALMER became involved and Bernie BALMER arranged for the Warrant to be sent to Prahran and for "STASH" to execute the warrant. According to WATERS "Stash" rang

the informant to get the Warrant faxed down. WATERS stated that the next day ██████ presented himself to Prahran at 3pm, because "STASH" was on afternoon shift. WATERS could not work out what ██████ might have said to make the police think he (WATERS) was involved in some false alibi because the execution of the warrant did not provide that alibi. I posed the question to Waters as to why the warrant need to be executed at Prahran, when it could have taken place at any police station. I did not get any response to this question. WATERS indicated that he believed ██████ had asked "Bluey Bob" who in turn spoke to WATERS to make an arrangement for ██████ to be arrested on anything in order to get his 05 case adjourned again. WATERS believed that ██████ was getting his .05 case confused with the murder. The arrangements were for the point 05 case, not a murder. WATERS stated that ██████ was either confused or making it up.

Meeting at Wheat re looking at court list re ██████ (check) date of arraignment of ██████ is 11th October 2007

On the morning of the 29th October 2007 I again had another meeting with WATERS. He informed me that on the previous Tuesday "Peacock" had spoken to Ron IDDLES and IDDLES had indicated there was no evidence to charge WATERS at the moment. IDDLES had apparently indicated that he did not want to interview WATERS. He was bragging about his knowledge of the investigation saying that he knew that there were fifty five phone lines off, and police were at a statement taking stage. WATERS told me that he knew what people had said in their statements. He went on to tell me that there were seven briefs of evidence which were going to the OPP for consideration. I remember saying to him who were the seven people. WATERS was not sure if the figure of seven related to seven people being charged or seven charges. He speculated that the briefs would relate to himself, Ange GOUSSIS, Stash, and Bluey Bob. He did not know if anyone else was involved as part of the seven people. WATERS told me that he was thinking of making a prepared statement to read out during his interview and that he would not answer any other questions. He told me his reasons for doing this was that he did not want to say no comment, and by making a prepared statement he did not have to answer any more of their bull shit questions. WATERS also had mentioned to me that he had been driving passed the Supreme Court in the previous week and happened to see Ron IDDLES, Peter TRICHIAS and Steve WADDELL coming out of Court. I am aware on the day WATERS was referring to that ██████ had in fact been in that Court. I took from the conversation about this that WATERS must have been sitting off the Court. During this meeting WATERS appeared washed out and stressed.

On the 2nd November 2007 WATERS again arrived at my chambers unannounced. He had in his possession a two page statement which he was contemplating reading out in a formal interview if that situation arose. He wanted my advice on what should be added or deleted from this statement. He was seeking my advice as a friend only, as I was not acting for him. WATERS advised me he was going to supply another Barrister, David DOHERTY, a copy to read as well. It was my understanding that DOHERTY was to represent WATERS if he was to be charged. He then went on to say that he had bumped into a psychiatrist by the name of [REDACTED] WATERS suggested that [REDACTED] was happy to hand those tests to WATERS. At some point during this conversation he informed me he had secret things to tell me. He told me that the police keep thinking that the secret meeting between everyone and [REDACTED] to plan the murder happened on a Friday approximately three to four weeks before the murder. He said that what police did not realize was that he (WATERS) was in Perth for three to four Fridays beforehand. He told me that he had got the others to check their diaries and they were also busy on certain Fridays as well. He said between them all they could account for seven to eight Fridays before the murder, therefore they could not have all met at the pub to plan this, so therefore [REDACTED] was a liar. There was a particular reference to Hodgkin checking his diary because as a police officer he had to maintain a diary of what he did each day. He then stated that in addition the police could not get phone records going back that far so they won't be able to prove it. WATERS also told me he had receipts for petrol stops and hotels from that period which related to a drive to Perth that he made. He believed these were relevant and that they were safely stored away although not at his home. He believed that the investigators were not aware of this and he was going to spring this on them if he was arrested and charged. He believed that this would wreck the police case. (I produce the two page document which was given to me by WATERS.) Through out these conversations during this period WATERS made reference on a number of occasions that he had been talking to Inspector Bob HODGKIN about the investigation. It was apparent to me that HODGKIN was keeping him updated.

On the 7th November 2007 I again met Waters and had a conversation with WATERS where upon he stated that he had been talking to HODGKIN. He came to give me my VRC tickets back. HODGKIN had apparently told him that police had seized his diary and as a consequence WATERS believed that police were monitoring his telephone. On this occasion I advised WATERS that the prepared statement he had provided me

was poor and not detailed enough. I suggested to him that it needed to be re written but that I could not do it for him as I was not acting for him.

On the 10th November 2007 I met WATERS again and he advised me there were more summonses on the way with respect to OPI hearings. He stated that he had heard both he and "Stash" would be called. At this point the reference to the OPI hearings related to the alleged leaks coming from Force Command in respect to the Briars Investigation. WATERS seemed to be excited about the prospect of these hearings. He told me that he expected "Stash" to be called and asked if Brian RIX had told him what he had heard about BRIARS. WATERS stated that "Stash" would say that he did not get that information from RIX. He stated that "Stash" would say he found out as a consequence of IDDLES going to Prahran and obtaining statements from two Detectives. He then mentioned that "Stash" was ready to sue the papers as they had published an allegation that he had supplied the address to ██████████, which both he and WATERS said was absolutely false. WATERS stated that "Stash" denies accessing the address by any means to give it to ██████████. WATERS went on to say he hoped if he was called to the OPI it would be an open Court so he could slag IDDLES and undermine him and therefore the investigation. He told me that an additional motivation for doing this was to get one back at investigators for causing himself and LALOR grief through spreading lies. WATERS then mentioned a fifteen hundred dollar payment ██████████^{PII} supposedly made to "Stash" in exchange for the address. WATERS said this was crap, and proved ██████████ was a liar. He again stated he believed his phone was "off" because of information which was coming back to him about things he had said on the phone. He stated that IDDLES had been back to Prahran to seize and photocopy more diaries including HODGKIN'S. WATERS believed that this was to check on the Friday alibi aspect and reinforced in his mind that his phone was "off". He told me as a consequence of that knowledge he had been putting some self serving material over the phones as insurance for later, just in case he was charged. (check if this occurred on a separate date)

On the 27th November 2007 I again had contact with WATERS where he was enquiring with me if ██████████ had been sentenced with respect to the Vampire murder, and if so what sentence he got. I advised him I was not aware of any of that. He also wanted to know what ██████████ had actually said and what undertaking he may have given the Court. WATERS was also interested to know what the police may have said on behalf of ██████████. He advised me that he was going to contact a solicitor, ██████████^{PII}, who he believed usually represented ██████████ with a view to finding out information about

██████ His main concern was he wanted to find out specifically what ██████ was saying about him and "Stash." He seemed desperate to know what ██████ had said, and I replied that I would keep an ear to the ground and try to find out.

On the 14th December 2007 WATERS again attended at my Chambers unannounced. He informed me that he was on his way to see Peter LALOR at the Great Western Hotel. Subsequent to that he told me he would be seeing Peter SPENCE at the Albert Park Yacht Club at 1 pm. He told me that BRIARS investigators were aware that an ex member of the police force, SPENCE, worked for the Tax Department and was at the tax office in Albury sometime prior to the Chartres-Abbott murder. He said that one an a half hours before SPENCE arrived at the Albury Office a female tax office employee checked ABBOTT on their computer but that woman could not be linked to the other players. WATERS believed that the investigators thought that this was the method that they had obtained the address, but he did not know if that was correct or not. He told me that SPENCE had already been spoken to about this matter. As previously stated investigators from BRIARS came to see me on the 14th January 2008. The following day I saw WATERS at the Wheat Café. He was very interested in what IDDLES had asked of me and what I had said in reply. I told him the investigators had made reference to a guy called ██████ or ██████ and WATERS mentioned a guy called ██████ who he said was known to himself and ██████ but not to others. WATERS thought that ██████ had made reference in his statement to the ██████ as someone who was connected to "Stash." He told me he had spoken to "Stash" about this. I asked him why ██████ would include this ██████ in his statement, and he stated that ██████ and ██████ had some kind of falling out in the past. WATERS asked me if I had ever had a drink with HODGKIN at the Canada Hotel. He told me that HODGKIN was saying he had never been to the Canada at that point in time. I advised him that I thought that is where I had met HODGKIN. WATERS was worried about this and told me he did not think it was good if I had told investigators that. After my conversation with BRIARS investigators in Chambers I also received a telephone call from Jim VALLOS. He thanked me sarcastically for sending around the Homicide Squad.

Missing IR's re Lee Rijestic telling Dkt IDDLES had been to GOBBO's office.

On the 30th January 2008, I ran into WATERS when I was in the company of a Solicitor Alistair GRIGOR. I advised WATERS I could not talk and I would see him tomorrow. WATERS told me he had been interviewed by BRIARS investigators. He said the interview only took two minutes and that he gave a "No Comment" response. He advised me that the allegation against him had changed and that what was now

alleged was that he got "Stash" to access the address. He said it was alleged that "Stash" had given the address to [REDACTED] for fifteen hundred dollars. WATERS told me he wanted to go to the media to give his side of the story but others had said he should not. WATERS then told me he had run into Jim VALOS, and Jim VALOS told him IDDLES had executed a search warrant on his office. WATERS seemed very interested in this. VALOS apparently told WATERS there was another file not specifically listed on the warrant, a family law file, which VALOS did not hand over. This file apparently related to Mark PERRY.

On the 11th February 2008 I again saw WATERS who advised me he had seen a friend at Homicide who had informed him of several developments in the BRIARS case. He told me that he had been advised [REDACTED] was now off the hook for the murder of the male prostitute and Mark PERRY was now the suspect. WATERS knew that the office of Jim VALLOS as well as the office of another solicitor had had search warrants executed upon them in relation to PERRY. He stated that PERRY was currently in hiding. WATERS mentioned that this may have been as a result of a Crime Stoppers release in late December which might have either been true or false. Again he mentioned to me that the original allegation with respect to him had changed from being the facilitator of an alibi for [REDACTED] to being paid fifteen hundred dollars to obtain the address of the victim.

On the 23rd February 2008 WATERS spoke to me and asked me to remind Mick GATTO that in early 2003, [REDACTED]

[REDACTED] WATERS told me that this had arisen as an issue as a result of a visit by IDDLES to Peter Alexander during the week. Apparently IDDLES told Alexander that [REDACTED] had a fall out with WATERS as WATERS was going around talking too much about the Vampire murder. WATERS told me the [REDACTED]

[REDACTED] WATERS said that [REDACTED] had made up the Vampire story to get back at WATERS. He said the plan [REDACTED]

[REDACTED] WATERS told me that he was going to speak to investigators to set the record straight about this aspect. He then went on to acknowledge that the talk of the fifteen hundred dollars paid by [REDACTED] [REDACTED] for the address of the Vampire was wrong, in fact the money was paid to LALOR to guarantee [REDACTED] would get bailed out on the Warrant by LALOR at the Prahran Police Station.

Believes we are missing some information about DKT going to see SHERRIFF about telling him what he should subpoena.

On the 15th April 2008 WATERS arrived at my Chambers at 8am unannounced. I was angry with him as I was in the middle of a meeting which I had to break. He spoke for about forty minutes and most of what he said was shit. However he did say that he was in the City early to go and see Stephen SHERRIFF's. SHERRIFF's was the silk representing Ange GOUSSIS in respect of the murder of Lewis MORAN. WATERS purpose in speaking to SHERRIFF was to provide him with material on [REDACTED] to discredit his evidence during cross examination. WATERS strategy was that if he was ever charged with the murder of CHARTRES – ABBOT then he could rely on [REDACTED] discredited evidence in the GOUSSIS trial.

On the 22nd April 2008 I again met WATERS. He wanted to talk to me about some information he had just found out. He told me that ^{PO1} [REDACTED], a police officer from the Homicide Squad, had made a statement to Steve WADDELL in respect to BRIARS. WATERS told me that ^{PO1} [REDACTED] had seen him and given him the heads up. WATERS told me the contents of the statement did not worry him as it apparently it only confirmed that WATERS knew ^{PII} [REDACTED] and socialised with him. He said ^{PO1} [REDACTED] had rung him about this, and that WATERS was full of questions about what this had meant. This issue for him as I said was not what was in the statement but a concern that he had that ^{PO1} [REDACTED] maybe trying to set him up.

On the 3rd June 2008 I again spoke with Waters and he was talking about Mokbel coming back to Melbourne with police. However what he really wanted to talk about was [REDACTED] and what he said were the lies he had told to the police in respect of the situation at the Canada Hotel. WATERS said that ^{PII} [REDACTED]
[REDACTED] Waters said he went and [REDACTED] and told him what [REDACTED] said. Later [REDACTED] apparently saw [REDACTED]
^{PII} [REDACTED] him to "fuck off". WATERS said [REDACTED] then went back to see him and they had a [REDACTED] According to Waters, ^{PII} [REDACTED] because Waters had cost him [REDACTED] WATERS expressed the view that he believed [REDACTED] had made multiple statements to investigators about Chartres-Abbot's murder, including his alleged involvement, and that because of the number of versions [REDACTED] had no credibility. Even though this was the case police were

prepared to listen to every word he said. Waters also suggested that he thought there might be additional OPI hearings in respect to the dispute between himself and [REDACTED]. WATERS was trying to subtly find out through me if Gatto had been called to any hearings. I advised him that I could not say. Waters also expressed a view at that point that GOUSSIS could not help the police in the way it was being reported in the paper and in the way the police hoped he could. In other words what WATERS was saying was that GOUSSIS knew nothing that could hurt him.

The following day I had another conversation with Waters about the issue of the [REDACTED] which is apparently referred to by [REDACTED]. Waters informed me that the [REDACTED] was [REDACTED]. WATERS said that the police had identified [REDACTED] and spoken to him. WATERS told me that [REDACTED] did not know [REDACTED] but did drink with Waters in the past. He went on to say that police had spoken to a [REDACTED] who had apparently been present at the Canada Hotel [REDACTED]. WATERS had spoken with [REDACTED] who would say [REDACTED] but it was over the [REDACTED].

On the 12th June 2008 WATERS again arrived at my office in the morning unannounced. He was hypothesizing that [REDACTED] had made up the whole thing and that Mark and Lee Perry had done the murder. He said that was why in his mind [REDACTED] keeps making things up and changing his story. He told me the police had made an application to obtain the DNA of Ange Goussis in respect of the Vampire murder. He told me he had checked the court file in regards to this. His theory was that if Goussis was responsible for the murder then his DNA would have already come up and he would have been charged. During this conversation Waters had a lot of theories but most of it was shit and he was rambling. He was coming up with theories on how he could be charged. Based on his knowledge of the evidence he thought he could only be charged as a counsellor or procurer. He again told me the allegation against him was that he had obtained the address off "stash" and passed it onto [REDACTED]. We discussed the elements of the offence of counselling and procuring in respect to what was alleged against him. He never said to me that this is what he had actually done. He then went on to say that there are a few ways in which people can get addresses. He alleged that some coppers from the Rape Squad were shitting themselves because they gave the reporting details of Chartes-Abbot to the victim. In this context he said the murderer would simply have to follow the victim from the Reservoir Police Station to his home. I posed the question how [REDACTED] would know the bail reporting station. He

suggested that the victim of the rape told Mark and Lee Perry. He said that Perry would then tell [REDACTED]. He suggested that [REDACTED] had decided to make up the story against "stash" and him in order to make it better for him in the investigation. He suggested that this would give [REDACTED] more credit and a better discount at sentencing if he gave up police. He told me that he had not seen [REDACTED] statement but he was working on it. We then had a conversation about a Solicitor Steve Andrianakis. WATERS was aware that Goussis had sacked Anthony Brand as his solicitor and engaged Andrianakis. I formed the impression that he was trying to find out if Andrianakis was approachable in order to get a copy of [REDACTED] statements.

Detail relationship between [REDACTED] and WATERS

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Statement taken and signature witnessed by me
at 12:05 PM on 21/05/2009 at Secure Location

Stephen WADDELL
Detective Inspector

I hereby acknowledge that this statement is true and correct and I make it in the belief that a person making a false statement in the circumstances is liable to the penalties of perjury.

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Acknowledgment made and signature witnessed by me
at 12:07 PM on 21/05/2009 at Secure Location

Stephen WADDELL
Detective Inspector