

Sensitive: Legal



NSW Police Force

18 January 2023

Mr Enzo Camporeale
Director, Legal
Special Commission of Inquiry into LGBTIQ hate crimes

By email ONLY: [REDACTED]

Dear Mr Camporeale,

**Special Commission of Inquiry into LGBTIQ hate crimes – New South Wales Police –
Summons No. NSWPF46**

We refer to Summons No. NSWPF46, issued to the Commissioner of NSW Police (**Commissioner**) on 20 December 2022 (**Summons**). A copy of the Summons is **enclosed** with this letter.

In response to the Summons, the Commissioner is to produce 1 document. A copy of an index listing the document being produced is also **enclosed** with this letter. The document will be produced electronically, with production being facilitated on the Commissioner's behalf by Corrs Chambers Westgarth.

We have been instructed that searches were completed by officers of NSW Police to locate additional documents responsive to the Summons however no further responsive documents could be located. We would be grateful if the Inquiry could please advise whether it requires a statement from an officer of the NSW Police Force addressing the nature of those searches and their outcome.

The document is produced to the Inquiry on a confidential basis. As raised in our letter to the Inquiry dated 1 November 2022, due to the limited time afforded to the Commissioner to respond to the summonses and the large number of documents to be produced, we are unable to obtain substantive instructions in relation to any claim that may be available to Commissioner at the time of production. We note that the documents produced in response to this Summons may, in general terms, contain highly confidential or sensitive information concerning police methodology, and/or commercial-in-confidence information.

We respectfully request that the Commissioner be given written notice in advance identifying any documents provided by the Commissioner to the Inquiry, or any information derived from any such documents, which the Inquiry intends to refer to in the context of any (open or closed) hearing, receive into evidence, or otherwise proposes to disclose to persons other than those assisting the Inquiry.

Yours sincerely



Katherine Garaty
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3472-2679-1968v1

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