

this and the following .....2..... pages is the  
Annexure marked with the letter *MSW 1*  
referred to in the affidavit of  
*Michael John Willing*  
sworn/affirmed at *Queanbeyan* this  
.....*30th*..... day of *January* 2023

Before me: [REDACTED]

(Solicitor/Justice of the Peace)



## Special Commission of Inquiry into LGBTIQ hate crimes

22 December 2022

Katherine Garaty  
Director, Crime Disruption and Special Inquiries Law  
Office of the General Counsel, NSW Police Force  
Locked Bag 5102  
PARRAMATTA NSW 2124

By email: [REDACTED]

Dear Ms Garaty,

### NSW Special Commission of Inquiry into LGBTIQ hate crimes: Request for statement

I refer to my letter to you dated 20 December 2022 in relation to the second public hearing listed in February 2023 ("the February hearing"). I refer also to the summons to attend issued to former Deputy Commissioner Michael Willing on 8 December 2022.

In preparation for February hearing, I am instructed to request that a signed statement is provided by Mr Willing, in relation to the subjects referred to below, by **18 January 2023**.

### Statement from former Deputy Commissioner Michael Willing

Mr Willing's statement should address at least the following topics. If Mr Willing considers that other topics are relevant and should be addressed, please do so. If documents referred to are in the Tender Bundle [Exhibit 6] ("TB"), please identify the document by reference to its place in the TB. If a document referred to is not in the TB, please annex it.

#### *Qualifications and experience*

1. Mr Willing's educational and professional qualifications and experience, including the dates of his appointment to various successive positions within the NSW Police Force ("NSWPF") and the date of his departure from the NSWPF, and annexing any curriculum vitae.

#### *2014 Issue Paper [TB Vol 2, Tab 48]*

2. The background to and reasons for the carrying out of an assessment by Detective Chief Inspectors ("DCI") John Lehmann and Pamela Young, in about September 2013, of the list of "30 alleged unsolved 'gay hate' homicides" provided by Sue Thompson to the Homicide Squad.
3. The reasons why, and by whom, DCIs Lehmann and Young were chosen to carry out that assessment.

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4. The timeframe within which that assessment was carried out.
5. Mr Willing's involvement in, and/or knowledge of, communications and/or co-operation between Strike Force Macnamir and those conducting the assessment.

### *Strike Force Macnamir*

6. The background to and reasons for the establishment of Strike Force Macnamir.
7. Mr Willing's role in connection with the establishment of Strike Force Macnamir.
8. Mr Willing's involvement in any way with Strike Force Macnamir at any time thereafter.
9. The date of, and reasons for, the conclusion of Strike Force Macnamir.
10. All personnel who comprised, or participated in, Strike Force Macnamir from its inception to its conclusion; the qualifications and experience of each of them; and the criteria by which, and the persons by whom, they were chosen.
11. A summary of the work of Strike Force Macnamir from its inception to its conclusion.

### *Operation Taradale and Strike Force Neiwand*

12. The nature and extent, including the dates of commencement and completion, of any reviews or reinvestigations of any or all of the three Taradale cases (Giles Mattaini, Ross Warren, John Russell), by the Unsolved Homicide Team, at any time between March 2005 and September 2015.
13. Mr Willing's involvement in and/or knowledge of any such review or reinvestigation.
14. The background to and reasons for the establishment of Strike Force Neiwand (which the Inquiry understands to have occurred in or about October 2015).
15. Mr Willing's role in connection with the establishment of Strike Force Neiwand.
16. Mr Willing's involvement in any way with Strike Force Neiwand at any time thereafter.
17. The date of, and reasons for, the conclusion of Strike Force Neiwand.
18. The reasons why, and by whom, DCI Lehmann and Detective Sergeant ("DS") Penelope Brown were chosen as the original Investigation Supervisor and Officer in Charge respectively.
19. The reasons why, and by whose decision, DCI Lehmann and DS Brown subsequently ceased to be the Investigation Supervisor and Officer in Charge, and were replaced by DS Steven Morgan and Detective Senior Constable ("DSC") Michael Chebl respectively.
20. All personnel who comprised, or participated in, Strike Force Neiwand from its inception to its conclusion; the qualifications and experience of each of them; and the criteria by which, and the persons by whom, they were chosen.
21. The reasons why several members of Strike Force Macnamir were also selected as members of Strike Force Neiwand, namely DS Brown, DS Morgan, DSC Chebl and DSC Paul Rullo.
22. A summary of the work of Strike Force Neiwand from its inception to its conclusion.

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23. The dates and extent of any publication of the results or conclusions of Strike Force Neiwand, such as contained in the summary documents at TB Vol 6, Tabs 172, 173, 174 and 176, including in particular:
- When and to whom in the NSWPF such results/conclusions were published;
  - Whether such results/conclusions were published to the families of any of Mr Russell, Mr Warren and/or Mr Mattaini. If so, when? If not, why not?
  - Whether such results/conclusions were published to the former Deputy State Coroner, Jacqueline Milledge. If so, when? If not, why not?
  - Whether such results/conclusions were published to the Standing Committee of the NSW Legislative Council. If so, when? If not, why not?
  - Whether such results/conclusions were published to the public. If so, when? If not, why not?

*Strike Force Parrabell*

24. Mr Willing's involvement in, and/or knowledge of, communications and/or co-operation between or among Strike Force Neiwand, Strike Force Macnamir and Strike Force Parrabell between October 2015 and June 2018, including but not limited to:
- The provision of assistance by one Strike Force to the other, including the dates, nature and extent of that assistance, and the reasons for it;
  - The substance of what was said at any meetings at which Mr Willing was present with Assistant Commissioner Anthony Crandell, and/or DCI Craig Middleton, and/or other members of the Strike Force Parrabell team, including a meeting on 14 April 2016;
  - The provision of information and/or findings and/or interim or final conclusions by one Strike Force to the other, including the reasons for doing so and the dates and details thereof; and
  - The substance of what was said at any meetings at which Mr Willing was present with the Flinders University academic team, including a meeting scheduled with Dr Derek Dalton in October 2016.
25. The reasons for Mr Willing's request in March 2017 for the Strike Force Parrabell officers to include the Taradale cases in the Parrabell review.


Please do not hesitate to contact Caitlin Healey-Nash on 0466 480 286 or at [caitlin.healey-nash@specialcommission.nsw.gov.au](mailto:caitlin.healey-nash@specialcommission.nsw.gov.au) if you have any queries in relation to this matter.

Yours faithfully



Enzo Camporeale  
Director, Legal

**Solicitor Assisting the Inquiry**

 J.P.  
J. K. K. K. K. K.  
Justice of the Peace  
No. 146342  
30 January 2023<sup>3</sup>  
at Queanbeyan