

This document has been redacted for Public Interest Immunity claims made by Victoria Police. These claims are not yet resolved.

Royal Commission
into the Management of Police Informants

STATEMENT OF JOHN JOSEPH NOLAN

1. My full name is John Joseph Nolan. I am currently employed by Victoria Police as the Local Area Commander for Mildura.
2. I make this statement in response to a request to the Royal Commission into the Management of Police Informants dated 2 September 2019.
3. I have been shown excerpts only of my diaries for the period 30 December 2006 to 21 January 2009.¹ I am told that these have been provided by IBAC to the Royal Commission and then to Victoria Police. I have been told that a request was made to the Royal Commission on 19 September 2019 for further documents, including my OPI emails and documents relating to the operations have been specifically asked about, but while the Royal Commission has provided the diary excerpts I have referred to it, does not propose to provide any additional documents. I also have not been granted access to relevant investigative logs, case notes, final/interim reports, affidavits and briefing notes. I expect that all this information would have been archived when OPI finished operations and that the custodian of the information would be IBAC.

Educational background and employment history (Q1)

4. I graduated from the Victoria Police Training Academy in March 1980.
5. In my early career (Constable through to Sergeant), I worked in various uniform and specialist positions including:
 - Oakleigh Uniform - Training Station
 - St.Kilda Road Uniform
 - Morwell Uniform
 - Gippsland Prosecutions

¹ VPL.0005.0192.0001; VPL.0005.0192.0116.

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- Morwell Criminal Investigation Branch
 - Moe Prosecutions Office
 - Moe Uniform
6. My first in-charge appointment was as the Station Commander of Cowes Police Station from December 1994 until August 1997.
 7. From August 1997 until July 2000, I was a Sub-Charge Senior Sergeant at the Transit Safety Division, during which time I also undertook periods of upgrading as:
 - (a) Inspector, Staff Officer to the Assistant Commissioner, Traffic and Operations Support for three months; and
 - (b) Inspector, Transit Safety Division for a year and a half.
 8. From July 2000 to March 2001, I was the Station Commander at Moe Police Station, during which I time I also undertook a period of upgrading as an Inspector for the Latrobe Police Service Area.
 9. From March 2001 to August 2005 I was an Inspector and Team Leader for the Ethical Standards Department (ESD), during which I time I also undertook periods of upgrading as:
 - (a) Superintendent, Crime Manager (Region 1) for two months;
 - (b) Superintendent, Stonnington (Region 1, Division 3) for three months; and
 - (c) Superintendent, Complaints Division, ESD for two and a half years.
 10. From August 2005 to November 2012, I undertook the following roles at the Office of Police Integrity:
 - (a) Team Leader, Investigations from August 2005 until July 2006, including a period of upgrading as the Manager, Operations, for four months; and
 - (b) Investigations Manager (later re-titled Assistant Director (Operations)) from July 2006 until November 2012, including a period of upgrading as the Deputy Director, OPI, for six months.

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11. From December 2012 until October 2015, I was a Specialist Investigator with ASADA for 12 months, then Investigations Manager with the Victorian Commission for Gambling and Liquor Regulation for 14 months, before returning to Victoria Police as the Local Area Commander for Mildura in October 2015. I remain in that role.
12. I have undertaken Victoria Police qualifications and training, including but not limited to:
 - 1984 Prosecutors' Course
 - 1986 Detective Training School
 - 1989 Law Instructors' Course
 - 1997 Advanced Detective Training School
 - 1997 Inspectors' Promotional Qualifications
 - 1998 Officers' Course
 - 2000 Discipline Investigators' Course
 - 2000 Civil Investigators' Course
 - 2001 International Police Executive Officers' Course
 - 2002 Police Management Development Program
 - 2003 – 2004 Senior Managers' Leadership Development Program
 - 2011 Company Director's Course
13. I hold the following qualification:
 - Graduate Certificate in Applied Management



Involvement or association with any investigation which had dealings with Ms Gobbo (Q2, Q3)

14. In August 2005, I commenced at the Office of Police Integrity (OPI), initially for 12 months as a Team Leader. After that initial 12 months, I was appointed Manager Investigations (titled later changed to Assistant Director (Operations)). In my role as Team Leader I reported to either Mr Peter Donaldson or Assistant Director Graham Ashton (titled later changed to Deputy Director). As the Manager Investigations, I reported directly to Assistant Director Ashton.
15. While at the OPI, among many other tasks I performed as part of my roles, relevantly:
 - (a) I attended Board of Management meetings from time to time for Taskforce Petra and Taskforce Briars. In the main, I only attended those meetings if (then) Assistant Director Graham Ashton was unavailable to attend; and
 - (b) I was involved in preparing or assisting in the preparation of joint agency agreements in relation to Operations Briars and Neon,² and others including Operation Opera (with Taskforce Petra),³ Operation Oboe (with Taskforce Petra)⁴ and Operations Slate and Perturbo (with ESD via Driver Taskforce).⁵
16. I provide detail of these operations and the extent of my involvement in my response to Questions 4 and 5 below.
17. I did not usually take notes of discussions held during Board of Management Meetings in relation to the nominated operations due to the extreme sensitivity of the matters being dealt with. For instance, the joint agency agreements for Operation Briars and Operation Neon provide that the communication of information regarding those operations would be strictly controlled (clause 3.1) and that no information would be communicated within or between the agencies outside of the official lines of communication (clause 3.2).⁶ I am aware that Assistant Director Ashton maintained a folder in his safe which included briefing notes and minutes

² VPL.0005.0012.0610; VPL.0005.0012.0636; VPL.0100.0058.0798.

³ VPL.0013.0001.0184.

⁴ VPL.0099.0006.0020.

⁵ VPL.0100.0175.0301.

⁶ VPL.0005.0012.0610; VPL.0005.0012.0636.

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from the meetings. I became aware of the folder during times I was acting in Assistant Director Ashton's stead. If I attended meetings during Mr Ashton's absence, I added any relevant documents to the folder.

18. I have not had access to my Outlook emails from my time at the OPI, but it is likely that they would contain records of matters pertaining to the nominated operations. I believe that my Outlook calendar from that time, to which I no longer have access, would contain records of meetings I attended.

Awareness of information or assistance by Ms Gobbo to Victoria Police (Q4, Q5)

19. I was not told that Ms Gobbo was a human source and only found out specifics of her engagements by Purana, Petra and Briars during the course of this Royal Commission.
20. I believe it would have been prudent for Victoria Police to notify OPI of Ms Gobbo's status as a registered as a human source (including the circumstances of her deployments) before she was engaged by investigators from the Petra or Briars Taskforce. Human sources can pose a significant risk to the integrity of police officers and police investigations as was discussed in several OPI publications including: *Past Patterns - Future Directions* (published February 2007), *Ceja Task force Drug Related Corruption* (published July 2007) and *Report on investigation into Operation Clarendon* (published June 2008). Ms Gobbo's status as a lawyer made the situation even more complex given confidentiality requirements (lawyer/client privilege) and the potential for conflicts of interest. If OPI had been notified that Ms Gobbo was a human source, it should have prompted a comprehensive assessment of her activities by the OPI given that OPI was engaged in a joint-operation with Victoria Police and had also undertaken to maintain oversight of those investigation.
21. I do not recall knowing of Ms Gobbo in an operational context until she was coercively examined at the OPI on 19 July 2007. I was told by Assistant Director Ashton that she was attending to give evidence either on the day or shortly before that examination date. I am now aware Operation Khadi had some reference to Ms Gobbo and I am unable to say if I sighted the final report for that however, I would



have expected it to come to me for review, if it were submitted while I was Assistant Director.

22. My first knowledge of Ms Gobbo's voluntary assistance to police arose when I was advised that she was going to be a witness for Taskforce Petra. This was around the time she made a statement, which I now know to be in January 2009. I believe I became aware of this through the OPI's joint investigations with Taskforce Petra. I cannot recall precisely when or who told me that Ms Gobbo had become a witness. I remember feeling surprised that she was going to be a witness, because I recalled her evidence at the OPI hearings as having little apparent evidentiary value. I was aware that, as a witness, she was referred to as 'Witness F'. I have no recollection of seeing the statement Ms Gobbo made in relation to Paul Dale.

Operation Briars (and associated OPI operations)

Operation Neon

23. I have been shown a Joint Agency Agreement, dated 22 March 2007, between the OPI and ESD in relation to Taskforce Briars.⁷ This agreement is in very similar terms to an unsigned copy of a Joint Agency Agreement in respect of Operation Neon.⁸ Operation Neon was the OPI operation that related to Taskforce Briars. To the best of my recollection, this operation was primarily for the purpose of providing covert and surveillance support to Taskforce Briars. At that time, Taskforce Purana was absorbing a great deal of the covert and surveillance resources available to Victoria Police. DC Overland and Assistant Director Ashton also expressed concerns to me about the potential for information leakage about the investigation due to the suspects having strong relationships with current serving members of Victoria Police. As such, Victoria Police looked to the OPI for assistance.
24. The agreements contemplate that the Operations Management Group would be comprised of DC Overland, AC Cornelius and Assistant Director Ashton (clause 2.1) and that the Operations Commander may also liaise with me, the OPI Manager of Operations, to the extent necessary to allow me to facilitate operational support arrangements and promote effective support from the OPI staff (clause 8.3).

⁷ VPL.0005.0012.0610.

⁸ VPL.0005.0012.0636.

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25. The decision to enter into this agreement was conveyed to me by Assistant Director Ashton, whom I understood had discussed the agreement with DC Overland. Ultimately, the decision to enter into the agreement for the OPI's part would have been made by the Director of the OPI on advice from Assistant Director Ashton.
26. I recall expressing concerns to Assistant Director Ashton about how OPI could maintain its statutory independence from Victoria Police while having an active role in the investigation - albeit in a support role. It would be inappropriate for OPI to investigate, for example, if a public complaint arose in the course of the investigation, it would pose significant conflict of interest issues for the OPI should it have been asked to investigate. Assistant Director Ashton expressed the view to me that these concerns could be managed, and the priority was to ensure that Victoria Police had the resources and support to conduct an effective investigation. The allegations raised in both Operation Petra ~~Briars~~ and Operation Briars involved the most serious allegations of police corruption and I understood the imperative to ensure the matters were resolved.
27. Concerns were also raised with me by Greg Carroll and Vanessa Twigg, from OPI Legal Services about the proposal to enter into a joint investigation agreement. While I have not been provided to access to my emails from the OPI, I have been informed that an email chain dated around 18 July 2007 between Vanessa Twigg, me and others has been tendered in evidence, which I believe sets out some of these concerns.
28. I have been shown a Memorandum of Understanding, Operation Neon/Briars, apparently signed on 9 July 2007.⁹ My name has been printed on the signing page of that document and then crossed out and replaced with Assistant Director Ashton's name. The word 'Acting' before 'Assistant Director, Police Integrity' has also been crossed out. I believe it likely that this document was drafted while I was acting in Assistant Director Ashton's position. The document appears to have been prepared by Bronwyn Smith, who was Assistant Director Ashton's Executive Assistant at the time. I believe that Ms Smith prepared the document expecting I would sign it, but that it was ultimately signed by Assistant Director Ashton upon his return to the position. The document is an agreement between OPI and Victoria Police regarding

⁹ VPL.0100.0058.0798 at .0899.

the disbursement of costs associated with the execution of Operation Neon/Briars. I recall providing Ms Smith advice during preparation of the document but I am not sure if I ever reviewed the final document before it was signed by Assistant Director Ashton.

Management Committees – Briars Taskforce

29. As part of the joint investigations, I attended the management committee meetings for Taskforce Briars and Taskforce Petra from time to time. I believe I only attended these meetings when Assistant Director Ashton was unavailable to attend himself. In the initial phase, discussions at these meetings tended to be at a high-level – which including strategy and resourcing issues rather than discussions about the minutia of the investigations. Later in the investigations, we were briefed about more aspects of the investigations. However, I was not told that Ms Gobbo had been involved as a human source. I was only aware that she was a witness.
30. I have been shown Management Committee meeting minutes for Taskforce Briars dated 10 April 2007, which record that I attended that meeting. Those minutes include a notation of "*Legal item – Fin McRae assisting re Winneke. OPI Director offered the services of Vanessa Twigg, to be tasked via RW through JN.*" I do not recall exactly what this notation relates to. I know there were a range of legal issues arising from the joint investigation including the ability to share telephone intercept material, the ability to share coercive examination transcripts and legal issues arising from the 'Kit Walker' investigation. Vanessa Twigg was a solicitor at the OPI, who was to assist in obtaining this advice from counsel. I am the 'JN' referred to in the minutes and I expect that I would have was tasked Ms Twigg accordingly.
31. I have also been shown minutes for 16 April 2007 and 21 May 2007 which record my attendance at Taskforce Briars Management Committee meetings. My diary records that I attended a Briars meeting on 16 April 2007. Although, I have not found a diary record indicating that I attended the Management Committee meeting on 21 May 2007, I have no reason to doubt that I did attend that meeting.
32. I have been shown an email from Detective Inspector Stephen Waddell to me dated 4 November 2009, attaching a note in respect of Warren Thomas Shea to be considered at a Board of Management meeting that afternoon. I have not seen my



diary for this date. I am unable to confirm that I attended the Taskforce Briars Board of Management meeting on 4 November 2009. However, it is likely that I did.

OPI hearings

33. My diary records that at 11.20 on 19 July 2007, I remotely observed an OPI examination of Ms Gobbo. I was notified that Ms Gobbo was to be examined on the day or shortly before the examination date. I was aware at the time that there was a high degree of sensitivity around Ms Gobbo's hearing, which I understood was why I had not been told sooner about the hearing. It was not obvious to me during the hearings that Ms Gobbo had been a human source and I did not know at the time that she was assisting police in any capacity. I recall, during the hearings, Ms Gobbo being warned a number of times that the OPI did not want her to reveal anything she had learned as part of her relationships with her clients or which was subject to client legal privilege. I recall that Ms Gobbo was required to attend for a second day of hearing, but I did not attend as I was overseas.

Taskforce Petra (and associated OPI operations)

34. I have been shown a Petra Taskforce Weekly Update, dated 1 May 2007,¹⁰ which refers to DSS O'Connell and DI Ryan attending the OPI offices and speaking to me and Greg Carroll. The update records, "*The talks centred on the exchange of information and were productive*". My diary records that at 14.00 on 26 April 2007, I met with DSS O'Connell, DI Gavan Ryan and Greg Carroll, Director of Legal Services at the OPI. I do not independently recall that meeting, nor what it was about. This Petra Taskforce Weekly Update also records Williams having signed a statement on 24 April 2007. I do not recall having seen that statement.
35. My diary records that on 26 April 2007 at 10.00 I spoke to George Brouwer, Ombudsman, about possibility of hearings for Argall and Gobbo. My diary also shows a meeting at 14.00 with Gavin Ryan, Shane O'Connell and Greg Carroll in relation to Operation Petra. I can also see from my diary that I attended a briefing for Assistant Director Ashton on 30 April 2007 for two hours from 9.30 to 11.30. I believe I spoke directly to Ombudsman Brouwer because Assistant Director Ashton was unavailable and I was acting in his role. I believe that Ombudsman Brouwer

¹⁰ VPL.0100.0046.2679.

asked me to defer that decision to Assistant Director Ashton, to make on his return. I believe from my diary notes that he return on 30 April 2007.

36. I have been shown minutes of an Operation Petra Management Committee Meeting dated 21 May 2007, which records that I was present.¹¹ The minutes record that the meeting commenced at 1630. It is likely that this meeting followed on from the Briars meeting on the same day, referred to at paragraph 31 above. I do not independently recall this meeting, but believe it is likely that I was present. I do recall having been present for a conversation about mitochondrial DNA analysis in relation to an attempt to analyse a DNA sample from the fence at the Hodsons' murder scene which was believed to be from Rodney Collins. It is likely that these minutes record that conversation.

Operation Oboe

37. I have been shown a Joint Agency Agreement, dated 25 June 2007, between the OPI and Victoria Police in relation to Operation Oboe (OPI) and Operation Petra (Victoria Police). This agreement was signed by DC Overland for Victoria Police and Assistant Director Ashton for the OPI. This operation related to the leak of an information report, 'IR44'. It was suspected that the murders of Terence and Christine Hodson were prompted by the unauthorised disclosure of information contained in IR44. At the time of this Joint Agency Agreement, I did not have any knowledge of Ms Gobbo having been involved in that operation. I later knew she was Witness F and was examined by OPI about the matter. I was not aware that Ms Gobbo had ever been a human source until reports of this Royal Commission.

Operation Opera

38. I have also been shown a Joint Investigation Agreement between the OPI and Taskforce Petra in relation to Operation Opera.¹² This operation related primarily to 73 pages of computer-generated confidential Victoria Police documents, which were found at the residence of Rodney Collins, following his arrest on 6 June 2008. The document records that the agreement commenced on 7 June 2008 following a meeting between Deputy Director Ashton, OPI, Assistant Commissioner Luke

¹¹ VPL.0100.0237.1774.

¹² VPL.0013.0001.0184.



Cornelius, ESD and DSS Shane O'Connell and me. The agreement is unsigned, but contemplates that it was or would be signed by DI O'Connell for Victoria Police on 13 June 2008 and by me for the OPI on 12 June 2008. I believe that this document was ultimately signed. I have also been shown a copy of this document,¹³ which is not signed by the named signatories, but has been signed by AC Cornelius, dated 25 June 2008 and marked, "*noted and approved*".

39. I do recall meeting with Taskforce Petra Detectives in relation to a leaked 73-page computer generated document mentioned in that Joint Agency Agreement. To the best of my recollection that document included a target profile of Dragan Ranjelovic, whom we initially believed may have been the target of a potential 'hit' by Rodney Collins. The OPI and Taskforce Petra were working together at the time to try to secure Ranjelovic, whom we believed may be under threat.
40. I have been shown an email from DI Smith to DC Overland, Assistant Commissioner Danye Moloney, AC Cornelius and me in relation to Operation Plyers (Taskforce Petra) dated 25 November 2008.¹⁴ I believe that Operation Plyers was a Victoria Police operation that came out of Operation Opera, which was an OPI investigation. It was believed that Oueida (referred to in that email) had had access to the target profile referred to at paragraph 39 above, which had ultimately been found with Rodney Collins. I management control over a team of OPI investigators for Operation Opera. I would have received reports of Operation Plyers in this capacity.

Interviews with Carl Williams

41. I have been asked if I recall interviewing Carl Williams (with Paul Adkins of the OPI) on 23 January 2006 and 24 January 2007. I do recall interviewing Williams with Paul Adkins. To the best of my recollection, we were requested to visit Carl Williams in prison – possibly by his wife and/or father. We visited Carl Williams at Barwon Prison where he effectively complained that he was being framed by police for crimes he had not committed. I prepared reports in respect to my visits.
42. The information provided in 2007 was the catalyst for the commencement of Operation Oboe. I recall thinking at the time that there was not much truth to

¹³ VPL.0099.0006.0020 (at .0027, .0041).

¹⁴ VPL.6018.0032.4827.

Williams' complaint and that it was really a mechanism for getting us attend to speak with him so that he could offer information in relation to Paul Dale in return for a benefit for himself. I have not had the opportunity to review the transcript of the interviews nor the relevant Information Report. I expect that IBAC would be the custodian of those documents. I have not been provided with my diaries for January 2006.

43. At some later stage, I was advised that the Purana taskforce had received similar information from Carl Williams relating to Paul Dale. I believe that this was the catalyst for forming the Petra Taskforce. I believe that Detective Sergeant Stuart Bateson and/or Inspector Jim O'Brien may have been the Purana detectives who received the information from Carl Williams.

Other Petra operations

44. I have been shown a Petra Taskforce Weekly Update for 16 July 2007,¹⁵ which records a meeting having taken place with me following the signing of a Memorandum of Understanding. I have not been shown a relevant memorandum of understanding in the course of preparing this statement and do not now recall to what operation this may have related.
45. I have been asked about a conversation between Ms Gobbo and one of her handlers, Officer Graham Evans on 8 March 2009, recorded in a transcript of an audio recording.¹⁶ The subject matter of the conversation is unclear to me, but it is possible that it relates to a complaint relayed to police (not sure by whom) in which Ms Gobbo complained about the conduct of solicitor Tony Hargreaves. It was alleged that Mr Hargreaves had threatened and abused Ms Gobbo in the vicinity of the Melbourne Magistrates' Court. The allegation was investigated by OPI Team Leader Martin Hardy and was found to be without foundation. As the then Assistant Director (Operations), I oversaw the investigation by Mr Hardy. The results were

¹⁵ VPL.0100.0046.2698.

¹⁶ VPL.0005.0050.0862.

reported to Assistant Director Ashton but I am not sure what, if any, action was taken. However, the incident did raise a concern for me about Ms Gobbo's veracity.

46. I have been shown Taskforce Petra Steering Committee Updates for 19 October 2009, 4 November 2009 and 16 November 2009,¹⁷ which were emailed to me by Detective Inspector Steve Smith. I assume that these documents were sent to me as part of the OPI's involvement in joint investigations with Petra. I have not been provided my diaries for this period. I cannot say whether I attended meetings with Petra on those days or whether the updates were sent because I was not in position to attend.
47. I have also been shown Taskforce Petra minutes dated 28 June 2010, which record me as having attended.¹⁸ I have not been provided my diaries for this period and do not independently recall this meeting. However, I have no reason to doubt that I attended this meeting.
48. I recall sending an email to Deputy Director ~~Ashton~~ ^{the} at some stage to tell him that I had attended a Petra committee meeting at Victoria Police Headquarters in his stead. During the course of that meeting, DC Sir Ken Jones had asked me to excuse myself from some segments of the meeting. I do not now recall the exact basis of DC Sir Ken Jones' request, but it was fully explained in the email to Deputy Director ~~Ashton~~ ^{me}. It is possible that the matters which were discussed in my absence related to Purana Investigations.
49. At some juncture during the Petra Investigation I recall being told by police members from the Taskforce that Assistant Commissioner Jeff Pope had allegedly been involved in a sexual relationship with Ms Gobbo during his early days with Victoria Police. It is my recollection that I advised the Deputy Director of the allegation and he undertook to raise the matter with the Chief Commissioner. I was later advised by the Deputy Director that the allegations were without foundation and would have no impact on Assistant Commissioner Jeff Pope's involvement in the operations. Although the allegations were reportedly 'unfounded', I remained concerned that such a rumour was circulating amongst members of the Petra Taskforce as it was clearly playing on the minds of police investigators. This created

¹⁷ VPL.6058.0036.8197; VPL.6058.0040.0826; VPL.6058.0040.2036.

¹⁸ VPL.0100.0046.1839.

a perceived conflict of interest. I expressed the view to the Deputy Director that Mr Pope should stand down from the Board of Management to resolve the conflict of interest in the public interest.

50. I had believed that I had this conversation with Deputy Director Ashton, but I cannot now recall whether that occurred before or after he left the OPI in late 2009. It is possible that I had this conversation with the next Deputy Director, Paul Jevtovic. I recall that AC Pope remained on the Steering Committee for a least a couple of meetings following the concerns that I raised.

Operation Eagle (and associated OPI operations)

51. I recall that Operation Eagle was an OPI operation, but I cannot now recall which operation it was. The diary excerpts that I have been provided refer to Operation Eagle in some entries, but does not provide further detail of the nature of the investigation. I have not otherwise been provided with any documents that might enable me to refresh my memory. I have been told that Victoria Police does not have such documents.

Operation Diana (and associated OPI operations)

52. I am aware of Operation Diana, which was an OPI investigation into Noel Ashby, Paul Mullett and Steve Linnell. I am not aware of Ms Gobbo having provided information in relation to this matter and feel quite sure that she did not. I was only aware of Ms Gobbo assisting police in relation to the relationship between Carl Williams and Paul Dale.

Other operations

53. I have been shown a Joint Investigation Agreement, which is unsigned, but contemplates that I would sign on behalf of the OPI and Assistant Commissioner Emmett Dunne would sign on behalf of Victoria Police.¹⁹ The document is largely redacted, including as to the Operation name, so I cannot tell which operation this relates to. However, I am named as a member of the Operations Management Group in this document, along with AC Dunne of ESD, Assistant Director, Legal &

¹⁹ VPL.0100.0175.0083 (at .0103).

Compliance, Vanessa Twigg of the OPI and other staff from the OPI and ESD as required.

Operation Degree

54. In 2010 and 2011, I had some involvement in Operation Degree, which was an investigation into:
- (a) media allegations about Carl Williams; and
 - (b) allegations made by Ms Gobbo during media interviews that members of Victoria Police had abused their position when engaged in her protection overseas.
55. I have been shown a report dated 1 September 2010 in relation to Operation Degree, prepared by Aaron Walker and signed by me.²⁰
56. I have been shown a letter dated 18 February 2011 from the Director of the OPI to Chief Commissioner Overland, setting out the outcomes of those investigations.²¹ I do not recall whether I was involved in preparing that letter.
57. I have been shown an email dated 7 October 2011 from me to Superintendent Shane Patton regarding an OPI investigation into an allegation by Ms Gobbo of the mismanagement of funds relating to her by the Petra Taskforce.²² My email recorded the provisional finding Director of the OPI's was that:
- ...the allegation that members of Victoria Police involved in Witness 'F's management submitted fraudulent expense claims has not been progressed. OPI has made every effort to provide Witness F with an opportunity to substantiate his/her allegations and has failed to do so.
58. My email requested that an audit be conducted of expense claims submitted by Taskforce Petra in relation to 'Witness F' for the sake of completeness. That audit had been requested previously from DC Jones via Chief Commissioner Overland, but had not been undertaken nor reallocated when DC Jones was stood down in May

²⁰ VPL.6071.0098.4505 (at .4509).

²¹ VPL.6133.0020.0880 (at .0881).

²² VPL.0100.0264.0006.

2011. To the best of recollection, the audit was completed sometime after my email of 7 October 2011, but I have not seen that audit to assist my memory.

59. I have also been shown an Issue Cover Sheet prepared by Supt Patton regarding Operation Degree and an audit of expense claims in relation to Witness F. The Issue Cover Sheet recommends that ESD conduct the audit requested in my email of 7 October 2011 and provide the results of that audit to me by 14 November 2011.

Operations Slate & Perturbo

60. I have been shown a Joint Undertaking Agreement between the OPI and ESD in relation to Operation Slate (an OPI operation) and Operation Perturbo (a Victoria Police operation).²³ I am named as one of a list of persons to and from whom telecommunications interception information could be communicated. Operation Perturbo was a Taskforce Driver operation, investigating allegations against Paul Dale of serious offences, including misconduct in public office and perverting the course of justice in the period from 2000 to 2001. I do not recall taking any active role in that investigation.

Other potentially relevant contact

61. I have been shown an email from John Whitmore to me dated 19 June 2003.²⁴ At that time, I was an Inspector and Team Leader for ESD. The email refers to a briefing note about the involvement of Detective Sergeant Dale in the trial of [REDACTED] a Taskforce Purana matter. I believe I may have been an acting Superintendent, Complaints Investigations Division at the time. I have been shown a ROCSID file report which records that, on 23 June 2003, I allocated the matter to CID3 for further investigation.²⁵ CID3 was a division of ESD, which handled longer term investigations.
62. My diary records that I attended a meeting on 20 February 2007 at 15.00 with Assistant Director Ashton, DC Overland, AC Cornelius and Commander Dannye Moloney. I cannot specifically recall what the discussion was about.

²³ VPL.0100.0175.0301.

²⁴ VGS0.5000.0050.1644 (at .1671).

²⁵ VPL.0100.0266.0002 (at .0007).

63. I have been shown an email chain containing an email dated 15 February 2010 from AC Cornelius, which refers to a meeting with me and Deputy Director Jevtovic in relation to matters that were "brewing" in the media at the time.²⁶ The matters included a story about a group described as "The Brotherhood" and an allegations that a member of Taskforce Purana had revealed the identities of Witness F and [REDACTED]
64. I have been shown an email chain which includes an email dated 12 May 2010 from AC Cornelius to DI Smith, copied to AC Moloney, AC Emmett Dunne, DC Jones and me.²⁷ The email refers to a discussion held at a Board of Management meeting the previous evening about arrangements being made for Witness F's safety and security and providing a point of contact other than DI Smith. My recollection is that DI Smith was being overwhelmed at that time by her constant contact.
65. I have been shown emails between Detective Senior Sergeant Boris Buick and me dated 12 January 2011,²⁸ in which DSS Buick asks for the OPI's assistance to run surveillance on Ms Gobbo and Paul Dale following charges being served on Dale. The emails refer to a concern that [REDACTED] was still at SSU, making that unit inappropriate for running surveillance on Dale.
66. I have been shown an email from Acting Superintendent Chris Gawne to me, dated 19 January 2011 regarding a complaint made by Paul Dale about DI Smith and DS Solomon concerning, among other things, evidence they have given on oath regarding Ms Gobbo's ability to give evidence against Mr Dale.²⁹ I have also been shown a ROCSID entry which records that the file was sent to Detective Senior Sergeant Guy on 25 January 2011 for investigation by a Detective from ESD with the last name Cripps.³⁰
67. I recall meeting with Superintendent Steve Gleeson in relation to the Comrie review, though cannot say precisely when this happened. I was conducting a review of Witness Security (WitSec) at that time. Supt Gleeson expressed to me his concern that there may be some cross-over between the scope of his work and mine.

²⁶ VPL.6049.0078.0491.

²⁷ VPL.6058.0034.1211.

²⁸ VPL.6071.0090.8226.

²⁹ VPL.6051.0006.0142.

³⁰ VPL.0100.0167.0026.



Without my diaries, I'm unable to say when or how many times I met with Supt Gleeson.

68. My review of WitSec concluded with a comprehensive report prepared by me and Investigator Aaron Walker, which set out a number of recommendations made to Chief Commissioner Ken Lay for his consideration.

Awareness of others (Q6)

69. I am not aware of who knew that Ms Gobbo had been a human source. I strongly suspect that Graham Ashton was aware, given his strong personal and professional relationship with Simon Overland. I believe that Greg Carroll and others in the OPI's legal branch were aware that she was a witness, but I am not aware whether they knew she was a source.

Personal contact with Ms Gobbo (Q7)

70. I have never had any personal contact with Ms Gobbo.

Other matters (Q8)

71. There are no other matters about which I am able to assist the Royal Commission.

Dated: 10 December 2019

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John Joseph Nolan