

**ROYAL COMMISSION  
INTO THE MANAGEMENT OF POLICE INFORMANTS  
ENQUIRIES ACT 2014**

**CONFIDENTIAL AFFIDAVIT OF NORMAN LEE ABRAMS  
STATEMENT OF [REDACTED]**

Date of Document: 15 January 2020

Filed on behalf of: [REDACTED]

Prepared by: Moray & Agnew Lawyers

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Ref: NLA:423512

I, **NORMAN LEE ABRAMS**, of Level 6, 505 Little Collins Street, Melbourne, in the State of Victoria,  
Solicitor, **MAKE OATH AND SAY AS FOLLOWS** as follows:

1. I am a Partner of the firm Moray & Agnew Lawyers. I previously acted on behalf of [REDACTED]  
[REDACTED] in connection with proceedings before the Supreme Court of Victoria, Court of  
Appeal in [REDACTED] last year.
2. Following receipt of the 20 September 2019 letter from the Royal Commission into the  
Management of Police Informants ("**the Royal Commission**") I received further limited  
instructions to act in connection with the request for a statement.
3. I am authorised to make this affidavit on behalf of [REDACTED] I make this affidavit from my own  
knowledge and belief, save where this appears otherwise. Where I depose to matters of belief, I  
believe those matters to be true.
4. I depose to the matters at paragraphs [10]–[14] on the basis of what [REDACTED] has instructed me  
in conference.

**Obtaining instructions**

5. Through the Victoria Police identified point of contact, I was able to have documents provided to  
[REDACTED] and then confer with him.
6. The documents given to [REDACTED] prior to the conference I held with him were the following:
  - (a) 20 September 2019 letter from the Royal Commission;
  - (b) [REDACTED] page statement made by [REDACTED] on [REDACTED] 2006 (identified with bate numbers  
VPL.0100.0151.7260 – VPL.0100.0151.7277 inclusive) and

- (c) Part of the [REDACTED] paragraph statement made by [REDACTED] on [REDACTED] 2006 that I redacted as per the attachment to this my affidavit and marked "NLA1".
7. On 8 January 2019 I conferred with [REDACTED] and took instructions from him by telephone. His physical location and current whereabouts are not known to me.
8. [REDACTED] confirmed having read, and also having before him at the time of our conference, the documents referred to in paragraph 6(a)-(c) above. [REDACTED] provided me with instructions to make a statement, through my affidavit, responding to the questions raised in the 20 September 2019 from the Royal Commission and for it to be produced to the Royal Commission.

#### **Questions and Responses**

9. [REDACTED] agreed for me to make an Affidavit that set out his instructions to me that responded to the 5 questions. In this part of my Affidavit I set out [REDACTED] responses which he authorised me to put into my affidavit.

#### ***Q1 An outline of how you first came to know Ms Gobbo***

10. In response to this question [REDACTED] instructed me as follows:
- (a) I first met Nicola Gobbo through lunches and dinners with Carl Williams and his family, Tony Mokbel and sometimes another associate such as [REDACTED]
  - (b) I was invited through Carl and lunch or dinner was always at a restaurant, usually one particular restaurant in China Town.
  - (c) The group would get together every month or so or perhaps every few months and I started going from around mid-2003.
  - (d) The lunches were long.
  - (e) Tony Mokbel picked up the bill for the lunch each time.
  - (f) Nicola Gobbo attended most of the lunches or dinners that I attended.
  - (g) It was thus through the social gatherings that I first came to know Nicola Gobbo in or around mid-2003.

#### ***Q2 Detail all matters in which Ms Gobbo represented or advised you***

11. In response to this question [REDACTED] instructed me as follows:
- (a) To the best of my recollection it was only on the one occasion that Nicola Gobbo either provided advice or represented me. That was following my arrest in [REDACTED] 2003.



- (b) After my arrest at the St Kilda Road Police Station, I rang a solicitor named Theo Maggazzi. I had previously engaged Theo Maggazzi when he accompanied me to the St Kilda Road Police Station when I had to [REDACTED] in relation to another matter. Theo said that he would arrange for somebody to look after me at Court the following day.
- (c) At the holding cells in the Melbourne Magistrates' Court the next day I was approached by Nicola Gobbo. I had been charged following my arrest in [REDACTED] 2003. Nicola Gobbo met with me down in the interview area and informed that she would be appearing for me. I was not aware of who directly had briefed Nicola Gobbo but I assume that Tony or Carl would have arranged for Nicola Gobbo to appear because I never paid for her appearance.
- (d) To the best of my recollection, that [REDACTED] 2003 appearance is the only time Nicola Gobbo either provided me with legal advice or represented me in a legal matter.

**Q3 In relation to paragraphs [REDACTED] and [REDACTED] of the statement signed by you on [REDACTED] 2006, whether you waived privilege over any notes taken by Ms Gobbo**

12. In response to this question [REDACTED] instructed me as follows:

- (a) Nicola Gobbo may have had her journal with her in the holding cell area where she met with me. I do not recall if she did or if she did, whether she made any notes.
- (b) I was aware of the potential for [REDACTED] which is why she made the note.
- (c) I do not remember exactly what was discussed. I recall she said that she would submit that my matter should be adjourned for a bail application at a later date.
- (d) I believe that was most of the discussion we had. I was returned to the cells and when I went upstairs when my matter came on, I know that the matter was adjourned for a few months. I did not speak with Nicola Gobbo at any point after that. I had no contact with her afterwards.
- (e) I do not waive privilege over any notes that Nicola Gobbo may have taken when she saw me on the day she appeared on my behalf in relation to charges that were laid in [REDACTED] 2003.

**Q4 Detail your knowledge or criminal or unethical activity engaged in by Ms Gobbo, if any**

13. In response to this question [REDACTED] instructed me as follows:

- (a) I have no knowledge of any criminal or unethical activity engaged in by Nicola Gobbo.

NA B

**Q5 Given the Commission's first two terms of reference, namely:**

1. *The number of, and extent to which, cases may have been affected by the conduct of Nicola Gobbo as a human source.*
2. *The conduct of current and former members of Victoria Police in their disclosures about recruitment, handling and management of Nicola Gobbo as a human source.*

*the Commission would be assisted by you providing any further details of any other matters within your knowledge potentially relevant to those terms of reference.*

14. In response to this question [REDACTED] instructed me as follows:

- (a) I am not aware of any case that may have been affected by the conduct of Nicola Gobbo as a human source. I had not heard any rumours to this effect.
- (b) I have no knowledge about the conduct of current or former members of Victoria Police in their disclosures about recruitment, handling and management of Nicola Gobbo as a human source. Whilst there were lots of rumours in 2003 around associates and many other things, Carl Williams did mention, as part of general discussion with me, that there was a rumour Nicola Gobbo was having an affair with police officer Paul Dale. That was just a rumour, one of many rumours about many things.

**Reconfirming Instructions**

15. Before concluding our conference, I reconfirmed as accurate and correct, the instructions given to me by [REDACTED] as are now set out in paragraphs 10 – 14 (inclusive) above.

**The contents of this affidavit are true and correct and I make it knowing that a person making a false affidavit may be prosecuted for the offence of perjury.**

SWORN by NORMAN LEE ABRAMS at Melbourne  
in the State of Victoria  
On 15 January 2020

)  
)  
)



Before me



**JESSICA ANN BUCK  
of 505 Little Collins Street,  
Melbourne, Victoria, 3000 being an  
Australian legal practitioner within  
the meaning of the Legal Profession  
Uniform Law (Victoria)**

A person authorised under section 19(1) of the **Oaths and Affirmations Act 2018** to take an affidavit.

ROYAL COMMISSION  
INTO THE MANAGEMENT OF POLICE INFORMANTS  
ENQUIRIES ACT 2014

CONFIDENTIAL AFFIDAVIT OF NORMAN LEE ABRAMS  
STATEMENT OF [REDACTED]

CERTIFICATE IDENTIFYING EXHIBIT

Date of Document: 15 January 2020

Filed on behalf of: [REDACTED]

Prepared by: Moray & Agnew Lawyers

Level 6,

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Melbourne VIC 3000

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Telephone: (03) 9600 0877

Email: nabrams@moray.com.au

Ref: NLA:423512

This is the exhibit marked 'NLA1' now produced and shown to Norman Lee Abrams at the time of swearing his affidavit on 15 January 2020

Before me:

  
.....

Signature of person taking affidavit

**JESSICA ANN BUCK**  
of 505 Little Collins Street,  
Melbourne, Victoria, 3000 being an  
Australian legal practitioner within  
the meaning of the Legal Profession  
Uniform Law (Victoria)

**EXHIBIT 'NLA1'**



'NLA1'

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MATERIAL SUBJECT TO PUBLIC INTEREST IMMUNITY CLAIMS

VPL.0100.0151.7242

## STATEMENT

## STATES:

1. I make this statement in the belief that the information I provide to the Police can not be used against me in any future court proceedings.
2. Sometime in 2001 or 2002 I was transferred from [REDACTED] Prison. Shortly after my arrival [REDACTED] At this time I resided in [REDACTED]
3. Around this time I also met Carl WILLIAMS.

4.

5.

6.  
7.

8.

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VPL.0100.0151.7249

35.

36.

37.

38. Lewis was later granted bail. Carl expressed concern that he may exact some revenge on him for the death of his sons. This was openly discussed in our group. Carl was extremely upset that Nicola GOBBO had acted for Lewis in his bail application. Andrew VENIAMIN actually threatened Nicola at one stage because of this. Carl was also very upset with Nicola and asked Tony MOKBEL to sack her.

39.



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VPL.0100.0151.7250

Statement taken and signature witnessed by me in Victoria on the [REDACTED]  
2006 at [REDACTED]

S.BATESON

Detective Sergeant 26242

I hereby acknowledge that this statement is true and correct and I make it in the belief that a person making a false statement in the circumstances is liable to the penalties of perjury.

Acknowledgement made and signature witnessed by me in Victoria on the [REDACTED]  
[REDACTED] 2006 at [REDACTED]

S.BATESON

Detective Sergeant 26242