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

STATEMENT OF PAUL ANTHONY SHERIDAN

1. My full name is Paul Anthony Sheridan.
2. I hold the rank of Detective Superintendent, Victoria Police.
3. I make this statement in response to a request from the Royal Commission into the Management of Police Informants dated 18 July 2019. This statement is produced to the Royal Commission in response to a Notice to Produce.
4. I have not had access to all of my emails for the relevant period for the purpose of preparing this statement.

Educational background and employment history (Q1)

5. I joined Victoria Police in 1974. Details of my progression through the ranks and relevant training are contained in Annexure A to this statement.

Involvement or association with any investigation that dealt with Ms Gobbo (Q2)

6. I have not been involved or associated as an investigator with investigations that dealt with Ms Gobbo.
7. From February 2010 until February 2015, I was the Detective Superintendent in charge of the Covert Services Division, which included the Source Development Unit (SDU), the Undercover Unit (UCU) and the Special Projects Unit (SPU). Assistant Commissioner Jeff Pope was my superior officer. In that role, I became aware that Ms Gobbo had previously acted as a human source.
8. As part of that role, I also had some involvement in arranging for Victoria Police's lawyers to access information relating to Ms Gobbo acting as a human source. I also had some limited involvement in issues to do with Ms Gobbo potentially acting as a prosecution witness in relation to charges against Paul Dale brought by the Driver Taskforce.
9. I have set out my recollection of my involvement in these matters. I have been assisted in preparing this statement by reviewing my official police diaries.

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Detective Superintendent, Covert Services Division

10. On 4 May 2010, I received an email from AC Pope passing on a request from Chief Commissioner Simon Overland that the SDU compile a chronology document relating to "F", which referred to Ms Gobbo¹. The request was in the context of a civil claim that Ms Gobbo had brought against Victoria Police. I did not know the details of her civil claim beyond what is set out in this email.
11. As the email chain indicates, the officer in charge of the SDU, Detective Inspector John O'Connor, was to arrange for Victoria Police's lawyers to have access to a chronology relating to Ms Gobbo. I do not recall reading this chronology. An email I later received from DI O'Connor indicates this chronology was provided to Victoria Police's lawyers on 27 May 2010².
12. By early May 2010, I believe that I knew Ms Gobbo was a deregistered source and there were considerations by some investigators to transition her to a witness. I recall that I learned that Ms Gobbo had previously acted as a human source only after arriving at the CSD, but I do not recall precisely when this was. I did not know the details of the information or assistance she had given, but the description of Ms Gobbo's role in DI O'Connor's email from 27 May 2010 is consistent with my understanding at the time.
13. In mid-August 2010, Senior Sergeant Andy Bona from Victoria Police's Civil Litigation Division informed me that Ms Gobbo's civil claim had settled and that there was to be a protocol for her to have a single point of contact at the SDU. Emails from 13 to 16 August 2010 indicate that S/Sgt Bona and I agreed on a draft protocol, which was designed to limit the opportunity for Ms Gobbo to attempt to re-establish any source relationship. The emails also show the protocol was approved by AC Pope³.
14. I then instructed DI O'Connor to prepare a set of Standard Operating Procedures (SOPs) to reflect the protocol. The SOPs were finalised and dated 29 August 2010⁴. The SOPs provided that DI O'Connor was the single point of contact for Ms Gobbo, that DI O'Connor would maintain a log of all contact and that he would report to me when he had contact with Ms Gobbo. I do not recall reviewing the contact log.

¹ VPL.0005.0013.1200.

² VPL.0005.0013.1182.

³ VPL.0005.0010.2013.

⁴ VPL.0005.0171.0010.

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15. Until November 2014 when another officer took over as Ms Gobbo's contact, DI O'Connor briefed me when he had contact with Ms Gobbo. These briefings rarely required any further action. Officer Richards was Ms Gobbo's contact point for a period in late 2011 and early 2012 when DI O'Connor was on leave.
16. On one occasion in early September 2010, I sought further advice by email from Superintendent Peter Lardner to clarify the position about receiving information that Ms Gobbo volunteered about ongoing investigations. His advice was that the information could be received but that Ms Gobbo could not be tasked⁵.
17. I recall that around this time – late August or early September 2010 –material relating to Ms Gobbo was moved into my office. I believe this followed from an email that AC Pope sent on 27 August 2010, asking that material relating to Ms Gobbo be collated in one place⁶. I did not know what the secure filing cabinet contained and do not know who collated it. As set out below, I recall that it was removed in November 2011 and moved to the HSMU.

Driver Taskforce

18. In mid-October 2010, officers from the Crime Department requested that DI O'Connor speak to Ms Gobbo about acting as a witness in a prosecution that the Crime Department was running against Paul Dale. On 14 October 2010, AC Pope sent an email to Superintendent Doug Fryer (copied to me) noting that the settlement agreement with Ms Gobbo might preclude calling her as a witness⁷. I am aware that at that time Supt Fryer was the officer in charge of the Driver Taskforce. I have no record or recollection of any response to AC Pope's email.
19. Over the next few months, I received further inquiries that I believe related to Ms Gobbo potentially acting as a witness for the Driver Taskforce:
 - (a) On 21 December 2010, my diary records that I spoke to DI O'Connor regarding Detective Inspector Mick Frewen seeking for Ms Gobbo to be a witness in a Commonwealth matter.

⁵ VPL.0005.0013.1038.

⁶ VPL.0005.0010.1961.

⁷ VPL.0005.0013.1096.

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- (b) On 7 January 2011, I received an email from Detective Senior Sergeant Boris Buick requesting mobile phone numbers for Ms Gobbo for investigative purposes. I approved this request by email⁸.
 - (c) On 4 February 2011, DI Frewen sent me an email about contacting Ms Gobbo for proceedings against Paul Dale and other enquiries. My diary records that I discussed this with DI O'Connor. I do not recall the discussion beyond what is in my diary.
 - (d) On 8 February 2011, I spoke with Supt Fryer regarding a proposal that the SDU manage Ms Gobbo in the lead up to the trial against Dale. As my diary records, I opposed this proposal for a number of reasons.
 - (e) On 16 February 2011, I met with AC Pope and discussed issues relating to Ms Gobbo. As my diary records, AC Pope wanted to discuss whether DI O'Connor would remain Ms Gobbo's contact point once she was to be a witness and that this should be considered at the Steering Committee Meeting.
20. I attended meetings of the Driver Steering Committee on 18 and 25 February 2011 to discuss issues related to Ms Gobbo's management as a witness. I was not a regular attendee at these meetings, I believe I was called to attend to respond to questions around the future management of Ms Gobbo should she progress to witness status. I am informed by my lawyers that the minutes for the 18 February 2011 meeting cannot be located. I recall only that the discussion at this meeting was generally about Ms Gobbo being required as a witness and the arrangements that would need to be made for her protection should she progress to witness status. I have been shown the minutes for the 25 February 2011 meeting⁹. They accord with my recollection of that meeting, but I do not recall anything further beyond that.
21. On 8 September 2011, DI O'Connor forwarded me an email chain concerning a subpoena that might be issued by Paul Dale's lawyers seeking material relating to Ms Gobbo¹⁰. The email chain indicates that DSS Buick would be meeting with a barrister, Gerard Maguire, regarding these issues. I was aware that Mr Maguire often provided advice to Victoria Police about public interest immunity matters. My diary also records that I spoke with DI O'Connor about this matter earlier that afternoon and that the Driver Taskforce was attending to this matter.

⁸ VPL.6078.0016.8891.

⁹ VPL.0005.0066.0274.

¹⁰ VPL.0005.0013.1273.

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22. On 23 September 2011, my diary records that I conferred with Mr Maguire about the Dale matter. I recall that at some point he came to my office to review the source management log, which may have been this day. My diary also records that I also spoke to AC Pope later that day about the same matter.
23. Over the coming weeks, I had further meetings about the issues to do with the Dale prosecution. These meetings are recorded in my diary. On 28 September 2011, I attended a meeting with Mr Maguire and lawyers from VGSO with DI Frewen and DSS Buick.
24. On 4 October 2011, I attended another meeting with Mr Maguire and lawyers from VGSO with DI Frewen and DSS Buick. My diary record for this meeting refers to "paragraph 21", which I believe relates to a written advice dated 4 October 2011 that Mr Maguire had prepared¹¹. I believe that I read this advice around the time of this meeting. As my diary records, AC Pope and Assistant Commissioner Graham Ashton were to be informed of this advice prior to the Commonwealth Director of Public Prosecutions (CDPP). I understood at the time that the CDPP was prosecuting the changes against Paul Dale. My diary also records that I briefed AC Pope about the advice.
25. On 5 October 2011, AC Pope informed me that he had spoken with AC Ashton and that there would be a meeting with the CDPP to discuss the Dale charges not proceeding.
26. On 19 October 2011, my diary records that I spoke with Superintendent Tony Biggin about whether any cash payments had been made to Ms Gobbo. Supt Biggin had been in charge of the Covert Services Division before me, during the time that Ms Gobbo had been a human source. I recall he said that there had been no cash payments, but that some of her minor expenses had been paid.
27. On 20 October 2011, DI O'Connor forwarded me a letter Ms Gobbo had sent to DSS Buick¹². I believe I would have read this at the time. The letter indicated Ms Gobbo refused to accept proposed witness protection arrangements.
28. In early November 2011, I attended a number of meetings and discussions regarding the potential disclosure of material relating to Ms Gobbo in the Dale prosecution. On 2 November 2011, Supt Fryer emailed me to request that members of the Driver Taskforce have access to the source management log to gain an understanding of what

¹¹ VPL.0005.0003.2968.

¹² VPL.0005.0013.1284; VPL.6031.0058.2690.

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Ms Gobbo's previous role as a human source had involved¹³. My diary records that I spoke to AC Pope and DI O'Connor about this request.

29. On 3 November 2011, I spoke with Supt Fryer about his request. I recall I was not in favour of this and, as my diary records, I explained the need to maintain a sterile corridor between sources and investigators. Supt Fryer referred to our discussion in an email he sent later that morning¹⁴.
30. Later on the afternoon of 3 November 2011, I met with Barrister Krista Breckweg and another person from the CDPP. My diary records that they were told the complexity involved in Ms Gobbo's tasking. Ms Breckweg asked to access material relating to Ms Gobbo for upcoming hearings in the Dale proceeding.
31. On 4 November 2011, Ms Breckweg again asked to obtain the information in a phone call and by email¹⁵. My diary records that AC Pope then instructed me to have a summary document prepared outlining the extent of contact reports and information reports with Ms Gobbo. As my diary records, I spoke to DI O'Connor to arrange SDU staff members to work over the weekend to prepare the summary document requested. I also spoke to Superintendent Neil Paterson at the HSMU to arrange access to the relevant information.
32. On Sunday 6 November 2011, DI O'Connor oversaw the SDU members collating the summary document. I was not present in the office that day.
33. On 7 November 2011, I prepared a covering sheet for the summary document in order to present it to AC Ashton¹⁶. My diary records that I spoke to AC Ashton about the document and that he stated that the document could not be disseminated to the CDPP because of concerns regarding public interest immunity. AC Ashton then undertook to contact the DPP about the issue.
34. On 8 November 2011, I attended a meeting with AC Ashton, Supt Fryer, DI Frewen and DSS Buick. As my diary records, the meeting was to discuss the risk to Ms Gobbo in her potentially giving evidence and being exposed as a human source when she was refusing to enter witness protection. My diary also records that AC Ashton was to advise the CDPP that he did not wish to call Ms Gobbo in Dale's current prosecution.

¹³ VPL.0005.0013.1085.

¹⁴ VPL.0005.0013.1152.

¹⁵ VPL.0005.0013.1144.

¹⁶ VPL.0100.0001.3633.

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35. The next morning, 9 November 2011, I received an email from Supt Fryer indicating that the CDPP had decided not to call Ms Gobbo as a witness¹⁷.
36. My diary records that on 14 November 2011, AC Pope informed me that the materials relating to Ms Gobbo would be transferred to Supt Paterson. Shortly after this, the files or the secure filing cabinet in my office was removed and I believe it was transferred to Supt Paterson the HSMU.
37. Subsequently, I had some minor involvement in matters to do with Ms Gobbo. I attended a few meetings relating to the process of reconstructing Ms Gobbo's human source file, Operation Loricated, but was not directly involved in undertaking that reconstruction.
38. When I later moved to Crime Command in 2015, I collated records of contact that members of Crime Command had with Ms Gobbo as part of an operation to manage her welfare, called Operation Stellified. I did so at the request of Commander Fryer and prepared a brief report in September 2015¹⁸. I do not recall being involved with issues to do with Ms Gobbo while at Crime Command. Given my previous role in the Intelligence & Covert Support Department I excused myself from further involvement in the management of Ms Gobbo.

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

39. I refer to my response to Question 2.

Awareness of others (Q4)

40. In addition to the members of the SDU responsible for handling Ms Gobbo, I am aware that members of the Driver Taskforce and Driver Taskforce Steering Committee involved in decisions of Ms Gobbo potentially giving evidence were aware of her role as a human source. This included Deputy Commissioner Ken Jones, Superintendent Fryer, AC Pope, AC Danyne Moloney, AC Emmett Dunne, AC Ashton and members of REDACTED
41. As recounted in response to Question 2, I am aware that Ms Gobbo's role as a human source was disclosed to some individuals from the CDPP.

¹⁷ VPL.0005.0013.1141.

¹⁸ VPL.6071.0106.1755.

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Authorisation of the use of Ms Gobbo as a human source (Q5)

42. I only became aware of Ms Gobbo's role as a human source after she was deregistered. I am not aware of who was responsible for authorising her use as a human source.

Personal contact with Ms Gobbo (Q6)

43. I do not believe I have had personal contact with Ms Gobbo other than being introduced to her at the Melbourne Supreme Court during an adjournment. I cannot specifically recall when this was or which case it may have been.

Information & assistance received (Q7 & Q8)

44. I refer to my response to Question 2.

Concerns as to use of a legal practitioner (Q9) and Ms Gobbo (Q10) as a human sourceComrie Review

45. My diary records that on 28 November 2011, AC Pope told me that there would be a case review of the SDU's management of Ms Gobbo. I was briefed about the terms of reference on 13 February 2012, and that it would be conducted by former Chief Commissioner Mr Neil Comrie (**Comrie Review**). On 21 March 2012, I answered some queries to assist Superintendent Steve Gleeson, who was assisting Mr Comrie with the review. My diary also records that I met with Supt Gleeson on 30 May 2012 to discuss a number of issues about his review. I have been shown a file note of this conversation prepared by Supt Gleeson and it accords generally with my recollection of that discussion¹⁹.

46. Separately from the Comrie Review, in March 2012, AC Pope asked me to conduct a review of the workings of the Covert Services Division (**CSD Review**). The review was to cover the UCU, SPU and the SDU. The terms of reference related to reviewing the structure of the Division to ensure it was working efficiently and effectively and in a way that managed the health and wellbeing implications of the covert policing environment. The CSD Review did not cover issues to do with the SDU's management of Ms Gobbo. I produced a report dated 12 October 2012²⁰. I understand that the CSD Review was later amended and expanded by Commander Doug Fryer and AC Pope, as I have been

¹⁹ VPL.0100.0001.0472.

²⁰ VPL.0005.0182.0001.

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- shown another version of the CSD Review dated 31 January 2013 with their names attached²¹.
47. On 22 June 2012, AC Pope showed me some excerpts from the Comrie Review about Ms Gobbo's management. The excerpts I was shown stated concerns that criminal offences may have occurred in Ms Gobbo's management. Prior to this I did not know or understand the full details of Ms Gobbo's management. The potential seriousness of this influenced my thinking around the SDU's management of high risk human sources going forward. I have not read the whole Comrie Review, but I have been informed of what the recommendations pertaining to human source management were.
48. My diary records that on 22 June 2012 AC Pope and I discussed disbanding the SDU and that AC Pope would be briefing the Chief Commissioner about the Comrie Review. I recall that AC Pope proposed disbanding the SDU. On 24 June 2012, I sent an email to AC Pope setting out my initial thoughts on the proposal to close the SDU²².
49. A few months later, on 16 August 2012, AC Pope advised me that the SDU would be disbanded and would not continue in its current form. Our discussion is recorded in my diary. On 30 August 2012, AC Pope forwarded me a chain of emails that had been sent to the Chief Commissioner regarding disbanding the SDU²³.
50. On 13 December 2012, I attended a meeting with the Chief Commissioner, AC Pope, Commander Fryer and a representative from Victoria Police's Human Resources department. I recall that the discussion was about closing the SDU and the mechanics of how the SDU would be closed.
51. On 12 February 2013, I attended the SDU office with Commander Fryer. I recall that Commander Fryer informed the SDU staff that the SDU would be closed and that sources would be transitioned to other handlers.
52. My diary also records that on 11 March 2013, I spoke with Officer Sandy White during a training course. He expressed concerns about the closure of the SDU. Our conversation is recorded in my diary.

²¹ VPL.0001.0001.0025.

²² VPL.0005.0013.1125.

²³ VPL.0100.0132.0124.

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Awareness about disclosure in relation to Ms Gobbo (Q11)

53. I refer to my response to Question 2 in relation to the potential disclosure of Ms Gobbo's role as a human source in relation to charges against Paul Dale. I do not otherwise recall issues to do with disclosure of Ms Gobbo's role.
54. I have been shown emails sent to me on 12 April 2011 regarding issues relating to Ms Gobbo arising at a trial for an accused, Cvetanovski²⁴. I do not recall these issues arising and do not recall whether I did anything in response to these emails.
55. I have been shown an email sent to me on 5 March 2012 regarding a subpoena issued in the prosecution of Faruk Orman²⁵. I do not recall receiving this email and I have no recollection as to how this subpoena was dealt with.

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

56. I have no knowledge of these matters.

Training (Q13)

57. My recollection of the relevant training or retraining I have received on these specific topics is as follows:
- (a) Obligation of disclosure – I do not recall specific internal training in this category. It is my personal practice to take advice from prosecutors both police and OPP in response to subpoena's received.
 - (b) The right of accused person to silence and to a legal practitioner – I do not recall specific training in this category however I am confident it was covered during initial training at the Police Academy relative to interviews of suspects and further during Detective Training and Advanced Detective Training courses.
 - (c) Legal professional privilege – I do not recall formal training in this category.
 - (d) Public interest immunity – As per my answer to (a)
 - (e) Professional and ethical decision making – I do not have a specific recollection as to training in this category however I believe that professional and ethical decision making is at the core of all aspects of policing, including arrest discretion, and hence would have been within internal training as outlined in my answers to (a) and (b).

Other information (Q14)

58. I have nothing further to add.

²⁴ VPL.0005.0013.1295; VPL.0005.0013.1272.

²⁵ VPL.0005.0013.1180.

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Dated: 12 November 2019

A handwritten signature in black ink that reads "Paul Sheridan". The signature is written in a cursive style with a large initial 'P'.

.....
Paul Anthony Sheridan

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Annexure A

1. A summary of the major roles I have undertaken and my progression through the ranks is as follows:
 - (a) 1975 – 1979: Constable - uniform duties Fitzroy and St Kilda;
 - (b) 1979 – 1984: Detective Senior Constable – Reservoir & Fitzroy Criminal Investigation Branches, Homicide Squad;
 - (c) 1984 – 1990: Uniform Sergeant, Licensing Gaming & Vice Squad, Detective Sergeant Coburg Criminal Investigation Branch, Homicide Squad;
 - (d) 1990 – 1994: Senior Sergeant Inspectorate CCP's office, Detective Senior Sergeant - Homicide Squad;
 - (e) 1994: Inspector Internal Investigations Department, Russell Street, Detective Inspector - Drug Squad, Missing Persons Squad, Homicide Squad;
 - (f) 1998: Detective Inspector, Lorimer Taskforce;
 - (g) 2000 – 2003: Detective Superintendent, Organised Crime Division;
 - (h) 2003 – 2008: Detective Superintendent, Crime Scene Division State Forensic Science Laboratory;
 - (i) 2007 – 2010: Superintendent, Region 1 (Yarra, Stonington, Port Phillip);
 - (j) 2010 – 2015: Detective Superintendent, Covert Services Division; and
 - (k) 2015 to current role: Detective Superintendent – Serious Crime Division (Homicide, Missing Persons Squad, Sex Crime Squad, Arson & Explosive Squad).

2. I have undertaken Victoria Police qualifications and training including:
 - (a) Detective Training School (1980);
 - (b) Sub- Officer's Course (1983);
 - (c) Advanced Detective Training School (1986); and
 - (d) Inspector's Course (1993).

3. I also hold the following formal qualifications:
 - (a) Bachelor of Arts (1990);
 - (b) Diploma Public Administration (2000);
 - (c) Bachelor of Laws (2012); and
 - (d) Practical Legal Training Diploma (2015).

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