

Sensitive: Legal



NSW Police Force

29 August 2023

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

By email: [REDACTED]

Dear Mr Camporeale

**Special Commission of Inquiry into LGBTIQ hate crimes – Production of documents pursuant to Summons No. NSWPF173**

We refer to:

- a) summons No. NSWPF173, issued to the Commissioner of NSW Police (**Commissioner**) dated 28 August 2023 (**Summons**), with a return date of 30 August 2023; and
- b) your letter to us dated 22 August 2023 enclosing the summons (**Letter**).

The Summons and Letter are **enclosed** for convenience.

**Production of Documents**

In response to the Summons, the Commissioner is to produce 171 documents. A copy of an index listing the document being produced is also enclosed with this letter. The documents will be produced electronically, with production being facilitated on the Commissioner's behalf by Corrs Chambers Westgarth.

**Confidentiality**

We refer to Practice Guideline 2 dated 1 February 2023 issued by the Inquiry and your Letter.

Given the short period of time in which the Commissioner has had to respond to the Summons, we are not in a position to confirm whether any non-publication claims need to be made over the documents. As such, the documents are being provided on a confidential basis. We will endeavour to finalise our instructions on any protective orders sought over the documents as soon as possible. In the interim, we respectfully object to documents being published online, brought upon screen during the public hearings, or otherwise be received into evidence.

Yours sincerely

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

3436-7740-8806v1

OFFICE OF THE GENERAL COUNSEL

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