Royal Commission into the Management of Police Informants

STATEMENT OF PAUL STEPHEN HOLLOWOOD

- 1. My full name is Paul Stephen Hollowood
- 2. I am currently a Superintendent in the Southern Metro Region of Victoria Police.
- 3. I make this statement in response to a request from the Royal Commission into the Management of Police Informants dated 12 September 2019. This statement is produced to the Royal Commission in response to a Notice to Produce.

Personal Information (Q1)

4. I graduated from the Victoria Police Academy in 1975. Details of my educational background, employment history and training are contained in Annexure A to this statement.

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

- To the best of my recollection, I have never had any personal contact with Ms Gobbo.
 I have not managed any police investigation that has dealt with Ms Gobbo.
- 6. However, from June 2004 until January 2011, I was a Detective Superintendent at the Crime Department (now Crime Command). In that role, I became aware that Ms Gobbo was a proposed prosecution witness and human source, as I attended meetings of the Petra Task Force Investigation Management Committee where these matters were discussed.

Roles as Superintendent, Crime Department

- 7. From June 2004 until February 2007, I led a major restructuring project called the Major Crime Management Model Project, which resulted in a reorganisation of the structure of criminal investigations across Victoria Police and the Crime Department in particular. This work was full time up until February 2007.
- From February 2007 until September 2008, I was an Operations Superintendent overseeing a number of workgroups, including the Purana Task Force, Drug Task Force, and the Arson and Explosives Squad.

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- 9. From September 2008 until January 2011, I held a role as Tasking Coordination Manager within the Crime Department. In this role, I was responsible for allocating resources to different squads, units, workgroups and task forces within the Crime Department. Superintendent Jack Blayney held a similar role around the same time.
- 10. In this role I was regularly briefed about the commencement, progress or resolution of major investigations as well as the strategic direction of those major investigations. These briefings related to my role in allocating and coordinating resources across the Crime Department. During this period, the Purana Task Force and Petra Task Force were among the major investigations I received briefings about.
- 11. I was not involved in the day-to-day details and operations of investigations. Issues specific to an individual investigation were sometimes escalated to me by exception. These issues most often related to granting further resources, giving formal approvals that could only be exercised by a Superintendent, or providing guidance or advice where required.
- 12. From 7 February 2009 until January 2011, I took up an operational role as the Senior Investigations Officer in charge of the Phoenix Task Force, which was to investigate the circumstances of the 173 deaths from the Black Saturday bushfires. This role later involved assisting the 2009 Victorian Bushfires Royal Commission.

Purana Task Force

- 13. I have no independent recollection of receiving any briefings about Ms Gobbo in relation to the Purana Task Force or its operations. I have two diary records concerning the Purana Task Force that refer to Ms Gobbo by her reference Witness F:
 - (a) For 16 March 2009, my diary records that after a Petra Task Force briefing, I was to speak with DI Edwards regarding access to Witness F;
 - (b) For 18 March 2009, my diary records that I spoke with DI Edwards regarding access to Witness F and that was to be delayed.
- 14. I have no further recollection of these discussion beyond what in my diary

VPL.0014.0093.0003

- 15. I have been shown a transcript of a plea hearing for the from the formation of 2007.
 The transcript indicates that certain documents were provided to the Court regarding assistance¹.
- 16. I do not recall approving requests relating to **sector** assistance. At the time, I sometimes was a member of the Rewards Committee that reviewed applications relating to assistance. This process generally involved a document to explain how the person had assisted police, which would then be reviewed and approved by the Rewards Committee. I recall that subjects of rewards applications were not identified by name.
- 17. My diary records that on 12 December 2008, I spoke with Detective Senior Sergeant Abrehart of the Purana Task Force regarding a witness, Mr Bickley. My diary records that DSS Abrehart needed authority to the service of the for that witness pending the service of the servi

Petra Task Force

- 18. The Petra Task Force was formed in April 2007 to re-activate an investigation into the murders of Terence and Christine Hodson. The task force was initiated and authorised by Deputy Commissioner Simon Overland. My diary records that on 22 and 23 March 2007, I met with DC Overland and others about the investigation into the Hodson murders, a statement from Carl Williams and the resources needed for a Task Force.
- 19. DC Overland sent a written direction dated 3 April 2007 to me and Supt Blayney. The direction included detail about how the Task Force was to be established including detail about what resources were needed and how they would be deployed². Supt Blayney and I received the direction because we were responsible for arranging and coordinating resources for major investigations like this.
- 20. Oversight of the Petra Task Force was arranged differently to other major investigations. DC Overland's written direction explained that the oversight function of the Petra Task Force was to be performed by an Investigation Management Committee.

¹ VPL.0012.0002.2166 at 2239.

² VPL.0100.0013.0846 at 1320-1323.

I recall that this committee usually comprised DC Overland (Chair), Assistant Commissioner Luke Cornelius and Mr Graham Ashton (Office of Police Integrity) and that sometimes others would attend.

- 21. The committee met regularly to receive progress reports from the Detective Inspector in charge of the task force, which was initially DI Gavan Ryan and DI Steve Smith. I accompanied representatives of the task force to a number of these meetings, but I did not attend all committee meetings.
- 22. When I did attend, I was privy to updates that were provided to the committee and the ensuing discussions concerning the Petra Task Force's progress. However, my role was to address any issues about the logistical and resource support of the task force. I recorded the fact I attended meetings in my official diary, but for security reasons, I generally kept no record of the committee proceedings in my diary. I relied upon the updates tended at the committee meetings, which were given to committee members at the meeting and were collected at the end of the meeting. I have reviewed my official diary in preparing my statement. My diary records that I attended Investigation Management Committee meetings throughout 2008 and early 2009, but not on 21 July 2008, 25 August 2008 and 8 September 2008. From February 2009, I attended very few Investigation Management Committee meetings because I was officer in charge of the Black Saturday Bushfire investigation from 7 February 2009 onwards. I also heavily involved in another large-scale joint investigation with interstate and federal bodies.
- 23. I recall that I first became aware that Ms Gobbo had information that might be relevant to the Task Force's investigation during discussions at the Investigation Management Committee. I recall that investigators mentioned that a statement was being prepared. I do not recall the detail of information that Ms Gobbo was to provide. I do not believe I have read any statement that Ms Gobbo had made.
- 24. I believe I became aware that Ms Gobbo had acted as a human source for Victoria Police around the time that she was proposed to be a witness. I believe this was during discussions at meetings the Petra Investigation Management Committee.
- 25. I recall that I was surprised when Ms Gobbo's role as a human source was discussed at the meeting because she was a lawyer. I recall that I was given general assurances that legal advice had been obtained about a lawyer acting as a human source at the time Ms Gobbo was being managed and that the advice indicated it could be done. I do not

recall who gave these assurances. I did not see any written advice to this effect and did not make further enquiries about the advice, as I accepted those assurances.

- 26. I also understood that there would likely be scrutiny of Ms Gobbo's role as a human source if she ultimately did give evidence as a prosecution witness. My understanding was that Ms Gobbo acting as a witness would involve disclosing her role as a human source. I cannot recall discussion suggesting that this fact would not be disclosed. I do not believe there was any discussion about obtaining advice regarding Ms Gobbo's transition to become a witness.
- 27. In preparing my statement, I have been shown Petra Weekly Update documents for the period from October 2008 to March 2009. These update documents include references to Ms Gobbo being interviewed by investigators, while later documents refer to Ms Gobbo (as "Witness F") providing a statement to Victoria Police in January 2009.
- 28. Based on reviewing these updates, I believe that I would have learned Ms Gobbo was a human source sometime around late 2008.
- 29. I do not recall specific discussions about whether Ms Gobbo should transition from a human source to providing a statement as an evidentiary witness. I recall that I personally had a concern about Ms Gobbo acting as a witness, as it has been my experience that most human sources do not transition well to becoming witnesses. This is because often a source's motivations and credibility are attacked when they are giving evidence. I was also concerned that Ms Gobbo acting as a witness protection program. I expressed these opinions during meetings of the Investigation Management Committee, but I cannot recall precisely when this was. I do recall that the Committee acknowledged that the risk to Ms Gobbo needed to be resolved as part of her transitioning to become a witness.
- 30. I do recall some discussion at an Investigation Management Committee meeting about ongoing attempts to have Ms Gobbo enter witness protection. I do not recall precisely when this was but believe it was after she had signed a statement.
- I attended further meetings of the Investigation Management Committee on 27 July
 2009, 24 August 2009 and 7 September 2009. In preparing my statement, I have
 reviewed some Petra Weekly Updates for the period from June to September 2009. I do

not have a specific recollection of discussions at these meetings regarding Ms Gobbo or otherwise.

32. I did not attend further meetings of the Investigation Management Committee in 2009 or 2010, due to my involvement in other investigations and the Royal Commission into the 2009 Victorian Bushfires.

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

33. I refer to my response to Question 2.

Awareness of others (Q4)

34. Based on the fact that I became aware that Ms Gobbo had acted as a human source through meetings of the Petra Investigation Management Committee, I believe that the other members of that Committee were aware she had acted as a human source. I am not otherwise aware of who knew Ms Gobbo was a human source.

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

35. Based on my knowledge of human source policies at the time, I assume that those in charge of the Intelligence and Covert Support Department were responsible for the authorisation of the use of Ms Gobbo as a human source. However, I am not aware of the individuals who were involved in authorising her use.

Personal contact with Ms Gobbo (Q6)

36. I do not believe I have had personal contact with Ms Gobbo.

Information & assistance received (Q7 & Q8)

- 37. I was generally aware that Ms Gobbo provide some assistance in relation to some investigations undertaken within the Crime Department, but I do not know which investigations these were. I learned this around late-2008 when I became aware that she was a human source.
- 38. I otherwise have no knowledge of the information or assistance that Ms Gobbo provided as a human source.

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

 I am not aware of any concerns that were raised about the use of a legal practitioner as a human source.

- 40. As set out above, when I learned Ms Gobbo had acted as a human source, I was given assurances that Victoria Police had sought legal advice regarding the use of Ms Gobbo as a human source and no concern had emerged.
- 41. As set out in my response to Question 2, I raised concerns about witness protection issues relating to Ms Gobbo's transition from human source to witness. I am not aware of other concerns about her use as a human source.

Awareness about disclosure in relation to Ms Gobbo (Q11)

- 42. I am not aware of any discussion within Victoria Police about the obligation of disclosure in relation to material concerning the use of Ms Gobbo as a human source.
- 43. I note that Petra Weekly Updates from 2009 mention subpoenas being issued in relation to Petra Task Force investigations. I do not recall being involved in any discussions about disclosure of Ms Gobbo's role as a human source in response to such subpoenas.

Other relevant matters (Q12-Q14)

- 44. I am not aware of any other human source who has provided information or assistance to Victoria Police who was subject to legal obligations of confidentiality or privilege.
- 45. I have had experience as an investigator of legal practitioners conveying information to police that was the subject of legal professional privilege, but this has only been upon a basis that privilege had been formally waived by their client.
- 46. The training I have received in respect to the identified topics was primarily through my training as a Detective and a Sub-Officer. In addition, my knowledge of these matters has been enhanced through my experience as an investigator, giving evidence and running trials with police prosecutors and lawyers from the Office of Public Prosecutions.

Dated 19 November, 2019

Paul S. Hollowood APM

APPENDIX A

Educational Background

- 1. My formal education qualifications include:
 - a. Master of Arts, Public Policy & Administration, Charles Sturt University (2001);
 - Associate Diploma, Public Administration (Policing) (Distinction), Charles Sturt University, (2000);
 - c. Associate Diploma, Executive Leadership, Australian Institute of Police Management, (2000);
 - d. Bachelor of Arts, Criminal Justice Administration, Phillip Institute of Technology, (1988).

Employment History

- 2. On 4 February 1974 I joined Victoria Police as part of the Police Cadet program.
- 3. I subsequently graduated from the Victoria Police Academy on 17 October 1975. Since then, I have performed the following substantive roles (excluding periods of higher duties):

Constable, Russell Street Police Station	1975 (Oct) – 1976 (Mar)
Constable, Carlton Police Station	1976 (Mar) – 1980 (Jan)
Detective Constable / Senior Constable, Brunswick CIB	1980 (Jan) – 1983 (Feb)
Detective Senior Constable, Homicide Squad, State Crime Squads	1983 (Feb) – 1985 (Sep)
Sergeant, Port Melbourne Police Station	1985 (Sep) – 1988 (May)
Detective Sergeant, Major Crime Squad, Crime Dept.	1988 (May) – 1989 (Nov)
Detective Senior Sergeant, Homicide Squad, Crime Dept.	1989 (Nov) – 1994 (Nov)
(includes Senior Investigations Officer lead for the Zenith Task Force)	
Detective Inspector, Crime Intelligence Support Centre	1994 (Nov) – 1998 (Dec)
Detective Inspector, Protective Security Intelligence Group	1998 (Dec) – 1999 (Dec)
Detective Inspector, Crime Audit & Professional Standards Unit	1999 (Dec) – 2001 (Apr)

Detective Inspector, Organised Crime Squad, Crime Dept.	2001 (Apr) – 2004 (Jun)
Detective Superintendent, Crime Department (including Project lead for the Major Crime Management Model Project and Senior Investigations Officer lead for the Phoenix Task Force)	2004 (Jun) – 2011 (Jan)
Superintendent, No. 2 Division, Southern Metro Region	2011 (Jan) – 2012 (Dec)
Superintendent, Witness Protection Implementation Project	2012 (Dec) – 2013 (Aug)
Superintendent, Operations Support, Southern Metro Region	2013 (Aug) – 2016 (Mar)
Superintendent, No. 3 Division, Southern Metro Region	2016 (Mar) – Current

Training Background

- 4. My major training programs during my employment include:
 - a. Pacific Region Leadership in Counter Terrorism Program, USA/Australia (2011);
 - Senior Management Leadership Development Program, Airlie Police College (2008);
 - c. Pacific Region Leadership in Counter Terrorism Program, USA/Australia (2007);
 - d. Project Management Training Course, Victoria Police (2003);
 - e. Corporate Management Review Evaluation Course, Victoria Police (2001);
 - f. Executive Management Course, Victoria Police (2000);
 - g. Federal Bureau of Investigation National Academy Course, Quantico USA (2000);
 - h. Police Command Course, SAC-PAV Melbourne (1999);
 - i. Police Executive Leadership Program, AIPM Manly (1995);
 - j. Counter-Terrorist Intelligence Coordinators Course, SAC-PAV Tasmania (1995);
 - k. National Strategic Intelligence Course, AIMP Manly (1995);
 - l. Officers Course, Victoria Police (1993);
 - m. Detective Sub-Officer Training Course, Victoria Police (1988);
 - n. Sub Officer Course, Victoria Police (1984);
 - o. Detective Training School, Victoria Police (1980).