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

STATEMENT OF

Hotham-O

1. My full name is ^{Hotham-O}
2. I hold the rank of [REDACTED] Victoria Police.
3. I make this statement in response to a request from the Royal Commission into the Management of Police Informants dated 23 May 2019 and a further request dated 21 October 2019 setting out a number of additional questions (**Additional Questions**).
4. This statement is produced to the Royal Commission in response to a Notice to Produce.
5. In preparing my statement, I have had access to official diaries I maintained during relevant periods. I have not had access to electronic diaries for the following periods, as the electronic diary records cannot be located for the period from [REDACTED] to [REDACTED] and for periods while I was on secondment as an [REDACTED] at [REDACTED] from [REDACTED] to [REDACTED] and again from [REDACTED] to [REDACTED].

Educational background and employment history (Q1)

6. I graduated from the Victorian Police Academy in [REDACTED]. 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)

7. I have not been involved as an investigator in any investigations that dealt with Ms Gobbo. For three months from [REDACTED], I was a member of the Source Development Unit (**SDU**). During my time at that unit, I became aware that Ms Gobbo was registered as a human source.
8. From [REDACTED], I was the officer in charge of the Human Source Management Unit (**HSMU**). In that role, I dealt with some issues relating to Ms Gobbo's time as a human source.

[REDACTED] at SDU

9. On [REDACTED] 2008, I began a role as a member of the SDU. The assignment was a three-month secondment ending on [REDACTED] 2008 that I undertook to expand my experience

Statement of ^{Hotham-O}

within Victoria Police and to gain practical experience having completed relevant training in [REDACTED] human source management in 2007.

10. I believe I became aware that Ms Gobbo was a human source shortly after beginning at the SDU. I believe that this was during an initial briefing from Officer Sandy White that I received when I arrived at the unit. The briefing was not specifically about Ms Gobbo, but rather an introduction to the unit and impressing upon me the sensitive nature of the matters the unit was dealing with.
11. I was never Ms Gobbo's source handler or source controller. I assumed that proper processes were being followed to ensure that Ms Gobbo was appropriately managed as a source. I do not believe I can recall who she was specifically providing information about at that time or who had been her clients as a lawyer. Except for the one matter set out below, I do not believe I conducted any duties related to Ms Gobbo.
12. My diary records that on [REDACTED] I was asked by Officer Fox to assist with [REDACTED] for a meeting that Ms Gobbo was attending with a person identified to me at that time as Jacques El-Hage. As my diary records, I made some routine observations about the site of the meeting and the meeting itself. I did not meet or speak to Ms Gobbo as part of this [REDACTED]. I had no ongoing role in [REDACTED] of Ms Gobbo and was only assisting as requested.
13. I have been shown a copy of minutes from an SDU internal conference meeting on [REDACTED]. The minutes list me as an attendee at the conference and record discussion about 2958, which refers to Ms Gobbo. I was at the conference, but I do not recall details of the discussion about Ms Gobbo. I was not closely involved in the discussions at the conference because I was returning to my permanent role at [REDACTED] on [REDACTED] which was the day after the conference ended.
14. I returned to [REDACTED] on [REDACTED] where I held a role until [REDACTED]. I was not involved in managing or administering human sources during that time. I did occasionally assist the HSMU and the SDU by acting in role playing exercises at the SDU's training courses, but that did not involve any operational work.
15. I have been informed that Ms Gobbo provided a statement to investigators at the Petra Taskforce in January 2009 and that Ms Gobbo ceased to be a registered source handled by the SDU around this time. I was not involved in any discussion around Ms Gobbo's

¹ VPL.6025.0002.0624.

transition from human source to providing a statement. I believe I became aware that Ms Gobbo had provided a statement at some point during my role at the HSMU (described below), but I cannot recall when.

██████████ at the HSMU

16. In ██████████ I began a role as the ██████████ in charge of the HSMU. At the time, the HSMU's operations included managing and delivering human source management training courses, maintaining the state-wide register of human sources, working with external agencies, updating policy, facilitating requests for assistance and preparing materials relating to individuals' assistance for submission the Rewards Committee.
17. In my role at the HSMU, I did not have an occasion to review records relating to Ms Gobbo in detail. However, I did deal with some issues relating to Ms Gobbo's role as a human source – namely:
 - (a) assisting Superintendent Steve Gleeson in his review of the SDU's management of Ms Gobbo as a human source (see Question 10 below);
 - (b) discussions regarding disclosing material related to Ms Gobbo in relation to subpoenas (See Additional Questions 2 and 3 below).
18. In mid-██████████ Superintendent Neil Paterson informed me that all holdings relating to Ms Gobbo would be transferred to the HSMU and kept in a secure filing cabinet². On the day the materials arrived, ██████████ I instructed two analysts from the HSMU to begin cataloguing this material and to keep a record on Interpose of what was available³. I believe that the cataloguing did take place and the catalogue was uploaded to Interpose as instructed, but I do not recall seeing that listing. At the time, I believe I knew only that the material related to Ms Gobbo.
19. In ██████████ I received an email from Detective Sergeant Jason Lebusque, who was compiling the brief for the Coronial Inquest into the deaths of Terence and Christine Hodson. In his email, he asked me to provide a statement outlining human source policies and also to provide some notes⁴. My diary records that on ██████████ I instructed ██████████ to collate the notes requested by DS Lebusque. I have been

² VPL.6137.0073.8549.

³ VPL.6137.0035.6711.

⁴ VPL.0100.0001.4739.

shown a copy of my email to [REDACTED] with notes attached to that email chain⁵. I do not know where the notes were retrieved from, but it may be that they were located within the safe of material concerning Ms Gobbo. My diary notes that I had a message for DS Lebusque on [REDACTED] about documents relating to Ms Gobbo, but I cannot recall what this related to.

20. In around [REDACTED] I prepared a draft statement as requested⁶, but it was never finalised or signed. I recall that AC Pope instructed that the statement was not to be provided but I do recall why this was the case. I have been shown an email from [REDACTED] [REDACTED] from Detective Senior Sergeant Boris Buick asking for the draft statement to be provided to VGSO to assist in PII claims⁷. I do not believe I was involved in the Hodson coronial inquest beyond preparing this draft, unsigned statement.

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

21. I refer to my response to Question 2.

Awareness of others (Q4)

22. I believe that other members of the SDU at the time around [REDACTED] until [REDACTED] were aware that Ms Gobbo was acting as a human source. I assume that those at the HSMU were aware as well. I do not know with any certainty what investigators were aware of Ms Gobbo's role as a human source.

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

23. Based on my knowledge of Victoria Police's human source policies, I know that the managers of the HSMU & SDU, the Inspectors with oversight of both units and the Superintendents in charge of State Intelligence and Covert Services Divisions would likely have known Ms Gobbo was a source and may have been involved her use as a human source. I believe that Superintendent Tony Biggin, Superintendent Mark Porter, Detective Inspector Rob Hardie, Detective Inspector Geoff McLean, Detective Inspector Doug Cowlshaw and Detective Inspector Andy Glow held these roles at various times.
24. Based on their roles, I assume that these individuals would have been aware of Ms Gobbo's role as a source and would have been involved in her authorisation.

⁵ VPL.0100.0001.4739.

⁶ VPL.6137.0037.2165.

⁷ VPL.6137.0037.2163.

Personal contact with Ms Gobbo (Q6)

25. I believe I may have been briefly introduced to Ms Gobbo at some time, but I cannot recall the context of this introduction.

Information & assistance received (Q7 & Q8)

26. It is possible that while I was at the SDU or the HSMU, information or assistance Ms Gobbo provided was mentioned or discussed. I have no recollection of the detail of any of that information or assistance.

Concerns raised as to the use of a legal practitioner as a human source (Q9)

27. I do not recall any concerns being raised regarding a legal practitioner acting as a human source during my time at the SDU.

28. I recall one further instance relating to concerns about a human source potentially being a legal practitioner. In [REDACTED] following a meeting of the Rewards Committee, Acting Assistant Commissioner Doug Fryer requested that I clarify the status of a human source who worked at a law firm.

29. My diary records that on [REDACTED] I informed the committee members (AAC Fryer and Superintendents Gerry Ryan and Neil Paterson) that the source had been a receptionist at a law firm at the start of the source relationship but had been [REDACTED]. The source had also been instructed only to give information relating to their social life, which was the information of interest.

Concerns raised as to the use of Ms Gobbo as a human source (Q10)Assistance to the Comrie Review

30. Between February and May 2012, I facilitated Superintendent Steve Gleeson's access to relevant records, as he was reviewing the SDU's management of Ms Gobbo as a human source with former Chief Commissioner Neil Comrie. I also answered and followed up some queries that Supt Gleeson had about records and source management processes. I was not involved in setting up the Comrie Review and have not read any draft or final report from that review.

31. In early February 2012, I arranged for Supt Gleeson to have access to Interpose. I sent an email to Supt Gleeson about this on 2 February 2012⁸. I believe that the SDU records

⁸ VPL.0100.0040.0557.

relating to Ms Gobbo had been migrated to Interpose, but I do not recall the process of how this was migrated into Interpose. My email records that Supt Gleeson was added to the HSMU Interpose security group, which meant that he had full access to all material available to the HSMU.

32. On [REDACTED] I emailed Officer Green to confirm if there were any hardcopy or electronic documents at the SDU relating to Ms Gobbo that would not be in Interpose⁹. I believe this email may have been prompted by questions that Supt Gleeson had asked about Interpose materials.
33. I have been shown an email from Officer Green to Officer Sandy White (but not sent to me)¹⁰ noting that Officer Green had told me that all the information would be on the source management log, which was uploaded.
34. I assisted Supt Gleeson with material for his review on a few other occasions in [REDACTED]
35. On [REDACTED] I provided risk assessment documents by email¹¹. That day I separately answered a number of queries from Supt Gleeson about Ms Gobbo's source file as well as more general questions about policy and the HSMU auditing processes¹². I had emailed Officer Richards earlier that day to ask him to assist me with answering these queries¹³.
36. On [REDACTED] Supt Gleeson emailed me to ask to meet to discuss some aspects of Ms Gobbo's source file¹⁴. We met two days later, on [REDACTED]. Based on an email I received the next day, I believe that Supt Gleeson was looking to obtain a copy of the Acknowledgment of Responsibility (**AOR**) delivered to Ms Gobbo. I recall discussing with Supt Gleeson my understanding that there were reasons why a hardcopy AOR might not be signed, and that in those circumstances an AOR might be delivered verbally instead and also on multiple occasions.
37. On [REDACTED] Supt Gleeson emailed me to following up his request for a copy of the AOR¹⁵. As that email chain indicates, I passed this request to DI O'Connor at the SDU. I am not aware of whether DI O'Connor ultimately located the AOR.

⁹ VPL.6137.0074.3079.

¹⁰ VPL.6025.0006.4029.

¹¹ VPL.0100.0040.0634.

¹² VPL.0100.0040.0923.

¹³ VPL.6137.0003.2420.

¹⁴ VPL.0100.0040.0960.

¹⁵ VPL.0100.0040.0691.

Awareness about disclosure in relation to Ms Gobbo (Q11)

38. I refer to my response to Additional Questions 2 and 3.

Training (Q13)

39. My recollection of the relevant training or retraining I have received on these specific topics is as follows:

- (a) Obligation of disclosure – I believe issues to do with disclosure of human source matters were addressed in part during a subpoena management session that was part of the Human Source Management training, but training in disclosure was largely learned in the course of investigations and running trials;
- (b) The right of accused person to silence and to a legal practitioner – I believe I learned about this during both the Academy and at Detective Training School;
- (c) Legal professional privilege – I do not recall receiving formal training on privilege, but I have learned about it in the course of my duties;
- (d) Public interest immunity – I do not recall receiving formal training on this until instruction during the ██████████ Human Source Management Course;
- (e) Professional and ethical decision making – I recall that members undertake to adhere to the code of ethics upon being sworn, and that issues of ethical decision making are part of updates on Force Values and many Victoria Police trainings.

Knowledge of HSMU process related to subpoenas and disclosure (Additional Question 1)

40. My recollection was that it was relatively uncommon for defence lawyers to subpoena records relating to human sources. I believe this related to an understanding from defence lawyers that material relating to the identity of human sources would often be subject to a claim of public interest immunity and that they would not gain access to inspect that material.

41. I do not recall there being any written policy or process document within the HSMU about how to respond to subpoenas or disclosure requests. I recall some instances when investigators received subpoenas that broadly sought production of materials that might have caught documents about human sources. The HSMU would generally ask the investigators to have defence lawyers clarify their request and specify what within the schedule of documents they particularly wanted. This would often result in the defence not seeking informer materials. Sometimes this involved informing investigators of what PII claims might be made so they could negotiate with defence.

42. If the defence still sought human source materials, the HSMU would generally obtain legal advice from VGSO about what would need to be produced because of the sensitivity of potentially disclosing the identity of human sources. Generally, a barrister would also be briefed to work with VGSO in asserting a public interest immunity claim over human source materials.
43. Generally, the HSMU would work with investigators to review relevant material to identify what might respond to the documents requested. Where the material related to a source handled by the SDU, the source handling team might also assist in that process.
44. When asserting a PII claim over human source material, the HSMU would generally provide instructions to VGSO or counsel to prepare a confidential affidavit that set out the general basis for refusing to supply material that related to a source. This affidavit would relate to the risk to sources generally as well as the likelihood that disclosure of sources' identities would stifle the critical flow of information. These affidavits were generally marked confidential and available only for the court's use.
45. I recall that on a few occasions, a magistrate or judge has required a further, more particular affidavit that addressed why individual documents or categories of documents should not be provided. This would mean that a further, more specific confidential affidavit about the particulars would be prepared addressing these issues.
46. These confidential affidavits were often, but not always, prepared and sworn by HSMU members. Sometimes they were prepared and sworn by investigators if the investigators were aware of the relevant matters.
47. Once the claim had been made and the affidavit material and submissions had been presented, it was the court's decision whether or not material would need to be produced in response to a subpoena and made available to the defence. On one occasion I recall the court made material available only to certain members of the defence legal team, subject to undertakings not to disclose it further.

Dealings with, or in relation to, Ms Gobbo (Additional Question 2)

48. Regarding Additional Questions 2(a) and (b), I refer to my response to Questions 2 and 10 above.
49. Regarding Additional Questions 2(c) and (d), I am not aware of having any involvement in matters regarding disclosure or subpoenas about the individuals named. I also refer to my response to Additional Question 3 below.

**Specific involvement relating to disclosure and subpoenas relating to Ms Gobbo
(Additional Question 3)**

50. I do not recall having any involvement in matters to do with disclosure or subpoenas in relation to Ms Gobbo's civil proceedings in 2010 or hearings relating to Paul Dale in 2010.
51. I do not have any independent recollection of dealing with matters of disclosure or subpoenas in the proceedings set out in Additional Question 3. However, I have been assisted in preparing the below by reference to emails, documents and my diaries.
52. I am informed that ongoing work is being done by Taskforce Landow in identifying how Victoria Police responded to subpoenas concerning Ms Gobbo. If further documents become available concerning the individuals named in the Additional Questions, I can make a further statement if necessary.

Dale and Collins committal: [REDACTED]

53. On the morning [REDACTED] Superintendent Mark Porter forwarded me an email from Detective Inspector Steve Smith of the Petra Taskforce regarding a subpoena from Paul Dale's defence lawyer that sought human source management files relating to Ms Gobbo¹⁶. I believe I was aware around this time that the Petra Taskforce was prosecuting Paul Dale and Rodney Collins for the murders of Terence and Christine Hodson.
54. Later that day, on [REDACTED] I sent an email to an analyst at the HSMU requesting that the analyst provide Officers Sandy White, Peter Smith and Anderson from the SDU with access to the HSMU records relating to Ms Gobbo¹⁷. This was necessary because Ms Gobbo was by then a deregistered source, meaning that the SDU members no longer had current access to the records relating to Ms Gobbo. As the email states, the purpose of this request is for "subpoena compliance".
55. On [REDACTED] Supt Porter replied to DI Steve Smith's email, noting that the SDU was commencing work in relation to DI Smith's request¹⁸. I was copied to this email.
56. I have no record or recollection of having any further involvement in relation to subpoenas in relation to Paul Dale's prosecution for the murder of the Hodsons.

¹⁶ VPL.6025.0003.5194.

¹⁷ VPL.6025.0008.2824.

¹⁸ VPL.6025.0003.5194.

57. In preparing my statement, I have been shown two confidential affidavits sworn by Detective Senior Constable Cameron Davey¹⁹ and one affidavit sworn by Detective Inspector Shane O'Connell²⁰. I do not recall seeing these affidavits before preparing my statement, and I do not believe I was involved in preparing them.

Zlate Cvetanovski Trial in [REDACTED]

58. I have been shown emails that Detective Senior Constable Craig Hayes sent to me on [REDACTED] relating to subpoenas issued by defence lawyers for an accused, Zlate Cvetanovski²¹. The email from [REDACTED] is also sent to Brian Dennis. I generally recall Mr Cvetanovski's name but do not recall anything further about him.

59. I have also been shown an email I sent to DSC Hayes on [REDACTED] setting out a number of arguments relating to why a letter of assistance should not be produced²². My email indicates that the Letter of Assistance sought related to [REDACTED]. I sometimes received requests from investigators like this seeking some guidance on how to respond to claims for documents that would usually be covered by PII. I have diary notes about this on [REDACTED] but those notes provide no additional information.

60. I have been shown an email from Brian Dennis, a barrister, to DSC Hayes dated [REDACTED] [REDACTED] attaching submissions and an affidavit of DSC Hayes in relation to resisting production of a letter of assistance provided to [REDACTED]²³. The email was not sent to me. I do not recall seeing this affidavit or these submissions before preparing my statement.

61. My diary does record that on [REDACTED] I instructed a member of the HSMU staff to provide a copy of the letter of assistance to Brian Dennis in order to run a public interest immunity claim in relation to that document. I have no further record or recollection of dealing with these issues. From [REDACTED] I was undertaking a role as [REDACTED] at [REDACTED].

Prosecution of Faruk Orman for murder of Paul Kallipolitis

62. On [REDACTED] Supt Paterson instructed me by email to arrange with VGSO to brief a barrister, Gerard Maguire, in relation to a subpoena that had been issued by lawyers

¹⁹ VGSO.2000.1510.0067; VGSO.2000.1510.0065.

²⁰ VGSO.2000.1510.0073.

²¹ VPL.6137.0023.8983; VPL.6137.0023.8984 and VPL.6137.0023.9173; VPL.6137.0023.9175

²² VPL.6137.0027.0337.

²³ VGSO.5000.0090.0025; VGSO.5000.0090.0035; VGSO.5000.0090.0027.

acting for Faruk Orman in his prosecution for the murder of Paul Kallipolitis²⁴. As the attached subpoena indicated, the defence sought intelligence products concerning Ms Gobbo and [REDACTED]. Shortly after I received Supt Paterson's email, I emailed Shaun LeGrand at VGSO to arrange to brief Mr Maguire on the matter²⁵.

63. On [REDACTED] I sent an email to Mr LeGrand at VGSO setting out my initial views on the issues arising from the subpoena and what processes might be followed to work through them²⁶.

64. I believe the Crime Department investigators would need to do its own process because they would have had access to different documents and their material might be subject to different claims. My reference to DSS Buick needing to "think more laterally" was prompted by his comment in his email from [REDACTED] that the investigators did not have any material. My comment was because if they had any relevant contact with Ms Gobbo then they would need to look carefully to ensure that was correct.

65. My view, expressed in the email, was for each of Crime and ICSD to separately provide responsive material to the subpoena. This would mean the subpoena is properly *belly* complied with without any need to unnecessarily disclose to investigators at Crime the fact that Ms Gobbo was a human source and compromise the human source program in doing so.

66. I do not recall what the "list of entities" I referred to was, but it may have related to conversations I had recently with Supt Gleeson relating to the Comrie Review. By this time in [REDACTED] I was aware that Supt Gleeson and Mr Comrie were conducting a review of the SDU's management of Ms Gobbo. I do not specifically recall discussions with Mr LeGrand or Mr Maguire regarding issues to do with Ms Gobbo's role as a source potentially affecting previous prosecutions.

67. My comment regarding "any disclosure will hurt us significantly" reflected my belief that any disclosure of Ms Gobbo's role as a human source could compromise Victoria Police's human source programs. A disclosure of any source's role or identity could seriously compromise the critical flow of information from sources. This comment was not directed particularly at disclosure of materials relating to [REDACTED] as I did not know

²⁴ VPL.6137.0040.7711; VPL.6137.0040.7713.

²⁵ VPL.6137.0075.3788.

²⁶ VGSO.5000.0010.7048.

much at all about [REDACTED] involvement in these matters. My role was to manage disclosure holistically, not for individual sources or investigators.

68. On [REDACTED] I sent a further email to Mr LeGrand and Mr Maguire regarding the view that the documents sought did not include source files. Mr LeGrand responded shortly after, stating that he thought we were "entitled to stick with that interpretation"²⁷. The email also notes that I spoke to Stuart Bateson regarding [REDACTED] noting that Jim Valos had been involved when they approached [REDACTED] I don't recall any specifics of that conversation other than what is in the email I've been shown.
69. I believe that I sought advice from Amy Gledden, who was a senior level intelligence manager at the Victoria Police, and an author of our intelligence doctrine, about the meaning of "intelligence product". I consulted her because she was a subject matter expert in intelligence materials and their use within Victoria Police. Given that advice, I felt comfortable relying upon the distinction between documents being a source file and documents being intelligence products. I do not know what Mr LeGrand refers to in his response regarding a conspiracy theory.
70. I believe I would have reviewed or instructed others to review material available on Interpose. However, I do not recall what searching or reviews were done.
71. On [REDACTED] Gerard Maguire sent an email to me and Shaun LeGrand from VGSO about the Orman subpoena, attaching a number of documents setting out a proposed response to the various subpoenas²⁸. I then forwarded this email and its attachments to Supt Paterson²⁹. My email to Supt Paterson indicates that I had determined that the Intelligence and Covert Support Department did not hold any material that fit the description of an information report or intelligence product, which I did with the benefit of clarification from Amy Gledden. My email states that both "Shaun [LeGrand] & Gerard [Maguire] are satisfied we are complying".
72. My email to Supt Paterson states that a "key residual issue for us is vigilance when [REDACTED] steps into the witness box itself. This will be managed by Crime". What I meant by this was that those who were running the prosecution might need to make claims for public interest immunity during the trial should the need arise.

²⁷ VGSO.5000.0010.7050.

²⁸ VPL.6137.0040.7836; VPL.6137.0040.7837; VPL.6137.0040.7849.

²⁹ VPL.6137.0076.1864; VPL.6137.0076.1865; VPL.6137.0076.1877.

73. Later that afternoon, Mr Maguire sent me a further email (copied to Mr LeGrand) about the response to the subpoena. I responded later that day noting that his queries would require input from the Purana members³⁰. This was because I understood the statements and materials that Mr Maguire was seeking would only have been available to investigators.

74. I do not have access to diary records relating to period because entries from my electronically maintained diary cannot be located for the period from [REDACTED] to [REDACTED]. However, I have been shown a memorandum of attendance prepared by Mr Maguire³¹, which suggests I attended conferences relating to subpoena response on [REDACTED] with Mr Maguire and lawyers from the VGSO.

75. I recall that the prosecution of Mr Orman for the murder of Paul Kallipolitis did not ultimately go ahead. I was not involved in any decision making to do with whether that prosecution continued.

Dated: 15 November 2019

[REDACTED]
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Hotham-O

³⁰ VPL.6137.0076.1250.

³¹ VPL.0100.0001.6868.

Annexure A

1. A summary of the major roles I have undertaken and my progression through the ranks is as follows:
 - (a) [REDACTED] Constable, [REDACTED]
 - (b) [REDACTED] : [REDACTED]
 - (c) [REDACTED] - [REDACTED]
 - (d) [REDACTED] - [REDACTED] Source Development Unit (Seconded);
 - (e) [REDACTED]
 - (f) [REDACTED] Human Source Management Unit;
 - (g) [REDACTED]
 - (h) [REDACTED]
 - (i) [REDACTED]
2. I have undertaken Victoria Police qualifications and training including:
 - (a) Detective Training School [REDACTED]
 - (b) [REDACTED] Human Source Management Training (2005); and
 - (c) [REDACTED] Human Source Management Training (2007).

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