



Special Commission of Inquiry into LGBTIQ hate crimes

SUBMISSIONS OF COUNSEL ASSISTING

6 February 2023

IN THE MATTER OF DAVID LLOYD-WILLIAMS

Introduction

1. These submissions are filed on behalf of Counsel Assisting the Special Commission of Inquiry into LGBTIQ hate crimes (**Inquiry**).

Summary of matter

Date and location of death

2. David Lloyd-Williams died between 8:30am and 11:45am on 24 August 1978 at North Head, in the Sydney suburb of Manly.

Circumstances of death

3. Mr Lloyd-Williams was 32 years old. In the months prior to his death he was suffering significantly from ongoing depression, for which he was receiving treatment in the community, having also recently been an inpatient at a mental health facility. On the morning of his death he travelled from the suburb of Mosman, where he was living, to North Head at Manly. This submission concludes that there he took his own life by jumping from a cliff.

Findings of post-mortem examination

4. Dr Grace Higgins conducted an autopsy on 26 August 1978. Multiple injuries to Mr Lloyd-Williams were found, consistent with a fall from a significant height. A blood sample was taken with no alcohol found. The cause of death was recorded as “multiple injuries”.

Persons of interest

5. No persons of interest in relation to the death were identified at the time, nor subsequently.

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Indicators of LGBTIQ status or bias

6. The evidence generally does not suggest that Mr Lloyd-Williams was a member of the LGBTIQ community. Until a number of months prior to his death, he had been in a heterosexual marriage, as a result of which he had a young daughter. A friend who shared a flat with Mr Lloyd-Williams prior to his marriage did not understand him to be gay.
7. North Head is known to have had a well-used beat area, often visited by men to sunbake and/or engage in sexual activity, and that was used during the era in which the death occurred, the late 1970s.¹ There is also some evidence that attacks on men who were using the area as a beat may have occurred during this period.
8. The location where Mr Lloyd-Williams' body was found does not, however, appear to be in the particular area of North Head that was best known as a site for beat activity.

Exhibits: availability and testing

9. Apart from the blood alcohol test that was conducted at the time of the autopsy, there is no record of any exhibits having been collected or retained.

Findings at inquest, including as to manner and cause of death

10. At an inquest held on 23 October 1978, City Coroner Leonard James Nash found as follows, that:

“On the 24th of August 1978 at North Head, he [Mr Lloyd-Williams] died from multiple injuries received when he cast himself from a cliff with the intention of taking his own life whilst in a state of mental depression.”

Features of /concerns with original police investigation

11. Independently of statements and other formal documentation provided to the Coroners Court by NSW Police in 1978, no separate police investigation file has been located or produced by the Police. There is no document containing any description of the area from which Mr Lloyd-Williams fell, nor of any search that was conducted of that area. There is also no description of whether any clothing or personal items were located with his body.
12. Potentially significant matters such as Mr Lloyd-Williams' ownership of the vehicle located near the cliff area from which he fell, and the fact that his keys remained in the ignition of the car, are derived from a newspaper article found by the Inquiry and do not appear in the police material. Nor are there

¹ See generally Exhibit 2, Tab 8, Statement of Ulo Klemmer dated 11 November 2022, at [18] (SCOI. 77307); Exhibit 2, Tab 1, Statement of Gary Wotherspoon dated 14 November 2022, at [40]-[42] (SCOI.77300).

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photographs of the area in that material. The only photograph of the relevant area appears in the newspaper article and is of limited assistance.

Strike Force Parrabell

Use of the Bias Crimes Indicators Review Form

13. The Bias Crimes Indicators Review Form (**BCIF**) was only partially completed.² This is because Strike Force Parrabell was unable to locate any records of the death at all, including the coronial file. Mr Lloyd-Williams is referred to in the form as both “David Williams” and “David Lloyd WILLIAMS”. In the latter case, the name “David Lloyd WILLIAMS” is set out in a manner that suggests that police were proceeding on the basis that rather than comprising a hyphenated surname (Lloyd-Williams), the name consisted of a middle name “Lloyd” and a surname “Williams”.
14. The BCIF contained an assertion that the body of Mr “Williams” was found naked “*in the Manly cliff area in 1979*” and that his clothes were left neatly folded. In this respect a comparison was drawn in the BCIF with the circumstances of another death that had occurred in the North Head area in 1988. It is evident from the content of the form that the basis for this assertion by Strike Force Parrabell was, at least in part, notes in a spreadsheet of potential gay hate victims created by former police gay liaison co-ordinator Sue Thompson.³ In the BCIF it was said that the spreadsheet indicated that the source of the content of these notes was a friend of Mr “Williams”, named Dave Davies.
15. The BCIF indicated that unsuccessful attempts had been made to obtain a death certificate and that no relevant information could be found through searches of the COPS database, the Ryerson Index, and the media. It was observed in the form that the “only other option” for police would be to identify the person “Dave Davies”.
16. The BCIF concluded with the observation that “*[s]earches were completed on any possible date of birth, possible misspelling of [the] name and date of death of Williams*” and that “*[c]urrently no information has been located*”.
17. In effect, the police did not uncover any information of substance about the death upon which they could base any opinion, and the BCIF was not completed in any substantive fashion. The matter is referred to as “unsolved” and the relevant indicator is noted as “insufficient information”.

² Bias Crimes Indicators Review Form – David Williams dated 9 March 2017 (SCOI.82180).

³ See generally Exhibit 6, Tab 56B, Excel spreadsheet titled ‘Possible Gay Hate Murders List’ provided to Michael Willing by Sue Thompson in about 2013 (SCOI.77315).

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Results of Strike Force Parrabell

(a) Case Summary⁴

18. The Strike Force Parrabell Case Summary concludes with the observation that:

SF Parrabell did not review this matter as details of the death could not be confirmed.

19. The death was categorised in the Parrabell Report as ***“Unsolved”*** and ***“Not Reviewed”***.

20. The body of the Strike Force Parrabell case summary reads as follows:

Identity: *The only information available is within a spreadsheet prepared by a former NSW police employee indicating that David Lloyd Williams was found naked at the bottom of a cliff at Manly in 1979. The person who provided the information was only known as ‘Dave Davies’, who could not be located without further details. Investigators were unable to locate any records relating to this matter despite extensive searches including all possible dates of birth; dates of death; and/or misspelling of names. Database searches including: COPS; Ryerson Index; Media Archives; Coroner; GRR; Police and State Archives were also unsuccessful.*

Sexual Orientation/Psychological Health: *Mr Williams’ personal history; body location; sexual orientation; psychological health; coronial or court findings could not be confirmed.*

Coronial/Court Findings: *The death of Mr Williams is noted in academic reports indicating its occurrence in the same ‘gay beat’ area as Mr Stewart (Parrabell Case 1); Mr Rath (Parrabell Case 2); and [REDACTED].*

21. The content of the summary is in keeping with the contents of the BCIF. The reference to reports indicating that it occurred in the same “gay beat” area as certain other deaths was evidently made in the absence of accurate detail as to precisely where at North Head the death occurred. Based upon evidence gathered by the Inquiry, and as has already been noted, while the death occurred at North Head, it does not appear to have occurred in the particular area of North Head that was best known as a site for beat activity (where other deaths considered by Strike Force Parrabell occurred).

(b) Academic review

22. The case summary refers to the academic review conclusion as being “insufficient information”.

⁴ Exhibit 6, Tab 49, Strike Force Parrabell Case Summaries – David Williams, p. 2 (SCOI.76961.00014).

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Investigative and other steps undertaken by the Inquiry

Summons to the NSW Registry of Births, Deaths and Marriages

23. As a result of a summons (BDM2) issued by the Inquiry on 23 August 2022 to the NSW Registry of Births, Deaths and Marriages (**BDM**), on 25 August 2022 the BDM produced a death certificate for Mr Lloyd-Williams.⁵ The summons had asked for any relevant certificates, including death certificates, for "WILLIAMS, David Lloyd", and also provided the name of his wife and the fact that he had been born in England. His wife's name and his place of birth were information that by this stage had been provided to the Inquiry by Dr Neil McEwan, who is referred to later in the submission.
24. The description of the circumstances of death in the certificate made it apparent that this was the death the subject of the information that had been provided to Ms Thompson, and subsequently included within the Strike Force Parrabell matters.

Receipt of Coroners Court file

25. Following receipt of the death certificate, the Inquiry requested any coronial file related to the death. The Coroners Court provided a file that consisted of 22 pages of material, including a number of witness statements, post mortem and toxicology reports, and a very brief record of the inquest proceedings that took place on 23 October 1978.

Summons issued to NSW Police

26. On 26 August 2022 the Inquiry issued a summons to NSW Police (NSWPF13) that sought all documents relating to investigations by them of the death of Mr Lloyd-Williams, using the details of his name and dates of birth and death as appeared in the death certificate.⁶
27. The legal representative for NSW Police replied by email dated 9 September 2022, advising that the only information or holdings of NSW Police in relation to the matter were the Strike Force Parrabell Case Summary and BCIF, and that any further information or holdings could not be identified.⁷
28. This is notwithstanding that the coronial file produced to Inquiry contains various statements and documentation produced by NSW Police at the time of Mr Lloyd-Williams' death. No explanation has been provided to the Inquiry as to what may have happened to the relevant NSW Police investigation file.

⁵ Death certificate of David Lloyd-Williams dated 9 November 1978 (SCOI.74028).

⁶ Summons to produce to NSW Police Force (NSWPF13) dated 26 August 2022 (SCOI.82178).

⁷ Email from Office of the General Counsel, NSW Police Force, to Solicitor Assisting the Inquiry, re Summons NSWPF13 dated 9 September 2022 (SCOI.82176).

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Summons issued to NSW Health Pathology – Forensic Medicine

29. On 28 September 2022 the Inquiry issued summons DOFM2 to the NSW Health Pathology – Department of Forensic Medicine, seeking all records held by the Department relevant to the autopsy of Mr Lloyd-Williams.⁸ On 11 October 2022 the Department produced an electronic file. This consisted of 12 pages of documents comprising copies of the post mortem report and report of death to the Coroner, the blood alcohol test results and the formal order for the autopsy. It did not provide any evidence of substance not otherwise contained in the coronial file.

Contact with friends of Mr Lloyd-Williams

30. Through a statement in the Inquiry’s holdings relating to another matter, the Inquiry was able to identify that the “Dave Davies” referred to in Ms Thompson’s spreadsheet as a source of her information was likely to have been The Honourable Justice David Davies, a Justice of the Supreme Court of New South Wales. Justice Davies was contacted and was able to provide the details of another friend of Mr Lloyd-Williams, Dr Neil McEwan, whom Justice Davies thought may have been able to provide greater information concerning Mr Lloyd-Williams. A meeting was thereafter held with Dr McEwan, who provided the Inquiry with some additional information concerning Mr Lloyd-Williams. The relevant information obtained from Mr Lloyd-Williams’ friends is commented on later in the submission.

Contact with family members

31. In the course of its work the Inquiry made contact with Mr Lloyd-Williams’ sister, with whom he had contact around the time of his death, and his daughter, who was an infant at that time.

Professional opinions obtained

32. By letter dated 19 December 2022,⁹ an expert opinion was sought from forensic pathologist Dr Linda Iles, Head of Forensic Pathology Services at the Victorian Institute of Forensic Medicine. Dr Iles was asked to address the following matters:

1. *The adequacy of the post-mortem investigations conducted with respect to Mr Lloyd-Williams.*
2. *Your view as to the medical cause of Mr Lloyd-Williams’ death (including any reasons for taking a different view to that formed by Dr Higgins).*

⁸ Letter from Solicitor Assisting the Inquiry to NSW Health Pathology – Forensic Medicine re Request for records, dated 28 September 2022 (SCOI.82175)

⁹ Letter of Instruction to Dr Linda Iles dated 19 December 2022 (SCOI.82318).

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3. *Your view as to whether Mr Lloyd-Williams' injuries were consistent with misadventure, suicide or foul play.*
4. *Your view as to any conclusions that can be drawn from the toxicological analysis.*
5. *Any recommendations for further investigations with respect to determining the manner and/or cause of Mr Lloyd-Williams' death.*
6. *Any other comment, within the area of your expertise, regarding the likely cause of Mr Lloyd-Williams' death.*

33. On 11 January 2023 Dr Iles provided a report to the Inquiry that addressed those matters.

Other sources of information

34. The Inquiry conducted searches in an effort to determine whether there were any media articles relating to the death of Mr Lloyd-Williams. Two articles were found in the *Manly Daily* newspaper, dated 25 and 26 August 1978.¹⁰

Steps which could / should have been taken originally or earlier, but which were not and are no longer possible

35. As noted earlier, based on the material that has been located, the precise location from which Mr Lloyd-Williams fell does not appear to have been well documented, nor is there any evidence indicating that that area was searched. If these matters were addressed at the time, either no records were made of them, or such records no longer appear to exist.

36. It is also submitted that the efforts of Strike Force Parrabell to identify the circumstances of the death could have been more thorough. While an officer working on the Strike Force did make contact by email with Ms Thompson in an attempt to find out more concerning the source of her information,¹¹ more could have been done in this respect, and to ensure that alternative renderings of the name David Lloyd-Williams were the subject of searches.

¹⁰ 'Cliff Death Fall', *The Manly Daily* (Sydney, 25 August 1978), p. 1 (SCOI.82319); 'Victim named' *The Manly Daily*, (Sydney, 26 August 1978), p. 1 (SCOI.82317).

¹¹ Email correspondence between Detective Chief Inspector Craig Middleton and Sue Thompson re Outstanding matters (SCOI.82174).

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Results of investigative and other steps undertaken by the Inquiry

37. This part of the submission sets out key matters arising from the Inquiry's consideration of the evidence and the conclusions that it is suggested can be drawn from the evidence.

Background information in relation to Mr Lloyd-Williams

38. On the afternoon of his death, Mr Lloyd-Williams' body was identified by a friend and work colleague, Herbert Russell. Mr Russell provided a statement¹² that was tendered at the inquest. He explained that he had worked with Mr Lloyd-Williams for five or six years at the ABC (then known as the Australian Broadcasting Commission) where Mr Russell was a Concert Manager. In the Report of Death to Coroner,¹³ Mr Lloyd-Williams was also described as a Manager with the ABC.
39. According to his death certificate,¹⁴ Mr Lloyd-Williams was born in Barnhurst in England and had been living in Australia for seven years at the time of his death. Information received from a friend of Mr Lloyd-Williams, Dr McEwan,¹⁵ is consistent with this. Dr McEwan had shared a flat with Mr Lloyd-Williams prior to Mr Lloyd-Williams' marriage. They had a mutual interest in music and Dr McEwan had first met Mr Lloyd-Williams when Mr Lloyd-Williams had auditioned for a church choir in Mosman. Mr Lloyd-Williams' interest in music appears to be consistent with the nature of his work at the ABC.

Mental health of Mr Lloyd-Williams leading up to his death

40. The inquest exhibits included a brief report by Dr J E Hoult, psychiatrist, dated 29 August 1978.¹⁶ Dr Hoult was treating Mr Lloyd-Williams at the time of his death. The report clearly implies that Mr Lloyd-Williams had spent time as an inpatient at North Ryde Psychiatric Centre. Dr Hoult was asked to see Mr Lloyd-Williams on 16 August 1978, eight days prior to his death, due to reports from the Centre's social worker that while at home, Mr Lloyd-Williams had been staying in his room all day, not answering the door and not attending work.
41. This is consistent with observations made in a statement by Mr Lloyd-Williams' sister.¹⁷ His sister states that she had seen her brother two days prior to his death, when she had gone to his flat to make sure that he was going to keep an appointment that he had with the Welfare Officer at the ABC at 10:30am that day. She indicates that he seemed to be in a very depressed state. She stayed with him for some

¹² Statement of Herbert Charles Russell dated 24 August 1978 (SCOI.73571.00012).

¹³ P79A Report of Death to Coroner dated 24 August 1978 (SCOI.73571.00002).

¹⁴ Death certificate of David Lloyd-Williams (n 5).

¹⁵ Statement of Caitlin Healey-Nash dated 5 February 2023, at [7]-[11] (SCOI.82364).

¹⁶ Report of Dr JE Hoult dated 29 August 1978 (SCOI.73571.00016).

¹⁷ Statement of Elizabeth Lloyd-Williams dated 24 August 1978 (SCOI.73571.00011).

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time, before she had to leave. She made contact with Mr Lloyd-Williams' mother-in-law to see if she could come over and talk with him.

42. More generally his sister observes that her brother had always been in good health and spirits but that this had changed in April 1978. His wife left him at that time and he had seemed to "*go down hill quickly with fits of depression*" and he had seemed to get worse over the last three weeks of his life.
43. In his statement, Mr Russell (friend and work colleague) said that six months prior to his death, he noticed that Mr Lloyd-Williams was going through "*fits of depression caused by marital problems*" and that he had last seen Mr Lloyd-Williams three weeks prior to his death, at which time he did not seem to be himself as he was restless and agitated.¹⁸
44. Mr Lloyd-Williams' mother-in-law also provided a statement to the police.¹⁹ Consistent with the observations made by his sister, his mother-in-law describes Mr Lloyd-Williams as having been in good health and spirits up until April 1978, which coincided with his marriage breaking down. His mother-in-law states that he then started to have fits of depression. During this period she would see Mr Lloyd-Williams every weekend and, over the two weeks prior to his death, he had been visiting her place to have tea a couple of nights a week. Over the two days and nights prior to his death, he had been staying at the house of his parents-in-law, but had remained agitated.
45. At his appointment with Dr Hoult on 16 August 1978 at North Ryde Psychiatric Centre, Mr Lloyd-Williams had told the psychiatrist that he was feeling very depressed and that he no longer felt that he had anything to live for since his wife had left him. He was having difficulty getting to sleep and had lost his appetite. He told Dr Hoult that he had recently seriously considered suicide, but that he was now past this. Dr Hoult was of the view that Mr Lloyd-Williams was suffering a depressive neurosis as a result of his marriage break-up. He prescribed an anti-depressant to last three days and made a further appointment for two days' time, on 18 August 1978, which Mr Lloyd-Williams did not keep.
46. Dr Hoult reported that his mother-in-law had then brought Mr Lloyd-Williams to see him on 21 August 1978, five days after the initial consultation, and three days before his death. His mother-in-law reported being concerned that Mr Lloyd-Williams was remaining in his room and not adequately caring for himself. The report concludes as follows:

It was agreed that he should not stay alone and he consented to go and stay with his mother-in-law [name]. I prescribed increased quantities of Nortriptyline, but requested that [his mother-in-law] control the medication and dispense each dose to Mr Lloyd-Williams. The need for

¹⁸ Statement of Herbert Charles Russell (n 12).

¹⁹ Statement of Anna Louisa Worton dated 24 August 1978 (SCOI.73571.00010).

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hospitalisation was considered but Mr Lloyd-Williams was opposed to it and there were insufficient grounds for compulsory admission. An appointment was made to see Mr Lloyd-Williams on Friday 25th August.

Events on the day of the death (24 August 1978)

47. As already noted, and consistent with Dr Hoult’s advice to Mr Lloyd-Williams that he should stay with his mother-in-law, Mr Lloyd-Williams stayed at the house of his parents-in-law over the two days preceding his death. In her statement, his mother-in-law said that she made Mr Lloyd-Williams breakfast at about 8:30am on the morning of his death. She stated that he seemed to be feeling better and that he told her that he was going home to clean up his flat and that he would phone her to arrange a time to come over to her place to have lunch. She did not subsequently hear from him and her statement recounts her subsequent efforts to contact and locate Mr Lloyd-Williams, to no avail.
48. At 11:45am Robert Steele was standing at the edge of the cliff at North Head and observed a body on the rocks below, and waves crashing over the body.²⁰ It would appear that he was on a work break at the time, as in his statement he describes then calling his “base” over a two way radio and asking for the police to be informed. Mr Steele remained at the location in order to show the police where the body was, before returning to work.²¹ In an article that appeared in the *Manly Daily* the following day Mr Steele is quoted in similar terms to his statement. He adds that he was looking for a fishing spot when he observed the body.²²
49. The officer in charge (OIC) of the investigation of the death was Constable John Mortimer. In his statement,²³ he reported having attended the location at 3:30pm. By this stage other police were already in attendance and the body of Mr Lloyd-Williams had been recovered by the Police Rescue Squad and conveyed to Manly District Hospital.²⁴

The cliff location

50. The OIC described the cliff location as at the “south eastern point” of North Head, and that the base of the cliff from which the body was recovered was about 300 feet (or roughly 90 metres) below the top. He described seeing a “white volkswagon station sedan” parked at the southern end of the “Scenic Drive”.²⁵ While his statement does not explicitly state that this was identified as the car of Mr Lloyd-

²⁰ Statement of Robert Steele dated 9 October 1978 (SCOI.73571.00008).

²¹ Ibid.

²² ‘Cliff Death Fall’ (n 10).

²³ Statement of Constable John Charles Mortimer dated 24 August 1978 (SCOI.73571.00013).

²⁴ Certificate of life extinct dated 24 August 1978 (SCOI.73571.00007).

²⁵ Statement of Constable John Charles Mortimer (n 23).

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Williams, it appears to imply this. Further, the *Manly Daily* article referred to states that “[a] car owned by a Mosman man was found at the top of the cliff” and that “[t]he keys were in the ignition”.²⁶

51. Although there is no diagram of the location in the Coroners Court documentation, the description of the car being at the southern end of Scenic Drive, and the cliff being at the “south eastern point” of North Head is sufficient to establish in general terms the area of North Head where the car and body were located (see map marked as **Attachment A**).
52. As previously mentioned, there is clear evidence of the existence of a beat at North Head that was used at this time. The known beat area was significantly to the north of the part of North Head where it appears that the body of Mr Lloyd-Williams was located.

Evidence in relation to clothing

53. The available material from the coronial file is silent in relation to any clothing worn by Mr Lloyd-Williams at the time of his death. There is nothing in the coronial file that suggests that Mr Lloyd-Williams’ clothing was located at the top of the cliff. Although the extent of investigative material is limited, this may be because the circumstances of the death were assumed at the time to be quite clear (namely an assumption of suicide, an assumption that it is suggested was borne out once further evidence gathering revealed the severity of Mr Lloyd-Williams’ depression).
54. Despite the relatively limited nature of the material, it would seem likely that had the body of Mr Lloyd-Williams been naked, and his clothing left folded at the top of the cliff, this would have been a distinctive and unusual feature that would have made its way into the statement of the OIC and/or the report of death to the Coroner.
55. It remains relevant to consider then, the reliability of information provided many years later to Ms Thompson suggesting that the body was naked and clothes were left at the top of the cliff. Relevant facts are set out in a statement made by the Inquiry solicitor with carriage of this matter, Caitlin Healey-Nash.²⁷
56. As that statement sets out, Justice Davies had been a mutual friend of both Mr Lloyd-Williams and Dr McEwan based on the shared interest of the three men in church music. Justice Davies’ recollection as conveyed to the Inquiry is that he had heard a suggestion at some time that Mr Lloyd-Williams’ clothes had been found folded at the top of the cliff above which his body was found. Although

²⁶ ‘Cliff Death Fall’ (n 10).

²⁷ Statement of Caitlin Healey-Nash (n 15) at [7]-[11].

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uncertain as to when and where he had heard this, Justice Davies thought that it may have been from Dr McEwan.

57. Dr McEwan indicated, when meeting with Inquiry staff, that, although he had had an understanding for some time that Mr Lloyd-Williams' clothes were found folded in a neat pile, he did not know when or from whom he heard this account.
58. Further enquiries made by this Inquiry with Ms Thompson indicate that her recollection is that the matters attributed by her to Justice Davies had been passed on to her by the relatives of another man whose body had been found at the base of a cliff at North Head.
59. In the end, it is not clear how it came to be that Justice Davies and Dr McEwan had the understanding that they did about these circumstances. It is possible that whatever was said to them at some time, and whatever they subsequently said to others, has become confused over time with the reported circumstances of another death at North Head where such circumstances (naked body, folded clothes) did exist.
60. It is submitted that little weight can be afforded to the hearsay suggestion, first recorded some 35 years after the death, that the body was naked and the clothes folded, in view of the lack of clarity of the basis for this suggestion and the likelihood that, if such were the case, it would have been noted in the materials provided by police to the Coroner or in the post mortem report.

Expert opinion of forensic pathologist Dr Linda Iles²⁸

61. Dr Iles was of the view that a reasonable statement of the cause of Mr Lloyd-Williams' death is "*Multiple injuries sustained in a fall from height*" and notes that this is not materially different from that arrived at by Dr Higgins.²⁹
62. Dr Iles opines, in effect, that the forensic pathology alone cannot determine whether the death may have involved foul play or misadventure, as opposed to an act of suicide. This is because the available material is insufficient in relation to determining the presence or absence of any subtle injury. As a result, she concludes that:³⁰

circumstantial findings best inform the manner of Mr Lloyd-Williams' death. The circumstances as described in the materials available, suggest that suicide was most likely.

²⁸ Expert report of Dr Linda Iles dated 11 January 2023 (SCOI.82316).

²⁹ *Ibid*, p. 4.

³⁰ *Ibid*.

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63. Dr Iles was of the view that there were no further medical investigations that would help to determine the manner of Mr Lloyd-Williams' death.³¹

Conclusions in relation to circumstances of death based on the evidence

64. The evidence clearly and consistently demonstrates that Mr Lloyd-Williams was suffering from severe depression at the time of his death. This is clear from all of the witnesses who had contact with him in the weeks and days prior, including his psychiatrist.
65. He had people around him, including his sister and mother-in-law, who were clearly very caring and were seeking to help Mr Lloyd-Williams as his condition appeared to worsen in the days leading up to his death.
66. The severity of his condition is reinforced by his indication to his psychiatrist that he had been contemplating suicide, his prior admission to an inpatient facility, the psychiatrist's suggestion that he admit himself as an inpatient, and the psychiatrist's requirement that he stay with his mother-in-law and that he not be permitted to administer his medication to himself.
67. The particular location at North Head that Mr Lloyd-Williams drove to and the fact that he left his keys in his car ignition also appear to be consistent with an act of suicide.
68. Sadly, the evidence overwhelmingly supports the proposition that on the morning of 24 August 1978, while suffering from deep depression, Mr Lloyd-Williams travelled in his car from Mosman to North Head at Manly, where he deliberately ended his life by jumping from a cliff at the south eastern end of North Head.

Conclusions as to bias

69. In view of the conclusion reached as to the circumstances of Mr Lloyd-Williams' death, it is submitted that this is not a death that was motivated by LGBTIQ hate bias.

Submissions as to manner and cause of death

70. It is suggested that an appropriate finding would be:

that Mr Lloyd-Williams died on 24 August 1978 of multiple injuries after deliberately jumping from a cliff at North Head in Manly. At the time of his death, Mr Lloyd-Williams was suffering from severe depression.

³¹ Ibid, p. 5.

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71. This submission is essentially consistent with the finding of the coroner made on 23 October 1978: see 10 above. It is submitted that the categorisation of the case as “unsolved” by Strike Force Parrabell, based as it appears to have been on the failure by the Strike Force to locate any contemporaneous materials concerning the death including the coronial file containing *inter alia* the report of the psychiatrist, was erroneous.

Submissions as to recommendations

72. There are no suggested recommendations arising from the matter.

William de Mars
Counsel Assisting

Attachment A



Map of North Head, Manly, showing estimated location of David Lloyd-Williams' body and car.

Source: Google Earth