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## **Royal Commission**

### **into the Management of Police Informants**

#### **Statement of Gerard Joseph Maguire**

**Gerard Joseph MAGUIRE States -**

##### **Personal information and background**

1. My full name is Gerard Joseph Maguire.
2. I make this statement in response to a notice to produce from the Royal Commission into the Management of Police Informants for a statement. I make this statement from my own knowledge and belief. Where I state matters of belief I believe those matters to be true.
3. I am an Australian Lawyer and a member of the Victorian Bar.
4. I hold degrees in Economics and Law from Monash University. In about April 1977 I completed articles of clerkship and was admitted as a Barrister and Solicitor of the Supreme Court of Victoria. About mid 1977 I was appointed as an associate to the Honourable Joseph Isaccs, a Deputy President of the Australian Arbitration Commission. I held that position for a little over 2 years. During that time I also held a full practicing certificate as a solicitor.
5. I signed the role of counsel at the Victoria Bar in May 1980. I am also admitted to practice in the States of New South Wales and Western Australia and in the Republic of Vanuatu.

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**Preliminary matters.**

6. I have been provided with access to 24 documents held by Victoria Police. I believe that copies of these documents have also been provided to the Royal Commission.<sup>1</sup> I refer to some these documents in more detail hereafter. I have not been provided with any chronology of the events which occurred between 2002 and 2011 and which are referred to hereafter. There are significant gaps in the materials and information available to me and from which I can refresh my memory as to those events.
7. First, I no longer have copies of any emails sent or received by me prior to 31 July 2010. In the period from a least 2000 I believe that I used two (2) email addresses which no longer exist. Furthermore, the copies of the emails that I have retained have been culled from time to time and are incomplete.
8. Secondly, throughout the time period referred to hereafter, I did not keep a hard copy diary or day book. I did keep an electronic calendar or attendance record which I have not retained. I used this electronic attendance record as the basis for preparing memorandums of attendance which I provided to my instructing solicitors. These set out the hours or days worked, court appearances or work undertaken and the fees charged in relation to the various briefs that I held.
9. Thirdly, I have not retained my court books prior to February 2010. In any event, my court books only refer to appearances and attendances in court and do not otherwise record conferences, advice in conference or the like.
10. Fourthly, I have located copies of a number of memorandums of attendance relating to the work for the Victoria Police in relation to the Ethical Standards Department (“ESD”), CEJA Taskforce (“CEJA”), BRIARS Taskforce (“BRIARS”), Petra Taskforce (“PETRA”) and other matters. However, I do not believe that I have a complete record of the memorandums of attendance which I provided to my

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<sup>1</sup> A list of these documents is Appendix 1 to this statement.

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instructing solicitors. Furthermore, some of the earlier documents I have entitled memorandums of attendance were created using an obsolete word processing program. I am unable to access or read these files.

11. Fifthly, I have not been provided with any diary or day-book entries compiled by relevant members of Victoria Police and which may record contact with me, work I undertook in respect of various taskforces or advice which I gave in conference. However, I have read the statement of former Det. Supt. Peter DE SANTO which appears on the Royal Commission website and which contains his diary extracts.
12. I have my fee book for the period 12 April 2000 to 1 July 2013. This records the fees I charged and identifies the solicitor or firm involved, the matter to which it related and would sometimes include a note as to the particular work done. Usually I would state "Fees as per memo". In these cases a copy of the memorandum of attendance would accompany my Clerk's fee slip sent to my instructing solicitor.
13. I have previously provided the Royal Commission with a memorandum of advice which I provided to Victoria Police concerning document disclosure and public interest immunity claims arising during committal proceedings involving Paul DALE.<sup>2</sup> I have also provided the Royal Commission with a copy of my memorandum of attendance in relation to that advice and a document entitled "ACC Prosecution & Subpoena Issues" I refer to these documents in more detail hereafter.<sup>3</sup> I have also located a memorandum of attendance dated 11 November 2009 which also appears to be relevant.<sup>4</sup>

**Involvement with any investigation which had dealings with Ms Gobbo.**

14. I have been asked by the Royal Commission to provide information in relation to my involvement with

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2 Memorandum of advice dated 4 October 2011 in the matter of **Buick v Dale**.

3 These are referred to in Appendix 1.

4 This is referred to in Appendix 1.

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any investigation which had dealings with Ms Nicola Gobbo (“GOBBO”).

**A. Ceja Taskforce.**

15. My first involvement with CEJA occurred in mid 2002. I was briefed to appear in the Melbourne Magistrates' Court in relation to a matter of Paul FIRTH v Antonios MOKBEL.<sup>5</sup> This proceeding concerned State based commercial drug trafficking charges laid against MOKBEL.<sup>6</sup>
16. I was briefed by the Victorian Government Solicitors Office to appear on behalf of ESD and CEJA in relation to a subpoena which had been issued on behalf of MOKBEL. This included a request for the production of documents from ESD and CEJA. The application was already underway when I was briefed and other counsel appeared for the Chief Commissioner of Victoria Police. MOKBEL was represented by Con HELIOTIS QC and GOBBO. My instructing solicitor was Phillip Dodson from the Victorian Government Solicitors Office however I primarily dealt with DE SANTO.
17. The defence sought production of documents concerning the FIRTH and other members of the former Victoria Police Drug Squad. At that time CEJA were investigating allegations of alleged criminal activity associated with members of that Squad, including the informant.
18. From his statement to the Royal Commission I am aware that DE SANTO recorded that he was present with me in Court on 30 May 2002 in relation to public interest immunity (“PII”) claims being made on behalf of ESD and the CEJA. I believe that this was the first occasion on which I was opposed to GOBBO and possibly the first occasion on which I met her. Whilst I had previously known of her I do not

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5 My fee book records that on 27 June 2002 my Clerk issued two fee slips to the Victorian Government Solicitor in relation to the matters of **Firth v Mokbel and others** and **Firth v Mokbel**.

6 Ultimately, I believe that these charges were not proceeded with.

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believe that I previously dealt with her.

19. I have no recollection of any conversation which I may have had with GOBBO at this time. Whatever conversation did occur was in the context of the application being made.
20. Subsequently, I was briefed by the Victorian Government Solicitors Office to act generally on behalf of CEJA. My role was to provide general legal support to the investigation. This included dealing with a multiplicity of subpoenas and requests for disclosure of documents arising out of the investigations between 2002 and 2007. The work that I undertook was very briefly set out in various memorandums of attendance which I subsequently sent to my instructors.

**B. The subpoena response process.**

21. I would generally adopt a standard procedure or approach when briefed on behalf of Victoria Police to respond to a subpoena. I would initially arrange for or create a summary response document. This was based on instructions from the informant or a member of the relevant investigative team. The summary response identified each separate item or class of documents or materials the subject of the particular subpoena request, set out whether there was any material which satisfied the request, its location or source, identified PII and relevance claims and recorded comments in relation to the material or disclosure. This summary response also identified documents or materials which had already been supplied or disclosed.
22. The identification of what documents or materials fell within each category or class of materials sought was largely a matter for the investigators.
23. The summary response was prepared for the assistance of the Court and parties. It created an audit trail

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tracking disclosure. This was important as the defence would sometimes issue supplementary subpoenas which sought production of documents previously supplied or in respect of which there were already court rulings. These summary responses were updated from time to time as disclosure occurred or as such rulings were made.

24. In conjunction with the summary response I also created an outline of submissions in support of any PII claims made. This was a statement of the legal contentions relied on by the Chief Commissioner of Police. It was invariably supported by an open affidavit sworn by an investigator which identified the broad basis for such claims made and which deposed to the scope of the disclosure being provided. Very often a confidential affidavit was also sworn by a more senior officer in support of particular PII claims identified.
25. Any documents produced in response to a subpoena were not provided to the parties until directed or ordered by the court. On occasion an order would be made for production to the parties of redacted copies of the relevant documents prior to the subpoena being called on. Furthermore, by at least the late 1990's, Judges and Magistrates in Victoria would usually inspect un-redacted copies of documents in respect of which PII or relevance claims were made as part of a subpoena process.
26. As part of the disclosure process, the documents produced to the court were highlighted indicating those parts of the material the subject of a PII claim. A second copy would be prepared with this redacted material masked in black. It was this second copy which was supplied to the parties.
27. A further part of that process was preparation of detailed spreadsheets which identified in summary form the basis of particular redactions which had been made. These summary descriptors included relevance, source identification, witness security, police methodology and the like.

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**C. Use of Ms Gobbo as a human source**

28. I have been asked to provide detail of how I learned, or was given reason to believe, that Gobbo was providing information or assistance to Victoria Police.
29. During my involvement with CEJA I had a number of dealings with GOBBO in the context of the taskforce investigations. I cannot recall specific details of the vast majority of occasions on which I spoke with her. I believe that the context was generally in relation to issues concerning disclosure of documents or other materials. Initially this was primarily in relation to MOKBEL but then extended to other clients for whom she was acting. Often these contacts occurred in the context of court hearings or applications and would include responding to phone queries. I did not interact socially with GOBBO.
30. Having met GOBBO in about mid 2002 I subsequently became aware that she was in regular discussions with Victoria Police members. I understood that she was providing police with information concerning various criminal activities. I cannot identify the precise time period or circumstances when this occurred. I cannot recall who told me or how I came to learn of this.
31. Over time I came to perceive GOBBO as a shrewd and skilled advocate who was very adept at advancing her clients interests. I came to know that she had a wide range of contacts within and that she socialized with Victoria Police members. I also knew that she had a large number of contacts and that she socialized with members of the criminal community. Thus, I believed that GOBBO was in the habit of providing information to police in order to advance the interests of the client she was working for at the time. This appeared to be a successful part of her overall strategy.
32. By about at least 2005 I was generally aware that GOBBO had been providing information to police about criminals and their activities. I cannot recall who told me this or the circumstances in which it occurred save that it was during my involvement with CEJA. I believe that this information about her came from a

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number of sources and that Victoria Police members were aware of her activities.

33. At about this time, the question of what role GOBBO played with police was also the subject of intense speculation and rumor among criminal lawyers. Once again, I cannot recall the specifics of this speculation save to say that it was occurring. I knew of it as I was being asked questions about her. I later became aware that there had been complaints made to professional bodies concerning her conduct. At that time I was not aware that GOBBO was a registered human source.
34. Because of the importance attached to the CEJA investigations its members were careful about the occasions and circumstances in which they dealt with the lawyers acting for various criminal defendants. This included with GOBBO. In this regard it was part of my role to act as a buffer between CEJA investigators and defence lawyers. This need for care was heightened once charges were laid against various Victoria Police Drug Squad members and especially following the murder of Terrance and Christine HODGSON on 16 May 2004.
35. While I cannot say when or in what circumstances, I was told by DE SANTO that he had had discussions with GOBBO in relation to MOKBEL. I knew that these were with a view to persuading MOKBEL to plead to Commonwealth trafficking charges which had also been laid against him and to otherwise co-operate with CEJA investigators. I was told that nothing had come of these discussions.
36. Shortly after the murder of Terrance HODGSON and his wife I was told that Terrance HODGSON had been an informer and had agreed to give evidence against Paul DALE, a former Victoria Police member. HODGSON's evidence related to a burglary of a house in Dublin Street, Oakleigh on 27 September 2003. HODGSON, DALE and another police member, David MICHAEL, were charged with drug trafficking and other offences arising out of that burglary. The murder of the HODGSONS led to the failure of the case against DALE and the charges against him were withdrawn in October 2004.

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37. At some time during 2005 or 2006, I met GOBBO outside the Melbourne Magistrates' Court. I had not seen her for a number of months. She was using a cane, appeared quiet distressed and in a lot of pain. She had lost a great deal of weight. She told me of her medical issues and illness and the effect on her of the drugs she was now taking taking.
38. My role within CEJA substantially ended in about mid to late 2006 however I still undertook a limited amount of further work during 2007. The last entry in my fee book relating to that taskforce is dated 4 October 2007.
39. My fee book also records that on 13 March 2008 I undertook one days work in relation to the matter of BUICK v ORMAN. I am unable to say what this relates.
40. My fee book also records that on 22 December 2008 I provided a memorandum of fees in relation to the Purana Taskforce – HUPFIELD v ORMAN. This was followed by a further memorandum or fees on 8 July 2009. I believe that both these matters related to subpoena disclosure during ORMAN's committal.

**D. The PETRA and BRIARS Taskforces.**

41. In April 2007 the PETRA was established by Victoria Police to take over the Homicide Squad investigation of the HODSONS' murder. BRIARS was established at about the same time to investigate alleged police corruption associated with the murder of Shane CHARTRES-ABBOTT. Persons of interest to the BRIARS investigation included David WATERS and Peter LALOR.
42. The BRIARS investigation had already been underway for some time prior to my involvement.
43. On 20 March 2008, I was briefed by the Victoria Government Solicitors Office to deal with issues arising

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from a subpoena issued by the defence in R v GOUSSIS who had been charged with the murder of CHARTRES-ABBOTT. This included disclosure issues on behalf of BRIARS.

44. My brief in BRIARS was similar to that at CEJA and in dealing with subpoena and disclosure issues I adopted the same approach. I primarily liaised with former Det. Insp. Stephen WADDELL. Once again I prepared memorandums of attendance which briefly recorded the work which I undertook.
45. The first of those memorandums was dated 4 June 2008 and dealt with work done between 20 March 2008 and 18 April 2008. This was in respect of the Victoria Police response to subpoenas issued on behalf of GOUSSIS.
46. In February 2009, as a result of the PETRA investigations, DALE was charged with the murder of Terence HODGSON and his wife. I believe that there was an initial hearing of the matter on 9 March 2009.
47. Between 11 June 2009 and 4 September 2009 I undertook further work on behalf of BRIARS. This is set out in my memorandum of attendance dated 11 November 2009.<sup>7</sup>
48. By at least mid 2009, I was aware that GOBBO had provided witness statements in relation to the DALE prosecution for the murder of the HODGSONS. I believe these witness related to the tape recording of conversations between GOBBO and DALE. I was now also aware that for a period of time GOBBO had been a registered human source.
49. I believe that I learned of these matters as part of my work with BRIARS or possibly as part of work that I also did for PETRA at about that time. I was not aware of the details of GOBBO's registration, de-registration or the time period during which she had been a registered human source.

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<sup>7</sup> See Appendix 1.

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50. As part of my work with BRIARS, WADDELL and I had a number of discussions and conferences in relation to document disclosure and PII claims on behalf of the taskforce. I also had discussions with other Victoria Police members including Grant KELLY, a member attached to the Purana Taskforce, senior officers such as Tony BIGGIN and Luke CORNELIUS, Vicky PRAPPAS, a solicitor from the Office of Public Prosecutions, defence counsel and others.
51. During that period in 2009, WADDELL and I discussed the change in status of GOBBO from registered human source to witness and the implications which flowed from that change. We were both concerned to ensure proper disclosure of materials to the Court and the parties and properly based PII claims. We were also concerned about the risk to GOBBO's safety if her role as an informer was revealed. We were concerned about the potential conflict which existed between her role as an informer and registered human source and her role and duties as a lawyer. We were also concerned about the potential impact on the BRIARS investigation.
52. At about this time, I was also made aware that GOBBO had been recorded on telecommunications intercepts speaking with at least one of the persons of interest to BRIARS. I cannot recall any specific details about these calls except that they were considered to be social and not professional in nature. However, the fact of the calls was a further matter of concern at that time.
53. Also about this time, I became aware that the work of at least BRAIRS was being overseen and coordinated by a management committee made up of very senior members of Victoria Police, including the then Chief Commissioner. I was told that the late Frank COSTIGAN QC was either a member of the committee or consulted to it.
54. At items 26 and 39 of my memorandum of attendance dated 11 November 2009, I noted the following -

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- a. Monday, 27 July 2009 – R v Mokbel – Briars Taskforce - Supreme Court - Appearance Kaye J re subpoena issues concerning Purana Taskforce documents. Conference with Grant Kelly. Telephone conference with Stephen Waddell. Conference with Rod McInnes. Consideration of Justice Health documents for editing re Witsec issues. Preparation re advice on Witness 3838 PII and confidentiality issues;
- b. Wednesday, 19 August 2009 – R v Mokbel – Briars Taskforce - Conference with Stephen Waddell re public interest immunity claims in respect of Briars documents. Advice re witness 3838. Communications with Grant Kelly, Ruth Shann and Peter Morrissey re re-edited documents.

55. I do not recall the specific matters that I was asked to advise on or the advice that I gave. However, I believe my advice was provided in conference with WADDELL and perhaps others. It appears to have dealt with PII claims which had either arisen or were likely to arise as a result of subpoenas issued in R v MOKBEL, which was a Supreme Court trial before the Honourable Justice Kaye. However, the reference to witness 3838 confirms that the matter dealt with GOBBO, that I was aware she was a witness and had been or was a registered informer.
56. On about 15 March 2010, I provided a memorandum of attendance in relation to a matter of DPP v DALE. This related to appearances on 11 March 2010 before the Honourable Justice Beach in the Supreme Court and Magistrate Riordan in the Melbourne Magistrates' Court. These appearances were to obtain and convey an ex parte injunction which was granted staying the lifting of a suppression order in respect of identification of GOBBO as a witness in that proceeding.
57. On 19 April 2010, Carl WILLIAMS was murdered in prison. This occurred during an adjournment of the DALE committal hearing. As a result of the death of WILLIAMS, the murder charges against DALE were withdrawn. The murder of WILLIAMS was investigated by the DRIVER taskforce ("DRIVER"). I was briefed to assist DRIVER in relation to a variety of issues including ensuring compliance with

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Coroners Court notices to produce documents. I was also involved in the document disclosure process which was part of the JOHNSON committal proceedings.

58. I am aware that, in the context of the DALE murder committal, a subpoena to produce documents had been served on Victoria Police.<sup>8</sup> At the time of WILLIAMS death the subpoena had not been fully complied with. I was not involved in formulating the response by Victoria Police to that subpoena. I believe that it was dealt with by the Victorian Government Solicitors Office and other counsel.

#### **E. The ACC Proceeding**

59. On 28 January 2011, DALE was charged with offences arising from evidence given by him to the Australian Crime Commission during hearings in 2007 and 2008 (“the ACC proceedings”).
60. In about mid September 2011 I was briefed to advise Victoria Police in relation to disclosure issues arising in the ACC proceedings. These centered around GOBBO who was listed as a witness for the prosecution. I understood that DALE was contenting that GOBBO had been acting as his lawyer on those occasions she had taped him. This obviously raised the issue of her credit and whether she had breached her professional responsibilities to him as her client.
61. My work on the matter started on 13 September 2011 with a conference with now Commander Michael FREWIN. I have no specific recollection of that meeting but believe I was given a general background as to what had previously occurred, GOBBO's status as a witness against DALE, her role as a registered human source and the issues which now arose.
62. That first meeting was followed on 15 September 2011 by a meeting with Superintendent Peter

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<sup>8</sup> I discuss the issues which arose at pages 7 to 9 of my advice of 4 October 2011.

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LARDNER, Acting Insp. Andy BONA and Louise JARRETT, a solicitor from the Victorian Government Solicitors Office. Once again I have no specific recollection of what was discussed but believe it was a further briefing consistent with that which I had already received from FREWIN.

63. It was in the course of these preliminary meetings that I advised that, at a minimum, it would be necessary a review to occur of the Human Source Unit's logs in relation to their management of GOBBO whilst she was a registered human source. This review was also to extend to the Witness Protection Unit's logs. I viewed this as being the easiest way to understand the scope and scale of the document disclosure which might have to occur and the basis for PII claims which might be made. It was apparent that no review of this material had occurred previously.
64. Throughout all the meetings which occurred there was significant concern expressed about GOBBO's safety in the event that her role as an informer was revealed. The risk of retaliation against her was seen as extremely high. It had been heightened as a result of the murders of the HODGSONS and WILLIAMS and was complicated by her refusal to enter Witness Protection.
65. I have read a copy of an email sent by me on 19 September 2011 to Krista BRECKWEG, JARRETT and FREWAN requesting information as to documents already provided to the DALE defence during the HODGSONS murder committal and other matters. I noted that a meeting was being set up for the coming Wednesday.<sup>9</sup> While I had already had discussions with FREWAN, LARDNER and others about the various issues, I was otherwise unfamiliar with either the original subpoena which had been served or the scope of the documentation which had been previously provided during the DALE murder committal.
66. Prior to the meeting in my chambers on 21 September 2011 I received an agenda entitled ACC Prosecution & Subpoena Issues.<sup>10</sup> I believe that this was prepared by the Victorian Government Solicitors

<sup>9</sup> See email from me to Krista BRECKWEG on 19 September 2011 referred to in Appendix 1 as document 24.

<sup>10</sup> This document has been provided to the Royal Commission and is referred to in Appendix 1.

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Office. The agenda identified the proposed attendees, noted the various Victoria Police work units from which relevant documents might be sourced and also that there was to be discussion about my proposed inspection of documents.

67. I have no detailed recollection of the discussion which occurred during the meeting on 21 September 2011 save that I and others expressed concern about the transmutation of GOBBO from a source into a witness and the potential consequences which this might lead to in the context of PII claims and disclosure generally. There was also a deal of discussion about the extreme risk to GOBBO, the danger she was in and the need to have her called as a witness at all.
68. The other steps taken by me in relation to the matter are set out in my memorandum of attendance.
69. On 22 and 23 September 2011, I reviewed the Human Source Unit log and a Witness Protection log in relation to GOBBO. At the time I was mindful that I was not accessing primary source documents such as diary entries, transcripts or information reports but rather very basic summaries. Given the time available and the sensitivity of the material I viewed this as the most effective way to proceed.
70. Following that review I believe I may have spoken with Insp. John O'CONNOR, Supt. Paul SHERIDAN and WADDELL told them of my preliminary assessment of the material. I prepared a draft memorandum of advice on 25 and 26 September 2011.
71. On Wednesday 28 September 2011, I provided my draft memorandum of advice to those present during a conference held at the Victoria Government Solicitors Offices at the Victorian Police Center. At pages 8 and 9 of my advice I explained how the pre-trial discovery in respect of the various DALE proceedings had evolved, the basis for earlier non-disclosure on what I had been told was a "break barrier" and the limited review which had taken place. There was a general discussion about the seriousness of the issues

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that I had raised.

72. I told the conference that I was providing the draft advice so that they could review it and comment before it was finalized. I explained that my review suggested that GOBBO had been specifically targeted against DALE at least whilst she was under the management of the Unit and that this targeting was directed to be consistent with professional contact by her. I concluded that at least the documents relevant to that issue would have to be provided to DALE'S lawyers.
73. I also said that GOBBO had been providing privileged information about her clients to police and that on at least one occasion she appeared to act on police instructions in relation to the conduct of a proceeding. I stressed the issue surrounding tasking and I emphasized that, in my view, any PII claims based on informer identity were unlikely to be sustainable. I also said that in any event the material had to be reviewed by the prosecution to determine what if any disclosure was required as a matter of prosecutorial fairness.
74. On 4 October 2011, there was a further conference at the Victorian Government Solicitors Office to discuss my advice. I do not believe that there was any substantive change from the draft I had provided earlier. I was told that arrangements were being made to have the GOBBO material reviewed by the prosecutors in the ACC proceedings.
75. Ultimately, I believe that whilst the ACC proceedings against DALE continued GOBBO was not called as a witness.
76. Subsequently, I was not asked to advise further in relation to any of the issues raised in my memorandum of advice of 4 October 2011.

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**Other matters.**

77. In response to a series of questions posed by the Royal Commission I state the following -
78. Save as set out above, I am not specifically aware of any member of Victoria Police or other organisation or individuals who I believe were aware, prior to the end of 2012, that GOBBO was providing information or assistance to Victoria Police. I am aware however that a number of complaints were made by lawyers and clients to professional bodies in relation to GOBBO'S activities. These included complaints by Tony HARGRAVES and Sarah GARDE-WILSON and Carl WILLIAMS and are referred in the memorandum of advice of the 4<sup>th</sup> of October 2011.
79. I am unable to provide any details of any person(s) I believe were involved in the authorisation, and continued authorization, of the use of GOBBO as a human source.
80. Save as stated above, I am unable to further detail contact I have had with GOBBO. I did not socialize with her and had no contact with her other than in a professional context.
81. Save as state above, I do not believe that I became aware of any information received by Victoria Police between 1995 and 2012 where I knew, believed or had reason to suspect that the source of that information was GOBBO.

**Concerns in relation to use of Ms Gobbo as a human source**

82. As set out above, from about mid-2009 I was aware of concerns which were raised by members of Victoria Police as to the use of a legal practitioner of a human source are set out above. These matters have been previously dealt with.

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83. Save for the matters set out above, I was unaware as to whether any concerns were raised at any time by members of Victoria Police (or other policing or law enforcement agencies for example the AFP, the Office of Public Prosecutions, the Commonwealth Director of Public Prosecutions) as to the use of GOBBO as a human source.
84. As I have stated above, I was asked to advise in relation aspects of disclosure concerning GOBBO in mid-September 2011. However, I have never been asked to advise on the propriety of the general approach adopted by Victoria Police in relation to GOBBO. Furthermore, I only became aware of her registration as a human source in about mid-2009.
85. Details of my awareness as to any discussion within Victoria Police about the obligation of disclosure in relation to material concerning the use of GOBBO as a human source are set out above.

**Other relevant issues**

86. I am not aware of any other human source who has provided information or assistance to Victoria Police who were subject to legal obligations of confidentiality or privilege.
87. I do not believe that there are any other matters relevant to the Royal Commission's terms of reference about which I am able to provide assistance to the Royal Commission.



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### APPENDIX 1

	Document ID	Title	Description	Document Date
21	VPL.0100.0020.9357	pre trial -	TRANSCRIPT - THE QUEEN v.	2005
9	VPL.0100.0001.6841	EV-0520	Purana - Hupfeld v Faruk Orman	22/12/2008
10	VPL.0100.0001.6843	EV-0521	Purana - Hupfeld v Faruk Orman	6/02/2009
11	VPL.0100.0001.6844	EV-0522a	Purana - Hupfeld v Faruk Orman	8/07/2009
3	VPL.0005.0019.0059	Maguire Invoice 11 September 2009	Briars Taskforce and R v Mokbel	11/11/2009
14	VPL.0100.0001.6858	EV-0526a	Briars Taskforce and R v Mokbel.	11/11/2009
18	VPL.0100.0001.6875	Ev-0530a	DPP v Paul Dale & ors.	15/03/2010
17	VPL.0100.0001.6873	EV-0529a	DPP v GOUSSIS	18/05/2010
4	VPL.0100.0001.6800	EV-0514a	Driver Taskforce - Inquest into the death of Carl Williams.	24/02/2011
5	VPL.0100.0001.6802	EV-0515a	DPP v Johnson - Driver Taskforce.	18/07/2011
12	VPL.0100.0001.6850	EV-0524a	Operation Magnum - R v Mokbel.	10/08/2011
6	VPL.0100.0001.6804	EV-0516a	Driver Taskforce - Inquest into the death of Carl Williams and DPP v Johnson.	7/09/2011
7	VPL.0100.0001.6807	EV-0517a	Driver Taskforce	7/09/2011
25	VPL.0100.0078.0017	EV-1029	Email to K Breckweg at CDDP re: Dale Disclosure	19/09/2011
2	VPL.0005.0003.2997	ACC Prosecution & Subpoena Issues	ACC Prosecution & Subpoena Issues	21/09/2011
22	VPL.0100.0025.4529	21 09 11 subpoena meeting agenda	ACC Prosecution & Subpoena Issues	21/09/2011
8	VPL.0100.0001.6808	EV-0518a	Driver Taskforce - DPP v Johnson.	22/09/2011
1	GLA.0003.0003.0518	44630514.msg - Driver - Buick v Dale - Memo 1	Buick v Dale - Memorandum of Advice	4/10/2011
19	VPL.0100.0015.9640	111107 DALE - Committal Transcript 7 November 2011	TRANSCRIPT - THE QUEEN v. PAUL NOEL DALE	7/11/2011
20	VPL.0100.0015.9830	111110 DALE - Committal Transcript 10 November 2011	TRANSCRIPT - THE QUEEN v. PAUL NOEL DALE	10/11/2011
15	VPL.0100.0001.6866	EV-0527a	DRIVER TASKFORCE - BUICK v DALE	22/11/2011

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13	VPL.0100.0001.6855	EV-0525a	Operation Magnum - R v Mokbel.	18/03/2012
16	VPL.0100.0001.6868	EV-0528a	DPP v ORMAN	3/06/2012
23	VPL.0100.0064.0813	L3 C8 Timetable - Updated on 080913 by vp25097	L3 C8 Timetable	8/09/2013
24	VPL.0100.0064.0814	L3 C8 Timetable - Updated on 090913 by vp25097	L3 C8 Timetable	9/09/2013

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