

**2022 Special Commission of Inquiry  
into LGBTIQ hate crimes**

**Before: The Commissioner,  
The Honourable Justice John Sackar**

**At Level 2, 121 Macquarie Street,  
Sydney, New South Wales**

**Thursday, 21 September 2023 at 10am**

**(Day 89)**

<b>Mr Peter Gray SC</b>	<b>(Senior Counsel Assisting)</b>
<b>Ms Meg O'Brien</b>	<b>(Counsel Assisting)</b>
<b>Mr Enzo Camporeale</b>	<b>(Director Legal)</b>
<b>Ms Caitlin Healey-Nash</b>	<b>(Principal Solicitor)</b>
<b>Ms Hermione Nicholls</b>	<b>(Senior Solicitor)</b>

**Also Present:**

**Mr Mark Tedeschi KC with Mr Anders Mykkeltvedt and  
Mr Mathew Short for NSW Police, Detective Acting  
Sergeant Cameron Bignell, Detective Sergeant Alicia Taylor  
and Ms Georgina Wells  
Mr Murugan Thangaraj SC for Mr Michael Willing  
Mr Ken Madden for Sergeant Geoffrey Steer  
Mr Matthew Hutchings for Mr Stewart Leggat  
Mr Darien Nagle for Mr John Lehmann  
Ms Linda Barnes for Detective Sergeant Penelope Brown  
Mr Jim Glissan KC for Ms Pamela Young  
Mr Stephen Russell for Detective Sergeant Paul Rullo**

1 THE COMMISSIONER: Yes, Mr Gray.

2

3 MR GRAY: Commissioner, there are a number of parties in  
4 the hearing room today, some of whom, at least, have not  
5 been present before, I don't think, and they may wish to  
6 announce their appearances.

7

8 THE COMMISSIONER: All right. Yes, I'll do that.

9

10 I note your appearance, Mr Tedeschi, with others,  
11 thank you.

12

13 MR TEDESCHI: Thank you.

14

15 MR NAGLE: Thank you, Commissioner, my name is Nagle  
16 I appear for now retired Detective Chief Inspector Lehmann.

17

18 THE COMMISSIONER: Thank you very much, Mr Nagle, you have  
19 leave.

20

21 MR HUTCHINGS: Commissioner, my name is Hutchings,  
22 I appear on behalf of Mr Leggat.

23

24 THE COMMISSIONER: Thank you, Mr Hutchings. Leave is  
25 given.

26

27 MR GLISSAN: For Ms Young.

28

29 THE COMMISSIONER: Thank you, Mr Glissan. Again, leave is  
30 given, thank you.

31

32 MS BARNES: I appear for Penelope Brown.

33

34 THE COMMISSIONER: Thank you, Ms Barnes. Again, leave is  
35 given, thank you.

36

37 MR GRAY: Commissioner, over the next two weeks, I will  
38 call evidence from a number of further witnesses in  
39 relation to Public Hearing 2 which, as you know, concerned,  
40 for the most part, three strike forces, Parrabell, Macnamir  
41 and Neiwand, together with some of the history relating to  
42 the ways in which the NSW Police Force has generally  
43 approached questions of LGBTIQ bias crime or hate crime  
44 during the period under review.

45

46 Before I call the first of those witnesses, I need to  
47 outline how it has come about that the Inquiry has decided

1 to take this course.

2  
3 In the first place, I record that on 16 August this  
4 year, the Letters Patent establishing the Inquiry were  
5 amended so as to extend the reporting date from 30 August  
6 to 15 December 2023.

7  
8 There were a number of reasons why it was considered  
9 that such an extension was needed. Among those were,  
10 firstly, the fact that in a large number of cases being  
11 considered by the Inquiry, the NSW Police Force belatedly  
12 produced, at virtually the last minute, in June 2023,  
13 significant additional quantities of documentary material,  
14 material much of which had been called for by summonses  
15 issued as long ago as May 2022, more than 12 months  
16 previously.

17  
18 That belated production of documents in so many cases  
19 by the body which is the primary repository of documents,  
20 if not the only repository, in relation to the vast  
21 majority of all the cases under consideration by the  
22 Inquiry, meant that it was impossible to complete the work  
23 of the Inquiry by 30 August.

24  
25 Those newly produced documents had to be reviewed; the  
26 analyses of many cases had to be reconsidered and reworked  
27 and further submissions prepared; in some cases, forensic  
28 testing had to be arranged and the results assessed.

29  
30 These problems were the subject of a number of public  
31 hearings in June, July and August this year, some in  
32 relation to particular cases and some in connection with  
33 the Inquiry's consideration of NSW Police investigative  
34 practices generally.

35  
36 The submissions of Counsel Assisting for the  
37 investigative practices hearing have recently been served  
38 on the police and are available on the Inquiry's website.

39  
40 One matter that emerged strikingly from the  
41 investigative practices hearing was that since at least  
42 2016, it has been well known within the Police Force that  
43 there are serious ongoing difficulties in locating  
44 documentary records and exhibits in unsolved cases.  
45 Internal NSW Police Force documents have recognised the  
46 potential impact of these difficulties on the ability to  
47 reinvestigate unsolved homicides.

1  
2 One internal police document in recent years estimated  
3 that if the Unsolved Homicide Team continued to review  
4 cases at its then current rate, it would take 900 years for  
5 existing cases to be reviewed.  
6

7 I note in passing that even as late as last week, in  
8 mid September, yet more belated documentary production was  
9 still being made by the NSW Police Force. That production  
10 of material last week, in that particular case, was in  
11 response to a summons issued in August 2022, more than  
12 a year ago.  
13

14 In addition to those matters, although not directly  
15 a reason for the extension, the Inquiry has had to confront  
16 another set of issues arising from the approach taken by  
17 the NSW Police Force in relation to Public Hearing 2. To  
18 this I now turn.  
19

20 Under the Special Commission of Inquiry Act,  
21 interested parties are not given the capacity to call  
22 witnesses of their own. Consistent with the Act, the  
23 Inquiry's Practice Guideline, which, if it is possible,  
24 might be brought up on the screen, Practice Guideline 1,  
25 has at all relevant times, since its publication on the  
26 Inquiry's website in early October 2022, included the  
27 following features, among others: at clause 20:  
28

29 *All witnesses at a public hearing will be*  
30 *called by Counsel Assisting.*  
31

32 At clause 21:

33  
34 *Any person authorised to appear at*  
35 *a hearing who wishes to have evidence of*  
36 *a witness or witnesses placed before the*  
37 *Commission is to notify Counsel Assisting*  
38 *of the names of such witnesses, and is to*  
39 *provide a signed statement of their*  
40 *expected evidence (if possible in the form*  
41 *of a statutory declaration) as soon as*  
42 *practicable.*  
43

44 At clause 23:

45  
46 *Counsel Assisting will determine whether or*  
47 *not to call the witness. An application*

1           *may be made directly to the Commissioner to*  
2           *call a witness only after the above*  
3           *procedure has been completed and Counsel*  
4           *Assisting has indicated that the witness*  
5           *will not be called.*

6  
7           Those paragraphs, I think, are now visible on the  
8 screen for those who are following this via the live  
9 stream.

10  
11           Notwithstanding those arrangements, both you, as  
12 Commissioner, and Counsel Assisting, are, of course, well  
13 aware that it may often be the NSW Police Force which has  
14 the best ability to identify appropriate witnesses to give  
15 evidence in relation to specific issues given the size of  
16 the Police Force, its close involvement with these issues  
17 over many years and its access to its own records and  
18 personnel.

19  
20           The Inquiry has therefore sought the assistance of the  
21 NSW Police Force, both in identifying such witnesses and in  
22 preparing written statements from those witnesses. The  
23 Inquiry has done so in a variety of contexts, including in  
24 relation to Public Hearing 2.

25  
26           On 20 September 2022, one year and a day ago, the  
27 Inquiry wrote to the police to request witness statements  
28 in relation to the public hearing that became this Public  
29 Hearing 2. The Inquiry requested statements from a number  
30 of named individuals, including: (a) as to Strike Force  
31 Parrabell and its methodology, Assistant Commissioner Tony  
32 Crandell, who was the senior officer who set up Strike  
33 Force Parrabell and wrote its final report; as to various  
34 topics relating to bias crime generally, including the Bias  
35 Crime Unit, Sergeant Geoffrey Steer; and, thirdly, as to  
36 Strike Force Neiwand and its methodology, Detective  
37 Sergeant Steve Morgan, who was the Investigation Supervisor  
38 and/or Detective Senior Constable Michael Chebl, who was  
39 the officer in charge.

40  
41           The Inquiry sought these statements because, as far as  
42 it was aware, these individuals would be best placed to  
43 give evidence in relation to the matters outlined in that  
44 letter. Each of the requests for a statement from these  
45 officers of the NSW Police expressly noted that if a topic  
46 fell outside the knowledge of the officer nominated by the  
47 Inquiry, the police should provide a statement from whoever

1 was the appropriate officer to address that topic.

2  
3 As to Strike Force Macnamir and its methodology, the  
4 Inquiry requested a statement from Mr Michael Willing by  
5 a letter dated 22 December 2022. Mr Willing had been the  
6 Commander Homicide from 2011 to 2017, a six-year period  
7 which encompassed virtually the whole duration of Strike  
8 Force Macnamir and also Strike Force Neiwand. He later  
9 rose to the rank of Deputy Commissioner of the NSW Police  
10 Force.

11  
12 In response to the Inquiry's requests, the NSW Police  
13 duly provided statements from the following officers and  
14 staff: (a) as to Strike Force Parrabell and its  
15 methodology, Assistant Commissioner Crandell; (b) as to  
16 bias crime related topics, Ms Shobha Sharma and Sergeant  
17 Ismail Kirgiz; (c) as to Strike Force Neiwand and its  
18 methodology, Detective Sergeant Morgan only, not Detective  
19 Senior Constable Chebl; and (d) as to Strike Force Macnamir  
20 and its methodology, Mr Willing.

21  
22 No suggestion was made by the police that the persons  
23 providing those statements were not in a position to  
24 address all the topics raised or that statements should  
25 also be obtained from other persons. However, in  
26 early December 2022, at the outset of this Public  
27 Hearing 2, just before Assistant Commissioner Crandell was  
28 to give oral evidence, the police advanced submissions to  
29 the effect that several of the topics which Assistant  
30 Commissioner Crandell had been asked to address in his  
31 statement and, indeed, had addressed, including both the  
32 creation of Strike Force Parrabell and its methodology,  
33 were outside the Inquiry's Terms of Reference. In a  
34 judgment delivered on 6 December last year, you rejected  
35 those submissions.

36  
37 As to Sergeant Steer, the police initially assisted  
38 him to complete his statement, but then, subsequently  
39 advised the Inquiry by a letter of 3 November last year  
40 that there was "potential for a conflict" between the  
41 interests of the Commissioner of Police and those of  
42 Sergeant Steer. Accordingly, that statement, in  
43 essentially unchanged terms, was, in fact, later provided  
44 by solicitors separately representing Sergeant Steer rather  
45 than by the NSW Police Force.

46  
47 All of those witnesses - that is, Assistant

1 Commissioner Crandell, Sergeant Steer, Detective Sergeant  
2 Morgan and Mr Willing, along with a number of others, some  
3 12 in all - gave oral evidence in Public Hearing 2 on  
4 a total of 18 days spread over December last year  
5 and February to May this year.  
6

7 Thereafter, at what was taken to be the conclusion of  
8 the evidence in Public Hearing 2, Counsel Assisting served  
9 comprehensive written submissions about that evidence, both  
10 on the police and on others who had been authorised to  
11 appear, including Mr Willing.  
12

13 On 28 June 2023, the police and Mr Willing delivered  
14 their respective written submissions in reply. In those  
15 submissions, each of those parties raised an argument, for  
16 the first time, that you, as Commissioner, could not make  
17 findings at all in relation to some topics because they  
18 were said to fall outside the Inquiry's Terms of Reference.  
19 You ruled on that issue on 18 July this year, rejecting  
20 those contentions.  
21

22 In those same reply submissions of 28 June, the  
23 NSW Police Force and Mr Willing also raised another  
24 contention, also for the first time, which is the one that  
25 has led to today's resumption of Public Hearing 2. That  
26 contention was that the Inquiry should have, but had not,  
27 obtained evidence from a total of more than 50 other  
28 individuals, nearly all of them current or former police  
29 officers or staff, and that the evidence of all those  
30 people was, so it was said, essential for various reasons.  
31 Again, it was asserted that as a consequence various  
32 findings or conclusions could not be made.  
33

34 In some respects, the submissions went so far as to  
35 assert that the absence of evidence or submissions from  
36 such individuals amounted to a failure of procedural  
37 fairness.  
38

39 As I explained a few minutes ago, under the Inquiry's  
40 Practice Guideline 1, if a party granted authorisation to  
41 appear at a public hearing, such as the NSW Police Force or  
42 Mr Willing, wishes a witness to be called, they are to  
43 raise that with Counsel Assisting and provide a statement  
44 from that witness. Neither the police nor Mr Willing did  
45 either of those things in respect of any of the witnesses  
46 whom they have now asserted to be essential. Instead, this  
47 argument was raised for the first time on 28 June 2023, at

1 which point the deadline for the Inquiry was still  
2 30 August 2023.

3  
4 The scale of the argument now advanced by the police  
5 and, to a lesser extent, by Mr Willing, is, on one view,  
6 very large indeed.

7  
8 As to Strike Force Parrabell, it is asserted or  
9 suggested that evidence should have been adduced from all  
10 16 officers who participated to any extent in the strike  
11 force, including but not limited to the three senior  
12 officers, namely, Messrs Middleton, Grace and Bignell.

13  
14 As to bias crime, and in particular the Bias Crime  
15 Unit, it is asserted or suggested that evidence should have  
16 been adduced from one or more witnesses, not named or  
17 otherwise identified in the police submissions, about  
18 matters such as the following: firstly, the objectivity of  
19 Sergeant Steer and the accuracy of his evidence in relation  
20 to the restructuring of the Bias Crimes Unit in 2017 and  
21 his being forced out of the Bias Crimes Unit at that time;  
22 and, secondly, the reasons for the 2017 restructure from  
23 the perspective of "those actually responsible for it".  
24

25 As to Strike Force Macnamir, which was instigated  
26 in February 2013 to look again at the death of Scott  
27 Johnson at North Head in 1988, it is asserted or suggested  
28 that evidence should have been adduced from, firstly, many  
29 of the officers who participated to any extent in the  
30 strike force during the whole of its existence from 2013 to  
31 2017, including but not limited to the senior officers,  
32 namely, DCI Pamela Young and Detective Sergeant Penny  
33 Brown; and, secondly, all officers, total number not  
34 stated, who subsequently participated to any extent in  
35 Strike Force Welsford, being the later strike force which  
36 was set up in 2018 to reinvestigate the death of Scott  
37 Johnson. That followed the finding of Coroner Barnes  
38 in November 2017, at the third Scott Johnson inquest, that  
39 Scott Johnson's death had been a homicide.  
40

41 As to Strike Force Neiwand, it is asserted or  
42 suggested that evidence should have been adduced not only  
43 from Detective Sergeant Morgan, who was the Investigation  
44 Supervisor with overall responsibility for the strike  
45 force, but also from all officers who participated to any  
46 extent in that strike force, including but not limited to,  
47 the officer designated as officer in charge, namely,



1 Detective Senior Constable Chebl.

2  
3 In that particular regard, I reiterate that in its  
4 20 September 2022 letter, one year ago, the request made by  
5 the Inquiry was for a statement from Detective Sergeant  
6 Morgan and/or Detective Senior Constable Chebl.

7  
8 The NSW Police chose only to provide a statement from  
9 Detective Sergeant Morgan, the Investigation Supervisor,  
10 and not to provide a statement from Detective Senior  
11 Constable Chebl, the Officer in Charge, either instead or  
12 as well. The Inquiry accordingly proceeded on the basis  
13 that in the view of the police, Detective Sergeant Morgan  
14 was the appropriate person to give comprehensive evidence  
15 about the work of Strike Force Neiwand.

16  
17 No indication was given, either in correspondence, or  
18 in the statement of Detective Sergeant Morgan itself, that  
19 Detective Sergeant Morgan was in any respect unable to  
20 address the topics listed in the Inquiry's letter of  
21 20 September 2022 or that his recollections or views were  
22 or might be in any way different from those of Detective  
23 Senior Constable Chebl, being the officer whom he had  
24 supervised.

25  
26 In addition to those matters, the submissions on  
27 behalf of the NSW Police Force pointed to large numbers of  
28 other persons, not necessarily, or only, tied to one or  
29 more of the various strike forces I have mentioned. Their  
30 evidence was also said to be essential in relation to  
31 a wide range of topics. Nearly all of the individuals in  
32 respect of whom the NSW Police now submit either that they  
33 should have been called as witnesses or that they should be  
34 given notice of possible findings which may be "adverse to  
35 their interests", are serving or former police officers or  
36 other members of staff of the NSW Police.

37  
38 Given the nature of these contentions advanced by the  
39 police in their submissions of 28 June, the Inquiry assumed  
40 that the police had provided to all such current or former  
41 police personnel the submissions of Counsel Assisting and  
42 had informed them of the views of the police, as found in  
43 their submissions, asserting the need for evidence or  
44 submissions from those individuals. However, contrary to  
45 the Inquiry's assumption in that regard, the police  
46 subsequently informed the Inquiry that with one exception,  
47 namely Mr Middleton, it had not done so.

1  
2 Commissioner, it will be submitted in due course, if  
3 these submissions on behalf of the police and Mr Willing  
4 continue to be pressed as to whether these many individuals  
5 needed to be called, that the submissions are misconceived  
6 at best. Among the reasons why that is so are the terms of  
7 the Inquiry's letter of 20 September last year, the terms  
8 of Practice Guideline 1, and the investigative rather than  
9 adversarial nature of an Inquiry such as this one.

10  
11 However, from a practical perspective, the Inquiry has  
12 taken the view that it would nevertheless take steps itself  
13 with a view to eliminating or at least minimising the need  
14 for such a debate.

15  
16 With that in mind, once the extension of the Inquiry  
17 was granted on 30 August, the Inquiry has sought to  
18 ensure - I am sorry, once the Inquiry was extended or the  
19 announcement thereof was made on 16 August, the Inquiry has  
20 sought to ensure, as far as possible, that any of the  
21 individuals referred to in the submissions of the police,  
22 or Mr Willing, who wished to give evidence or to make  
23 a submission would be given every opportunity to do so.

24  
25 In outline, the steps taken by the Inquiry and the  
26 results of those steps include the following: first, on  
27 10 August, in anticipation of the extension being granted,  
28 the Inquiry wrote to the police.

29  
30 In that letter, the Inquiry requested that the police  
31 provide statements by 1 September, being three weeks later,  
32 from nine of the individuals referred to in the submissions  
33 of the police and also from a witness or witnesses capable  
34 of addressing the bias crime related matters which I have  
35 mentioned. All nine of those individuals - and, as it  
36 turned out, a person later put forward in respect of the  
37 other matter - were current or former police officers.

38  
39 No statements from any of those 10 witnesses were  
40 provided by the due date - namely, 1 September. Of the  
41 nine current or former police officers in question, the  
42 NSW Police have subsequently provided statements from  
43 three, namely, Messrs Middleton, Grace and Bignell, all of  
44 whose evidence relates to Strike Force Parrabell. An  
45 unsigned statement has also been provided by the police  
46 from an officer who addresses part of the bias crime  
47 related subjected matter to which the police submissions

1 also referred.

2  
3 As to the other six current or former police officers  
4 from whom the Inquiry requested that statements be obtained  
5 by the police, the police eventually informed the Inquiry  
6 that it was not in a position to represent any of them  
7 because of the possibility of a "conflict of interest".  
8 The nature of such asserted possible conflict has not been  
9 disclosed.

10  
11 The six current or former officers in question, three  
12 of them having risen to the rank of Detective Chief  
13 Inspector, are: Detective Chief Inspector Stewart Leggat;  
14 Detective Chief Inspector John Lehmann; Detective Chief  
15 Inspector Pamela Young; Detective Sergeant Penelope Brown;  
16 Detective Senior Constable Paul Rullo; and Detective Senior  
17 Constable Michael Chebl.

18  
19 All of those individuals were involved to greater or  
20 lesser extent in either or both of Strike Force Macnamir  
21 and Strike Force Neiwand. Three of those individuals so  
22 far have subsequently provided witness statements to the  
23 Inquiry, assisted by their own lawyers. Two others have  
24 indicated that they intend to do so. One, former Detective  
25 Senior Constable Chebl, has indicated that, for various  
26 reasons, he does not intend to do so.

27  
28 Secondly, although the Inquiry specifically did not  
29 request that the police provide statements from any of the  
30 more than 40 other individuals the subject of the  
31 submissions of the police or Mr Willing, the Inquiry's  
32 10 August letter also notified the police that if it  
33 considered - that is, if the NSW Police Force considered -  
34 that any of those additional individuals should also  
35 provide a statement to the Inquiry in relation to Public  
36 Hearing 2, then NSW Police should also provide such  
37 a statement by 1 September.

38  
39 Again, no statements from any such individuals were  
40 received by the due date, 1 September. As of today's date,  
41 21 September, such statements have now been received by the  
42 Inquiry via the police from five such persons.

43  
44 Third, the Inquiry has itself written to approximately  
45 40 of the individuals identified in the submissions of the  
46 police and Mr Willing, including all nine of those from  
47 whom the Inquiry had initially requested the police to

1 provide statements. In those letters, the Inquiry has  
2 explained the circumstances giving rise to the sending of  
3 such a letter, identified the relevant parts of the  
4 submissions affecting the person in question, and invited  
5 the person to make any statement or submission which they  
6 might wish to make.

7  
8 Of those 40, 37 are present or former police officers  
9 or staff. Of those 37, it appears, based on correspondence  
10 from the police, that the NSW Police Force only represents  
11 nine.

12  
13 As at today, 21 September, of those 40, 16 have not  
14 responded at all; 11 have responded saying they have no  
15 wish to provide either a statement or submissions; 13 have  
16 responded by providing a statement or indicating that they  
17 will provide a statement, nine of those under the auspices  
18 of the police and four provided directly by those  
19 individuals themselves. None has made a submission as yet.  
20 All such statements will be tendered and received in  
21 evidence.

22  
23 Given the circumstances I have outlined, the Inquiry  
24 understands that those statements constitute the whole of  
25 the evidence which those witnesses or the police regard as  
26 necessary to put before the Inquiry.

27  
28 A number of persons have specifically requested that  
29 they not be required at this stage to give oral evidence or  
30 further oral evidence. They include: firstly, Mr Willing;  
31 secondly, former Detective Senior Constable Chebl, the  
32 Officer in Charge of Strike Force Neiwand; and, third,  
33 former Detective Sergeant Bowditch, who was the officer  
34 in charge of the initial investigation into the death of  
35 Ross Warren at Bondi in 1989. I will, in due course,  
36 perhaps on Monday, tender a confidential bundle of material  
37 in relation to those requests.

38  
39 In its letter of 10 August, the Inquiry stipulated  
40 that if the NSW Police considered that any witness for whom  
41 it provided a statement should also be called to give oral  
42 evidence, it should so inform Counsel Assisting. The  
43 police have not done so in respect of any such witness.  
44 The Inquiry, therefore, understands that the NSW Police  
45 does not seek to ask questions of those witnesses from whom  
46 it has provided statements.

47

1 Commissioner, I expect that that is sufficient for the  
2 moment to orient both you and those following this public  
3 hearing as to the reasons for this prolongation of Public  
4 Hearing 2.

5  
6 So far as Strike Force Parrabell is concerned, as  
7 I have said, the police have provided written witness  
8 statements from three officers, Messrs Middleton, Grace and  
9 Bignell. No other person involved in Strike Force  
10 Parrabell has taken up the opportunity to provide  
11 a statement.

12  
13 All three of those statements, as I have said, along  
14 with all other witness statements provided since 10 August,  
15 whether by the police or by any of the individuals in  
16 question, will be tendered and received in evidence.

17  
18 I do not propose to call either Mr Middleton or  
19 Mr Grace to give oral evidence over and above their written  
20 statements. I do propose to ask Mr Bignell about some  
21 aspects of his witness statement and related matters, which  
22 I will do in just a moment.

23  
24 Before I do that, firstly, I need to tender three new  
25 volumes, namely, volumes 17, 18 and 19, to be added to  
26 exhibit 6.

27  
28 **EXHIBIT #6 ADDITION OF VOLUMES 17, 18 AND 19 OF THE TENDER**  
29 **BUNDLE**

30  
31 THE COMMISSIONER: Yes, thank you.

32  
33 MR GRAY: As to those three volumes, I note that a small  
34 number of documents will not be tendered this morning.  
35 They are the following: in volume 17, tabs 389, 390, 392  
36 and 394. They are various emails and text messages sent by  
37 police officers to Pamela Young in April 2015. This  
38 follows an application last night by Ms Young's legal  
39 representatives for the redaction of those officers' names.

40  
41 Secondly, in volume 19, tab 516 is a statement of an  
42 officer, who I will refer to as I446. In this case, this  
43 is pending the determination of a separate application for  
44 non-publication orders over that officer's name.

45  
46 Thirdly, volume 19, tab 519. This is the statement of  
47 Penelope Brown, which was only received by the Inquiry

1 yesterday and thus only served on the parties late  
2 yesterday. The parties will have until midday tomorrow to  
3 consider whether any non-publication orders are necessary.  
4

5 I anticipate that these matters will be resolved over  
6 the next few days, with the documents able to be tendered  
7 when we resume next Monday.  
8

9 I call Cameron Bignell.  
10

11 MR TEDESCHI: Commissioner, before the witness is called,  
12 firstly, in relation to the tender, there is one other  
13 statement - I don't know whether it's included in the lot  
14 that have been tendered - it is from Sergeant Steer. We  
15 only got that at 10 o'clock last night.  
16

17 THE COMMISSIONER: If it is not included, it will be  
18 included, obviously.  
19

20 MR TEDESCHI: I am told it is in the volumes. I have only  
21 had a chance to have a brief look at it this morning.  
22 Perhaps that might be reserved for the moment.  
23

24 THE COMMISSIONER: Sure.  
25

26 MR TEDESCHI: Commissioner, I didn't know that my friend  
27 was going to address you in the way that he has this  
28 morning. I had no notice of it whatsoever. I would wish  
29 to reserve the position of the Commissioner of Police to  
30 respond to the comments when I have had a chance to look at  
31 the transcript of what Mr Gray has said this morning.  
32

33 I note that you are not sitting tomorrow. I'm not  
34 available Monday and Tuesday next week. You are not  
35 sitting on Wednesday. So after today, my next appearance  
36 is not until Thursday. I don't know whether you,  
37 Commissioner, would want to perhaps briefly sit maybe  
38 10 o'clock tomorrow morning or something of that nature -  
39 it is a matter for you - or whether you would like to leave  
40 it until Thursday next week.  
41

42 THE COMMISSIONER: I will leave it until Thursday, thank  
43 you.  
44

45 MR TEDESCHI: Thank you.  
46

47 THE COMMISSIONER: That will give you more time to

1 obviously consider what you want to say and, yes, I will  
2 give you that opportunity. But I think at the moment,  
3 Mr Tedeschi, for a number of reasons I won't explain,  
4 Thursday is probably the earliest I can do that.

5  
6 MR TEDESCHI: Thank you.

7  
8 MR GRAY: Commissioner, there is one matter that I also  
9 need to do before we move on, which is to hand up  
10 a proposed order pursuant to section 8 of the Special  
11 Commission of Inquiry Act as to non-publication and related  
12 matters, about some of the documents and some of the  
13 matters referred to in the documents that have just been  
14 tendered. I understand this is agreed; the terms of this  
15 are agreed, I'm told.

16  
17 THE COMMISSIONER: Is there any other party who needs to  
18 be privy to those? I mean, it may be at the behest of only  
19 the police, I don't know, but is there anybody else who  
20 needs to be privy to that order?

21  
22 MR GRAY: I'm told that all other parties represented  
23 today have seen these. If I'm wrong about that, I will be  
24 told. That's what I'm instructed.

25  
26 THE COMMISSIONER: Can I just invite anyone, if you are  
27 ever in doubt about what is being said about  
28 non-publication orders, just make your position clear and  
29 we will ensure that it's rectified if there is any issue.  
30 All right. Thank you.

31  
32 Yes, very well. I have made those orders, thank you.

33  
34 MR GRAY: May it please you, Commissioner, I call  
35 Mr Bignell.

36  
37 THE COMMISSIONER: All right. Mr Bignell, would you  
38 please come forward, thank you.

39  
40 <CAMERON BIGNELL, sworn: [10.43am]

41  
42 <EXAMINATION-IN-CHIEF BY MR GRAY:

43  
44 MR GRAY: Q. Mr Bignell, your name is Cameron Bignell?

45 A. It is.

46  
47 Q. And you are a Detective Acting Sergeant in the

1 NSW Police?  
2 A. I am, yes.  
3  
4 Q. And you have provided a statement [NPL.9000.0026.0007]  
5 to the Inquiry dated 8 September 2023?  
6 A. Yes.  
7  
8 Q. Are the contents of that statement true and correct?  
9 A. They are.  
10  
11 Q. When were you first asked by anyone to provide your  
12 recollections about Strike Force Parrabell and its  
13 methodology?  
14 A. I think it was in about August.  
15  
16 Q. This year?  
17 A. Yes.  
18  
19 Q. So approximately a month ago?  
20 A. Yes.  
21  
22 Q. Prior to that point in time, August this year, no-one  
23 had ever asked you, in connection with this Inquiry, for  
24 you to set out any recollections or understandings of how  
25 Strike Force Parrabell had undertaken its work?  
26 A. Not specifically to that, no.  
27  
28 Q. What do you mean by that, "not specifically"?  
29 A. I hadn't been asked to talk about how Parrabell was  
30 conducted prior to August.  
31  
32 Q. Are you aware that Assistant Commissioner Crandell  
33 gave a statement to the Inquiry in October last year?  
34 A. I wasn't aware of the date but I'm aware he has given  
35 a statement, yes.  
36  
37 Q. Well, you can accept from me that it was in October  
38 last year, but putting aside the specific date, at the time  
39 he provided that statement, were you aware he was providing  
40 it?  
41 A. No.  
42  
43 Q. No-one asked you - either he himself or anyone on his  
44 behalf - for your recollections about Strike Force  
45 Parrabell?  
46 A. Not at that time, no.  
47



- 1 Q. Were you aware at the time that he gave some oral  
2 evidence in this witness box in December last year?  
3 A. Yes.  
4
- 5 Q. At around about that time, did anyone ask you for your  
6 recollections about anything to do with Strike Force  
7 Parrabell?  
8 A. No.  
9
- 10 Q. In May this year, the Inquiry wrote a letter to police  
11 seeking clarification of various matters to do with Strike  
12 Force Parrabell and the police wrote back in May this year.  
13 At that time, did anyone ask you for your recollections  
14 about Strike Force Parrabell?  
15 A. No.  
16
- 17 Q. Do you have your statement [NPL.9000.0026.0007] with  
18 you?  
19 A. I don't have it with me, no.  
20
- 21 Q. I will just refer to you as Mr Bignell, if you don't  
22 mind, just for the sake of brevity.  
23 A. Yes.  
24
- 25 Q. Is that now available to you?  
26 A. It is, yes.  
27
- 28 Q. At paragraph 24, you tell us that on or around  
29 30 August 2015, you were attached to Parrabell on  
30 a full-time basis. That's correct?  
31 A. Yes.  
32
- 33 Q. For how long were you with Parrabell on a full-time  
34 basis or, indeed, at all? When did you finish, in other  
35 words?  
36 A. Yeah, I completed my duties for Parrabell when  
37 I transferred to the Sex Crimes Squad in April 2016.  
38
- 39 Q. Does that mean --  
40 A. I'm sorry, '17.  
41
- 42 Q. I'm sorry?  
43 A. Seventeen.  
44
- 45 Q. 2017. Does that mean for the entirety of that time,  
46 including the first four months or so of 2017, you were  
47 working full-time on Parrabell?

1 A. No. Towards the end of Parrabell, which was the  
2 beginning of 2017, I wasn't working full-time on Parrabell.  
3  
4 Q. But you were still doing miscellaneous tasks?  
5 A. Yes.  
6  
7 Q. I will come back to some of those later, but apart  
8 from that, if I may call it, run-out period, was the bulk  
9 of your work on Strike Force Parrabell completed by  
10 about November or December 2016?  
11 A. Yes.  
12  
13 Q. You tell us, while we are there on paragraph 24, that  
14 you were not involved in the initial meetings or  
15 consultations that led up to the formation of Parrabell?  
16 A. That's correct.  
17  
18 Q. Now, just on who was involved, you were full-time from  
19 30 August 2015 until, let's say, early 2017; correct?  
20 A. Yes.  
21  
22 Q. Mr Middleton and Mr Grace, although obviously involved  
23 in Parrabell, were not full-time on Parrabell, were they?  
24 A. That is correct, yes.  
25  
26 Q. I will come to this in a little bit more detail later,  
27 but in the broad, for most of the period, is it your  
28 evidence that they participated by coming to monthly  
29 meetings?  
30 A. Their involvement was a little bit more than a monthly  
31 meeting but - yes.  
32  
33 Q. Let's just break it down for both of those. Their  
34 participation consisted of monthly meetings?  
35 A. Yes.  
36  
37 Q. And, secondly, what else?  
38 A. Well, Mr Grace was Investigations Manager at the time.  
39 He was effectively the supervisor of Strike Force Parrabell  
40 above me, so he had more day-to-day dealings with the  
41 investigators and myself.  
42  
43 Q. By "day-to-day dealings" - like what?  
44 A. Conversations, you know, checking in on us to make  
45 sure that we were okay, that we were doing what was  
46 required of us.  
47

1 Q. And Mr Middleton?

2 A. A little less frequently, but also made those similar  
3 inquiries.

4

5 Q. Now, I understand from some of the material that is  
6 before us - I'm not sure if it's in your statement or  
7 not - that initially, apart from yourself, there were two  
8 other investigators, when it started?

9 A. From the onset, yeah, there was only I think myself  
10 and two others.

11

12 Q. And then that number increased over time, and so at  
13 various times there was a total, perhaps not all at the  
14 same time, but a total of 10 or 12 or 13 people who had  
15 spent some time working on Parrabell; is that right?

16 A. That is the case, yes.

17

18 Q. If you are able to tell us, what was the most working  
19 on Parrabell at any one moment, of the investigators?

20 A. I couldn't give you an exact number, but it was  
21 greater than, I'd say, eight.

22

23 Q. Were you all in the one room?

24 A. Yes.

25

26 Q. What were the logistical arrangements?

27 A. Yes, we were all in the one room. Within the  
28 Surry Hills detectives office there was a strike force area  
29 that was allocated to us for the duration of Parrabell.

30

31 Q. Were Mr Middleton or Mr Grace in that room?

32 A. No.

33

34 Q. Were they in the same building?

35 A. Yes.

36

37 Q. Now, in paragraph 28 you say you were never told and  
38 you never got the impression that Parrabell was established  
39 to obtain a particular result or outcome - and I won't read  
40 it all out but you see the rest of that paragraph?

41 A. Yes.

42

43 Q. Were you aware at the time of Parrabell being started  
44 that there had been a considerable amount of media  
45 attention to what was said to have been up to 80 or more  
46 gay hate related deaths?

47 A. I wasn't aware of the media previous to my involvement

- 1 with Parrabell, no.  
2
- 3 Q. Not at all?  
4 A. No.  
5
- 6 Q. You hadn't seen any of the articles of Rick Feneley in  
7 the Sydney Morning Herald?  
8 A. I hadn't personally, no.  
9
- 10 Q. You were unaware of the articles of Paul Sheehan in  
11 the Sydney Morning Herald?  
12 A. Not prior to Parrabell, no.  
13
- 14 Q. Well, not related to 80 or more gay hate murders of an  
15 historical nature - you were unaware of all that publicity?  
16 A. I had not seen any of those articles prior to my  
17 involvement in Strike Force Parrabell.  
18
- 19 Q. Had anyone in the gay community where you might have  
20 mixed ever mentioned them?  
21 A. No.  
22
- 23 Q. I wonder if Mr Bignell could please briefly have the  
24 statement of Mr Grace [NPL.9000.0024.0012]. I just want to  
25 get some dates. All I'm doing at the moment, Mr Bignell,  
26 is just getting some dates straight. This is at tab 508 of  
27 the tender bundle. If we go to Mr Grace's statement at  
28 paragraph 47, first of all, have you seen this statement  
29 before?  
30 A. I have read it, yes.  
31
- 32 Q. No, but before today?  
33 A. Yes.  
34
- 35 Q. How long ago?  
36 A. Last week.  
37
- 38 Q. Did you read it after it had been finished or while it  
39 was being prepared?  
40 A. After it had been finished.  
41
- 42 Q. At paragraph 47, Mr Grace says he, Mr Grace, prepared  
43 the investigation plan in around May 2015. Do you see  
44 that?  
45 A. Okay, yes.  
46
- 47 Q. Is that right as far as you are aware?

- 1 A. I can't comment on that.  
2
- 3 Q. Are you aware that it was he who prepared it?  
4 A. Yes.  
5
- 6 Q. And if he says he prepared it in May 2015, you are not  
7 in any position to disagree?  
8 A. No.  
9
- 10 Q. You had no input into it?  
11 A. No.  
12
- 13 Q. Then at paragraph 48, in relation to the induction  
14 package, he says that he also drafted that one - is that  
15 your understanding?  
16 A. Yes.  
17
- 18 Q. And he says that he drafted that one in April 2016?  
19 A. Yes.  
20
- 21 Q. Do you agree with that?  
22 A. Yes.  
23
- 24 Q. Just, by the way, at the end of paragraph 47, where  
25 he's talking about the investigation plan, he says that his  
26 experience has been that investigation plans are not  
27 normally updated throughout an investigation. Do you see  
28 that?  
29 A. Yes.  
30
- 31 Q. And would you agree that, indeed, that was the case  
32 here, with Parrabell - the investigation plan was not  
33 updated?  
34 A. Yes, that's the case.  
35
- 36 Q. And on the induction package, the same applies - it  
37 was never changed either, was it?  
38 A. Not to my knowledge, no.  
39
- 40 Q. And then, thirdly, the coordinating instructions,  
41 going to paragraph 49 of Mr Grace, he says that they were  
42 drafted in around October 2016. Do you agree with that?  
43 A. If that's his recollection, then I've got no reason to  
44 disagree with that.  
45
- 46 Q. And in the last sentence of the paragraph, he says  
47 they were ultimately drafted by him, Mr Grace?

- 1 A. Yes.
- 2
- 3 Q. Do you agree with that?
- 4 A. I do.
- 5
- 6 Q. According to him in paragraph 49, at least it seems to
- 7 read as though "we" being himself, Mr Middleton and you,
- 8 considered that a coordinating instructions document would
- 9 be helpful, and that the instructions were formulated over
- 10 a series of meetings. Now, did you have any part in
- 11 talking about or drafting the coordinating instructions?
- 12 A. I didn't, no.
- 13
- 14 Q. Now, still on some dates, if that folder could come
- 15 back - I'm sorry, Mr Bignell, I've got to put a few folders
- 16 in front of you now and again. If we could have volume 3,
- 17 please, and go to tab 64 [SCOI.74246\_0001], you'll see that
- 18 on the front page there's an email from you to Mr Middleton
- 19 and Mr Grace of 29 June 2017?
- 20 A. Yes.
- 21
- 22 Q. You pass on some information from Sergeant Steer about
- 23 bias crime classifications and you tell Mr Middleton and
- 24 Mr Grace that you are going to use four of the five
- 25 classifications that Sergeant Steer had talked about?
- 26 A. Yes.
- 27
- 28 Q. Do you agree that - and I can come to other documents
- 29 about this - indeed, at about that time, on or after
- 30 29 June 2016, the form of the bias crime - I will start
- 31 again, the BCIF, the Bias Crime Indicators Form, was
- 32 altered to reflect what appears in that email?
- 33 A. Yes, that is the case.
- 34
- 35 Q. And I think your evidence is - tell me if I'm wrong -
- 36 that your understanding is that the Bias Crime Indicators
- 37 Form, BCIF, was in one form from the beginning up to that
- 38 point, and then it changed to a second form reflecting
- 39 this?
- 40 A. That is the first time that the form changed, yes.
- 41
- 42 Q. That's the first time that the form changed -- -
- 43 A. Yes.
- 44
- 45 Q. -- and it later changed a second time at a later time
- 46 that I will come to?
- 47 A. The third time?

- 1  
2 Q. To a third different form?  
3 A. Yes, that is the case.  
4  
5 Q. Also in volume 3 at tab 68 [SCOI.74312\_0001], if you  
6 could turn to tab 68, halfway down the page, there is an  
7 email from you to Mr Middleton about an update of where the  
8 team was up to?  
9 A. Yes.  
10  
11 Q. As at 7 September 2016?  
12 A. Yes.  
13  
14 Q. And then at the top of the page, there is an email  
15 from Mr Middleton to Mr Crandell and another person, which  
16 includes this statement:  
17  
18 *As discussed majority of team will be*  
19 *returning to their LACS as of the*  
20 *10/9/2016.*  
21  
22 Do you see that?  
23 A. I do, yes.  
24  
25 Q. Does that accord with your recollection that that's  
26 what happened?  
27 A. It does, yes.  
28  
29 Q. So most of the investigators were gone from  
30 10 September 2016?  
31 A. Yes.  
32  
33 Q. And this email goes on to say that three indeed had  
34 already gone, for various reasons, and that two would be  
35 staying for an additional six weeks from 10 September. Do  
36 you see that?  
37 A. I do, yes.  
38  
39 Q. And Mr Middleton says there:  
40  
41 *This should see the end of the documentary*  
42 *review process.*  
43  
44 A. Yes.  
45  
46 Q. Does that all correspond with your own recollection  
47 that that's what was happening at that time?

- 1 A. It does, yes.  
2
- 3 Q. So six weeks from 10 September is about 21 October,  
4 give or take?  
5 A. Yes.  
6
- 7 Q. So should we understand, then, that all of the  
8 investigators other than you were gone by about 21 October?  
9 A. I can't give you the exact date, but yeah, it sounds  
10 about right.  
11
- 12 Q. Something like that?  
13 A. Yes.  
14
- 15 Q. So if Mr Grace created the coordinating instructions  
16 in October 2016, as he says, then by the time he did that,  
17 either all the investigators were already gone or all but  
18 two were already gone; would you agree?  
19 A. I do, yeah, there may be an error in the year of when  
20 those coordinating instructions may have been prepared by  
21 Mr Grace.  
22
- 23 Q. What might that error be, do you think?  
24 A. Well, seeing those dates, it's my recollection that  
25 that occurred around the end of 2016, that the  
26 investigators returned to their respective PACs or PDs, and  
27 the formation of those documents wouldn't have been  
28 necessary post the return of those --  
29
- 30 Q. Well, we will come to whether it might have been  
31 necessary or not, but at any rate, Mr Grace's evidence is  
32 that he drafted it in October 2016. I've just taken you to  
33 that?  
34 A. Yes, yes.  
35
- 36 Q. And if that's right, then at the time he did that,  
37 either all the investigators were gone or all but two were  
38 gone?  
39 A. Correct, yes.  
40
- 41 Q. Now, in January 2017, if you turn to tab 83 in that  
42 folder [SC0I.74429\_0001], on 19 January there was a meeting  
43 at which various people were present, including you and  
44 including Mr Crandell?  
45 A. Yes.  
46
- 47 Q. And I think you tell us in your statement somewhere



1 that you've read these minutes, you don't actually recall  
2 the meeting?  
3 A. That is correct, yes.  
4  
5 Q. But you accept or you don't dispute the minutes?  
6 A. I don't, no.  
7  
8 Q. It seems, we can see on the third page that, in the  
9 third sort of bullet point, there's a note that Mr Crandell  
10 suggested a change to the wording of the BCIF. Do you see  
11 that?  
12 A. I do, yes.  
13  
14 Q. Or two changes, really, instead of "Not Bias Crime",  
15 it would be "No Evidence of a Bias Crime", and instead of  
16 "Bias Crime", it would be "Evidence of a Bias Crime".  
17 A. Yes.  
18  
19 Q. That, I think you agree, led to the second change to  
20 the form resulting in the third version of the form?  
21 A. Yes, that's the case.  
22  
23 Q. Now, if that was happening, as it evidently was,  
24 in January 2017 when all the investigators were well and  
25 truly gone, what was the effect, in your understanding, of  
26 that change?  
27 A. It had no effect on any of the investigators, they'd  
28 already left.  
29  
30 Q. Clearly not. What about on you, for example?  
31 A. It had minimal effect.  
32  
33 Q. Well, what was the nature of the effect, minimal or  
34 otherwise, if any?  
35 A. It was just a better way of recording that bias crime  
36 indicator for each of the cases that had been reviewed.  
37  
38 Q. Better why?  
39 A. I think it was more fair.  
40  
41 Q. Because?  
42 A. Well, we're saying that there was no evidence or there  
43 was evidence of. In the review, there were cases where  
44 there was a lot of material to review, others not so much,  
45 and so in cases where there was no available evidence for  
46 us to review, it would be unfair to say that there was  
47 evidence or there wasn't evidence if we didn't have

1 anything to review.  
2  
3 Q. I see. That's your understanding of the essential  
4 rationale for that change?  
5 A. Yes.  
6  
7 Q. I will come to this in a moment, but by that  
8 point, January 2017, in fact, some time before that, all  
9 the BCIFs had in fact been well and truly filled in and  
10 completed by yourself; is that right?  
11 A. That's the case, yes.  
12  
13 Q. And so is all that happened after January 2017, in  
14 that respect, that the form of the question, if you like,  
15 was changed, but the form of the answers didn't change?  
16 A. From my understanding, no, none of the categories  
17 changed.  
18  
19 Q. Well, none of the --  
20 A. Sorry, none of the classifications that had been made  
21 on each case changed.  
22  
23 Q. No, and none of the text that was populating the space  
24 for responses as to whether there was no evidence or the  
25 like - none of that text changed?  
26 A. Not to my knowledge, no.  
27  
28 Q. You were in charge, I presume, of such matters?  
29 A. Yes. So I'm not aware - I didn't change anything  
30 myself.  
31  
32 Q. Okay. Now, back to your statement, if we could,  
33 please [NPL.9000.0026.0007]. You tell us in paragraph 2  
34 that you're 34 years of age?  
35 A. Yes.  
36  
37 Q. And so as at August 2015, when you started working on  
38 Parrabell, you were 26 years of age?  
39 A. I was, yes.  
40  
41 Q. In paragraph 11 you tell us that you became a sworn  
42 officer in May 2009?  
43 A. I did, yes.  
44  
45 Q. When you were 20?  
46 A. Yes.  
47

1 Q. In paragraph 20 subparagraph (b) you tell us that you  
2 completed a police investigator course in 2012?

3 A. I did, yes.  
4

5 Q. When you were about 22 or 23?

6 A. Sounds about right, yes.  
7

8 Q. And then in paragraph 23 - in fact, before I go to  
9 paragraph 23, in paragraph 18, you refer to your  
10 involvement in the LGBTIQ community, including in terms of  
11 your professional role, the fact that you are a Gay and  
12 Lesbian Liaison Officer. You talk about that in  
13 paragraph --

14 A. I do, yes.  
15

16 Q. You tell us in paragraph 20 that you completed the Gay  
17 and Lesbian Liaison Officer course in 2011?

18 A. Yes.  
19

20 Q. Now, apart from doing that course, the Gay and Lesbian  
21 Liaison Officer course, did you have any background or  
22 training in bias crime?

23 A. No, I did not.  
24

25 Q. Did anybody else among the investigators?

26 A. No.  
27

28 Q. Did Mr Middleton or Mr Grace?

29 A. I don't believe so.  
30

31 Q. Did anyone discuss with you whether it might have been  
32 good to have someone who did?

33 A. I didn't have those discussions, no.  
34

35 Q. Did it occur to you that it might have been good to  
36 have someone who did?

37 A. I didn't think so, no.  
38

39 Q. Why not?

40 A. Because what we were tasked to do in respect to  
41 reviewing the case file items and completing those  
42 indicator forms, I don't think that that experience or  
43 training was necessarily relevant to conduct that task.  
44

45 Q. Wasn't the overall objective - and I'll come to it in  
46 a bit more detail - to look at historic documentary  
47 holdings and form a view as to whether those holdings

1 indicated the possibility of a bias factor?

2 A. Yes.

3

4 Q. You don't think that someone with experience in bias  
5 crime might have had some particular expertise in that  
6 respect?

7 A. It may have but I don't think it affected the way that  
8 we did Strike Force Parrabell.

9

10 Q. Well, it meant that every single person who was  
11 looking at this was someone who did not have any particular  
12 expertise in bias crime; is that right?

13 A. Effectively, yes.

14

15 THE COMMISSIONER: Q. And you thought that was an  
16 advantage, did you?

17 A. I did not.

18

19 MR GRAY: Q. Now, in paragraph 23, you were talking  
20 about why you might have been asked to be involved. In  
21 23(c) you describe your position as being one of the more  
22 senior investigators of the detectives at Surry Hills at  
23 the time?

24 A. Yes.

25

26 Q. You were aged 26; correct?

27 A. I was, yes.

28

29 Q. And you had been an attested officer for six years?

30 A. Yes.

31

32 Q. And you had done an investigator course three years  
33 earlier, in 2012?

34 A. I was also designated by that point.

35

36 Q. Sorry?

37 A. I'd also attained my designation by that point.

38

39 Q. What does that mean?

40 A. As a detective.

41

42 Q. True. And you did that - when was that? Just remind  
43 me.

44 A. I received my designation in December 2013.

45

46 Q. So as a 26-year-old with a total of six years'  
47 experience, having done about three years since achieving

1 the status of investigator, you were one of the more senior  
2 investigators there?  
3 A. I was, yes.  
4  
5 Q. How junior were the rest of them?  
6 A. Based on years of service, time in a full-time  
7 investigative capacity --  
8  
9 Q. Did they have less than six years' experience?  
10 A. In terms of - are you asking within the Surry Hills  
11 detectives office or Strike Force Parrabell, sorry?  
12  
13 Q. You said you were one of the more senior investigators  
14 of the 15 detectives at the Surry Hills PAC?  
15 A. Yes.  
16  
17 Q. Well, of the other 14, did they all have less  
18 experience than you?  
19 A. Not out of all of them, but there was - as I say,  
20 I was one of the more senior investigators.  
21  
22 Q. Just help us with what that means.  
23 A. I'm not saying I'm the most senior investigator in the  
24 entire Surry Hills detectives office.  
25  
26 Q. No, but when you say you're one of the more senior --  
27 A. Yes.  
28  
29 Q. -- or were one of the more senior, just break that  
30 down for us.  
31 A. Yes. In terms of my service history, the time when  
32 I attained my designation and my experience within that  
33 particular office.  
34  
35 Q. So most of the others had less of all of those factors  
36 than you did?  
37 A. Yes.  
38  
39 Q. How many of the investigators on Strike Force  
40 Parrabell were from the Surry Hills PAC?  
41 A. Throughout Parrabell, in its entirety, there were  
42 times when there were one or two that assisted with Strike  
43 Force Parrabell, but the staffing of Parrabell was taken  
44 from areas outside of Surry Hills.  
45  
46 Q. Oh, so only one or two from Surry Hills, throughout  
47 or --

- 1 A. At any given time, yes.  
2
- 3 Q. I see. Thank you. Can I just turn to the actual  
4 process now, in terms of what you and your fellow  
5 investigators actually did. Now, you deal with this at  
6 paragraphs 48 and following of your statement  
7 [NPL.9000.0026.0007]. I will come back to the slightly  
8 separate topic of the constituent documents, but for the  
9 moment, I'm just looking mainly at what actually happened  
10 on the ground.  
11 A. Yes.  
12
- 13 Q. You tell us in 48 that there were three primary  
14 stages - first, the triage; second, the completion of the  
15 BCIF; and, thirdly, the assessment; correct?  
16 A. Yes.  
17
- 18 Q. Now, as to the triage stage, you tell us, and I'm  
19 looking mainly at paragraphs 51 to 55 and so on, that one  
20 of the first things that needed to be done was to obtain  
21 the documents for the respective cases?  
22 A. That is the case, yes.  
23
- 24 Q. Because, of course, this Parrabell exercise was an  
25 entirely paper-based review, wasn't it?  
26 A. It was, yes.  
27
- 28 Q. And so you needed to - is this right - obtain, as far  
29 as you could, all documentary records available about  
30 a particular case?  
31 A. That was our intentions, yes.  
32
- 33 Q. Now, you say the ways you went about this - I'm  
34 looking in paragraph 51 at the moment - were to first  
35 conduct a search of two computer systems, namely, e@gle.i  
36 and COPS?  
37 A. Yes.  
38
- 39 Q. And then, thirdly, to send a request to archives;  
40 correct?  
41 A. Yes.  
42
- 43 Q. Just for clarity, when you say "archives", who are we  
44 talking about?  
45 A. The NSW Police archive section at that time.  
46
- 47 Q. Of the government?

- 1 A. I believe my memory was, at that particular time, we  
2 were transitioning to the State repository, so we still had  
3 a section within the NSW Police that managed our archives.  
4
- 5 Q. So you are talking about, at that point, archives  
6 within the NSW Police?  
7 A. Yes.  
8
- 9 Q. Now, you say in the last sentence of that paragraph,  
10 that because e@gle.i and COPS postdated the relevant  
11 deaths, there was often only limited material on those  
12 computerised systems?  
13 A. Yes.  
14
- 15 Q. And the period you were looking at was 1976 to 2000,  
16 I think?  
17 A. Yes, I believe so.  
18
- 19 Q. And did both e@gle.i and COPS postdate 2000?  
20 A. I can't give you the exact dates. I wasn't obviously  
21 in the Police Force around that time, but from my  
22 recollection, yes.  
23
- 24 Q. So you say generally the information was collated from  
25 the hard copy archive material - that is, from one source,  
26 namely, the police hard copy archives?  
27 A. Yes.  
28
- 29 Q. In paragraph 52 you talk about steps you took with the  
30 archives team. In paragraph 53 you add that if nothing  
31 came from archives, you would try the Coroners Court and  
32 you would try another computer system called TRIM?  
33 A. Yes.  
34
- 35 Q. If you can recall, over the life of Parrabell, did the  
36 Coroners Court or TRIM generate much of the material that  
37 you finished up dealing with?  
38 A. The Coroners Court, I believe, was able to provide  
39 some information. TRIM wasn't very successful, no.  
40
- 41 Q. In 54 you say that if the archives had extensive  
42 material, that suggested to you that the area commands must  
43 have successfully filed relevant material and therefore the  
44 archives possessed the full extent of the material. Do you  
45 see that?  
46 A. I do, yes.  
47

1 Q. Why do you think that follows?

2 A. It was my understanding that if we were able to access  
3 a brief of evidence in respect to if someone had been  
4 charged or, you know, a large volume of case file items  
5 pertaining to a particular investigation, that generally  
6 speaking, that would be the entirety of the files  
7 associated with that particular case.

8

9 Q. You say that was your understanding. But based on  
10 what?

11 A. It was, as I said, my understanding that, you know,  
12 within my role within the police, that if we were to file  
13 something, we would file everything, we wouldn't file in  
14 dribs and drabs.

15

16 Q. Well, that was what should happen?

17 A. It is, yes.

18

19 Q. But what made you think that in all these historical  
20 cases dating back to 1976 it had happened?

21 A. I suppose I, you know, was hopeful that that was all  
22 the material that was available to us.

23

24 Q. Does it follow from what I'm reading in paragraph 54  
25 in particular, and from generally the other paragraphs in  
26 this area, that if archives turned out to have a decent  
27 amount of material, you looked no further and assumed that  
28 was all there was?

29 A. I can't recall if we made any other inquiries as  
30 process or due course. Obviously I know that every  
31 particular case, it was requested that archives do  
32 searches. Outside of that, I'm not a hundred per cent sure  
33 if other investigators conducted inquiries for every single  
34 case that they were reviewing out of process.

35

36 Q. Well, if they did, they did it off their own bat,  
37 admirable though that may be, but not according to any  
38 system that you were organising?

39 A. Well, we had had, obviously, cause to contact, say,  
40 the Coroners Court, access the TRIM system, what have you,  
41 so they were aware that there were other avenues that we  
42 could look at to acquire all of our case file items.

43

44 Q. Well, apart from the archives, e@gle.i, COPS, TRIM and  
45 the Coroners Court, were you aware of any other  
46 possibilities as to where documents might be located?

47 A. They were the areas that we were relying on to



1 retrieve those archives.  
2  
3 Q. Yes. Were you aware of any others?  
4 A. There may be. I'm not aware personally.  
5  
6 Q. I wonder if we could have in volume 19 tab 522  
7 [NPL.0100.0018.0001]. You may or may not have seen this,  
8 Mr Bignell, so I will ask you that first. It is  
9 a document, you can see, dating from August 2016. You can  
10 see on the last page, it's prepared by Detective Chief  
11 Inspector Lehmann on 5 August 2016 - on the last page.  
12 A. I'm on the last page, the signature of Mr Willing, is  
13 that --  
14  
15 Q. Yes, but above that, there is a heading  
16 "Recommendation", "Forwarded for information and action",  
17 and then there is a signature of John Lehmann.  
18 A. Sorry, what page within that document? I think it  
19 might be out of order in this folder.  
20  
21 Q. Is it? It would be page 5.  
22  
23 THE COMMISSIONER: Perhaps he could be assisted.  
24  
25 THE WITNESS: I think that page shouldn't be the first  
26 page. Yes, I have that now.  
27  
28 MR GRAY: Q. You see that Mr Lehmann prepared this  
29 document on 5 August 2016?  
30 A. I do, yes.  
31  
32 Q. He was a Detective Chief Inspector in the Unsolved  
33 Homicide Team, and this, of course, is in the middle of  
34 your work on Strike Force Parrabell?  
35 A. It is.  
36  
37 Q. Just a year after it started, and six months or so  
38 before it finished?  
39 A. Yes, that date would coincide with that.  
40  
41 Q. You can see that the heading - well, not the heading,  
42 but the issue at the top of the first page, is described as  
43 "Proposal for a project plan concerning locating,  
44 identification and reconciliation of exhibits relating to  
45 unsolved homicide cases"?  
46 A. I see that, yes.  
47

1 Q. Take a moment to look at it, if you need to --

2 A. Yes, I've read the document --

3

4 Q. -- but, first of all, have you ever seen this before?

5 A. I have never seen this before.

6

7 THE COMMISSIONER: Q. And no-one had ever drawn it to  
8 your attention?

9 A. No.

10

11 THE COMMISSIONER: Thank you.

12

13 MR GRAY: Q. Have a look at page 2 under the heading  
14 "Problem - 4". Do you see Mr Lehmann says there:

15

16 *At the conclusion of original*  
17 *investigations that remain unsolved, the*  
18 *UHT experience has found that many briefs*  
19 *of evidence, case file documents and*  
20 *physical evidence exhibits were not*  
21 *archived and stored in the proper manner.*

22

23 Was that something of which you had any awareness?

24 A. Sorry, what do you mean by that?

25

26 Q. Did you have any awareness that many briefs of  
27 evidence, case file documents and physical evidence  
28 exhibits were not archived and stored in the proper manner?

29 A. Well, I couldn't comment. That's been my experience,  
30 I hadn't had a cause to, I suppose, go to historical  
31 matters.

32

33 THE COMMISSIONER: Q. Does it follow that you were  
34 unaware of this fact?

35 A. Yes.

36

37 THE COMMISSIONER: Thank you.

38

39 MR GRAY: Q. Now, Mr Lehmann goes on - I won't read it  
40 all - to say in the next sentence, among other things:

41

42 *... case file boxes including exhibits --*

43

44 he is talking about sometimes not all the time --

45

46 *were not even recorded and archived, but*  
47 *left on shelves at various locations in*

1           *police premises or in some cases, left in*  
2           *non police premises with no records to*  
3           *indicate their movement or whereabouts.*

4

5           I take it you had no awareness of any such problem?

6           A.    No.

7

8           Q.    He says:

9

10           *In 2015 the NSWPF Records Repository at*  
11           *Stanmore closed...*

12

13           And I think that was something you referred to a minute  
14           ago --

15           A.    Yes.

16

17           Q.    -- that you were aware of that?

18           A.    Yes.

19

20           Q.    He says that:

21

22           *... with the contents transferred to the*  
23           *State archives Depot at Kingswood or the*  
24           *Records Section at [police headquarters in]*  
25           *Parramatta.*

26

27           Did you know that records had gone to those two separate  
28           places, Kingswood and Parramatta?

29           A.    I didn't know the location but I knew they were being  
30           transferred out of the NSW Police record-holding facility.

31

32           Q.    One was the State archives depot and one was the  
33           records section. Mr Lehmann says that during that move,  
34           numerous exhibits were located amongst case file boxes  
35           having been improperly stored. I won't read the rest of  
36           it. Are you telling us that you had no awareness that  
37           these sorts of problems existed as at August 2016?

38           A.    We weren't relying on exhibits for our review.

39

40           Q.    I take that point. But part of what he is talking  
41           about concerns briefs of evidence and case file documents,  
42           doesn't it?

43           A.    Yes.

44

45           Q.    And you weren't aware of any of these sorts of  
46           problems?

47           A.    Not personally, I hadn't encountered those problems.

1 Obviously I was aware that there had been some  
2 short-fallings with respect to NSW Police filing material.  
3 But I personally, prior to my involvement in Parrabell,  
4 hadn't had cause to access historical records.

5  
6 Q. Prior to Parrabell?

7 A. Yes.

8  
9 Q. But once you did start work on Parrabell and you were  
10 accessing historical records, did you have any awareness  
11 that these sorts of problems existed?

12 A. I suppose I was able to, you know, come to that  
13 conclusion, given that some of the requests weren't  
14 gleaning any records. So there was obviously some kind of  
15 issue with why they weren't available to us.

16  
17 Q. Some of the requests to archives were met with the  
18 response that there were no records?

19 A. Yes.

20  
21 Q. How many, out of the 80-odd cases?

22 A. I can't recall a number.

23  
24 Q. Five, 10, 20?

25 A. I can't recall the number.

26  
27 Q. One?

28 A. There was more than one.

29  
30 Q. Ten?

31 A. I can't recall the exact number.

32  
33 Q. What did you do when archives said, "We don't have  
34 anything"?

35 A. That's when we would obviously look at the Coroners  
36 Court or access the TRIM records to see if any of those  
37 case file records were still stored within the local PD.

38  
39 Q. Sorry, you were speaking a little bit quickly. You  
40 would go to Coroners Court and TRIM, and where else did you  
41 say?

42 A. The TRIM system, sorry, I don't know what TRIM stands  
43 for, but that is a local record management system, so we  
44 could look at TRIM to see if a particular station had any  
45 records relating to a case that hadn't been transferred to  
46 the records section.

47

- 1 Q. You would approach the particular police station?  
2 A. No. So our admin officers at Surry Hills had access  
3 to that system that, I believe, is a state-wide system  
4 within the NSW Police.  
5
- 6 Q. So you would access whatever was on TRIM?  
7 A. Yes.  
8
- 9 Q. That might have come from a police station?  
10 A. Yes.  
11
- 12 Q. But you didn't go to any of the police stations  
13 themselves?  
14 A. No.  
15
- 16 Q. Either physically or by post or email or any other  
17 means?  
18 A. No.  
19
- 20 Q. In the next tab, 523, in volume 19 [SCOI.85738\_0001],  
21 there is a letter from NSW Police, Office of General  
22 Counsel, to this Special Commission dated 21 June this  
23 year. Do you see that?  
24 A. I do, yes.  
25
- 26 Q. Now, this is a letter in which the Office of General  
27 Counsel outlined the steps that are being taken by police  
28 in this Inquiry in 2022/2023, to try and find documents.  
29 So it's methods that are being adopted, as it were, now,  
30 just to orient you in time.  
31
- 32 You'll see towards the bottom of that page, the Office  
33 of General Counsel say that the people that they refer to  
34 as "our instructors", meaning relevant police officers,  
35 have, "as a matter of regularity, caused the following  
36 searches to be performed in relation to summonses"; do you  
37 see that?  
38 A. Still on the first page, sorry?  
39
- 40 Q. Yes, about six lines from the bottom, see the sentence  
41 beginning, "In providing those instructions"?  
42 A. Oh, yes, I do.  
43
- 44 Q. If you just read what the police say there. They have  
45 "caused the following searches to be performed". Are you  
46 in that space now?  
47 A. Yes, I am.

- 1  
2 Q. Now, first of all, they say that they review computer  
3 systems, and they list six in the item (a). Do you see  
4 that?  
5 A. I do.  
6  
7 Q. E@gle.i, EFIMS, security and shared drives, State  
8 Crime Command databases, COPS and the Record Management  
9 System; do you see that?  
10 A. I do, yes.  
11  
12 Q. In your case, you looked at e@gle.i and you looked at  
13 COPS. Did you look at or attempt to find documents in  
14 EFIMS?  
15 A. EFIMS, no.  
16  
17 Q. Secure and shared drives?  
18 A. I didn't have access to those.  
19  
20 Q. State Crime Command databases?  
21 A. I also didn't have access to that.  
22  
23 Q. The Record Management System?  
24 A. That's TRIM.  
25  
26 Q. That's TRIM?  
27 A. It's now called RMS - Record Management System.  
28  
29 Q. Secondly, under (b), we're told that as of now, the  
30 police also search police area commands, or they instruct  
31 police area commands to search their holdings, but you  
32 didn't do that?  
33 A. No.  
34  
35 Q. (c), they undertake searches with Forensic Evidence &  
36 Technical Services, known as FE&TS. Did you do that?  
37 A. No.  
38  
39 Q. I won't ask you about (d), which is concerned with  
40 exhibits. But (e), did you contact current or former  
41 police officers to try to find documents?  
42 A. There was cause to contact a couple of officers,  
43 I can't recall their names off the top of my head, to get  
44 access to e@gle.i systems where there was case file items  
45 contained within them.  
46  
47 Q. Other than that, did you either habitually or ever

1 contact the relevant police officer who was involved in the  
2 investigation of a case to see if that officer could point  
3 you in the direction of documents and where they might be?  
4 A. No.

5  
6 Q. Then (f), requests for archives, and you told us you  
7 did do that?

8 A. Yes.

9  
10 Q. Department of Health, (g), did you approach them?

11 A. No.

12  
13 Q. On reflection, given what you've said in paragraph 54  
14 in particular --

15 A. Sorry, is my statement within this folder?

16  
17 Q. Oh, no, we need the statement again now, sorry.  
18 [NPL.9000.0026.0007], and just taking you back to  
19 paragraph 54 of your statement --

20 A. Sorry, 54, was it?

21

22 Q. Fifty-four.

23 A. Yes.

24

25 Q. You're there saying that, as I understand you, if  
26 archives seemed to have a lot of material, you assumed that  
27 that's probably all there was?

28 A. I did, yes.

29

30 Q. On reflection, in the light of what I have taken you  
31 to just now in Mr Lehmann's document, and in the Office of  
32 General Counsel letter, do you think that it may be that  
33 you may not have obtained all documents in a particular  
34 case?

35 A. It could have been the case.

36

37 Q. Now, let's go to paragraph 56.

38

39 MR GRAY: I see the time, Commissioner.

40

41 THE COMMISSIONER: Yes, I will take a short break.

42

43 **SHORT ADJOURNMENT**

44

45 THE COMMISSIONER: I'm about to say something which might  
46 anticipate what you are about to say. Why don't you let me  
47 say what I'm saying first, then you can say what you want

1 to say.

2

3 MR HUTCHINGS: Please.

4

5 THE COMMISSIONER: First of all, thank you to every one of  
6 the counsel who announced their appearance this morning.  
7 I don't expect you to remain in the hearing room, except  
8 when you think it is necessary to do so, and you can take  
9 it from me that you remain or go according to your own  
10 other commitments.

11

12 The proceedings will, unless you are told otherwise,  
13 be live streamed, so you can watch them at your  
14 convenience. There will also be a transcript available at  
15 the end of each day, usually fairly promptly. If there are  
16 matters that you need to attend to that you want to attend  
17 to in correspondence, I am happy for your solicitors or for  
18 you to do it that way.

19

20 The only thing I would ask, because it is a rather  
21 cosy environment here, is that if you are going to come  
22 back or you want to be here for some particular purpose or  
23 for a period, just let us know so that we can make sure  
24 that you have accommodation at a table or wherever.

25

26 Now, I will expect you here obviously when the  
27 relevant persons for whom you appear are here, but if you  
28 think there is some other issue that might affect their  
29 interests, just let us know that you want to come or you  
30 want to say something and we will facilitate that. But by  
31 all means, take it from me - don't leave just because  
32 I have said it - if you wish to be excused now any of you,  
33 or each of you, by all means do so. If I have anticipated  
34 or not, then please raise what you had in mind.

35

36 MR HUTCHINGS: Commissioner, you have anticipated  
37 absolutely what I was going to raise.

38

39 THE COMMISSIONER: Thank you. If your standing means that  
40 you are going to go somewhere else, then you, and anybody  
41 else for that matter, can be excused for the moment.

42

43 MR HUTCHINGS: Thank you, sir.

44

45 THE COMMISSIONER: Thank you.

46

47 MR GLISSAN: I will take up that invitation as well,



1 Commissioner.  
2  
3 THE COMMISSIONER: I won't take it the wrong way,  
4 Mr Glissan.  
5  
6 MR GLISSAN: Indeed not.  
7  
8 THE COMMISSIONER: Yes, Mr Gray.  
9  
10 MR GRAY: Q. Mr Bignell, do you have your statement  
11 [NPL.9000.0026.0007] there?  
12 A. I do, yes.  
13  
14 Q. So can we just turn to 55, just to clear this point  
15 away. With the two exceptions that you mention, to  
16 particular cases, for all other cases in the 80-plus, there  
17 was one investigator per case?  
18 A. Generally speaking, yes.  
19  
20 Q. Now, in paragraph 56, I just want to make sure I'm  
21 following what you are saying there. In any given case,  
22 the investigator for that case would review all the  
23 documents obtained?  
24 A. Yes.  
25  
26 Q. And then you say he or she would extract anything that  
27 could be relevant to a determination of whether the  
28 incident featured anti-LGBTIQ bias.  
29 A. Yes.  
30  
31 Q. Now, when you say "extract", do you mean cut and paste  
32 into a Word document or what do you mean?  
33 A. No. So what would happen, if a product was uncovered  
34 during their review, whether it be a statement or a record  
35 of interview, they would make a copy of that original  
36 document and then upload that on to the e@gle.i system.  
37  
38 Q. So physically extract?  
39 A. Yes.  
40  
41 Q. From the box, whatever it was?  
42 A. Yes.  
43  
44 Q. Make a copy?  
45 A. Yes.  
46  
47 Q. Upload that on to e@gle.i?

- 1 A. Yes.  
2  
3 Q. And then put the actual document back in the box?  
4 A. That is correct, yes.  
5  
6 Q. About five lines in, you say:  
7  
8 *When uploading the materials to e@gle.i,*  
9 *investigators were required to enter an*  
10 *overview of the document. ... [they] would*  
11 *note what they believed were key sections*  
12 *of the document that I should direct my*  
13 *attention to during my review.*  
14  
15 Do you see that?  
16 A. I do, yes.  
17  
18 Q. Does that mean this, that investigator A looking at  
19 case B has got 15 boxes, let's say, of material?  
20 A. Yes.  
21  
22 Q. He or she goes through the 15 boxes and, in total,  
23 decides that 25 documents are worthy of extracting --  
24 A. Yes.  
25  
26 Q. -- let's say. So they do what you've just described?  
27 A. Yes.  
28  
29 Q. Upload it. Let's say they choose 25 - I'm making  
30 these numbers up - and there were 400 altogether?  
31 A. Mmm-hmm.  
32  
33 Q. So the other 375 just stay where they were?  
34 A. The expectation is that they would review all  
35 documents available to them, but yes.  
36  
37 Q. No, of course, quite. They would review them all?  
38 A. Yes.  
39  
40 Q. Choose the ones they thought were relevant?  
41 A. Yes.  
42  
43 Q. Upload those?  
44 A. Yes.  
45  
46 Q. And as to the ones that weren't relevant, they would  
47 just stay in their box and not be uploaded?

1 A. Yes.

2

3 Q. And then, as to the ones they do upload, they would  
4 also, on e@gle.i, give a kind of what you have called an  
5 overview of that document?

6 A. Yes.

7

8 Q. And what would the overview consist of?

9 A. Depending on what the document was, if it was, as  
10 I said earlier, a statement or a record of interview, they  
11 may direct me to a particular paragraph within that  
12 document, as an aide-memoire for me to go straight to that  
13 document, that may assist me with, you know, time  
14 management.

15

16 Q. Just jumping forward to paragraph 59, you say, in  
17 about the fourth line of paragraph 59, that you always  
18 encouraged investigators to be over-inclusive with their  
19 upload - so that's right?

20 A. Yes.

21

22 Q. In other words, you were telling them, "If you think  
23 it even might be relevant, upload it"?

24 A. Yes.

25

26 Q. And then your impression was - I'm looking at  
27 paragraph 60 now - because you found they had often  
28 uploaded things which in your view were not actually very  
29 relevant, you formed the view that they had followed your  
30 instructions and had been over-inclusive?

31 A. Yes.

32

33 Q. But in terms of what they did not upload, am I right  
34 to understand that you yourself did not look at that  
35 material at all?

36 A. That is the case.

37

38 Q. So the choice of relevance was made by investigator A  
39 about case B?

40 A. Yes.

41

42 Q. And investigator A would, in the way you've just  
43 described, alert you to what that investigator thought was  
44 particularly noteworthy about the documents that were  
45 chosen to be uploaded?

46 A. Not necessarily alert me. I would see that on the  
47 e@gle.i system for my review.

- 1  
2 Q. Well, in terms of the overview, they would alert you  
3 to something that you should be particularly interested in?  
4 A. Yes.  
5  
6 Q. Now, 57 says:  
7  
8 *Once all material has been reviewed,*  
9 *investigators would then prepare a summary*  
10 *or synopsis of the case.*  
11  
12 What was that, a Word document or something else?  
13 A. No, it was on e@gle.i. It was basically, given  
14 I wasn't aware of each case in intricate detail, having  
15 reviewed the material, they would be in a better position  
16 to tell me, you know, who the victim was, potentially who  
17 the offenders were, where it happened, when it happened, so  
18 it was an overview in time, date, place and who was the  
19 involved parties.  
20  
21 Q. Then that exercise by the investigator, doing what  
22 you've just described, wasn't something that they were  
23 doing in terms of filling in the BCIF; it was simply  
24 a stand-alone summary or synopsis on e@gle.i?  
25 A. There was obviously elements of that information that  
26 I could use to complete the BCIFs, but yes, that is the  
27 case.  
28  
29 Q. That you could use? I'll come to what you did, but in  
30 terms of what they did --  
31 A. Yes.  
32  
33 Q. -- they were not filling in the form BCIF at all?  
34 A. That was not their role, no.  
35  
36 Q. So you say in 58 that when commencing on Parrabell,  
37 investigators were given a copy of the BCIF and they were  
38 expected to familiarise themselves with the 10 indicators  
39 and what type of material could be responsive to each of  
40 them?  
41 A. Yes.  
42  
43 Q. When you say they were expected to familiarise  
44 themselves, did somebody, such as yourself or someone else,  
45 give them a kind of explanation or introduction to what  
46 they were supposed to do with the BCIF?  
47 A. Well, there was no need for them to do anything

- 1 necessarily with the BCIF other than use it as an  
2 aide-memoire for them to do their reviews.  
3
- 4 Q. What did you say, if anything, to any of them about  
5 what the point of the BCIF was?  
6 A. So I would explain, obviously, that my role is to use  
7 that data that they had extracted from the case file items  
8 to complete that BCIF. As it says, I'd ask them to  
9 familiarise themselves with those 10 categories within the  
10 BCIF. We would have some broader discussions in respect of  
11 what those certain materials may look like, whether it be  
12 crime scene photos, records of interview, witness  
13 statements, you know, material to that effect, that they  
14 should pay particular attention to try and locate.  
15
- 16 Q. So is this right, that they were meant to look at the  
17 BCIF and thus get an idea of what sorts of things in due  
18 course you might need to do in your role?  
19 A. I would ask them to familiarise themselves with each  
20 of those points within the 10 indicators and then they  
21 would obviously have to form their own opinion based on  
22 what material, based on the review of the available case  
23 file items, would be relevant to me to populate that form.  
24
- 25 Q. Sure. But all they did was decide this document could  
26 be relevant?  
27 A. Yes.  
28
- 29 Q. That document could be relevant?  
30 A. Yes.  
31
- 32 Q. All these documents are not relevant?  
33 A. Yes.  
34
- 35 Q. And as I've said, I think you've agreed already, as to  
36 all the ones that they, rightly or wrongly, thought were  
37 not relevant, you never saw them?  
38 A. No.  
39
- 40 Q. Now, when you say in paragraph 58 that they were given  
41 a copy of the BCIF, I take it that means, does it, that  
42 they were given a copy of whatever BCIF was then in force?  
43 A. Yes.  
44
- 45 Q. So up to June 2016, they were given the first version  
46 of the BCIF?  
47 A. That would have been the case, yes.

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Q. And then after June 2016, they were given the second version of the BCIF?

A. My recollection is that when the second BCIF was formulated, they were made aware that there had been changes and that was made available to them, yes.

Q. So they weren't actually given it - it wasn't given to them?

A. I don't think I physically printed out a new copy and handed it to them. I made them aware of where it was available to them. Obviously, if they wanted to print a copy of it to have with them, they were able to, but I didn't personally hand them a copy of that form.

Q. What did you tell them what the differences were?

A. I believe I told them that we had changed the classifications but the 10 indicators had remained the same.

Q. Did you tell them that the concept of beyond reasonable doubt had been introduced?

A. I didn't tell them that, no.

Q. Why not?

A. Well, it wasn't necessarily going to change the way that they were conducting their duties within Parrabell.

Q. Because the only person who needed to turn his mind to the question of beyond reasonable doubt was you; is that right - in completing the BCIF?

A. More or less, yes.

THE COMMISSIONER: Q. And is that another way of saying that, in effect, apart from choosing documents for you to consider, in effect, what they did was create a narrative or a timeline identifying the relevant participants in the narrative?

A. Sorry, can you rephrase that question?

Q. What they did for you was not only select the documents they thought were relevant to the case, but do I understand by the term "overview", which was used a moment or two ago, that they prepared, did they, or put up on e@gle.i, some sort of narrative or timeline, a chronology or identifying those persons who they thought were relevant participants in the events?

1 A. No, they didn't do that.  
2  
3 Q. Well, what did they do?  
4 A. So the overview - are you asking about the overview or  
5 the extraction or review of material?  
6  
7 Q. I understand the extraction, they extracted documents.  
8 Just tell me what the overview comprised, then.  
9 A. Yes. The overview was basic information in respect to  
10 who the victim was, if there was offenders identified, they  
11 would give me those names, the location that the incident  
12 occurred.  
13  
14 Q. And dates?  
15 A. And the dates.  
16  
17 Q. So that was it?  
18 A. More or less, yes.  
19  
20 THE COMMISSIONER: Thank you.  
21  
22 MR GRAY: Q. Now, in 59 you say that the process of  
23 extracting relevant material was a collaborative one  
24 between you and the investigators, you worked in a common  
25 area and there were many informal discussions with  
26 investigators often running specific documents past you.  
27 So that's correct; you stand by that?  
28 A. Yeah, discussions were had during that process, yes.  
29  
30 Q. Sure. But given that there were 80-plus cases --  
31 A. Yes.  
32  
33 Q. -- is this right, that the investigators from time to  
34 time would have a discussion with you where they would say,  
35 "Look, here's a document, I'm not really sure whether it's  
36 necessary to be included in what I'm giving to you or not",  
37 and you'd have a discussion about that particular document?  
38 A. From time to time, yes.  
39  
40 Q. Well, how often did that happen?  
41 A. I couldn't tell you an exact time. It happened, you  
42 know, infrequently, I'd say.  
43  
44 Q. Infrequently?  
45 A. Yes.  
46  
47 Q. So by and large, they just made these decisions - I'm

1 not criticising this - by and large, they just made these  
2 decisions themselves?

3 A. Yes.

4

5 Q. And as you already said, and you make this point in  
6 your statement towards the end of paragraph 60, because  
7 you've had the impression that they were doing what you  
8 wanted, which was to be over-inclusive, you didn't go back  
9 to the original file yourself to check whether something  
10 else should have been included that they had not included?

11 A. I did not do that.

12

13 THE COMMISSIONER: Q. And nor, as far as you were  
14 concerned, did either Mr Grace or Mr Middleton?

15 A. Not to my knowledge, no.

16

17 THE COMMISSIONER: All right. Thank you.

18

19 MR GRAY: Q. So when we come to the BCIF completion,  
20 which gets to paragraph 61 of your statement, as  
21 I understand it - tell me if this is right - what you're  
22 telling us is that you yourself alone filled out all the  
23 BCIFs?

24 A. Yes.

25

26 Q. And you say in paragraph 61 that you populated the  
27 BCIF having reviewed whatever extracted material from the  
28 files the investigators had chosen?

29 A. Yes.

30

31 Q. And by "populate the BCIF", we mean - and I'll come to  
32 an example in a little while - the BCIF has two columns, as  
33 you will recall, there are sort of questions or prompts on  
34 the left?

35 A. Yes.

36

37 Q. Then there's a box on the right for something to be  
38 inserted?

39 A. Yes.

40

41 Q. So you, in the case of all 80-plus, were the person  
42 who chose what text to insert in all those boxes?

43 A. I was, yes.

44

45 Q. In paragraph 62, you say that following the change  
46 from the first to the second form, which is the June 2016  
47 period --



1 A. Yes.

2

3 Q. --

4

5 *... all cases which had used the original*  
6 *form were subsequently re-reviewed and*  
7 *a copy of the updated BCIF was populated.*

8

9 Now, when you say "all cases which had used the original  
10 form were subsequently re-reviewed", do you mean by you or  
11 do you mean by the original investigators?

12 A. No, it was re-reviewed by me and then put before the  
13 review panel.

14

15 Q. We'll come to the review panel, but the expression  
16 "subsequently re-reviewed" means re-reviewed by you?

17 A. Yes.

18

19 Q. Not sent back to the investigators again?

20 A. No.

21

22 Q. So the form changes, and among other things - and  
23 we'll come to this - introduces the term "beyond reasonable  
24 doubt", and you then look at the BCIF again with those  
25 different terminology here and there?

26 A. Yes.

27

28 Q. And you decide what, if any, changes to the previous  
29 text that you had slotted in needed to be made?

30 A. Yes.

31

32 Q. Then in paragraph 63 you say that at the conclusion of  
33 Parrabell, all cases were reviewed against the same version  
34 of the BCIF. Now, by that, you mean reviewed by you?

35 A. At the conclusion, yes, all cases contained within  
36 Strike Force Parrabell had been reviewed by me on the  
37 second form.

38

39 Q. And then when there was a second change to it, thus  
40 generating the third form from January 2017, did you then  
41 go back and, yourself, personally make other changes to the  
42 BCIFs?

43 A. No. No.

44

45 Q. So in terms of the third version, post January 2017  
46 version, which is the one that appears in the  
47 coordinating - the one that appears in the Parrabell

1 report --  
2 A. Yes.  
3  
4 Q. -- did you actually review anything or did you just  
5 simply move the text across to the new form?  
6 A. I didn't do either.  
7  
8 Q. What did you do?  
9 A. I completed all my reviews on the second form. It's  
10 my understanding that the transferring of text from the  
11 second to the third form was done by someone else.  
12  
13 Q. Who do you understand that was?  
14 A. Mr Grace.  
15  
16 Q. And is your understanding that he's just simply - it  
17 may not have been technically simple but that he has simply  
18 moved it from document 1 to document 2 unchanged?  
19 A. Document 2 to document 3, yes.  
20  
21 Q. Picking up that language, from document 2 to document  
22 3?  
23 A. Yes.  
24  
25 THE COMMISSIONER: Q. And did he tell you that?  
26 A. Yes.  
27  
28 THE COMMISSIONER: Thank you.  
29  
30 MR GRAY: Q. Turning to the third phase of the Parrabell  
31 exercise as you have outlined, namely, the review process,  
32 and this starts at paragraph 64 of your statement, you had  
33 monthly meetings, or approximately monthly meetings, with  
34 Mr Middleton and Mr Grace to discuss the BCIF forms?  
35 A. Yes.  
36  
37 Q. In that paragraph 64, when you refer to the "recently  
38 completed BCIF forms", you obviously mean recently  
39 completed by you personally?  
40 A. Yes.  
41  
42 Q. Then you say:  
43  
44 *The associated material myself and the team*  
45 *had found ...*  
46  
47 What does that mean?

1 A. So "associated material", so that was all the case  
2 file items that had been extracted and uploaded on to the  
3 e@gle.i system and the information or the material that  
4 I had relied on to complete those BCIFs.

5  
6 Q. So are you telling us that for any given case, when  
7 there was a monthly meeting to discuss that case,  
8 Mr Middleton and Mr Grace would have both the BCIF form as  
9 filled in by you and everything that was on e@gle.i about  
10 that case?

11 A. Yes.

12  
13 Q. Would they have it literally or would they have it in  
14 the sense that it was available to them if they wanted to  
15 look at it?

16 A. I would bring the hard copies - the copies that had  
17 been made by the investigators, I had them in folders for  
18 each of the cases. Generally speaking, I would bring them  
19 with me to those meetings if we had to refer back to any of  
20 that material as part of that review process.

21  
22 THE COMMISSIONER: Q. And do I take it that the hard  
23 copies of those materials, as far as you're aware, unless  
24 the particular person had accessed that before, were given  
25 to them for the first time at the case review meetings?

26 A. No. Mr Grace reviewed all those products  
27 electronically on e@gle.i and approved those products on  
28 e@gle.i. So once something is entered, it's submitted and  
29 then it has to be approved. In terms of Mr Middleton's  
30 review of those available documents, I'm not too sure what  
31 he - if he did that prior to those meetings. I know that  
32 Mr Grace had.

33  
34 THE COMMISSIONER: Thank you.

35  
36 MR GRAY: Q. When you just used the word "approved" in  
37 that answer, what does that mean in that context?

38 A. So it's within the e@gle.i system, as I said, if  
39 someone puts a product on to the e@gle.i system, it goes on  
40 as "entered". Once they are happy with the contents of  
41 that and the attachments are correct, they will submit  
42 that, and that will be submitted and forwarded through to  
43 a reviewer. Once it is reviewed, it is accepted.

44  
45 Q. But in the case of Mr Grace accepting it, as far as  
46 you know, he was only seeing what the investigator had  
47 chosen to extract?

1 A. He was accepting the products that were uploaded on to  
2 e@gle.i by that investigator, which would have been the  
3 ones that they had chosen to extract from the case file  
4 notes, yes.

5  
6 Q. So the concept of "approving" in this context meant  
7 that he was noting that he had seen what the investigator  
8 had chosen to extract?

9 A. So I think "approving" is the wrong term. I'm  
10 referring to terminology as part of the e@gle.i system,  
11 that changes a product to accepted, once someone reviews  
12 that product, and it's accepted as being, you know, the  
13 contents are more or less what it should be, in terms of  
14 spelling or grammar and there is an attachment to that  
15 product.

16  
17 Q. But what it doesn't mean, though, I take it from  
18 everything you've said so far, is that Mr Grace was somehow  
19 checking whether what the investigator had chosen to  
20 include was the correct choice?

21 A. No, I don't think that's necessarily the case.  
22 Mr Grace, being the investigations manager, his role on  
23 e@gle.i was to review the products that were put on there  
24 and accept them for the purpose of categorising them on the  
25 e@gle.i system.

26  
27 Q. Quite.

28 A. So it was a more procedural process.

29  
30 Q. That's what I thought.

31 A. Yes.

32  
33 Q. So Mr Grace, as far as you knew, just like yourself,  
34 only ever saw, in terms of the historical documentary  
35 record, what the investigator had chosen as being in the  
36 investigator's mind relevant?

37 A. Yes.

38  
39 Q. But you think that in the case of Mr Grace, for these  
40 monthly meetings, he did look at all of those documents as  
41 chosen by the investigator, as well as your completed BCIF?

42 A. I can't make that assumption but I'd imagine he would  
43 have.

44  
45 Q. I see. Thank you for that. You, in fact, don't know;  
46 you just are inclined to assume that he may well have done?

47 A. Yes.

1  
2 Q. In paragraph 64 you say that at these monthly  
3 meetings, the three of you - I'll come to Mr Crandell and  
4 Ms Braw - would come to what you call "an ultimate  
5 determination of anti-LGBTIQ bias". I'm reading from  
6 paragraph 64.  
7 A. Yes.  
8  
9 Q. Mr Crandell and Jacqueline Braw sat in on these  
10 meetings occasionally - how often?  
11 A. I can't give you an exact figure. More than one,  
12 I'd say less than five.  
13  
14 Q. Less than five out of 14 or so?  
15 A. More or less, yes.  
16  
17 Q. Fifteen, maybe?  
18 A. Yes.  
19  
20 Q. I see. You say in paragraph 65 that apart from these  
21 monthly review meetings, you don't recall having any other  
22 regular meetings with either Mr Middleton or Mr Grace?  
23 A. There was no other scheduled meetings with the two of  
24 them.  
25  
26 Q. No. So any other meetings, is this right, were, as it  
27 were, chance meetings if you bumped into each other?  
28 A. Effectively, yes.  
29  
30 Q. Now, in 66 you say that in the monthly review  
31 meetings, you would provide Mr Middleton and Mr Grace with  
32 a synopsis. Was that a synopsis that you had prepared or  
33 the one that the investigator had prepared?  
34 A. No, so the synopsis of the case can be found on the  
35 last page of the BCIF.  
36  
37 Q. So you wrote that?  
38 A. Yes.  
39  
40 Q. So that the synopsis is actually part of the text that  
41 you had included in the BCIF?  
42 A. Yes.  
43  
44 Q. You would take them through - I'm reading from  
45 paragraph 66 - each part of the BCIF form and the relevant  
46 evidence "I had included" - what do you mean by that?  
47 A. So that was the copies of the case file items that had

1           been extracted. So if there was something that I needed to  
2           draw their attention to within a particular product,  
3           whether it be a statement or a record of interview, I had  
4           that available to me in those meetings.

5  
6           Q.    I'm sorry, Commissioner and Mr Bignell, I just lost my  
7           point of reference for something. Now, in paragraph 67 you  
8           say that the three of you acted as a panel, you each  
9           reviewed the materials for each case, and again, just for  
10          clarity, you mean that you certainly reviewed the materials  
11          that the investigator had chosen?

12          A.    Yes.

13  
14          Q.    You have the impression that Mr Grace may well have  
15          done as well?

16          A.    Yes.

17  
18          Q.    And you don't know whether Mr Middleton did or not?

19          A.    I would assume he would have but I can't be sure.

20          I wasn't sitting with him whilst he reviewed that material.

21  
22          Q.    Quite so. But you did bring hard copies of those very  
23          materials to the meeting?

24          A.    Yes.

25  
26          Q.    And in some cases - but I assume not all - some of the  
27          documents in those hard copies were looked at in the  
28          meeting?

29          A.    Yes.

30  
31          Q.    In paragraph 68 you talk about how the meetings were  
32          approached with open minds, and you all brought your  
33          different life experiences, professional knowledge and  
34          skills. What was the actual methodology at these meetings  
35          other than discussing back and forth? What criteria or  
36          markers did you have in mind?

37          A.    We relied on the BCIFs, the indicators and then the  
38          final classifications that were made for each of the cases  
39          as a general sense, but we would rely on the available  
40          information, the three of us having reviewed that  
41          information and determining whether or not we could come to  
42          an agreement on the most appropriate classification for  
43          that case.

44  
45          Q.    Well, I'll come to an example in a second, almost  
46          immediately after this next couple of questions, but the  
47          BCIF forms, as you know, have the 10 indicators --

- 1 A. Yes.  
2
- 3 Q. -- with space for responses, and then more or less at  
4 the end - and there are the four different categories each  
5 time for the 10 indicators?  
6 A. Yes.  
7
- 8 Q. And then at the end, there's a kind of overall  
9 section?  
10 A. Yes.  
11
- 12 Q. Where there's an overall classification, in effect,  
13 taking into account all 10 indicators; correct?  
14 A. Yeah.  
15
- 16 Q. Now, in these monthly meetings, were the three of you  
17 discussing possible changes to the text that you had chosen  
18 to insert in respect of the 10 indicators or were you  
19 discussing what to say in respect of the overall  
20 classification at the end?  
21 A. So generally speaking, I would take a completed form  
22 to those meetings, so I had populated all the information  
23 in each of the available sections.  
24
- 25 Q. Including the last one?  
26 A. Yes.  
27
- 28 Q. It would be reviewed by the three of us, or more so by  
29 Mr Grace and Mr Middleton, they would review the  
30 information that I had already inputted into that prior to  
31 the meeting. There was quite often suggestions to changes  
32 within how I had worded certain things, or text.  
33
- 34 Q. Throughout - that is --  
35 A. During that review.  
36
- 37 Q. No, no, but both in respect of the text inserted for  
38 the 10 indicators and at the end or only at the end?  
39 A. Generally speaking, more the end, final synopsis.  
40 Sometimes there were some minor changes that were made  
41 within each of the 10 subcategories, I suppose, but more  
42 often than not, if any changes were suggested, it would be  
43 to that final synopsis.  
44
- 45 Q. Let's just take one example, if we get volume 13,  
46 please, tab 266, in fact, within tab 266, there are  
47 a number of subcategories, A, B, C and so on?

1 A. Yes.  
2  
3 Q. I will just take the first one as an example. It  
4 happens to be the one at 266E [NPL.0129.0001.0034\_0001].  
5 Do you see that? "Robert John Maclean"?  
6 A. Yes.  
7  
8 Q. I'm not focusing on Mr Maclean's case specifically,  
9 but simply as an example of how you did this --  
10 A. Sure.  
11  
12 Q. So there's a description on the front page. That's  
13 the sort of synopsis, if you like, that I assume you wrote?  
14 A. Yes.  
15  
16 Q. Then there are the 10 indicators, the first one being  
17 "Differences"?  
18 A. Yes.  
19  
20 Q. The prompts on the left and the comment on the right?  
21 A. Yes.  
22  
23 Q. So all the comments have been written by you?  
24 A. Yes.  
25  
26 Q. And the same applies for all 10 indicators all the way  
27 over through to the very last page?  
28 A. Yes.  
29  
30 Q. And then on the last page - and this is typical of all  
31 of them, I'm sure you would agree - there's a heading  
32 "General Comment"?  
33 A. Yes.  
34  
35 Q. So you wrote that?  
36 A. Yes.  
37  
38 Q. Then there's a heading "Summary of Findings"?  
39 A. Yes.  
40  
41 Q. And you wrote that?  
42 A. Yes.  
43  
44 Q. And in this particular one, it says "Indicator: Bias  
45 Crime"?  
46 A. Yes.  
47



- 1 Q. So that was the categorisation in this particular  
2 case?
- 3 A. That is the case, yes.  
4
- 5 Q. Now, you would typically take to these monthly  
6 meetings a form fully completed like this one, including  
7 under "General Comment" and under "Summary of Findings"?
- 8 A. Yes.  
9
- 10 Q. Including your choice, for the moment, before it was  
11 reviewed?
- 12 A. Yes.  
13
- 14 Q. Of what the overall answer would be, "Bias Crime" or  
15 "Not Bias Crime" or "Insufficient Information"?
- 16 A. I would, yes.  
17
- 18 Q. You would have all of that for them to look at?
- 19 A. Yes.  
20
- 21 Q. Now, in terms of that final decision, the summary of  
22 findings and the indicator, were any changes made to any of  
23 your opinions?
- 24 A. Yes.  
25
- 26 Q. Out of the 80-plus, how many?
- 27 A. I couldn't tell you how many.  
28
- 29 Q. Many or not many?
- 30 A. No, not really, no.  
31
- 32 Q. Not many?
- 33 A. No.  
34
- 35 Q. A handful?
- 36 A. Yeah, I'd say so, yes.  
37
- 38 Q. And were any changes made to the text in respect of  
39 indicators 1 to 10 in any of these cases?
- 40 A. There were a few changes. I can't remember if it was  
41 context or, you know, spelling or grammatical issues but  
42 more often than not, no.  
43
- 44 Q. So more often than not, no, and where there were  
45 changes, they were, as I understand you, pretty minor; is  
46 that right?
- 47 A. Yes.

1  
2 Q. So all in all, apart from a handful, what you put  
3 forward was actually accepted?  
4 A. More often than not, yes.  
5  
6 Q. Well, apart from a handful, I think you said?  
7 A. Yes.  
8  
9 Q. Now, I just want to ask you a couple of questions  
10 about some evidence that has been given earlier in the  
11 hearing. Could we have volume 1, tab 4 [SCOI.76961\_0001].  
12 That is Mr Crandell's statement to the Inquiry, the one  
13 that I mentioned to you, from October last year?  
14 A. Yes.  
15  
16 Q. Just turn to paragraph 36 would you, please. Have you  
17 seen this before, by the way, Mr Crandell's statement?  
18 A. I have read the statement, yes.  
19  
20 Q. When was that?  
21 A. Last week.  
22  
23 Q. But not prior to that?  
24 A. No.  
25  
26 Q. Do you see in paragraph 36, Mr Crandell says that in  
27 the time following some incidents in 2013, he became aware  
28 of a number of articles and media publications concerning  
29 88 historical deaths, and so on?  
30 A. I do, yes.  
31  
32 Q. This is under the heading of "Establishment of 'Strike  
33 Force Parrabell'"?  
34 A. Yes.  
35  
36 Q. In 37 he talks about his understanding of what  
37 Sue Thompson had done in terms of preparing a list?  
38 A. Yes.  
39  
40 Q. And then in 38 he says that given the community  
41 interest in the 88 deaths and his observations of Operation  
42 Parrabell, he decided, in effect, to start Strike Force  
43 Parrabell. I'm paraphrasing. Do you see that?  
44 A. Yes.  
45  
46 Q. Now, is it still your evidence that you, for your  
47 part, were not aware that articles and media publications

1 and community interest played any part in why Parrabell was  
2 initiated?  
3  
4 MR TEDESCHI: I object. That was not what he was asked  
5 previously. He was asked whether he had knowledge of media  
6 references to such matters. He wasn't asked about whether  
7 Parrabell was set up because of that.  
8  
9 THE COMMISSIONER: Yes. Thank you. Break it up, Mr Gray.  
10  
11 MR GRAY: I'm happy to clarify that.  
12  
13 THE COMMISSIONER: All right.  
14  
15 MR GRAY: Q. I asked you some questions this morning  
16 about whether you were aware of media articles and interest  
17 about the 88 deaths?  
18 A. You did, yes.  
19  
20 Q. And you said no?  
21 A. That is the case, yes.  
22  
23 Q. When Parrabell was set up in 2015, did you have any  
24 awareness that a factor in Mr Crandell's setting it up was  
25 to respond to the media publicity about those deaths?  
26 A. Not prior to my involvement in Parrabell. Post my  
27 involvement, yes.  
28  
29 Q. How long post?  
30 A. Quite soon.  
31  
32 Q. Almost immediately?  
33 A. Yes.  
34  
35 Q. So once you started at Parrabell, you were aware that  
36 a reason for undertaking the Parrabell exercise was to  
37 respond to the media attention on these 88 deaths?  
38 A. One of, yes.  
39  
40 Q. And did Mr Crandell say so?  
41 A. Oh, I can't recall who it came from.  
42  
43 Q. Did it come from someone within Parrabell?  
44 A. It would have been either Mr Crandell or Mr Grace or  
45 Mr Middleton.  
46  
47 Q. And did any of them say whether they thought the

1 articles were accurate or inaccurate?  
2 A. I can't recall any of the specifics of those  
3 conversations.  
4  
5 Q. I'm sorry, I just didn't hear you.  
6 A. I can't recall the specifics of those conversations.  
7  
8 Q. Maybe not the specifics, but did any of them say  
9 anything to the effect that these articles were wrong and  
10 that "we should do something about it"?  
11 A. I don't recall anyone giving me their opinion on those  
12 articles.  
13  
14 THE COMMISSIONER: Q. Leaving the media to one side,  
15 were you aware of any allegations from the LGBTIQ community  
16 that there were deaths, unsolved homicides, that needed to  
17 be looked at or had not been looked at adequately,  
18 historically?  
19 A. Prior to my involvement in Parrabell the only case  
20 I was aware of was Scott Johnson, but none of the others.  
21  
22 Q. So the answer to my question is apart from  
23 Scott Johnson, you weren't aware of any concerns on the  
24 part of the LGBTIQ community about unsolved deaths?  
25 A. No, it didn't form part of my involvement within the  
26 community, either professionally or socially.  
27  
28 Q. And what involvement with the community did you have?  
29 A. Well, as I explained earlier, I was, you know, in my  
30 early 20s. We certainly weren't discussing, you know, the  
31 gay hate crimes that had occurred in the '70s or '80s.  
32  
33 Q. It was old news?  
34 A. Well, it didn't necessarily affect me personally at  
35 that time so it wasn't something that I was discussing with  
36 my circle of friends.  
37  
38 THE COMMISSIONER: All right. Okay. Thank you.  
39  
40 MR GRAY: Q. In paragraph 41, Mr Crandell says that he  
41 held a number of initial planning meetings with various  
42 persons to discuss the objectives of Parrabell in around  
43 early 2015, and you can read the rest of paragraph 41. Do  
44 you see that?  
45 A. I do, yes.  
46  
47 Q. He says in 42 that these meetings were attended by

1 Mr Middleton and others, such as Mr Grace and yourself.  
2 Now, I think I understand from your evidence this morning  
3 that that is actually not correct?  
4 A. I wasn't involved in any meetings post the end  
5 of August 2015 - sorry, pre August 2015.  
6  
7 Q. Pre August 2015?  
8 A. Yes, sorry.  
9  
10 Q. So no criticism necessarily of Mr Crandell, but to say  
11 there that you were in these meetings happens to be wrong?  
12 A. Yes.  
13  
14 Q. Then if you just turn to paragraph 85, there  
15 Mr Crandell gives an outline of the methodology of  
16 Parrabell. Just break that down. He says, in the second  
17 line, "obtain all available documents", so you would agree  
18 with that?  
19 A. Yes.  
20  
21 Q. And then a couple of lines down "allocate an  
22 examination of each case to one or more officers within the  
23 Strike Force", and you would agree with that?  
24 A. I do, yes.  
25  
26 Q. And then he says "form a view as to whether each case  
27 had any evidence of 'bias'". He doesn't say who did that,  
28 but would you say it was the investigator who did that or  
29 that it was you who did that?  
30 A. No, it was me.  
31  
32 Q. And the fourth thing is "complete a BCIRF sheet", it's  
33 clear from your evidence today that it was you who did  
34 that?  
35 A. That was the case, yes.  
36  
37 Q. And then, fifthly, "ensure that all material was  
38 uploaded on to e@gle.i", and you agree with that?  
39 A. Yes.  
40  
41 Q. Now, in 86, he says:  
42  
43 *For the purposes of the examination of each*  
44 *case, all police holdings were identified*  
45 *and sourced from other entities, such as*  
46 *the State Coroner.*  
47

1 Now, in the light of your evidence this morning, would you  
2 say that that may be an overstatement?  
3 A. I think so, yes.  
4  
5 Q. And if you read 87 to yourself - could you just tell  
6 us if you agree that, in the broad, you agree with 87?  
7 A. I'm sorry, what was the question in respect to that?  
8  
9 Q. Do you agree with what is contained in 87?  
10 A. Not necessarily, no.  
11  
12 Q. What do you not necessarily agree with?  
13 A. If a case had been originally deemed as suspicious or  
14 a suicide, it didn't mean that there wasn't any available  
15 case file items for us to review. Quite often than not  
16 there was material available for us. So as a general  
17 summary of those cases, no, I don't agree that that's the  
18 case.  
19  
20 Q. Do you agree that the material discovered ranged from  
21 nothing at all in some cases to masses of archived boxes in  
22 other cases?  
23 A. Yes.  
24  
25 Q. Just still on Mr Crandell - do we have the transcript  
26 in hard copy? If I can just ask for it to be brought up on  
27 the screen, I can show you on the screen, just a couple of  
28 answers that Mr Crandell gave. He was asked questions for  
29 probably a couple of days about this. I'm only going to  
30 take you to about two questions, which is certainly not the  
31 whole of what he said.  
32  
33 At page 726, if we just start at line 12 - in fact,  
34 start at line 2, actually. I just want to ask you about  
35 the three questions and answers that are here. You'll see  
36 that the questions, which I was asking, contain within them  
37 the idea that it was the investigators who actually filled  
38 out the forms - that was the understanding of some people,  
39 including me, at the time?  
40 A. Okay.  
41  
42 Q. And obviously from the evidence you've given this  
43 morning, that understanding is not correct?  
44 A. No, that was not correct.  
45  
46 Q. So at line 2, I have asked Mr Crandell about the  
47 investigators, and suggested that their entire activity was

1 to read whatever paper existed, take the form in their left  
2 hand or right, fill it out, and then form their own view at  
3 the end as to whether or not they thought there was a bias  
4 crime. His answer was:

5  
6 *There was a little bit more in terms of*  
7 *governance for that. I don't think it was*  
8 *a case of just the investigators filling*  
9 *out a document.*

10  
11 Do you see that?

12 A. I do.

13  
14 Q. Then my next question was:

15  
16 *No, I'm not suggesting that's all they did.*  
17 *What I said [to you] was they read the*  
18 *files, whatever the files consisted of,*  
19 *they filled out the forms --*

20  
21 "they" the investigators --

22  
23 *by largely setting out a narrative of what*  
24 *they believed had occurred ... and then*  
25 *[they] formed a view based upon that*  
26 *exercise as to whether they thought there*  
27 *had been bias or no bias ...*

28  
29 And he answered "Yes". Do you see that?

30 A. I do.

31  
32 Q. It's clear, isn't it, from your evidence today that,  
33 in fact, that answer is wrong: the investigators didn't do  
34 those things at all?

35 A. That is the case, yes.

36  
37 Q. You did those things?

38 A. I did.

39  
40 Q. The investigators read the file, certainly?

41 A. They did, yes.

42  
43 Q. But in terms of filling out the forms and forming  
44 a view about bias or no bias, that was you?

45 A. That was, yes.

46  
47 Q. Then at line 24, I said - I was trying to establish

1 what the exercise was, I said:

2  
3 *Please correct me if I'm wrong - was that*  
4 *of the kind of what I have outlined: they*  
5 *read the files, they filled out the forms*  
6 *and they formed a view ... as to whether or*  
7 *not they thought at that stage there was or*  
8 *was not evidence of bias.*  
9

10 The answer was:

11  
12 *Yes. And those thoughts ... the position*  
13 *that they came to would be under the review*  
14 *by more senior detectives, so that was the*  
15 *governance that I had in place.*  
16

17 Now that is wrong, isn't it?

18 A. To a degree, yes.

19  
20 Q. It was not the governance that he had in place, was  
21 it?

22 A. No.

23  
24 Q. The governance that he had in place was the one you've  
25 described this morning.

26 A. Yes.

27  
28 Q. Whereby all the investigators actually did - no  
29 criticism of them - was to make decisions as to what to put  
30 before you as, in their opinion, relevant from all the  
31 material they had assembled?

32 A. Yes.

33  
34 Q. Everything else from there-on in, filling out the form  
35 and forming a view about bias or not, was you?

36 A. That is the case, yes.

37  
38 Q. Now, did Mr Crandell, to your knowledge, know that or  
39 not?

40 A. I'm not too sure.

41  
42 Q. That's all I need to ask about that for the moment.  
43 I want to turn now back to your statement  
44 [NPL.9000.0026.0012], at about paragraph 34 and following,  
45 where you talk about the constituent documents. You tell  
46 us in 34 that you yourself were not involved in the  
47 development of any of the four documents, the Terms of



1 Reference, the investigation plan, the induction package or  
2 the coordinating instructions?  
3 A. That is the case, yes.  
4  
5 Q. And you say that, to your knowledge, they were drafted  
6 by Mr Grace, and indeed that's what he says?  
7 A. Yes.  
8  
9 Q. Now, in 35 you say you recall reading them when they  
10 were first made available to you. Just unpacking that, the  
11 investigation plan, it seems, had been drafted in May 2015,  
12 and you came on board in August/September 2015, so it was  
13 already in existence, according to Mr Grace. Were you  
14 given the investigation plan when you started?  
15 A. Yes, the investigation plan - so in respect to what  
16 documents were made available to me from the very onset,  
17 I don't know the specifics of those, but there was an  
18 amount of documents that were provided to me from the  
19 onset, that I familiarised myself with, one of them  
20 obviously being the first BCIF and, yeah, I familiarised  
21 myself with that. I can't recall specifics of the other  
22 documents that were made available to me.  
23  
24 Q. We know from Mr Grace that both the induction package  
25 and the coordinating instructions didn't come into  
26 existence until well into 2016?  
27 A. Yes.  
28  
29 Q. So you obviously weren't given them --  
30 A. No.  
31  
32 Q. -- in August 2015?  
33 A. Yes.  
34  
35 Q. But you think you were probably given the  
36 investigation plan and probably given the first version of  
37 the BCIF?  
38 A. Yes.  
39  
40 Q. And were they given to you or you were told, "They're  
41 on e@gle.i"?  
42 A. No, my memory is that they were hard copies.  
43  
44 Q. Did anyone, Mr Crandell or Mr Grace or Mr Middleton,  
45 give you any kind of introduction or explanation, orally,  
46 I mean, about those documents or about what Parrabell was  
47 going to do with them?

1 A. I don't recall anyone telling me what Parrabell was  
2 going to do with them, I was obviously asked to familiarise  
3 myself with them and I was given a verbal introduction as  
4 to what we were hoping to achieve as a result of Strike  
5 Force Parrabell.

6  
7 Q. By whom?

8 A. By Mr Grace and Mr Middleton from the onset and  
9 I believe at some point Mr Crandell as well spoke with me.

10  
11 Q. But in terms of the documents then available, the  
12 investigation plan and the first version of BCIF, did any  
13 of them say anything to you about those documents?

14 A. I can't recall specifically.

15  
16 Q. Does that mean that your recollection is probably not?

17 A. They would have referred to those documents, I would  
18 imagine, given that they were prepared for the commencement  
19 of Strike Force Parrabell and so there would have been  
20 certain inferences made in those documents as to what they  
21 were expecting me to do, given an investigation plan  
22 outlines what the expectations are of a particular strike  
23 force.

24  
25 Q. Let's just go to the three documents in particular.  
26 The first is the investigation plan. We need volume 1,  
27 tab 14 [SCOI.74385\_0001]. So this is familiar to you,  
28 I presume, and on the last page under Mr Grace's name, it  
29 does bear a date of May 2015.

30 A. Yes.

31  
32 Q. Although a different date for Mr Middleton. So on the  
33 first page, there is the "Background", which I don't need  
34 to take time with. Then "Situation", then "Mission", then  
35 "Execution", and under the "Execution", what appears is  
36 that Parrabell was to review "previously reported deaths"  
37 in the relevant times:

38  
39 *... to determine if a sexuality or gender*  
40 *bias was a contributing factor*

41  
42 Correct?

43 A. Yes.

44  
45 Q. And so when we go to "Investigative Outcomes" on the  
46 bottom of the next page, the four categories that were  
47 contained in the investigation plan are set out there in

1 those four bullet points?  
2 A. Yes.  
3  
4 Q. "There is evidence that sexuality or other bias was  
5 involved". That's the first one?  
6 A. Yes.  
7  
8 Q. "It appears likely" is the second one; "It appears  
9 unlikely" is the third; "There is no evidence" is the  
10 fourth. Do you see that?  
11 A. I do, yes.  
12  
13 Q. And all of them refer to "sexuality or other bias"?  
14 A. Yes.  
15  
16 Q. At the top of that same page, page 3, in the first  
17 bullet point, there is reference to the "attached Bias  
18 Crimes Identification Form", ie, an attached BCIF?  
19 A. Yes.  
20  
21 Q. Now, it's not attached to this document in your  
22 tab 14, but your recollection is that you did get a BCIF at  
23 that time?  
24 A. Yes.  
25  
26 Q. And it was consistent, wasn't it, in the sense that it  
27 used the language as appears at the bottom of page 3 of  
28 this investigation plan?  
29 A. Oh, I actually can't recall what the first form had as  
30 the indicators.  
31  
32 Q. Okay. I'll come to that, then. For the moment,  
33 though, on this document, what I want to take you to is on  
34 page 2 under the main heading "Execution", and then under  
35 the heading "Tactical" - do you see that?  
36 A. I do, yes.  
37  
38 Q. It says:  
39  
40 *Investigators will systematically review*  
41 *the ... case file holdings to identify*  
42 *existing evidence indicative of any bias*  
43 *crime.*  
44  
45 Now, is that accurate in your mind?  
46 A. No, not necessarily.  
47

1 Q. Why is that?

2 A. Well, the role of the investigators was to review the  
3 available information and extract any information that  
4 would be relevant to me completing the BCIF, in my opinion.

5

6 Q. And then on the top of page 3, the first bullet point,  
7 the investigation plan says:

8

9 *Investigators will commence a physical*  
10 *review of these files to determine if any*  
11 *Bias Crime Indicators exist.*

12

13 Now, that's not accurate either, is it?

14 A. Well, that a little more so, in that, as I said, they  
15 were provided a copy with the BCIF, whatever one was being  
16 used at that particular time, asked to familiarise  
17 themselves with that document and extract data that - or  
18 information, sorry, that they thought I could use to  
19 populate that form. So I think, as a general sense, it's  
20 more accurate than the last point.

21

22 Q. And what about the second bullet point on that page,  
23 which says:

24

25 *Investigators will use an evidence based*  
26 *approach to complete the Bias Crimes*  
27 *Identification Form. This form will assist*  
28 *investigators in determining, based on the*  
29 *available evidence, whether Bias Crime*  
30 *Indicators exist.*

31

32 Is that accurate?

33 A. Well, I suppose it's saying "investigators", as  
34 a plural. Me as also an investigator, I did that.

35

36 Q. What doesn't seem to appear is the notion of triage by  
37 the investigators followed by somebody else, namely you,  
38 actually doing the BCIF and the determination of bias or  
39 not bias - that doesn't seem to be there?

40 A. That doesn't, no.

41

42 Q. Did you, nevertheless, understand from the outset that  
43 that was, in fact, what was going to happen?

44 A. I can't recall if I was told I was required to  
45 complete all those BCIFs, but obviously I got that sense,  
46 that that was my role, hence why I completed all of those  
47 BCIFs as part of my role within Parrabell.

1  
2 Q. So somebody told you that, in fact, the person who was  
3 going to complete the BCIFs in every single case was just  
4 you, and it was just you who was going to form a view about  
5 bias or no bias, not the investigators - someone told you  
6 that, did they?  
7 A. I believe so, yes.  
8  
9 Q. And who was that?  
10 A. I can't recall.  
11  
12 Q. And somebody told the investigators that, too, that  
13 that was the limit of their involvement?  
14 A. I told them that.  
15  
16 Q. You told them that?  
17 A. Yes.  
18  
19 Q. Under the heading "Resources", there is a description  
20 "Senior Investigator" - one of those - and two  
21 "Investigators". Now, does the expression "Senior  
22 Investigator" there cover, in fact, your role or was it  
23 covering someone else's role?  
24 A. No, I'd say that would be my role.  
25  
26 Q. And so that the senior investigator's role is said to  
27 be to review each investigation from a bias crime  
28 perspective and to draw conclusions based upon the review.  
29 So did someone tell you that what that meant was that you,  
30 as the senior investigator, were the person who was  
31 actually going to complete the BCIF?  
32 A. As I said, I imagine there was a conversation had from  
33 the infancy of Strike Force Parrabell and my involvement in  
34 Strike Force Parrabell, where I was told what my role would  
35 be, and that's what I set out to do throughout Parrabell.  
36  
37 Q. So far as you knew, who was given the investigation  
38 plan? You were given it - who else was given it?  
39 A. I don't know.  
40  
41 Q. And I think you agreed earlier this morning that this  
42 particular document, the investigation plan, never changed?  
43 A. No, not to my knowledge.  
44  
45 Q. Then could we have volume 2, tab 59 [SC0I.77317\_0001].  
46 So this is the induction package, and you will see at the  
47 bottom of it that it says "Published April 2016"?

1 A. Yes.

2

3 Q. Which is consistent with what Mr Grace says?

4 A. Yes.

5

6 Q. And you received this at about that time?

7 A. Yes.

8

9 Q. You say in your paragraph 37 - I'm just going back a  
10 bit slightly in your statement - when you are talking about  
11 the investigation plan, you say:

12

13 *I recall that the Investigation Plan was*  
14 *available as part of an administrative*  
15 *package of documents available to all*  
16 *officers working on ... Parrabell.*

17

18 A. Yes.

19

20 Q. And you have said something similar a little while  
21 ago?

22 A. Yes.

23

24 Q. And at this stage - that is, when you started  
25 in August 2015 --

26 A. Yes.

27

28 Q. -- the administrative package presumably consisted of  
29 the investigation plan only, did it?

30 A. And the BCIF, yes.

31

32 Q. And the BCIF - so two. And you say:

33

34 *I did not feel the need regularly to refer*  
35 *to the Investigation Plan during the course*  
36 *of ... Parrabell as I was comfortable that*  
37 *I understood my role ...*

38

39 So did you ever, in fact, go back and look at it?

40 A. No, I don't recall that I did.

41

42 Q. And in paragraph 39, talking now about the induction  
43 package, you say:

44

45 *While I recall seeing the Induction Package*  
46 *once it had been drafted, I did not refer*  
47 *back to it on a regular basis [either] ...*

1  
2 A. That is the case.  
3  
4 Q. Did you ever actually refer back to it?  
5 A. I read it once it was created but I don't think I went  
6 back to it, no.  
7  
8 Q. You say at the end of 39 that you don't recall  
9 providing it to the investigators either?  
10 A. Not me personally, no.  
11  
12 Q. Not personally, but you point out that it was on  
13 e@gle.i, was it, or somewhere?  
14 A. I can't recall if it was on e@gle.i or if it was on  
15 our shared drive that we were utilising.  
16  
17 Q. Available electronically, anyway?  
18 A. Yes, yes.  
19  
20 Q. Now, just looking at it - this is in tab 59 of  
21 volume 2 - in this one, there is an actual Bias Crime  
22 Indicator Form embedded in it starting on page 4, do you  
23 see that?  
24 A. I do, yes.  
25  
26 Q. I will just come to one or two details of that. At  
27 the bottom of page 3, there are the four findings set out  
28 as the four possible findings that could be made, and you  
29 may notice that they are the same four as were in the  
30 investigation plan?  
31 A. Yes.  
32  
33 Q. "There is evidence that sexuality or other bias",  
34 et cetera?  
35 A. Yes.  
36  
37 Q. All the same. Now, when we go to the embedded BCIF -  
38 so take, for example, on page 4 under the first indicator,  
39 "Differences", there are actually only three, aren't there,  
40 not four, possible findings?  
41 A. Yes.  
42  
43 Q. Did you notice that at the time?  
44 A. No, I didn't, actually.  
45  
46 Q. Did anyone mention to you that there was some sort of  
47 inconsistency between page 3 and the actual form?

- 1 A. No.  
2  
3 Q. And did anyone tell you what was meant by the  
4 expression "It appears likely", or "It appears unlikely" -  
5 what kind of criterion or standard was meant by that?  
6 A. No.  
7  
8 Q. You just had to use your commonsense or work it out?  
9 A. More or less, yes.  
10  
11 Q. Work it out for yourself, really?  
12 A. Yes.  
13  
14 Q. And what about the expression "There is evidence" -  
15 what, in your mind, given that you were the one using this  
16 form at that time, did you understand you needed to be  
17 satisfied of in order to say "There is evidence of bias"?  
18 A. It was a pretty big threshold to meet to class  
19 something as having evidence of bias, so I was certainly  
20 very mindful of that in conducting my review and completing  
21 those forms. Again, it went to the review panel and the  
22 three of us had to make that determination, and we all had  
23 to come to the same decision, to classify something at the  
24 end as being as a result of bias.  
25  
26 Q. Sure, but just breaking that down, when you get to the  
27 review panel, there are the 10 indicators?  
28 A. Yes.  
29  
30 Q. With their four findings each?  
31 A. Yes.  
32  
33 Q. And there is also the conclusionary overall  
34 categorisation at the end?  
35 A. Yes.  
36  
37 Q. I think you said earlier that, with a handful of  
38 exceptions, the conclusions that you had arrived at  
39 remained unchanged?  
40 A. Yes.  
41  
42 Q. So you said that the first one, "There is evidence",  
43 was, I think your expression was a moment ago, a pretty  
44 high threshold or something like that?  
45 A. Of course.  
46  
47 Q. And why is that "of course"?



1 A. Well, in respect to classifying something as almost  
2 definitively being as a result - that death being as  
3 a result of a bias towards them, I certainly wanted to be  
4 sure that I was making the right decision.

5  
6 Q. So you took the first possible finding, "There is  
7 evidence that sexuality or other bias was involved", as  
8 meaning, in your mind, you had to be satisfied that  
9 sexuality or other bias, on the materials available, was  
10 clearly established?

11 A. Yes.

12  
13 Q. And that meant, didn't it, that inevitably, given the  
14 nature of the paper review, very few cases would meet that  
15 criteria?

16 A. From my memory, I can't recall the final findings in  
17 respect to what number of each case was classified, but  
18 there wasn't a great volume of cases that were given that  
19 classification, no.

20

21 Q. No, it was a very low number?

22 A. Yes.

23

24 Q. I don't need to take time with you on that, because we  
25 have the records.

26 A. Of course.

27

28 Q. But my question to you is not so much what did happen,  
29 which, as you say is correct, but inevitably, if that was  
30 the view you took - and I'm not criticising it - of this  
31 very high threshold for the first finding, it meant that,  
32 inevitably, not many cases would meet that threshold?

33 A. Effectively, yes.

34

35 Q. Later on - and I will come to this - that first  
36 indicator, in a later form, had added to it the words  
37 "beyond reasonable doubt; remember that?"

38 A. Yes.

39

40 Q. And in your mind, did that make it even a higher  
41 threshold?

42 A. Yes.

43

44 Q. So it was even more difficult for a case to be given  
45 that categorisation once "beyond reasonable doubt" was  
46 added?

47 A. No, not necessarily. I think adding that - you know,

1 when we're documenting our findings, obviously, we were  
2 having to be satisfied that we were classifying a case  
3 beyond a reasonable doubt. We weren't, you know, putting  
4 our own spin on things; we weren't - what's the word I can  
5 use? - it wasn't our thoughts, we had to have something in  
6 front of us to suggest that that was the actual case; it  
7 wasn't just our gut feeling, "Oh, that person was killed as  
8 a result of bias". We had to have something in front of us  
9 that enabled us to come to that determination beyond  
10 a reasonable doubt.

11  
12 Q. We may be slightly at cross-purposes. You said very  
13 fairly a little while ago that even before "beyond  
14 reasonable doubt" was added, when it was just simply "There  
15 is evidence", you regarded that as a high threshold?

16 A. For me personally, the addition of the "beyond  
17 reasonable doubt" didn't change how I conducted the way  
18 I determined that classification.

19  
20 Q. So in your mind, it was a high threshold throughout,  
21 from beginning to end?

22 A. Yes, yes.

23  
24 Q. And you agree, therefore, that at all times, before  
25 and after "beyond reasonable doubt" was added, not many  
26 cases would meet that threshold?

27 A. Yes.

28  
29 THE COMMISSIONER: Is that a convenient time, Mr Gray?

30  
31 MR GRAY: Yes, it is.

32  
33 THE COMMISSIONER: Mr Tedeschi, before we rise, there is  
34 a letter dated 15 September 2023 that went to Ms Garaty  
35 about a matter. It may be that you are not aware of the  
36 contents of that letter. I will have a copy provided to  
37 you and those at the Bar table, if you are not aware of it.  
38 It raises a matter of some concern to me, as Commissioner,  
39 and to this Inquiry.

40  
41 A response was sought by 10am today. I don't want  
42 a substantive response at 2 o'clock but, as a courtesy, in  
43 the event that there has been some oversight and somebody  
44 has just fallen between the cracks, could I just be given  
45 the courtesy of when I might expect a response to that  
46 letter? I don't propose to talk about it now, or the  
47 contents of it, but I will have a copy provided so that you

1 can just at least, as a courtesy, update me at 2 o'clock as  
2 to when a substantive response might be achieved.

3  
4 If you are not familiar with the contents - and I'm  
5 assuming for the moment you may not be - I'd like to know,  
6 because it does raise a matter of some concern.

7  
8 All right. I will adjourn until 2.

9  
10 **LUNCHEON ADJOURNMENT**

11  
12 THE COMMISSIONER: Yes, Mr Tedeschi.

13  
14 MR TEDESCHI: Commissioner, I understand that a letter  
15 from Ms Marsic was sent about 10 minutes ago in response to  
16 the Inquiry's letter.

17  
18 THE COMMISSIONER: Yes. I noted it. Thank you very much.  
19 It will be dealt with at some later point, thank you.

20  
21 Yes, Mr Gray.

22  
23 MR GRAY: Q. Mr Bignell, do you still have the induction  
24 package there?

25 A. I do, yes.

26  
27 Q. I was just, I think, part way through, just drawing to  
28 your attention this contrast, that on page 3, in the  
29 description of what is called "Execution", it's stated that  
30 four findings are available, and they are set out on the  
31 bottom of the page?

32 A. Yes.

33  
34 Q. Whereas in the BCIF, which follows, which starts on  
35 the next page, embedded into the induction package itself,  
36 there are only three?

37 A. Yes.

38  
39 Q. And I think you said this morning - correct me if I'm  
40 wrong - that you actually hadn't noticed that before?

41 A. No, I hadn't.

42  
43 Q. Now, the first version of the BCIF, as you have  
44 explained this morning, had four possible findings?

45 A. I honestly can't recall the specifics of that first  
46 form.

47

1 Q. We looked at the investigation plan this morning --  
2 A. Yes.  
3  
4 Q. -- which sets out four findings, and they are  
5 actually the same as the ones at the bottom of page 3, in  
6 the induction package. We don't seem to have an example of  
7 the actual original BCIF --  
8 A. Okay.  
9  
10 Q. -- but the investigation plan says there were those  
11 four findings available. So, catching up with where we  
12 were --  
13 A. Yes.  
14  
15 Q. -- in the induction package, the same four findings  
16 appear on page 3, but only three of them appear in the  
17 embedded example of the BCIF. So my question is: was  
18 there another version of the BCIF floating around which  
19 actually looked like this one, that only had three  
20 indicators, or, sorry, three possibly findings, not four?  
21 A. I'm not too sure if there was one that postdated  
22 Parrabell that was toyed with by Mr Middleton or Mr Grace.  
23  
24 Q. Predated, do you mean?  
25 A. Potentially, yes. But in respect to the ones that  
26 I used, no.  
27  
28 Q. All right. In respect of the ones you used, they all  
29 had four possible findings?  
30 A. Again, I can't recall exactly what the indicators were  
31 of the original form that I first started with.  
32  
33 Q. I didn't catch that.  
34 A. So the very first form that I started with in August,  
35 beginning of September, I can't recall exactly what the  
36 indicators looked like for that form.  
37  
38 Q. Okay. I'm going to come to this later but maybe since  
39 we're on it, I'll ask you now. You've given some evidence  
40 about how you populated the BCIF form with text, in the way  
41 you explained this morning?  
42 A. Yes.  
43  
44 Q. And you've given evidence that you're aware of at  
45 least three versions of the form?  
46 A. Yes.  
47

- 1 Q. A first, a second and a third, and in each of the  
2 second and the third, there were some changes to, as it  
3 were, the questions or the indicators or the prompts?  
4 A. No, well, in terms of the prompts, they didn't change.  
5  
6 Q. Correct. Not the prompts, but the findings did?  
7 A. I want to be careful with how I answer this. The  
8 indicators for each of the prompts on each of the  
9 10 different points, that changed. And in respect to how  
10 the final decision was made, that correlated with whatever  
11 the indicators were at that time.  
12  
13 Q. We'd better make sure about the terminology we're  
14 using. Look at page 4 of this example?  
15 A. Yes.  
16  
17 Q. It may be an imperfect example. But the 10 indicators  
18 begin with number 1, which is "Differences"; correct?  
19 A. Yes.  
20  
21 Q. So there are only 10 of those, and the tenth of them  
22 is "Level of Violence".  
23 A. Yes.  
24  
25 Q. That's what you mean by the --  
26 A. Yes, so they didn't change.  
27  
28 Q. They did not change, indeed. And the prompts didn't  
29 change either?  
30 A. No.  
31  
32 Q. But, somewhat unhelpfully, looking at page 4, above  
33 the three lines beginning with "There is evidence", and so  
34 on, the word "Indicators" appears again, which is not  
35 really what's coming, is it: they are not the indicators,  
36 they are the available findings, aren't they?  
37 A. Yes.  
38  
39 Q. So what I'm putting to you is that what actually  
40 changed from form to form was the available findings, even  
41 though they're called here "Indicators".  
42 A. Yes.  
43  
44 Q. That's right, isn't it?  
45 A. Yes.  
46  
47 Q. Now, what I want to ask you is this: notwithstanding

1 the changes to the available findings from version 1 to  
2 version 2 and from version 2 to 3, did any of the text that  
3 you had written originally, on version 1, change as  
4 a result of any changes to available findings in version 2  
5 or version 3?  
6 A. From version 2 to version 3, I believe no. I didn't  
7 make any changes. When we re-reviewed the cases that had  
8 been done on the first form for the purpose of the second  
9 form, there were some changes that were made.  
10  
11 Q. "We" being who?  
12 A. Sorry, so we reviewed them as a collective, in respect  
13 to Mr Middleton, Mr Grace and myself.  
14  
15 Q. Yes?  
16 A. We re-reviewed the already completed forms.  
17  
18 Q. Version 1?  
19 A. From version 1. And as a result of that re-review,  
20 comparing them to the new form and what was required of us  
21 in the new form to populate that appropriately, there were  
22 some changes required.  
23  
24 Q. And what scale of changes? I don't mean literally,  
25 how many, but a lot or not very many or --  
26 A. No, not very many.  
27  
28 Q. And was the nature of those changes in your mind at  
29 least significant or relatively minor?  
30 A. No, relatively minor. It was just more in wording it  
31 more appropriately to align with the indicator that was the  
32 most appropriate with the second form.  
33  
34 Q. And were those few minor changes that you just  
35 mentioned confined to the 10 indicators, the text of the 10  
36 indicators, or did they also include some changes to the  
37 concluding final parts?  
38 A. From my memory, it had no bearing on the actual  
39 prompts; it was just the final indicators.  
40  
41 Q. So the text comprising, in effect, the responses to  
42 the prompts, never changed from beginning to end?  
43 A. Not to my memory, no.  
44  
45 Q. Regardless of any changes to the form?  
46 A. Yes.  
47

1 Q. Was there any discussion among you and Mr Middleton  
2 and Mr Grace as to whether perhaps there needed to be  
3 because the form had changed?

4 A. Not to my knowledge or memory.

5  
6 Q. Just still on the induction package, if we turn over  
7 to page 10, after the embedded BCIF, do you see in this  
8 document, which dates from April 2016 after you had been  
9 going for about eight months, Detective Inspector Middleton  
10 is described as the "Crime Manager", and his role is  
11 supervision and review of BCIFs?

12 A. Yes.

13

14 Q. Mr Grace is described as "OIC", and his role is to  
15 review e@gle.i and completed BCIFs?

16 A. Yes.

17

18 Q. "Case Officer" is what you're called, and your role is  
19 said to be managing and accounting for the investigative  
20 process and to be responsible for completing the BCIFs?

21 A. Yes.

22

23 Q. Now, that, of course, is accurate, according to what  
24 you have told us today?

25 A. Yes.

26

27 Q. And spells out accurately what, indeed, did happen; is  
28 that right?

29 A. That's the case, yes.

30

31 Q. And "Investigators", their role, according to this  
32 form, is to:

33

34 *Review case files with a view to*  
35 *identifying evidence that is relevant to*  
36 *Bias Crime.*

37

38 And on your evidence this morning, that also is more or  
39 less accurate?

40 A. Yes.

41

42 Q. On the next page, page 11, under the heading  
43 "Coordinating Instructions" - and pausing there, the  
44 coordinating instructions themselves had not come into  
45 existence yet, as we established this morning, but under  
46 that heading in this document, the induction package, the  
47 fifth bullet point says, "The Case Officer", being you,

- 1 "will complete the Bias Crime Indicator Forms". So that  
2 was clear enough?
- 3 A. Yes.
- 4
- 5 Q. Now, if we move to the coordinating instructions  
6 themselves, which are back in volume 1, at tab 15  
7 [SCOI.75071\_0001] on page 13, after the embedded later  
8 version of the BCIF, Mr Crandell has been added, at the top  
9 of the tree, as the Commander. Do you see that?
- 10 A. Yes.
- 11
- 12 Q. The Crime Manager, being Mr Middleton, is now said to  
13 be someone who would account for the investigative process  
14 and be part of the final review team. And the  
15 Investigations Manager, being Mr Grace, was to review  
16 e@gle.i and be part of the final review team?
- 17 A. Yes.
- 18
- 19 Q. And you, as Case Officer, although I'm not sure if you  
20 are actually identified by name in this one, but Case  
21 Officer was indeed your role?
- 22 A. Yes.
- 23
- 24 Q.  
25 *... is responsible for completing final*  
26 *Bias Crime Indicator Forms ...*
- 27
- 28 So on these coordinating instructions, although you're not  
29 named and although it's rather brief, it is apparent, once  
30 one reads it carefully, that only you were going to be  
31 completing the BCIFs?
- 32 A. Yes.
- 33
- 34 Q. Do you still have your statement [NPH.9000.0026.0007]  
35 as well?
- 36 A. Yes.
- 37
- 38 Q. At paragraph 40 - in fact, just before I move on to  
39 that, which is the coordinating instructions, one more  
40 question on paragraph 39 about the induction package. You  
41 say there that you did not refer back to it - the induction  
42 package - on a regular basis?
- 43 A. That's correct.
- 44
- 45 Q. It was only created in April 2016, by which time you  
46 had been under way for about eight months?
- 47 A. Yes.



1  
2 Q. So did you refer back to it at all?  
3 A. The induction package, as I recall, wasn't created for  
4 me; it was created for the new investigators that were  
5 coming on board to assist.  
6  
7 Q. So does that mean the answer is "no", you did not  
8 refer to it at all?  
9 A. I did not.  
10  
11 Q. On paragraph 40, turning to the coordinating  
12 instructions, you also say there in about the fourth line:  
13  
14 *I did not refer back to [them] on a regular*  
15 *basis.*  
16  
17 Do you see that?  
18 A. I do.  
19  
20 Q. They only came into existence, according to Mr Grace,  
21 in October 2016, when you were virtually finished the work  
22 that you were doing; correct?  
23 A. Yes.  
24  
25 Q. So not only did you not refer back to them on  
26 a regular basis, would it be right to say that you didn't  
27 refer to them at all?  
28 A. Effectively, yes.  
29  
30 Q. You also say:  
31  
32 *I do not recall providing it to the*  
33 *investigators, but it was readily available*  
34 *to them ...*  
35  
36 Do you see that?  
37 A. Yes.  
38  
39 Q. But as we established this morning, either all of them  
40 were already gone, or there were only two left at that  
41 point; you agree?  
42 A. I do.  
43  
44 Q. So it wasn't readily available to any investigators  
45 other than possibly two, who still remained?  
46 A. Yes.  
47

1 Q. The other investigators never saw it?

2 A. Potentially, no.

3

4 Q. Just briefly on the document itself, on page 3, at the  
5 bottom of the page, it is stated that investigators have  
6 created the BCIF - do you see that?

7 A. I do.

8

9 Q. Now, in fact, we know that it was Mr Grace. But then  
10 there is some sort of detail given in the rest of that  
11 paragraph as to how the BCIF is completed, and an example  
12 is given about an offender:

13

14 *... if the offender is recorded in police*  
15 *files as associating with persons known to*  
16 *have assaulted young gay men, then the*  
17 *investigator may mark Bias Crimes Indicator*  
18 *4 ... as being relevant.*

19

20 Now, as I understand your evidence this morning, that would  
21 not happen at all?

22

A. It wouldn't have.

23

24 Q. Did not happen at all. That's not what the  
25 investigators were to do at all?

26

A. That was the case.

27

28 Q. So the coordinating instructions are wrong in that  
29 respect?

30

A. Effectively, yes.

31

32 Q. At the top of page 4, the findings as at the date of  
33 the coordinating instructions are set out, and there are  
34 changes to the wording of those four findings. Are you  
35 conscious of them as you look at them now? Can you see --

36

A. Yes.

37

38 Q. "Sufficient evidence/information" has been inserted  
39 and the words "beyond reasonable doubt" have been inserted?

40

A. I can see that.

41

42 Q. But your evidence, as I understand it, is that - and  
43 I'm paraphrasing - that really that made no difference to  
44 the way you went about your job?

45

A. No.

46

47 Q. And it certainly made no difference to anything that

1 the investigators might ever have done, because they never  
2 saw it?

3 A. In my opinion, no.

4

5 Q. Now, in terms of the findings, the beyond reasonable  
6 doubt standard is referred to in the first two, "Bias  
7 Crime" and "Suspected Bias Crime" - you can see that?

8

9 A. Yes.

10

11 Q. But then in the paragraph below, it says:

12

13 *At the conclusion of each case review, an*  
14 *overall conclusion will be made referring*  
15 *to each relevant indicator and the relevant*  
16 *evidence.*

17

18 And so on?

19 A. Yes.

20

21 Q. And we know from the form that, indeed, the form does  
22 provide for that. But that paragraph concludes in the last  
23 line:

24

25 *All conclusions in relation to the role of*  
26 *bias are made on the balance of*  
27 *probabilities.*

28

29 Do you see that?

30 A. I do.

31

32 Q. Which is, of course, the lower civil standard?

33 A. Yes.

34

35 Q. So in your mind, how was that sequence to work? The  
36 findings were to be made on the high threshold of the  
37 criminal standard, but then, when you were assessing the  
38 overall situation, you would drop down to the lower civil  
39 standard. How did that work, in your mind.

40

41 A. Well, as I said earlier, in my mind I was applying the  
42 higher standard to my review and to my initial  
43 determination with respect to what indicator I thought was  
44 most appropriate to classify a particular case, in respect  
45 to the review panel that was conducted after I completed  
46 the Bias Crime Indicator Form, in respect to what decision  
47 the three of us would come to as a collective, it was my

- 1 understanding that we were looking at a more higher  
2 standard in respect to beyond reasonable doubt to determine  
3 what the most appropriate indicator was for that case.  
4
- 5 Q. Now, just breaking that down, in terms of the  
6 10 indicators, that's where we find, as to two of them, the  
7 expression "beyond reasonable doubt"?  
8 A. Yes.  
9
- 10 Q. And you've given your evidence about how you  
11 approached that?  
12 A. Yes.  
13
- 14 Q. But in the concluding part of the form, which in this  
15 example, in this document, is on page 13, a "General  
16 Comment" and the "Summary of Findings" actually, as it  
17 turns out, you populated that with text as well when you  
18 did all of these, didn't you?  
19 A. Yes.  
20
- 21 Q. True it is that everything you wrote was later looked  
22 at by the review panel of three?  
23 A. Yes.  
24
- 25 Q. But at the time you populated the final sections, the  
26 "General Comment" and the - one is called "General  
27 Comment", and one is called "Summary of Findings", at the  
28 end of the form?  
29 A. Yes.  
30
- 31 Q. When you, for your part, before it got to the review  
32 panel, put the text in there and made a call yourself as to  
33 what the appropriate finding was, were you doing that, at  
34 that point in your work, by reference to beyond reasonable  
35 doubt or by reference to balance of probabilities?  
36 A. Me personally, I was applying the beyond reasonable  
37 doubt approach to my final comments.  
38
- 39 Q. And I think you told us this morning that - correct me  
40 if I'm wrong - as to those final sections, "Summary of  
41 Findings", and the overall categorisation, did you say that  
42 none of them were ever changed after the review process or  
43 that a small handful were?  
44 A. No, some were.  
45
- 46 Q. A handful?  
47 A. Yes.

1  
2 Q. So you had arrived at those classifications by  
3 reference, at least in your mind, to the high standard of  
4 beyond reasonable doubt?  
5 A. Yes.  
6  
7 Q. And almost none of them were changed?  
8 A. Yes.  
9  
10 Q. Now, the Bias Crime Indicator Form, just turning to  
11 your statement at paragraph 41 - I think we have more or  
12 less covered this, I won't take too much time on this, but  
13 at 42 you say there were three versions that you were aware  
14 of?  
15 A. Yes.  
16  
17 Q. You say at 44 that the first version you were aware of  
18 was in the investigation plan, and I've been through with  
19 you the investigation plan, and in 45 you say the second  
20 version - you talk about the second version, and that's the  
21 one that came into play after 29 June 2016, when Mr Steer  
22 made his presentation?  
23 A. Yes, yes.  
24  
25 Q. Just on 45, at the bottom of that paragraph when you  
26 say, "I recall that all cases were reviewed using this  
27 version" - that is, the second version --  
28 A. Yes.  
29  
30 Q. -- do you mean reviewed by you?  
31 A. Yeah, so I used that second form to conduct my review  
32 of all cases.  
33  
34 Q. Yes. So that those that had been completed by you in  
35 the form of the first version --  
36 A. Yes.  
37  
38 Q. -- you then did what, once the second version came  
39 into play?  
40 A. So I transferred the data over to the new form and  
41 then, as a collective, in respect to Mr Middleton, Mr Grace  
42 and me, re-reviewed it to determine the classification most  
43 appropriate on the second form.  
44  
45 Q. I may have asked you this already, I think I did, but  
46 were any changes made?  
47 A. Some, yes.

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Q. In order of magnitude, how many?

A. I can't recall, I'm sorry.

Q. A small number?

A. From memory, yes. It wasn't a great change.

Q. And then the third BCIF - this is paragraph 46 - is the one that came into play after January 2017 --

A. Yes.

Q. -- in the meeting that we looked at this morning. And then you say as to that one, in the fourth line:

*All cases were ultimately reviewed on the basis of the BCIF in the final report.*

Now again, does that mean reviewed by you?

A. No.

Q. What does it mean?

A. So after the creation of the third Bias Crime Indicator Form, as I said earlier, Mr Grace transferred all the data over to that form with that updated indicator or indicators. The reviews had already been conducted by me, they'd already been assessed by the review panel, and it was populating those forms, the third form, with the data already available to Mr Grace.

Q. So I'm not being critical but really it wasn't a review at all?

A. No.

Q. It was just a mechanical moving of text from one document to another?

A. That is correct, yes.

Q. In 47, you say that you didn't think the difference between the various constituent documents had any material impact on Parrabell. That's your view?

A. It is, yes.

Q. You say:

*I do not believe the investigators were greatly influenced by the constituent documents.*

1  
2 And from your evidence today, that almost inevitably must  
3 be so, would you agree?

4 A. That is my opinion, yes.

5  
6 Q. The constituent documents, to the extent that they  
7 ever saw them, don't seem to have, as far as you know,  
8 played much part in anything they did?

9 A. To my knowledge and my opinion, no.

10  
11 Q. Now, you say in the fourth line:

12  
13 *Whilst they --*

14  
15 that is the constituent documents --

16  
17 *were available to the team, investigators*  
18 *largely relied on verbal briefings and*  
19 *instructions from me.*

20  
21 What were the verbal briefings and instructions that you  
22 gave them?

23 A. So upon commencement with Parrabell as an  
24 investigator, I would provide them with the most up to date  
25 version of the Bias Crime Indicator Form, depending on what  
26 one was available to us at that time, and we would run  
27 through that form.

28  
29 Depending on when they came in to the investigation,  
30 I would suggest that they have a look at e@gle.i and have  
31 a look at what some of the other investigators had done,  
32 previous to their involvement, to see what documents were  
33 coming to light as part of the earlier reviews.

34  
35 I obviously encouraged them to ask questions if they  
36 had any concerns with what was expected of them or during  
37 their process of reviewing material to come to me and ask.  
38 It was, you know, a general introduction that I would give  
39 them, "Here is a Bias Crime Indicator Form, this is what  
40 we're doing, this is what we're endeavouring to do as  
41 a result of the review in respect to a completed Bias Crime  
42 Indicator Form. If you have any questions, please ask me."

43  
44 Q. Given that some of the language in some of the  
45 constituent documents included terms like "gay hate", "gay  
46 bias", and numerous others, "sexuality related bias", and  
47 quite a few other expressions of that kind --

1 A. Yes.  
2  
3 Q. -- did you give them any explanation or path forward  
4 by which they were to know what was meant by all of those  
5 terms?  
6 A. No, not necessarily. I suppose I made the assumption  
7 they were serving members of the NSW Police Force and had  
8 some sort of broader knowledge of what each of those terms  
9 meant to them.  
10  
11 Q. Would there be a difference between a sexuality bias  
12 and a gender bias, for example, in your mind?  
13 A. Yes.  
14  
15 Q. And did you explain that to the investigators?  
16 A. No. I made the assumption that it was quite  
17 straightforward and that they would be able to draw that  
18 inference or difference.  
19  
20 Q. What's the difference, then, in your mind?  
21 A. In my mind, if it's a bias based on gender, there's an  
22 assigned gender that the bias is being made upon. If it's  
23 sexuality related, it's what they identify in terms of  
24 their sexuality, or their perceived sexuality.  
25  
26 Q. What about whether bias could be present even though  
27 some other factor may also have been present, like robbery,  
28 for example, what did you tell them about that?  
29 A. Sorry, what - could you repeat that?  
30  
31 Q. There are some cases, as I'm sure you know, where the  
32 victim, the deceased, may, on one view, have been the  
33 victim of a bias related crime, but also might have been  
34 robbed. In other words, there might have been a robbery  
35 motive involved, there might also have been a gay bias  
36 related motive involved. What did you tell the  
37 investigators about that situation where there were two  
38 factors potentially involved?  
39 A. I don't recall any specific conversations I had with  
40 the investigators to draw any differences with those.  
41  
42 Q. Did you understand, or, to your knowledge, did they  
43 understand, that if there was a robbery motive, then that  
44 ruled out a bias motive?  
45 A. I suppose the role of the investigators was if they  
46 were able to find documentation that went to prove  
47 a motive, one way, shape or form, whether it be a robbery



1 or as a result of a bias, to whatever degree, that they  
2 would include that in the documents provided to me for my  
3 review.  
4  
5 Q. If there was bias, they would include it, even though  
6 there might have been something else as well?  
7 A. I'd hope so, yes.  
8  
9 Q. You would hope that that's what they did?  
10 A. Yes.  
11  
12 Q. Did you ever have that discussion, though?  
13 A. There were a couple of cases where robbery appeared to  
14 be the motivation behind it, so I do recall that there  
15 were, at times, discussions around, "Hey, what do you think  
16 of this motive", you know, "This is what they've offered up  
17 in a record of interview", so yes, I do recall a couple of  
18 discussions around that.  
19  
20 Q. So if the likelihood, in the investigator's view or  
21 your view, was that it was more likely robbery, although  
22 both could have been present, does that mean that it was  
23 ruled out as a possible bias case?  
24 A. I'm not too sure.  
25  
26 Q. You are not too sure?  
27 A. Well, I would have to look at a specific case to  
28 comment on that.  
29  
30 Q. No, I'm just asking at a general level, what was the  
31 approach to be taken in that situation?  
32 A. If we had firm information to suggest that an offender  
33 had conducted or committed a robbery on a victim, as  
34 a result of that robbery, the person was now deceased, then  
35 I'd make a pretty good assumption that it wasn't as  
36 a result of bias.  
37  
38 Q. And that's what the investigators did too, as far as  
39 you know?  
40 A. Well, they didn't have to make that decision --  
41  
42 MR TEDESCHI: I object.  
43  
44 THE COMMISSIONER: Sorry?  
45  
46 MR GRAY: There was an objection, I believe.  
47

1 THE COMMISSIONER: Yes.

2

3 MR TEDESCHI: Commissioner, my friend is confusing the  
4 two roles that have been very clearly explained by this  
5 witness - collecting of information in the form of  
6 documents, and then he made the assessment in terms of --

7

8 THE COMMISSIONER: All right. Let me clarify it this way.

9

10 Q. So far as the investigators were concerned, then, is  
11 what you're really saying is that you did not believe, nor  
12 did you expect them to turn their minds to the existence of  
13 bias or not?

14 A. That wasn't their role, no.

15

16 Q. I'm sorry?

17 A. That was not their role, so I didn't ask them to do  
18 that.

19

20 Q. So their role was basically to pick out any documents  
21 at all that they thought might be relevant to the  
22 deceased's - to the homicide, or alleged homicide?

23 A. Yes.

24

25 Q. And not address their minds to any particular factor?

26 A. I suppose they would have, as general course, but  
27 their role was not to offer up that information in respect  
28 to completing a Bias Crime Indicator Form.

29

30 Q. So it was to bring to your attention anything at all  
31 that they thought relevant or irrelevant might go to the  
32 circumstances in which the person becomes deceased?

33 A. Yes, to establish motive. To establish motive.

34

35 Q. You say "to establish motive". What did you expect  
36 them to do in relation to a quest for documents that might  
37 go to motive, then?

38 A. If there was any information that offered up  
39 a suggestion of motive, then it would be included.

40

41 THE COMMISSIONER: Okay.

42

43 MR GRAY: Q. Could we turn, please, to volume 16,  
44 tab 386 [SCOI.83388\_0001]. Now, this is a letter,  
45 Mr Bignell, which you may very well not have seen. It's  
46 from the Office of the General Counsel for the police to  
47 this Inquiry on 19 May this year. It was a response to

1 a letter from the Inquiry seeking some clarification about  
2 various aspects of Parrabell. I asked you this morning  
3 whether anybody asked you about your recollections of  
4 Parrabell at about that time, and you said, "No"?

5 A. That's my memory, yes.

6  
7 Q. Okay. I just want to take you to a couple of things  
8 in this letter to see whether you agree that they are  
9 right?

10 A. Okay.

11  
12 Q. On page 2, under the heading "The Evidence of  
13 AC Crandell", it's stated that officers from Strike Force  
14 Parrabell applied an intuitive synthesis methodology in  
15 assessing each case. Is that right in your view? What can  
16 you tell us about that?

17 A. So I think the officers, in terms of the investigators  
18 that were conducting the review, they didn't have to apply  
19 any kind of thought process in respect of making  
20 a determination of each of the cases, so no, I don't think  
21 that's the most accurate way of recording that.

22  
23 Q. In the next paragraph, the letter says:

24  
25 *Investigators ... in Parrabell conducted*  
26 *a thorough review of the materials held by*  
27 *[the police], applied police methodology*  
28 *(as applicable at the time ... ) and then*  
29 *formed a view regarding the existence (or*  
30 *otherwise) of bias crimes by reference to*  
31 *the BCIF template. Any conclusions reached*  
32 *by an investigator were subject to*  
33 *assessment by senior officers before*  
34 *a final conclusion was reached.*

35  
36 Do you see that?

37 A. I do.

38  
39 Q. Now, that's not really an accurate account of what  
40 happened, is it?

41 A. Well, I suppose it depends what we're referring to as  
42 "investigators". I was an investigator on Strike Force  
43 Parrabell, so that could have been referring to my role,  
44 and the senior officers, Mr Grace and Mr Middleton, were  
45 both senior to me, so I was still an investigator on Strike  
46 Force Parrabell.

1 Q. So if we treated the paragraph as including you in the  
2 word "investigators" in the first sentence and then as, in  
3 the second sentence, you being the only investigator  
4 referred to in the words "an investigator", then you could  
5 make it right?  
6 A. You could, yes.  
7  
8 Q. But if you read it more naturally, it's not right, is  
9 it?  
10 A. No.  
11  
12 MR TEDESCHI: I object.  
13  
14 THE COMMISSIONER: Why?  
15  
16 MR GRAY: I press it.  
17  
18 THE COMMISSIONER: Mr Tedeschi, why?  
19  
20 MR TEDESCHI: It is asking the witness to interpret what  
21 is meant by a letter from a legal officer.  
22  
23 THE COMMISSIONER: It has come on the basis of,  
24 apparently, instructions, if so, from whom; secondly, I'm  
25 meant to rely upon it presumably as an accurate description  
26 of what occurred. I'd like to know what the true position  
27 is, so I'm going to allow it, thank you.  
28  
29 MR TEDESCHI: Commissioner, the first question was in  
30 relation to the first paragraph, "a larger collaborative  
31 process through which officers from Strike Force Parrabell  
32 applied an intuitive synthesis methodology".  
33  
34 THE COMMISSIONER: Who devised that phrase, by the way,  
35 and what does it mean?  
36  
37 MR TEDESCHI: And the questioning by Counsel Assisting was  
38 interpreted by the witness as only applying to the officers  
39 who were doing the triage process. Now, he wasn't taken --  
40  
41 THE COMMISSIONER: Mr Tedeschi, I don't know whether we've  
42 been in the same room today or not, but as far as I'm  
43 concerned, I've heard evidence today which would suggest  
44 that that kind of process wasn't undertaken by the officers  
45 who were collecting documents out of boxes. However, on  
46 the face of this letter, it could be interpreted that way.  
47

1 MR TEDESCHI: Could I make my submission to you,  
2 Commissioner?

3

4 THE COMMISSIONER: Are you going to tell me what somebody  
5 intended by this letter, are you?

6

7 MR TEDESCHI: No. What I'm suggesting is that this  
8 officer should be given an opportunity to respond to the  
9 suggestion that a larger collaborative process involving  
10 officers from Parrabell, using an intuitive synthesis  
11 methodology in assessing each case, was engaged in by those  
12 officers who conducted the review. He has been asked about  
13 the officers who conducted the triage. He hasn't been  
14 asked about those other officers.

15

16 THE COMMISSIONER: Mr Tedeschi, first of all, Mr Gray is  
17 entitled to ask the questions he is going to ask. As  
18 always, I will give you an opportunity to ask any questions  
19 you think need to be clarified. So what is your problem?

20

21 MR TEDESCHI: My problem is that --

22

23 THE COMMISSIONER: You think it's unfair at the moment, do  
24 you?

25

26 MR TEDESCHI: Yes, it is.

27

28 THE COMMISSIONER: All right. Let's work on the basis,  
29 Mr Gray, that you either accommodate what Mr Tedeschi has  
30 said or you don't. It is a matter for you. I will allow  
31 Mr Tedeschi to explore the matter if he feels, for some  
32 reason, there is some unfairness. I personally do not  
33 observe or detect any unfairness, but on the assumption  
34 Mr Tedeschi is right, why don't you do what you want to do  
35 and I'll let him do what he wants to do.

36

37 MR GRAY: Q. Mr Bignell, let's go back to the second  
38 paragraph under that heading. It says:

39

40 *Investigators in ... Parrabell conducted*  
41 *a thorough review of the materials ... and*  
42 *then formed a view ...*

43

44 Now, apart from you, in respect of whom that would be  
45 a true statement, it's not true of any other investigator,  
46 is it?

47

A. It's not.

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Q. So to say that investigators formed a view regarding the existence or otherwise of bias crimes by reference to the BCIF template, apart from you, who did indeed do that, it is quite untrue in relation to all the other investigators, isn't it?

A. It is.

Q. Now, on the first paragraph that my friend is anxious about, I did ask you whether you thought that was right, and you said you didn't think it was, but let's go through it again. The sentence - the paragraph asserts:

*The use of BCIFs by ... Parrabell was one element of a larger collaborative process through which officers from ... Parrabell applied an intuitive synthesis methodology in assessing each case. While BCIFs were an important tool ... they were only one element ...*

Now, does that paragraph, in particular the first sentence, apply with any accuracy in your mind to anything that the investigators did?

A. No.

Q. What does it mean, in your mind, if anything, in relation to what the three-person review panel did?

A. I think it's more relevant to what Mr Grace, Mr Middleton and myself did.

Q. And what does it mean, that the BCIF was part of a larger collaborative process? What was the larger collaborative process?

A. I suppose our review meetings.

Q. And would you say that what happened in the meetings was an intuitive synthesis methodology?

A. Not necessarily, no.

Q. What do you think "intuitive synthesis methodology" means?

A. To me, that doesn't - you know, it doesn't reflect what actually happened in those review meetings when we were properly - or when we were assessing the available information. It wasn't based on intuition, it was based on the available evidence.

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THE COMMISSIONER: Q. Can I ask you this: insofar as you can understand it, what do you think is meant by "intuitive synthesis methodology"?

A. I actually have no idea.

THE COMMISSIONER: Thank you.

MR GRAY: Q. On page 3 of the letter under the heading "D. The different versions of the BCIF", in the third paragraph, it says:

*... at all material times, members of [Strike Force] Parrabell used a BCIF in a substantively similar way ...*

Do you agree with that?

A. Yes.

Q. How did the investigators use the BCIF?

A. So the 10 indicators, or prompts, did not change. They relied on them the whole time.

Q. Sure. But how did they use them in a substantively similar way to the way you used them and the review panel used them?

A. So they were required to extract information from the case file items that would best be applied to each of those prompts for me to then populate them when I was completing those forms.

Q. So you say the investigators used the BCIF in that sense?

A. Yes.

Q. Then the letter says:

*The use of the BCIF was informed by discussions between members of ... Parrabell and regular exchanges between junior and senior members of the team.*

Is that correct?

A. Yes.

Q. And "regular exchanges between junior and senior

- 1 members", would you understand that to be between the  
2 investigators and yourself or what?
- 3 A. In that context, yes.
- 4
- 5 Q. Were the investigators, here apparently described as  
6 the "junior" members, having regular exchanges with  
7 Mr Middleton or Mr Grace?
- 8 A. No.
- 9
- 10 Q. Only with you?
- 11 A. Yes.
- 12
- 13 Q. On page 4, under the heading "Form 3", towards the  
14 bottom of the page - now, the expression "Form 3" is  
15 a reference to what we've been calling, and you've been  
16 calling, the second version of the BCIF?
- 17 A. Yes
- 18
- 19 Q. In the third paragraph from the bottom, the letter  
20 says:
- 21
- 22 *We are instructed that the senior officers*  
23 *of ... Parrabell considered that the*  
24 *amendments ... between Form 2 and Form 3 --*  
25
- 26 ie, between the first version and the second version --
- 27
- 28 *were such that it was appropriate for*  
29 *officers of ... Parrabell to revisit cases*  
30 *that had been assessed.*
- 31
- 32 "Officers" plural:
- 33
- 34 *Specifically, for each case that had been*  
35 *previously assessed, the case was returned*  
36 *to the investigation team, and the*  
37 *investigation team was required to*  
38 *re-review and reassess the case in*  
39 *accordance with Form 3.*
- 40
- 41 That's quite wrong, isn't it, on your account?
- 42 A. Yes, that did not happen.
- 43
- 44 Q. It's simply false; that simply did not happen, did it?
- 45 A. It did not happen.
- 46
- 47 Q. All right. Back to your statement



1 [NPL.9000.0026.0007] now, in paragraph 70, you tell us that  
2 you had no involvement in the selection or appointment of  
3 the academic review team?

4 A. That is the case.

5  
6 Q. In paragraph 72, you say that in the course of  
7 a meeting with Dr de Lint and Dr Dalton, when they  
8 travelled to Sydney to meet the team - which I believe  
9 was October 2016 - you say in the course of that meeting  
10 you discussed the BCIF form and explained the methodology  
11 for completing those forms to ensure that the academic  
12 review team was familiar with "our" process?

13 A. Yes.

14  
15 Q. Did you tell them that, actually, you were the only  
16 person that filled out the forms?

17 A. I think that, yeah, that inference was made.

18

19 Q. Sorry?

20 A. I'm quite certain that that inference was made during  
21 that meeting, that I was the one that was completing all  
22 those Bias Crime Indicator Forms.

23

24 Q. So if they had the impression that the various  
25 investigators were themselves completing the forms, you  
26 couldn't assist with how they might have thought that?

27 A. I'm quite certain that I made it clear that I was  
28 completing all of those Bias Crime Indicator Forms to the  
29 academic team during that meeting.

30

31 Q. Now, just a couple of final things. Firstly, I'm not  
32 sure if it is in that volume but it might be, I'd just like  
33 you to look at Mr Middleton's statement briefly.

34 [NPL.9000.0029.0001] in paragraph 60, if you could just go  
35 to that?

36 A. I have that.

37

38 Q. He is talking about form 3, which, as previously  
39 understood, is the second version of the form?

40 A. Sorry, what are we suggesting form 3 is?

41

42 Q. Form 3, as I understand it, is the one that came into  
43 existence after Sergeant Steer's presentation in June, in  
44 other words, it's the second version of the form?

45 A. Okay, right.

46

47 Q. And he says in paragraph 60:

1  
2           *Due to the material amendments made between*  
3           *Form 2 and Form 3 --*  
4  
5       ie, the first version and second version --  
6  
7           *... cases that had been reviewed in*  
8           *accordance with Form 2 --*  
9  
10       that is, the first version --  
11  
12           *were subsequently returned to investigators*  
13           *to re-assess and if necessary, re-review in*  
14           *accordance with Form 3.*  
15  
16       Now, that's not correct, is it?  
17       A.   Well, it was returned to me to reassess.   So as an  
18       investigator, I did do that reassessment.  
19  
20       Q.   Yes, correct.   It was returned to you to do something?  
21       A.   Yes.  
22  
23       Q.   Not to "the investigators"?  
24       A.   I was an investigator, so, yes.  
25  
26       THE COMMISSIONER:   Q.   Yes, but you were the person  
27       solely who took responsibility for that review; is that  
28       correct?  
29       A.   Yes.  
30  
31       MR GRAY:   Q.   Mr Middleton says:  
32  
33           *I was not involved in tasking the*  
34           *investigators --*  
35  
36       plural --  
37  
38           *to complete these reassessments.*  
39  
40       Now, the investigators, plural, did not complete the  
41       reassessments, did they?  
42       A.   They did not.  
43  
44       Q.   You did?  
45       A.   Yes.  
46  
47       Q.   Now, just in paragraph 68, he is talking about the

1 review process, that's the three-person panel, and in 68(2)  
2 he says:

3  
4 *In preparation of the panel meeting,*  
5 *I would review any completed BCIF that was*  
6 *to be assessed by the panel.*

7  
8 And your understanding is that that's correct?

9 A. If he did that, yes.

10  
11 Q. He says:

12  
13 *I also reviewed progress reports sent to me*  
14 *by DSC Bignell ahead of the meeting.*

15  
16 Now, what is that, as you understand it?

17 A. They were emails sent just giving him an update on how  
18 we were progressing, how many cases had been reviewed, how  
19 many were still to be reviewed.

20  
21 Q. I see. But not - I see, progress reports in the  
22 overall sense of how the whole project was travelling?

23 A. Yes, yes.

24  
25 Q. Now, he doesn't say, and I think this is consistent  
26 with your understanding, that he looked at the underpinning  
27 material itself, that is, the documents that had been  
28 extracted by the investigators. Is that your  
29 understanding?

30 A. Potentially not.

31  
32 Q. Pardon?

33 A. Yeah, I'm not sure if he did or not.

34  
35 Q. I see. Now, lastly, just some questions about  
36 Mr Grace's statement, which is also in that folder  
37 [NPL.9000.0024.0012]. I just want to ask you about  
38 a couple of paragraphs. First of all, 31(c). He is  
39 dealing with the three-stage process that you also have  
40 talked about, and in 31(c) he is at the review stage, by  
41 the review panel of three people. He says:

42  
43 *The review ... was the process of reviewing*  
44 *the compiled BCIF which, following the*  
45 *triage process, contained the facts which*  
46 *were determined relevant by the*  
47 *investigating officers ...*

- 1  
2 And you would agree with that, I think?  
3 A. Yes.  
4  
5 Q. Then:  
6  
7 *... to make a determination on whether bias*  
8 *was relevant and, if so, what category of*  
9 *bias ...*  
10  
11 So that's what the review panel was doing?  
12 A. Yes.  
13  
14 Q. Then he says this:  
15  
16 *The review team --*  
17  
18 being the three of you --  
19  
20 *approached this task on the basis that*  
21 *there would be sufficient detail in the*  
22 *BCIFs to determine whether there were facts*  
23 *which would provide evidence as to whether*  
24 *or not a bias crime existed.*  
25  
26 Now, my question is this: as you understand it, did the  
27 three-person team not look at the underlying totality of  
28 the material at all, but only look at the content of the  
29 BCIFs that you had completed?  
30 A. As I said, so I reviewed the material that was  
31 extracted.  
32  
33 Q. Of course, certainly.  
34 A. Mr Grace had cause to review that material that was on  
35 e@gle.i as part --  
36  
37 Q. "Had cause to", what do you mean?  
38 A. Sorry?  
39  
40 Q. You said, "had cause to"?  
41 A. In respect to his role on the e@gle.i system, he would  
42 review that data with it was entered, to change that to the  
43 status of "accepted". In doing that, I would imagine that  
44 he would have reviewed or read that material.  
45  
46 Q. The extracts?  
47 A. Yes.

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Q. Yes.

A. In relation to Mr Middleton, I can't comment whether or not he did read that material or not.

Q. Thank you. Then turn to paragraph 43. He says:

*On joining ... Parrabell, ... new officers  
would have received the Induction  
Package ...*

Prior to April 2016, new officers coming in could not have received the induction package, obviously?

A. Pre April 2016, that was the expansion of Strike Force Parrabell, when there were I think up to 10 new officers that became available to us --

Q. In about April?

A. Yes, it was around that time. It was later on, and that's when that induction package was created to coincide with the call for more investigators to come on board to assist with that review process. That was when they were provided that information.

Q. And I think you've covered this already but he says they "would have received it". Your evidence is that they did receive it or that you assumed they did, or what?

A. I assume they did. I can't recall physically handing that to them. I don't know if Mr Grace did. It was available to them. There was a document or a folder within our shared drive that had all those constituent documents available to them. As I said, I can't recall physically printing it out and handing it to each of those investigators but I'm aware that it was available to them.

Q. He says that they would have been provided a briefing by you. Did that happen?

A. Yes.

Q. And more often than not, he would also have provided an introduction to the goals of the strike force. Did that happen?

A. Of course. He introduced himself to them, they were coming to board to assist us with the review so --

Q. Sure. But apart from that courteous introductory aspect, did he, in any meetings that you were present, give

1           them any substantive or serious discussion about what the  
2           actual job was?  
3           A.    He would have given them an overview of what was  
4           required and why they were here, or there, rather. You  
5           know, in terms of how formal that was, it was more, you  
6           know, the niceties of "You're here, this is what we're  
7           hoping to achieve, this is how we're going to do it."  
8           I certainly don't recall him sitting everyone down and, you  
9           know, hard and fast rules, "This is what's going to happen,  
10          this is how we're going to do it."  
11  
12          Q.    In 53, if we could go to that, he is talking about the  
13          BCIF evolving over time, and you have explained that, from  
14          version 1 to version 2 to version 3, and in the last  
15          sentence, second-last line, he says:  
16  
17                   *The triage team were made aware of*  
18                   *amendments to the BCIF form through updates*  
19                   *to the constituent documents and by way of*  
20                   *verbal discussions.*  
21  
22          Now, they weren't made aware of anything by updates to the  
23          constituent documents, were they?  
24          A.    So Mr Grace was responsible for creating those  
25          constituent documents and updating them as Parrabell  
26          progressed.  
27  
28          Q.    No, no, we've been through this.  
29          A.    Yes.  
30  
31          Q.    They were never updated. You agreed with this before.  
32          The constituent documents are the investigation plan, the  
33          induction package --  
34          A.    Mmm-hmm.  
35  
36          Q.    -- and the coordinating instructions, which you have  
37          given evidence today were never changed?  
38          A.    I didn't provide them to them.  
39  
40          Q.    No, no, pausing there. Given that they were never  
41          changed, nothing was conveyed to the triage team by updates  
42          to them, since they didn't change; you would agree?  
43          A.    Sorry, I'm struggling to understand what you are  
44          asking me.  
45  
46          Q.    I can see there is a problem. His sentence says that  
47          the triage team were made aware of amendments to the

1 BCIF --  
2  
3 A. Yes.  
4  
5 Q. -- by two methods: one, updates to the constituent  
6 documents; and, two, verbal discussions?  
7 A. Yes.  
8  
9 Q. Focusing on updates to the constituent documents, what  
10 I'm reminding you of is that you have given evidence that  
11 there were no updates to the constituent documents; they  
12 never changed?  
13 A. It is my understanding that the actual BCIF forms, in  
14 my opinion, is a constituent document.  
15  
16 Q. That may be a way of looking at things, but he is, in  
17 this statement, talking about the constituent documents as  
18 being the three I have referred to.  
19 A. Well, that's Mr Grace's recollection of how things  
20 happened.  
21  
22 Q. Yes, but you know that that's not right, don't you,  
23 because they were not updated?  
24 A. Effectively, yes.  
25  
26 Q. Are you agreeing with me?  
27 A. Yes.  
28  
29 Q. Now, were they made aware of amendments to the BCIF  
30 form by way of verbal discussions?  
31 A. Yes.  
32  
33 Q. By you or someone else?  
34 A. Yes, by me.  
35  
36 Q. And why?  
37 A. Well, if a new BCIF form was created, in respect to  
38 the first and the second form, I made them all aware of the  
39 update and they were provided a copy --  
40  
41 Q. And what difference did it make to their work?  
42 A. Well, it was more general discussion, "This has  
43 happened, this has come from our preliminary reviews. We  
44 need to change that form. Here is a copy of the updated  
45 form for your reference." Referred to that accordingly.  
46 It didn't change the way they did things, in that the  
47 indicators didn't change or the --

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Q. And did you explain to them what the reason for the changes was?

A. I could only imagine there was a general discussion as to why that occurred.

THE COMMISSIONER: Q. And are you saying what you can distinctly recall, what you believe most likely happened?

A. I recall having a conversation, post that meeting, where a decision was made after we met with Sergeant Steer and he gave that presentation, with the investigators, about the changes to the Bias Crime Indicators form. I do recall a conversation occurring.

Q. And did you explain to them what you were doing and what they were expected to do?

A. Yes.

THE COMMISSIONER: Okay, thank you.

MR GRAY: Q. Paragraph 65 talks about your presence in both the triage team and the review team. Now, technically, if we were being detailed - you weren't doing the triage, were you?

A. No.

Q. But I don't want to take time on that. But he says that allowed the senior team input into the triage process, and he says:

*... to ensure that the triage team were accurately and effectively populating the BCIFs with all relevant material.*

Now, that's not what they were doing, were they?

A. No.

Q. All they were doing was extracting material, some of which you chose, according to your assessment, needed to go into the BCIF, and some didn't?

A. Yes.

Q. In paragraph 66 he gives two examples of his looking at what he calls "source material". One example concerns records of interview. He says that where there had been a record of interview, he would usually discuss that with you and usually review that record of interview document



1 himself. Is that your recollection?

2 A. So, again, that would be generally a document someone  
3 would bring to the review panel, those kind of documents,  
4 that we could look at and assess as a collective.

5

6 Q. So do you recall him raising records of interview?

7 A. Yes.

8

9 Q. And what about coronial reports, which he goes on to  
10 talk about in that paragraph? Did he, to your knowledge,  
11 review coronial reports, if they were indicated on the  
12 BCIF?

13 A. Yes. It was my understanding that Mr Grace reviewed  
14 all documents that were included on the e@gle.i system.

15

16 Q. Thank you. And I think finally, in 67, the next  
17 paragraph, he says each of Mr Middleton, yourself and  
18 himself would read the BCIF for each case to be reviewed in  
19 the meeting, as well as any particularly pertinent  
20 documents. What do you understand him to be referring to  
21 there?

22 A. So whilst I was completing the BCIFs, I would often  
23 make reference in those forms with a reference number, and  
24 that would refer back to the product on the e@gle.i. So if  
25 it was a statement, I would put the statement number, so  
26 that would allow them to then go to e@gle.i, if they saw  
27 fit, to look at that particular document that I was  
28 referring to in completing that indicator form.

29

30 Q. And that, such a document, would in any event be  
31 brought by you to the meeting in hard copy?

32 A. I would generally bring all documents, not just the  
33 ones that I referred to in completing those Bias Crime  
34 Indicator Forms, but I suppose the pertinent documents,  
35 that is the ones I'm directly referring to in completing  
36 those indicator forms.

37

38 Q. Sorry, when you say you would generally bring all  
39 documents, you mean even those that the investigator had  
40 not extracted?

41 A. No, no, no. Sorry. So if an investigator - upon  
42 completing their review, they would put all the documents  
43 that they deemed relevant on e@gle.i. They would be then  
44 put into a folder for that particular case. I would bring  
45 that whole folder.

46

47 MR GRAY: I thought that's what you meant. Thank you.

1 Those are my questions.

2

3 THE COMMISSIONER: Yes, Mr Tedeschi.

4

5 MR TEDESCHI: Commissioner, might I have a 10-minute  
6 adjournment to consult with the witness?

7

8 THE COMMISSIONER: Yes, if you feel unable to continue  
9 now, by all means, certainly.

10

11 MR TEDESCHI: I should be ready very shortly.

12

13 THE COMMISSIONER: All right. Thank you. We will  
14 adjourn.

15

16 **SHORT ADJOURNMENT**

17

18 THE COMMISSIONER: Yes, Mr Tedeschi.

19

20 MR TEDESCHI: Yes, thank you, Commissioner.

21

22 **<EXAMINATION BY MR TEDESCHI:**

23

24 MR TEDESCHI: Q. Sergeant, you were asked some questions  
25 by Counsel Assisting about one category of finding, "Bias  
26 Crime", that contained the term "beyond a reasonable  
27 doubt", did "beyond a reasonable doubt" play a role in any  
28 of the other three categories of findings?

29 A. No, not necessarily.

30

31 Q. In relation to the second category, which was in the  
32 penultimate version, of "Suspected Bias Crime", the  
33 category referred to "evidence or information that exists  
34 that the incident may have been motivated by bias, that the  
35 incident cannot be proved beyond a reasonable doubt that it  
36 was either wholly or partially motivated by bias and  
37 constitutes a criminal offence" - what was the standard of  
38 proof, if any, that applied to that category?

39 A. We still endeavoured to apply the highest standard,  
40 but if there was any other suggestion that, you know, took  
41 away from the element of bias, then obviously it was bumped  
42 down to the suspected bias. So I suppose we did apply  
43 a balance of probabilities approach to anything less than  
44 a definitive beyond reasonable doubt bias crime.

45

46 Q. You were asked some questions by Counsel Assisting  
47 about a case in which there was both a possible element of

1 robbery and a possible element of bias or hate crime. Can  
2 I give you a scenario that applied to quite a few of the  
3 cases, of the case where a person has been murdered and it  
4 would appear from the material that during the course of an  
5 attack on that person, the person has been robbed, so that  
6 there's a possible element of robbery. Would the existence  
7 of that possible element of robbery exclude any possibility  
8 of a bias crime against a person who is in the LGBTIQ  
9 communities?

10 A. It wouldn't exclude it, no.

11  
12 Q. So how would you deal with a situation where there was  
13 the possibility of both elements?

14 A. It would have been likely assessed as a suspected bias  
15 crime.

16  
17 Q. Even though there might have been a robbery?

18 A. Yes.

19  
20 Q. Now, were you asked some questions about a letter that  
21 was sent from the Office of the General Counsel of the  
22 NSW Police to this Inquiry, dated 19 May this year, and you  
23 were directed to page 2 under the heading "C. The evidence  
24 of AC Crandell". The first paragraph was read to you,  
25 which reads as follows:

26  
27 *The use of BCIFs by [Strike Force]*  
28 *Parrabell was one element of a larger*  
29 *collaborative process through which*  
30 *officers from [Strike Force] Parrabell*  
31 *applied an intuitive synthesis methodology*  
32 *in assessing each case.*

33  
34 What do you understand to have been the larger  
35 collaborative process of Strike Force Parrabell?

36 A. So the review of the available documentation, the  
37 completion of the Bias Crime Indicator Form and the review  
38 panel coming to the ultimate decision in respect to what  
39 the most appropriate indicator was for each case.

40  
41 Q. And as you have explained to this Inquiry, that  
42 collaborative process did involve those three persons on  
43 the review panel having access to the BCIF forms?

44 A. Yes.

45  
46 Q. When you yourself were writing up the BCIF forms, did  
47 you in each case come to an initial conclusion yourself as

- 1 to which category of finding that each particular case, in  
2 your view, should be categorised as?  
3 A. I did, yes.  
4  
5 Q. And was that an initial view on your part, subject to  
6 discussion with the review panel?  
7 A. It was, yes.  
8  
9 Q. Was the final decision made by the review panel?  
10 A. It was.  
11  
12 Q. How did you come to your initial conclusions about  
13 each case based upon the evidence? Was there some sort of  
14 counting done or was there some sort of allocation of  
15 priorities given to any of the 10 indicative factors in the  
16 BCIF form? How did you do it? How did you come to  
17 a conclusion?  
18 A. There was no, you know if a number of indicators were  
19 met, then it would fall within a particular category; it  
20 was looking at all the information as a whole and  
21 holistically to see, you know, where it would best fall.  
22 Obviously there was, in different cases, certain  
23 information that pointed more in one direction than the  
24 other, and we would assess all available information to  
25 make a determination. But there was no, you know, if one  
26 was met and one wasn't, then it would fall within  
27 a category; it was looking at every single case in its  
28 entirety based on what was available to us.  
29  
30 Q. So each case was looked at as an individual case on  
31 its own?  
32 A. Yes.  
33  
34 Q. There was no formula for looking at particular parts  
35 of the case or particular categories of evidence?  
36 A. No.  
37  
38 Q. And the paragraph then goes on to say:  
39  
40 *While BCIFs were an important tool in this*  
41 *process, they were only one element of it.*  
42  
43 Is that correct?  
44 A. To a degree, yes.  
45  
46 Q. And in the second --  
47

1 THE COMMISSIONER: Q. Sorry, did you say "to a degree"?

2 A. Yes.

3

4 THE COMMISSIONER: Thank you.

5

6 MR TEDESCHI: Q. What were the other elements of the  
7 process?

8 A. Well, the review or the triage process, the completion  
9 of the Bias Crime Indicator Form, and then the review  
10 panel.

11

12 Q. And you've also said that at least in terms of  
13 Detective Grace, he had access to the underlying documents  
14 on e@gle.i as well?

15 A. Him and Mr Middleton both had access to those  
16 documents.

17

18 Q. Now, the second paragraph that was read to you says  
19 this:

20

21 *Investigators in Strike Force Parrabell --*  
22 *only --*

23

24 Now, by "investigators", if you understand that to mean the  
25 members of Strike Force Parrabell --

26

27 *conducted a thorough review of the*  
28 *materials held by NSW Police Force --*

29

30 is that correct?

31 A. Yes.

32

33 Q. --

34

35 *applied police methodology (as applicable*  
36 *at the time ... ) and then formed a view*  
37 *regarding the existence (or otherwise) of*  
38 *bias crimes by reference to the BCIF*  
39 *template.*

40

41 What do you say about that?

42 A. The members of Strike Force Parrabell did do that.

43

44 Q.

45 *Any conclusions reached by an*  
46 *investigator --*

47

1 The term of "investigator", if you apply that to mean  
2 a member of Strike Force Parrabell:

3  
4 *Any conclusions reached by an investigator*  
5 *were subject to assessment by senior*  
6 *officers before a final conclusion was*  
7 *reached.*

8  
9 Was that the case?

10 A. It was, yes.

11  
12 Q. And in what sense?

13 A. In that every person that was a member of Strike Force  
14 Parrabell undertook a process, obviously everyone had  
15 different roles but as a whole, Strike Force Parrabell  
16 members came to that - or did that as described there.

17  
18 Q. Now, prior to giving evidence here today, have you had  
19 an opportunity to read the submissions that were made,  
20 I think back in June of this year, by Counsel Assisting in  
21 relation to Public Hearing 2?

22 A. I have, yes.

23  
24 Q. What would you say to the suggestion that the purpose  
25 of Strike Force Parrabell was to refute the suggestion that  
26 there had been a significant number of gay hate motivated  
27 homicides?

28 A. I disagree with that.

29  
30 Q. Why do you say that?

31 A. That wasn't the ultimate goal of Strike Force  
32 Parrabell.

33  
34 Q. What was the ultimate goal?

35 A. To review each of the names on that list of 88 and to  
36 make a determination whether or not that person's death was  
37 a result of a bias.

38  
39 Q. What do you say to the suggestion that the purpose of  
40 Strike Force Parrabell was to show that the claim of 88 gay  
41 hate murders, 30 of them unsolved, was an exaggeration?

42 A. No. That was not the intention of Strike Force  
43 Parrabell.

44  
45 Q. Why do you say that?

46 A. It was never portrayed to me that there was an  
47 exaggeration of gay hate crimes and that my purpose was to,

1 you know, dispute that. It was to, again, look at all  
2 those names, all those deaths, and to make the  
3 determination.

4  
5 Q. What do you say to the suggestion that the purpose of  
6 Strike Force Parrabell was to refute the suggestion that  
7 the NSW Police had not adequately investigated gay hate  
8 crimes?

9 A. No, that wasn't the role of Strike Force Parrabell.

10  
11 THE COMMISSIONER: Mr Tedeschi, could I just ask this  
12 question - I'm not going to stop you - but I'm just  
13 wondering why all this wasn't dealt with in Mr Bignell's  
14 statement. You seem to have this pre-prepared, but I don't  
15 understand why it's now coming out, as it were - it's not  
16 really re-examination, it's sort of examination-in-chief,  
17 so why do we need to second-guess every time these  
18 statements come in, because you often ask questions which  
19 you either must know the answer to or, alternatively, they  
20 have been discussed. I'm interested to save some time.

21  
22 MR TEDESCHI: Well --

23  
24 THE COMMISSIONER: No, I'll finish, if I may.

25  
26 You were obviously prepared to ask these questions.  
27 I'm just wanting to know why it wasn't put up-front. Could  
28 you tell me that?

29  
30 MR TEDESCHI: I think it impliedly was included in the --

31  
32 THE COMMISSIONER: Impliedly? Where?

33  
34 MR TEDESCHI: I will come to that. My next set of  
35 questions is going to be about a part of his statement  
36 in --

37  
38 THE COMMISSIONER: But I'm interested in his evidence, not  
39 in your gloss. So what I really want to know is, whoever  
40 prepared his statement, given the time frames, why it  
41 wasn't done fulsomely. If you anticipated all along asking  
42 Mr Bignell for his personal view as a junior police officer  
43 at the time, aged 26, what his views might have been about  
44 Counsel Assisting's submissions, either I take note of it  
45 or I don't, but I'm just wondering why you wouldn't come  
46 up-front with it.

47

1 MR TEDESCHI: Commissioner, I was of the view that it was  
2 incumbent upon Counsel Assisting, having made those  
3 submissions, to put those questions to the witness, in  
4 fairness.

5  
6 THE COMMISSIONER: Because it's a procedural fairness  
7 issue, is it?

8  
9 MR TEDESCHI: Yes. I was surprised that it hadn't been  
10 put.

11  
12 THE COMMISSIONER: I see. Were you surprised? Well,  
13 I must confess that that might be of some interest,  
14 Mr Tedeschi, but it might also come as no surprise that  
15 I may not necessarily be interested in the person who did  
16 not formulate Parrabell in the first place. But, anyway,  
17 your answer is you don't have one, you're just doing it now  
18 because it is helpful to me, is it?

19  
20 MR TEDESCHI: I'm doing it because I expected Counsel  
21 Assisting to do it and he hasn't.

22  
23 THE COMMISSIONER: I see. So it's a criticism of Counsel  
24 Assisting, is it?

25  
26 MR TEDESCHI: I would have thought that Counsel Assisting,  
27 having made those submissions, would have been obliged by  
28 the normal rules of procedural fairness to put it to the  
29 witness --

30  
31 THE COMMISSIONER: And tell me if you will, though --

32  
33 MR TEDESCHI: -- if he is to maintain those submissions.

34  
35 THE COMMISSIONER: Of course, and I do understand that,  
36 and no doubt you are well familiar with them. But I'm just  
37 understanding why one of the most junior people in the  
38 Parrabell process would be able to comment usefully on the  
39 purpose of Parrabell. I just wonder why that would be so.  
40 But please go on. You go on. Let's not waste any more  
41 time. You go on.

42  
43 MR TEDESCHI: I can answer that question, if you wish.

44  
45 THE COMMISSIONER: No, no, I'd prefer to you get on with  
46 it, if you wish.

47



1 MR TEDESCHI: Q. Sergeant, what do you say to the  
2 suggestion that the purpose of Strike Force Parrabell was  
3 to assert that the true position was that only a small  
4 proportion of the 88 cases that were investigated by  
5 Parrabell were, in fact, gay hate murders, and that the  
6 number of those that were unsolved was much less than 30?

7 A. No, I disagree with that.

8  
9 Q. Could I take you now very briefly to your statement  
10 [NPL.9000.0026.0007] at paragraph 68, if that could be  
11 brought up?

12 A. Yes, I have that.

13  
14 Q. Paragraph 68 reads - it is about the meetings of the  
15 review panel:

16  
17 *The meetings were approached with open*  
18 *minds and with a focus on achieving the*  
19 *correct identification of whether*  
20 *anti-LGBTIQ bias affected the relevant*  
21 *case. We capitalised on each other's*  
22 *different life experiences, professional*  
23 *knowledge and skills throughout our*  
24 *discussions. These meetings were often*  
25 *full of robust discussion as we sought to*  
26 *challenge both our own and each other's way*  
27 *of thinking to reach the most appropriate*  
28 *categorisation for each case.*

29  
30 Is that still, to this day, your genuine view about what  
31 those discussions entailed?

32 A. It is, yes.

33  
34 Q. You say in paragraph 69:

35  
36 *I do not recall any instances where I felt*  
37 *pressured to change my opinion on the*  
38 *designation of a case, that my opinion had*  
39 *been unfairly shut down, or that I had*  
40 *disagreed with the final designation*  
41 *selected.*

42  
43 Is that still your view?

44 A. It is, yes.

45  
46 Q. At any stage, did anybody seek to convince you to  
47 minimise the incidence of gay hate crime?

1 A. They did not.

2

3 Q. At any time during your involvement in Parrabell, did  
4 anyone suggest to you that you should seek to minimise the  
5 incidence of gay hate crime?

6 A. No.

7

8 Q. At any time during your involvement in the strike  
9 force, did anybody tell you or suggest to you that the  
10 incidence of gay hate crime was exaggerated or overblown?

11 A. They did not.

12

13 MR TEDESCHI: Yes, thank you.

14

15 THE COMMISSIONER: Q. Mr Bignell, can I just ask you  
16 this, before any further questions, if any, are asked of  
17 you. Were you asked to participate in Parrabell or were  
18 you told you were going to do it?

19 A. It was put to me that it would be a good opportunity.  
20 I don't know if I necessarily had a choice in the matter  
21 but I obviously accepted the offer, nonetheless.

22

23 Q. And did anyone tell you, and if so, who, why you were  
24 doing what you were doing?

25 A. Not necessarily.

26

27 Q. When you say "not necessarily", did anyone say to you,  
28 "I'd like to you do this, Cameron, because ..."? Apart  
29 from being a good career opportunity, did anyone ask you or  
30 tell you what it was they had in mind that you should do?

31 A. No, they didn't tell me what the outcome needed to be.

32

33 Q. No, no, I'm not talking about outcome. Did they tell  
34 you why you were being asked to review some 80-odd cases?

35 A. Well, the Terms of Reference explained to me what was  
36 required of me in doing that review.

37

38 Q. I didn't ask you that, Mr Bignell, I just wonder if  
39 you would address yourself to my question. Did anyone tell  
40 you why you were being asked to address the 88 or whatever  
41 it was cases?

42 A. No.

43

44 Q. So, without me being disrespectful, it was, in a case  
45 of, "This is a really good career opportunity. You're  
46 going to do it", but you were never explained what it was  
47 or why it was you were asked to do these cases, or why

1 these particular cases; is that right or not?  
2 A. I was told what we were hoping to achieve by doing the  
3 review. I wasn't told --  
4  
5 Q. I'll come to that in a minute.  
6 A. -- "This is why we are doing it."  
7  
8 Q. I'll come to that in a minute, but I take it from what  
9 you have just said, nobody told you why you were being  
10 asked to do the review or these particular cases?  
11  
12 MR TEDESCHI: Commissioner, with respect, the question is  
13 ambiguous --  
14  
15 THE COMMISSIONER: No, well, you sit down, Mr Tedeschi.  
16  
17 MR TEDESCHI: Whether you're asking why it was him --  
18  
19 THE COMMISSIONER: You can ask in a moment. You sit down,  
20 please. I'll ask --  
21  
22 MR TEDESCHI: It is an ambiguous question.  
23  
24 THE COMMISSIONER: Mr Tedeschi, please, do me the  
25 courtesy. I won't stop you, I don't think I have done so  
26 yet. Please.  
27  
28 Q. Did anyone explain to you why you were doing the  
29 review or, in particular, these cases?  
30 A. No.  
31  
32 Q. And it was put to you on the basis that it would be  
33 a career enhancing opportunity?  
34 A. Yes.  
35  
36 Q. But you never asked "Why these cases?" "Where did  
37 they come from?" or "How come we're looking at these  
38 particular cases"?  
39 A. I was made aware where the cases came from.  
40  
41 Q. And what were you told and by whom?  
42 A. I don't know who exactly told me, if it was Mr Grace  
43 or Mr Middleton, that the list, the 88 names, had been  
44 developed previously by Sue Thompson.  
45  
46 Q. I see.  
47 A. Yes.

1  
2 Q. And did you understand the allegations that  
3 Ms Thompson had been making in relation to the cases?  
4 A. Not previous to my involvement with Parrabell, no.  
5  
6 Q. But after Parrabell, did you read anything Ms Thompson  
7 had written to inform yourself what created her interest in  
8 these cases?  
9 A. Yes.  
10  
11 Q. And what view did you form about that?  
12 A. It was my opinion that some of the suggestions that  
13 were being made by Ms Thompson were incorrect.  
14  
15 Q. Leaving aside whether they were correct or incorrect,  
16 did you understand what she was asserting?  
17 A. Yes.  
18  
19 Q. And which was what?  
20 A. That the police hadn't done a good enough job in  
21 respect to their response to investigating those deaths.  
22 There was a number of suggestions that she was making, but  
23 that was the main one.  
24  
25 Q. And you believed that you were doing a review of those  
26 cases in order, what, to deal with her allegations?  
27 A. No, I was doing that review to determine whether or  
28 not those deaths were a result of a bias, particularly  
29 a gay bias.  
30  
31 Q. Yes, but, in effect, to deal with whether or not her  
32 allegations were correct or not?  
33 A. To a degree, yes.  
34  
35 THE COMMISSIONER: Mr Tedeschi, is there anything you  
36 would like to ask?  
37  
38 MR TEDESCHI: Q. You have told the Commissioner that you  
39 didn't know about the Sue Thompson list before you became  
40 involved in Parrabell?  
41 A. I didn't, no.  
42  
43 Q. And what were you told about that list when you first  
44 became involved in Parrabell?  
45 A. That there was a list in existence containing 88 names  
46 of men, that it was being asserted that they died as  
47 a result of a bias, and it was - basically it was suggested

1 that they were all murdered or died because of a bias.

2

3 Q. Bias against LGBTIQ members?

4 A. Yes.

5

6 Q. And did you have any preconceived view about those  
7 88 deaths when you first started at Parrabell?

8 A. No.

9

10 Q. I might be corrected but I think the Commissioner was  
11 asking you if you had any idea why you were chosen to do  
12 the particular task that you did.

13 A. Only based on what I've said in the statement.  
14 I don't know if that is entirely the case. That was my  
15 opinion as to why I was chosen to be involved in Strike  
16 Force Parrabell.

17

18 MR TEDESCHI: Yes, thank you.

19

20 THE COMMISSIONER: Yes, Mr Gray.

21

22 <EXAMINATION BY MR GRAY:

23

24 MR GRAY: Q. Mr Bignell, so that I get this straight,  
25 soon after you started at Parrabell, somebody told you that  
26 "We're doing this because there's a Sue Thompson list of  
27 88"?

28 A. At the time I was told about Parrabell I was made  
29 aware of that list.

30

31 Q. Who told you that?

32 A. It was either Mr Middleton or Mr Grace.

33

34 Q. And did they say, whoever it was, "This list of 88  
35 looks good to us, let's just confirm it", or did they say,  
36 "We think this list of 88 is a bit exaggerated", or did  
37 they say anything about why it was being reviewed at all?

38 A. I believe I was told that the 88 - or the suggestion  
39 that those 88 names, that there was a suggestion that they  
40 were all murdered or killed because of an LGBTIQ bias  
41 towards them, and I was told that we were going to be  
42 conducting a review of each of those 88 names, just of  
43 those 88 names, to determine whether or not they were  
44 a victim of an LGBTIQ bias.

45

46 Q. And why was that going to be done, according to what  
47 you were told? Why review it at all?

1 A. I don't know.  
2  
3 Q. Was it to prove it wrong or was it to prove it right  
4 or was it for some other reason that is not obvious?  
5 A. I don't know why the Strike Force Parrabell came  
6 about. As I said, I was made aware of it in August 2015  
7 and it was put to me that I would be involved in that. As  
8 to why it came out - or came about prior to that, I do not  
9 know.  
10  
11 Q. So you knew by the time this had been made known to  
12 you, the Sue Thompson list --  
13 A. Yes.  
14  
15 Q. -- you knew that it listed 88 deaths; correct?  
16 A. Yes.  
17  
18 Q. You knew that, according to what you were told, it was  
19 being suggested that all 88 of them had a gay hate bias  
20 factor in them?  
21 A. Yes.  
22  
23 Q. You knew - I think from something you said earlier  
24 today - or you were told, that the suggestion was being  
25 made, whether by Sue Thompson or someone else, that in some  
26 or all of those cases, the police had not sufficiently  
27 investigated them?  
28 A. Yes.  
29  
30 Q. And you say, do you, that given that that was the  
31 appreciation of the list of 88 that was abroad, you just  
32 have no idea why the police wanted to check the list  
33 themselves and review them?  
34 A. Not definitively, no. I can draw certain assumptions  
35 as to why --  
36  
37 Q. What would you draw?  
38 A. -- but I don't know.  
39  
40 Q. What would you draw?  
41 A. That there was --  
42  
43 MR TEDESCHI: I object on relevance.  
44  
45 MR GRAY: I press it.  
46  
47 THE COMMISSIONER: I'm sorry?

1  
2 MR TEDESCHI: I object on relevance.

3  
4 THE COMMISSIONER: I think it is relevant, Mr Tedeschi,  
5 thank you. Yes.

6  
7 MR GRAY: Q. Not so much what would you draw, what did  
8 you draw?

9 A. That the list of 88 names that was out there, that was  
10 in the community, was, in fact, being, I suppose, advocated  
11 that it was, you know, a short-falling of police, that all  
12 of those people died as a result of a gay bias, and so, you  
13 know, there's an issue within the State of New South Wales  
14 of gay bias, and that we needed to look at each of those  
15 cases and make a determination whether or not that was the  
16 case.

17  
18 Q. Because there was a view inside the police that those  
19 accusations were wrong?

20 A. I suppose, yes.

21  
22 Q. That's what you knew, didn't you?

23 A. That's my opinion, yes.

24  
25 Q. You knew that the police thought that the accusations,  
26 whether by Sue Thompson or anyone else, that there were 88,  
27 that these 88 were gay bias deaths and that the police  
28 hadn't investigated them properly, were wrong?

29 A. I think the view was that no-one had actually looked  
30 at that list. The list had been formed by Ms Thompson and  
31 then no-one had gone away and had a proper look at each of  
32 those names to make a proper determination.

33  
34 Q. The view - and I will put this again - that you  
35 understood to be held in the police, including in Parrabell  
36 officers, Mr Middleton, Mr Grace, Mr Crandell, was that the  
37 accusations by Ms Thompson, or whoever, about the list of  
38 88, were exaggerated or wrong, and that this review was  
39 designed to set out the true position?

40 A. I disagree with the fact it was saying that it was  
41 exaggerated or wrong. It was that no-one had actually  
42 looked at each of those deaths individually to make  
43 a proper determination.

44  
45 Q. Are you saying that those who spoke to you,  
46 Mr Middleton or Mr Grace, or anyone else, were entirely  
47 neutral and thought that the accusations by Ms Thompson or

1 others might have been perfectly true and, if so, then so  
2 be it?

3 A. I know for myself that the information that was  
4 provided to me from the onset of Parrabell, there would  
5 have been no issue if every one of those 88 deaths had been  
6 returned as being a victim of gay bias. It wouldn't have  
7 been an issue if that was my findings.

8  
9 THE COMMISSIONER: Q. Yes, but the point is that the  
10 view held by you, I suggest, at the very least, was that  
11 Ms Thompson's allegations were suspect?

12 A. No. It was that we hadn't properly looked at each of  
13 those names.

14  
15 Q. Did you think they had a basis in truth or did you  
16 think they were suspect?

17 A. I didn't have any opinion on that list.

18  
19 THE COMMISSIONER: I see, okay.

20  
21 MR GRAY: Q. And according to you, you detected no  
22 impression or opinion among any of the others you were  
23 working with; they were just a complete blank slate, were  
24 they?

25 A. Mr Crandell, Mr Middleton and Mr Grace did not offer  
26 any opinion as to that list to me.

27  
28 Q. No suggestion as to whether they thought the list  
29 might have been exaggerated or wrong in any way?

30 A. As I said, I was told that the intentions of Strike  
31 Force Parrabell was to look at each of those 88 names and  
32 make a determination whether or not they were a victim of  
33 bias.

34  
35 MR GRAY: Thank you.

36  
37 THE COMMISSIONER: Thank you. Mr Bignell, thank you very  
38 much for your assistance.

39  
40 <THE WITNESS WITHDREW

41  
42 THE COMMISSIONER: Mr Tedeschi, the time for you to  
43 respond, if you still wish to do so, to what Mr Gray said  
44 this morning, will be 9.30 next Thursday morning. We've  
45 got a fair bit on our plate that day and I will have to  
46 limit you to about half an hour.

47



1 MR TEDESCHI: That's fine.

2

3 THE COMMISSIONER: I can't imagine that you would need  
4 much more time.

5

6 MR TEDESCHI: No.

7

8 THE COMMISSIONER: All right. We will make it your  
9 response at 9.30 next Thursday, and I will adjourn  
10 otherwise. Thank you very much

11

12 **AT 3.54PM THE SPECIAL COMMISSION OF INQUIRY WAS ADJOURNED**  
13 **TO MONDAY, 25 SEPTEMBER 2023 AT 10AM**

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