TONY HARGREAVES & PARTNERS LAWYERS

3 March 2010

Our Ref: TH:JE:90037

Mr Greg Elms
Victorian Government Solicitor's Office
BY EMAIL: greg.elms

Dear Mr Elms,

Re: Paul Dale

Thank you for your ongoing assistance in this matter. I would be grateful if you would clarify a couple of points:-

Whilst we are still wading through the material, it seems to us that there is very little documentation relevant to the agreement of Victoria Police to pay the sum of to the Australian Taxation Office to extinguish the tax debt of George Williams. There is reference in notes to a committee considering this matter.

I would have thought that there would be more documents in existence. I do not think we have received any documents relative to the negotiations for the agreement to pay the money, or what factors were taken into account in agreeing to pay it. The only documents we seem to have are letters notifying Mr Williams and his lawyer that Victoria Police had to revoke the arrangement because of the Queensland decision of *Moti*. Would you please clarify this point.

• Further, it would appear that Mr Williams was released from the prison at Christmas time 2008 and spent a number of days with the police. It was as a result of those discussions that the final statement by Mr Williams was made in which he asserts Mr Dale counselled and procured Mr Williams to engage a person to execute Mr Hodson. Would you please confirm that there are no tape recordings, video tapes or any other electronic recordings of the conversations that took place with George and Carl Williams. From past experience, meetings of that nature are normally recorded, especially with a person like Carl Williams.

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I request your response to these issues.

Yours faithfully, TONY HARGREAVES & PARTNERS

per: A. HARGREAVES email: tony