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NSW Police Force

21 June 2023

Mr Enzo Camporeale
 Director, Legal
 Special Commission of Inquiry into LGBTIQ hate crimes
 121 Macquarie St
 SYDNEY NSW 2000

By email ONLY: [REDACTED]

Dear Mr Camporeale

Special Commission of Inquiry into LGBTIQ hate crimes: Production of Documents – Crispin Dye

We refer to:

- a) Summons No. NSWPF1 issued to the Commissioner of NSW Police (**Commissioner**) dated 18 May 2022 (**Summons 1**);
- b) your letter dated 13 June 2023;
- c) my email to you on 14 June 2023; and
- d) my letter to you dated 19 June 2023.

Production of Documents

As noted in my letter dated 19 June 2023, an additional hardcopy of what appears to be the coronial brief has been identified and has been digitised. We are instructed to provide this copy of the brief to you noting that we understand the Inquiry already has a copy; the content of the Documentary Tender Bundle in respect of Crispin Dye is supportive in that regard.

An index of the further documents to be produced under Summons 1 is **enclosed** with this letter. Production of these documents will be facilitated by Corrs Chambers Westgarth on the Commissioner's behalf via the iCourts portal.

Scope and manner of searches for records undertaken by the Commissioner

We are otherwise instructed that the Commissioner's response to Summons 1 concerning Crispin Dye is complete.

In providing those instructions, we note that our instructors have, as a matter of regularity, caused for the following searches to be performed (where applicable) in relation to summonses in general:

- a) Review of NSWPF computer systems: The NSWPF e@gle-i system, the Exhibits Forensics Information and Miscellaneous Property System (**EFIMS**), NSWPF secure and shared drives, State Crime Command Databases, the Computerised Operational Policing System (**COPS**); and the records management system are all regularly searched in response to summons issued by the Inquiry.
- b) Searches of Police Area Commands: All Police Area Commands have been instructed to search their holdings to identify documents which may be relevant to summons No.

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- NSWPF1 and NSWPF3 as well as targeted searches being undertaken in respect of police stations with carriage of particular deaths subject of a summons from the Inquiry.
- c) Forensic Evidence and Technical Services (FETS) Command: Searches are undertaken with FETS in respect of every summons issued by the Inquiry in order to locate relevant documents and exhibits (where requested by the Inquiry).
 - d) Metropolitan Exhibit and Property Centre (MEPC): Where a summons requests information about exhibits, the MPEC is searched for relevant documents and exhibits.
 - e) Contact with current and former NSWPF officers: In addition to assistance from serving NSWPF officers with personal knowledge of matters within the Inquiry's Terms of References, where the NSWPF considers it may assist with its response to the Inquiry, contact is also made with former officers of the NSWPF.
 - f) Requests submitted to archives: To recover certain historical records stored with State Archives, the Commissioner is reliant on those engaged by State Archives or other Government storage facilities in order to search for documents which may be responsive to the Summons. We note for completeness that the Commissioner's staff are not permitted to search through these archived records and cannot otherwise impose any requirements or monitor the actions of these staff to ensure any requests are comprehensively actioned. These searches have now been performed in relation to some summonses on multiple occasions, using different search term combinations.
 - g) New South Wales Department of Health: Where requests relate to the Forensic and Analytical Science Service (FASS), autopsy or other related processes the Commissioner's staff engage with representatives of the Department of Health in order to locate documents which may be relevant to summons issued by the Inquiry.
 - h) Coroner's Court: Where necessary, the Commissioner engages with the Coroner's Court in order to locate documents which may be relevant to summons issued by the Inquiry.

The Commissioner considers that the searches undertaken in relation to this matter have been comprehensive. Should the Inquiry particularise specific further searches that it considers should be undertaken, the NSWPF will endeavour to conduct such searches as expeditiously as is reasonably possible.

We would otherwise be grateful for a response to our letter of 14 June 2023 concerning the return of hard copy material provided by the Commissioner to the Inquiry between May and October 2022.

Yours sincerely



Katherine Garaty
Director – Crime Disruption and Special Inquiry Law
Office of the General Counsel
NSW Police Force