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NSW Police Force

4 September 2023

Mr Enzo Camporeale
 Director, Legal
 Special Commission of Inquiry into LGBTIQ hate crimes
 GPO Box 5341
 SYDNEY NSW 2001

By email: enzo.camporeale@specialcommission.nsw.gov.au

Dear Mr Camporeale

Special Commission of Inquiry into LGBTIQ hate crimes – Public Hearing 2 Witnesses

We refer to:

- a) your letter dated 10 August 2023 in relation to Public Hearing 2;
- b) our letter dated 17 August 2023, responding to the 10 August letter, in which we confirmed that we would formally represent Detective Superintendent Craig Middleton;
- c) our letter dated 18 August 2023, in which we noted that we were seeking DI Paul Grace and DA/S Cameron Bignell's instructions in relation to whether they agreed to be represented by us;
- d) your letter dated 24 August 2023, requesting confirmation that we represent DI Grace and DA/S Bignell;
- e) our letter dated 25 August 2023, regarding the representation of officers referred to in the 10 August letter; and
- f) our telephone conversation on 29 August 2023, during which you confirmed that the witness statements of Detective Superintendent Middleton, DI Grace and DA/S Bignell are due to be provided on 4 September 2023.

As you are aware, having regard to the terms of Practice Guideline 1, the Commissioner's legal representatives were required to form a view as to whether we could represent the individuals listed in your letter dated 10 August and assure the Inquiry that we did not perceive a potential conflict of interest between the witnesses and those persons whom we already represent.

We recently confirmed our position in relation to the representation of the individuals listed in your letter dated 10 August as outlined in our letter dated 25 August. In respect of the remaining individuals listed in your letter dated 10 August, throughout the previous week our office has caused for approaches to be made of each of these individuals.

In addition to the individuals already advised, based on information currently to hand, our office has formed the view that it is in a position to represent the following persons:

- ∞ Detective Sergeant Alicia Taylor;
- ∞ Detective Sergeant Rowena Clancy;
- ∞ Ms Jacqueline Braw; and
- ∞ Ms Siobhan McMahon.

3437-7690-2694v1

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Our office has not received instructions from Ms Zdenka Vaughan or Mr Michael Fuller.

Request for extension for provision of statements

We confirm that our office is in the process of confirming instructions in respect of and/or facilitating the statements requested by the Inquiry from the individuals we are in a position to represent, namely:

- ∞ Detective Superintendent Craig Middleton;
- ∞ Detective Inspector Paul Grace;
- ∞ Detective A/Sergeant Cameron Bignell;
- ∞ Detective Sergeant Alicia Taylor;
- ∞ Detective Sergeant Rowena Clancy;
- ∞ Ms Jacqueline Braw;
- ∞ Ms Georgina Wells;
- ∞ Mr Strath Gordon; and
- ∞ Ms Siobhan McMahon.

D/Supt Middleton, DI Grace and DA/S Bignell, however, in the limited time available since receiving the Inquiry's request for these statements, will not be in a position to provide the Inquiry with their statements by 4 September 2023. This is compounded by the fact that DI Grace is now overseas and has limited access and availability, and DA/S Bignell has a Sergeant's examination on Tuesday, 5 September 2023 which has impacted his ability to provide instructions.

Accordingly, we request an extension of time to produce statements from Detective Superintendent Middleton, DI Grace and DA/S Bignell to **Friday, 8 September 2023** and note that we will endeavour to provide these statements sooner if possible.

We anticipate being in a position to provide statements of Ms Wells and Ms McMahon today.

In relation to the balance of those individuals, best endeavours have been made to progress any statements to be provided by those individuals in the limited time available, however we will not be able to provide those statements today. Accordingly, we also seek an extension to provide any further statements to **Friday, 8 September 2023**, though we will provide any statements sooner if we are able to do so.

Yours sincerely



Patrick Hodgetts
A/Director
Crime Disruption and Special Inquiries Law
Office of the General Counsel
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