

## The Royal Commission into the Management of Police Informants

SUBMISSION OF: PAUL NOEL DALE [REDACTED]

[REDACTED]  
Ex-Detective Sergeant 27243 Victoria Police

Resigned 2005

1. In 2002 I was promoted to Detective Sergeant, positioned at the then Major Drug Investigation Division, Victoria Police, hereinafter referred to as MDID.
2. It was during 2002 that I came into contact with Criminal Barrister, Nicola Gobbo, in a professional capacity.
3. Nicola was representing criminals my team of investigators had recently charged. Over the following several months I would come into contact with Nicola Gobbo on a regular basis as the criminals we were charging at the time were all involved in major drug trafficking activities, and it became very clear to all at the MDID at the time, that Nicola Gobbo was the 'Go to' lawyer for criminals charged with major drug trafficking offences.
4. Nicola had gained a very good reputation amongst the major drug dealers in Melbourne and spent many hours at the MDID offices assisting her clients (She was regularly called after hours by arrested suspects- and she would turn up to the offices of the MDID at St. Kilda Road Police Complex).
5. I don't recall ever seeing any other barristers attend at the MDID offices after hours as commonly as Nicola did, we now know why, she was actually working for the Police and not her clients!!
6. It was during this time that I met Nicola whilst 'Off Duty' at a Homicide Squad social function.
7. I don't recall how this came about, however it was at a hotel/pub in South Melbourne. Nicola was drinking with numerous off duty members.
8. We had all had a lot to drink when Nicola offered to drive us all to the Casino. Even though we were aware she had been drinking excessively, a number of us squashed into her convertible Mercedes Benz coupe and were driven by Nicola to the casino, where we continued to drink into the early hours of the morning.
9. From that night onwards I felt I had built a rapport with Nicola, and hence I would recommend her to criminals my team or others had arrested for drug matters.
10. Without access to my old day books etc., I can't exactly recall all the criminals names I dealt with that were referred to Nicola, or already had Nicola as a lawyer, but there were many.
11. I had numerous contacts with Nicola during 2002 - 2003, both on a professional basis and a number of occasions socially, and we got along well, both professionally and socially throughout 2002/03.

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

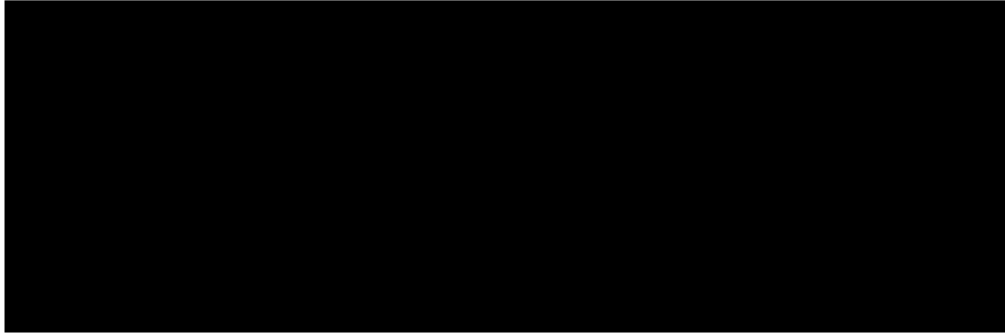
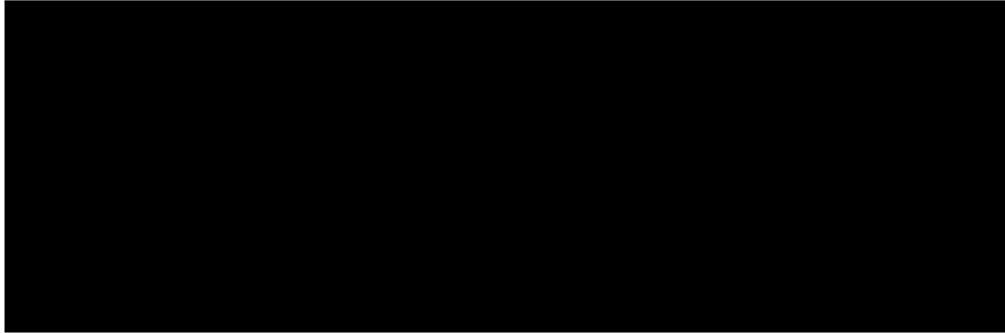

12. It was during this time that Nicola was building a reputation in the criminal world representing high profile criminals such as Tony Mokbell and Carl Williams.
13. I became aware in 2003 that Nicola was providing information to Superintendent Peter DeSanto of the Ethical Standards Department, Victoria Police.
14. DE Santo was in charge of a task force investigating alleged corruption by members of the disbanded Drug Squad.
15. I was present on a number of occasions when Nicola took calls from Desanto. Nicola informed me that Desanto was asking her to speak to criminals who may be willing to pass on information about alleged police corruption.
16. She informed me that she had a close relationship with Desanto and that they met socially on occasions as well.
17. I do not recall any further specifics of the Desanto calls other than to say, Nicola was passing information to him at that time.
18. I had no issue with the fact she was assisting Desanto at the time, as I had no respect for corrupt police members.
19. Over a 4 month period in 2003 I was in charge of a Drug Trafficking Investigation Code named Operation Gallop.
20. Operation Gallop was investigating large scale Ecstasy production and sales. In September 2003, one of my lead investigators, Detective David Miechel, along with career criminal and prolific Police Informer, Terrence Hodson, were caught trying to break into and steal drugs/cash from one of the Operation Gallop target addresses.
21. Over the following few days/weeks, numerous arrests were made as a result of evidence obtained during the operation Gallop investigation. It was during this time, that Nicola again was prominent in providing legal assistance to a number of the arrested/charged offenders in particular Azzam Ahmed our main target of the investigation.
22. There were numerous remand/bail applications during this time and I had a lot of dealings with Nicola.
23. It was also during this time that Nicola was assisting Terrence Hodson and his son, Andrew Hodson.
24. In December 2003 as a result of a Coercive statement obtained from Terrence Hodson implicating me in the Burglary of the Oakleigh house, I was charged and remanded in custody.
25. I was immediately transferred to Port Phillip Prison where I remained until my successful bail application some 10 days later.
26. It was during my time on remand, Nicola visited me in a professional capacity and informed me she was willing to act on my behalf, I accepted that offer.
27. Sometime after my release it became apparent that Nicola could not represent me as it would have been a conflict of interest.
28. I was suspended from Victoria Police at this time, however maintained contact with Nicola Gobbo on a regular basis seeking legal advice from her. At all times it was my belief that Nicola Gobbo was a practising Barrister and that my conversations/discussions with her regarding my legal matters were confidential.
29. I can't recall the exact amount of contact I had with Nicola through this period however, at one time Nicola called me and passed on a message from Terrence Hodson. Nicola told me that Terrence Hodson wanted to meet with me. I replied that as I was currently suspended

and charged with criminal offences, I could not meet with him. Knowing what we all now know of Nicola's role as a registered and highly active Police informant for a number of areas of the Victoria Police Force, I believe Nicola in conjunction with members of Victoria Police, were trying to somehow set me up.

30. In May 2004, Terrence and Christine Hodson were murdered in their Kew home.
31. I was arrested at my home address and my address searched by Warrant the following morning. Then Detective Senior Sergeant Charlie Bezzina was in charge of my arrest at the time.
32. I was conveyed to the St Kiilda Road Police complex, interviewed and released without charge.
33. I made contact with Nicola Gobbo at this time and met with her at a hotel/bar in Albert Park. I discussed what had just occurred with her, and other matters of legal concerns I had at the time.
34. I met with her for legal advice in what I believed to be a legitimate Lawyer client professional privileged conversation. I would never had met with her or discussed my personal legal/criminal concerns with her had I known she was working as a Registered Police Informant for Victoria Police.
35. It was shortly after this that the then OPI was created. I was subpoenaed to the OPI where I was compulsory examined in regards to some documents/ folder (Commonly referred to as the Blue Folder) that had been removed from the MDID offices and were circulating within the criminal underworld.
36. It was put to me that I had stolen this folder and released it somehow into the underworld.
37. I again met with Nicola and discussed this legal matter, believing she was a practicing Barrister and that my legal discussions would be kept privileged!
38. Sometime later, I think possibly 2004 or 2005 a further examination was conducted into the 'BLUE FOLDER' and how it came to be in the possession of certain underworld figures.
39. I was subpoenaed to attend a further compulsory examination that was conducted at the County Court at the time. Once again I denied any involvement in any criminal activity.
40. After this examination I again met with Nicola Gobbo and discussed legal matters believing my conversation with her was of a privileged nature???
41. I don't have a clear recollection of the events of 2006 however I am fairly certain that it was 2007 when I was again subpoenaed to a compulsory examination by the Australian Crime Commission.
42. It was during this examination that I was asked certain questions about my relationship with Nicola Gobbo. I claimed privilege at that time due to the fact it was my strong belief and still is to this day, that my dealings/conversations with Nicola Gobbo were of a client/Lawyer setting and that certain discussions were privileged due to that fact.
43. A short adjournment took place whilst it was discussed with my counsel acting on my behalf and provided to me by the Police Association, Tony Hargreaves.
44. I was eventually informed that due to the purpose of the ACC compulsory hearing that I could make a claim of Legal Professional privilege and that I must answer all questions, all be it no answers could incriminate me.
45. At the start of the ACC hearing I was informed of my rights and I was provided with a certificate against any possible self-incrimination. It was pointed out to me in no uncertain

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terms, that nothing I said at this compulsory and secret hearing could ever be used against me by Victoria Police or any other legal jurisdiction.

46. I will never, ever believe such lies again!!! Absolutely everything I said at 2 compulsory ACC hearings was included in the brief of evidence against me for the charge of Murder.
47. Not only that, the entire hearings transcripts were provided to Carl Williams, in jail, who subsequently spread them through the jail system.
48. I was contacted by criminals I had named in these hearings asking me why I had declared them as Police informers!!
49. It was either after this hearing or the second ACC hearing I was called too, that I was able to access some of the transcripts of evidence provided by other witnesses.
50. 
51. 
52. I met with Nicola Gobbo again after my second compulsory hearing held at the Australian Federal Police Building, Melbourne in 2009.
53. We met at a café in Albert Park and I discussed the fact I had again recently attended a further ACC Compulsory hearing.
54. 
55. It was at this time that I actually asked her if it was legal for us to discuss the ACC hearings to which she responded, "I am your lawyer, and you are allowed to talk to your Lawyer".
56. I was left in no doubt in my mind that what I was then talking to Nicola Gobbo about was a Legally Privileged Conversation.
57. Unbeknown to me at the time, Nicola was recording this conversation on behalf of Victoria Police!!
58. It was as a result of this taped conversation and an induced statement from Carl Williams that in February 2009, I was arrested again for the murder of Terrence Hodson and this time charged and remanded into custody.
59. I was immediately transferred to the ACACIA unit of Barwon Prison, where I spent 6 weeks in total isolation. A tactic we now know to be used by Victoria Police in conjunction with our so called independent Corrections department to break peoples mental capacity to cope.
60. It was during this time that I was visited by Solicitor Tony Hargreaves, who informed me that part of the evidence to be alleged against me, would be a taped conversation held between Nicola Gobbo and myself.
61. That the taped conversation was being said to corroborate Carl Williams and hence my charging!
62. I informed Tony that Nicola was my legal advisor that the majority of my conversations I had with her, were for legal advice.
63. I am totally appalled by the legal system that such a fundamental right of every citizen of this county to have competent legal assistance could be completely disregarded by Victoria

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- Police and whoever else was involved in this atrocious behaviour of utilising a practicing Barrister as a Police Informer. This has totally undermined our justice system.
64. I wrote to the then President of the Bar Association and made my complaint about how this could happen. I did not receive a reply.
  65. At this point in time I had lost all faith in our legal system and was at a complete bewilderment as to how this could possibly be happening.
  66. I was being held in isolation in a tiny cell at the ACACIA unit and had no contact with any person for a 6 week period (Tactic used by Victoria Police and Department of Corrections)
  67. This is a totally inhumane method/tactic by Victoria Police and the Office of Corrections to break peoples sanity/mental capacity to cope with a horrendous situation.
  68. I am so happy today, that this atrocious behaviour of Victoria Police/Office of Corrections and Nicola Gobbo, has been brought to the attention of the community and how this Royal Commission must make the people involved in this accountable for their atrocious behaviour.
  69. I was remanded in custody for 8 months due to this atrocious behaviour of Victoria police and Nicola Gobbo. I will be forever medicated due to the mental disorder this caused me and the mental and physical effects that it has had upon me. A combination of treachery by Victoria Police, Nicola Gobbo and the Corrections Department.
  70. In recent times since the announcement of the Royal Commission, I have been approached by a number of people who have provided me with further information regarding Nicola Gobbo's activities.
  71. I was recently approached by [REDACTED]. I presume this is how his name is spelt?
  72. [REDACTED] informed me that he was selected to be part of the newly formed Human Sources Division back in 2005?
  73. It was a newly formed squad to control informers. He stated he was working with Superintendent Anthony Biggin, [REDACTED] and others I don't recall the names he mentioned now?
  74. He told me how they had their own offices [REDACTED] they operated in a covert manner and were [REDACTED]
  75. He further stated that he was present when they first met with Nicola Gobbo and registered her as Informer 3838.
  76. He went onto to explain how all contact with human sources [REDACTED] and [REDACTED] stand-alone computer files back at their offices.
  77. I did not inquire with him any further information as I believe the royal Commission has this role and that [REDACTED] well may be an ex member of Victoria Police willing to tell you the truth, because believe me, most will try to deceive you and outright lie to you.
  78. I have also been approached by a person well versed on the activities of Nicola Gobbo, he is a journalist and widely known for his stories surrounding the Gangland Wars (Adam Shand).
  79. He informed me that Nicola Gobbo had had a relationship with the then main drug trafficking target of Operation Gallop, Azzam Ahmed.
  80. He further stated that Nicola helped Ahmed launder drug money through the purchase of properties including her then chambers, in Nicolas name?
  81. Azzam has since been released from Jail and wants his money.

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82. Azzam is a criminal the Royal commission should examine, because if this is true, these allegations, then Victoria Police will have been aware of this.
83. During a break at my Committal hearing for the murder charge, I was approached by then Detective Cameron Davies. He told me Gobbo had been supplying him with information for some time. I did not continue with this conversation at the time. Cameron Davies may hold information relevant to the Commission?
84. After I was acquitted of the Australian Crime Commission charges, I was with my wife and my mother [REDACTED] late after being out for dinner and drinks.
85. [REDACTED]
86. We came across Detective Senior Sergeant Borris Buick (Informant in my matter) [REDACTED]
87. [REDACTED]
88. I spoke to Boris who made it very clear to me that he did not agree with using Gobbo as an informer/witness, but was directed to do so by Simon Overland
89. As a result of Nicola Gobbos actions in purporting to act as counsel while covertly informing against me was a fundamental and appalling breach of her obligations as counsel to me and he duties to the court.
90. As previously stated, I spent 8 months in custody in the most onerous conditions within the ACACIA Unit, Barwon Prison, as a direct result of Nicola Gobbos and Victoria Police's/Office of Corrections atrocious conspiracy behaviour
91. It was during my committal that it became apparent that Nicola was a Police Informer and was turned into a prosecution witness on the instructions of the then Chief commissioner, Simon Overland, in attempt to convict me of charges I had not committed.
92. These people need to be held to account, this has been the greatest Conspiracy to Pervert the Course of justice I have ever witnessed.
93. I was a lucky one in that I fought for my innocence albeit against great odds (Police reprehensible conduct at the highest level).
94. I will never ever be the same person I was before this atrocious behaviour of Victoria Police and Nicola Gobbo and their conspiring to convict me of criminal matters I had not committed!
95. If I am not called to give evidence at this royal Commission, I will gladly give this information to the media cameras on the steps of the building the hearings are held.
96. What Victoria Police and Nicola Gobbo, at the highest level, have done to me and others was criminal behaviour and they now need to be held to account.
97. I have no concerns of this information being made public.
98. I look forward to this Royal Commission finally bringing justice to those who have let our system down and manipulated our legal system so atrociously.

Paul Dale

[REDACTED]