

**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**

On Monday, 5 December 2022 at 10.00am

(Day 10)

Counsel Assisting:

**Mr Peter Gray SC (Senior Counsel Assisting)
Ms Christine Melis (Counsel Assisting)
Mr William de Mars (Counsel Assisting)
Ms Kathleen Heath (Counsel Assisting)
Ms Gráinne Marsden (Counsel Assisting)
Ms Meg O'Brien (Counsel Assisting)
Ms Claire Palmer (Counsel Assisting)
Mr Enzo Camporeale (Director Legal)
Ms Kate Lockery (Principal Solicitor)**

Also Present:

**Mr Mark Tedeschi KC (for NSW Police)
Mr Anders Mykkeltvedt (for NSW Police)
Mr Ken Madden (for Sergeant Steer)**

1 THE COMMISSIONER: Mr Tedeschi, I note you are here today,
2 having previously indicated your requirement for leave.
3 I think we gave you and others leave some time ago.
4

5 MR TEDESCHI: Thank you, Mr Commissioner. I appear today
6 with Mr Mykkeltveidt. Ms Richards has unfortunately had to
7 go away for a family emergency but will be here later in
8 the week.
9

10 THE COMMISSIONER: Thank you. Yes, Mr Gray.
11

12 MR MADDEN: Commissioner, could I announce my appearance
13 with your leave. Madden, solicitor, and I appear for
14 Sergeant Geoffrey Steer.
15

16 THE COMMISSIONER: Thank you very much, Mr Madden.
17 I think again we indicated by correspondence that leave was
18 granted. Thank you so much.
19

20 MR MADDEN: Yes, you did, thank you.
21

22 THE COMMISSIONER: Yes?
23

24 MR TEDESCHI: Commissioner, you would have received
25 a letter from those instructing me on Friday which
26 indicated that we wished to make oral submissions to you in
27 relation to the material proposed to be tendered and
28 evidence proposed to be called this week.
29

30 THE COMMISSIONER: Yes.
31

32 MR TEDESCHI: With your permission, we would seek to do
33 that early in the piece, this morning.
34

35 THE COMMISSIONER: By all means, I think it is important
36 that if you are going to make those submissions you do so
37 sooner rather than later. I agree.
38

39 What I might do is get Mr Gray just briefly to open
40 this part of the hearing. He is cognisant of your desire.
41 He will accommodate that, so we will get back to you fairly
42 swiftly, I think.
43

44 MR TEDESCHI: Thank you.
45

46 THE COMMISSIONER: May I just ask you in advance - and it
47 may or may not be relevant - Mr Crandell is here, is he?

1
2 MR TEDESCHI: Yes, in uniform in the back of the room.

3
4 THE COMMISSIONER: He is welcome in uniform or not in
5 uniform, so there you go.

6
7 All right, yes, Mr Gray.

8
9 MR GRAY: Commissioner, this is the second of the public
10 hearings of the Special Commission of Inquiry into LGBTIQ
11 Hate Crimes. The Special Commission is inquiring into
12 deaths suspected of being LGBTIQ hate crimes in the 40-year
13 period between 1970 and 2010.

14
15 By its Terms of Reference, the Special Commission is
16 expressly required to have regard to a number of earlier
17 reports, including the report and findings of Strike Force
18 Parrabell.

19
20 Strike Force Parrabell was a review by the NSW Police
21 carried out between 2015 and 2018 of historical records
22 relating to more than 80 deaths. Those deaths had occurred
23 between 1976 and 2000 and by 2015 had been widely
24 publicised as actually or possibly involving what might now
25 be called anti-LGBTIQ bias.

26
27 The resulting Parrabell report in June 2018 was in two
28 parts. The first part was the work of the police officers
29 who carried out that historical paper review exercise, and
30 the second part was a review by a team of academics
31 retained by the NSW Police of the work of those police
32 officers.

33
34 The Inquiry has also identified Strike Force Neiwand
35 and Strike Force Macnamir as other relevant investigations
36 conducted by NSW Police into possible homicides against
37 LGBTIQ people during the relevant period, to which it is
38 necessary to have regard as well.

39
40 Further, in light of the Inquiry's Terms of Reference,
41 it is important for the Inquiry to have regard generally to
42 the ways in which NSW Police have approached the matter of
43 suspected hate or bias crimes, including the
44 identification, investigation and recording of such crimes.

45
46 This second hearing will be conducted in two stages.
47 The first stage will commence today and will occupy some or

1 all of this week and next. The second stage will take
2 place on dates to be fixed in February 2023.

3
4 It is expected that this public hearing will include
5 evidence relating to, firstly, Strike Force Parrabell and
6 its final report, including the methodologies used by the
7 Parrabell police officers on the one hand and the academic
8 team on the other; secondly, Strike Force Neiwand and
9 Strike Force Macnamir, including the reasons for their
10 establishment; and thirdly, changes in the approach of the
11 NSW Police to the identification, investigation and
12 recording of suspected hate or bias crimes, including the
13 relevant history of the Bias Crime Unit as variously named
14 and configured over the years.

15
16 On 20 September 2022 the Inquiry requested the
17 NSW Police to provide witness statements from a number of
18 police officers and from two of the academics who carried
19 out the academic review of the work of the Parrabell police
20 officers, and in due course such statements were provided.

21
22 It is anticipated that the following witnesses will be
23 called to give oral evidence in this second hearing:
24 firstly, Assistant Commissioner Anthony Crandell, who was
25 the commander of Strike Force Parrabell and is the former
26 NSW Police Corporate Sponsor for Sexuality, Gender
27 Diversity and Intersex; secondly, Shobha Sharma, who is the
28 Manager, Policy and Programs Team, Crime Prevention
29 Command; thirdly, Sergeant Geoffrey Steer, formerly Hate
30 Crime Coordinator and Bias Crime Coordinator and former
31 team leader of the then Bias Crime Unit; and fourthly,
32 Sergeant Ismail Kirgiz, who is the current Hate Crime
33 Coordinator from the Engagement and Hate Crime Unit.

34
35 It is anticipated that the witnesses at the second
36 stage of this hearing, in early 2023, will include
37 Detective Sergeant Steven Morgan, Investigation Supervisor
38 for Strike Force Neiwand, and Professors Derek Dalton and
39 Willem de Lint, members of the Flinders University academic
40 review team. There is also likely to be additional lay and
41 expert evidence.

42
43 The four reports expressly referred to in the Terms of
44 Reference, including the final report of Strike Force
45 Parrabell, were received in evidence at the first public
46 hearing of the Inquiry last month and are collectively
47 exhibit 1. A tender bundle for the November hearing became

1 exhibit 2. For this hearing, I seek to have received into
2 evidence the December tender bundle, which consists of 10
3 volumes in all, including two supplementary volumes. This
4 tender bundle contains, in particular, firstly, a number of
5 witness statements; secondly, various documents obtained by
6 way of summons, mainly from the NSW Police and also from
7 other sources; and, thirdly, various relevant publications,
8 including academic articles and media reports.

9
10 There have been a series of requests in recent times
11 by the NSW Police for certain material in the tender bundle
12 to be redacted. The Inquiry has considered these requests
13 and has made redactions such as to personal or sensitive
14 information of witnesses and victims; the names of then
15 juvenile offenders; phone numbers and email addresses of
16 New South Wales police officers; information that could
17 reveal confidential sources; and information that may
18 prejudice ongoing investigations or criminal trials. The
19 Inquiry has also applied pseudonyms to the names of persons
20 such as unrelated victims, confidential witnesses and
21 persons of interest.

22
23 The material in this tender bundle is directly
24 relevant to the present hearing and also to the work of the
25 Inquiry generally. I would suggest that it be received as
26 exhibit 6. Commissioner, you may wish to do that now or
27 you may wish to first hear what Mr Tedeschi has to say
28 about the matters that he wishes to raise.

29
30 Before, Commissioner, you rule on that point, I should
31 say one further thing before Mr Crandell is called, which
32 is this: on 21 November at the opening of the November
33 hearing, I sought to tender as part of exhibit 2 the
34 statement of Stephen McCann, which was at tab 11 of
35 exhibit 2, and two letters prepared by Stephen McCann dated
36 10 August 1991 and 15 April 1991, they being tabs 136 and
37 137 of exhibit 2 respectively.

38
39 At that time, Mr Mykkeltvedt, on behalf of the
40 Commissioner of Police, sought additional time for his
41 client to consider her position in relation to those
42 documents. I can indicate that the tender of those three
43 documents as part of exhibit 2 is no longer pressed.
44 However, the statement of Stephen McCann dated 10 November
45 2022 and redacted versions of those two letters of
46 10 August 1991 and 15 April 1991 are now included in
47 the December tender bundle which, as I say, might perhaps

1 become exhibit 6, at tabs 233, 233A and 233B.

2

3 As I say, I would propose that the December tender
4 bundle would become exhibit 6, and subject to the matters
5 that my friend wishes to raise, I would call Mr Crandell.

6

7 THE COMMISSIONER: All right. Now, Mr Tedeschi, first, do
8 you have any objection to me marking this as exhibit 6
9 before I hear you?

10

11 MR TEDESCHI: Your Honour, our submissions go to the
12 relevance of many of those documents, so we would submit
13 that you, Commissioner, should hear us first before
14 admitting those documents into evidence.

15

16 THE COMMISSIONER: Okay.

17

18 MR TEDESCHI: We would also wish to have our instructing
19 solicitor just quickly review those folders to make sure
20 that the documents that are there are the versions that we
21 have agreed to. We haven't had an opportunity to see the
22 final volumes of documents and I don't think even my
23 learned friend has had that opportunity, so we would just
24 wish to check to make sure.

25

26 THE COMMISSIONER: Well, it probably doesn't make very
27 much difference if you have some time to do that. It is
28 better that you are not confused about the exercise, so by
29 all means, take whatever time is necessary. What I will do
30 is I will defer the exhibit 6 for two reasons: first, to
31 let you, in the first instance, put whatever you are going
32 to put on the relevance; and, second, to enable your
33 solicitor to check that it is with the various redactions
34 or whatever else has been agreed, by all means.

35

36 All right, Mr Tedeschi, let me understand what your
37 position is.

38

39 MR TEDESCHI: Commissioner, we wish to make oral
40 submissions in support of the letter that was sent to you
41 by the General Counsel of the NSW Police last Friday,
42 2 December. We would just like to check that you have
43 received that letter?

44

45 THE COMMISSIONER: Yes, I have, thank you.

46

47 MR TEDESCHI: We are concerned that this Inquiry focus on

1 what are the real issues that have been raised for your
2 consideration by the Terms of Reference from the Governor,
3 and we wish to provide some assistance to you,
4 Commissioner, by way of submissions on what we would
5 suggest are the main focus of the evidence this week and
6 next.

7
8 Commissioner, we suggest that the main focus of
9 attention this week, and possibly into next week, seems to
10 be on four distinct topics: firstly, the creation of the
11 Bias Crime Unit, by whatever name, in the NSW Police Force
12 and the criteria that were adopted by that unit for the
13 characterisation of hate crimes, predominantly by Sergeant
14 Steer; secondly, the creation of Operation Parrabell and
15 its methodology; thirdly, the creation of Task Force
16 Parrabell and its methodology; and fourthly, the contract
17 between the NSW Police and some academics from Flinders
18 University to provide an independent review of Task Force
19 Parrabell's report.

20
21 We submit to you, Commissioner, that the focus of
22 these topics is outside the Terms of Reference that govern
23 this Inquiry. We submit that it is apparent from the Terms
24 of Reference and from the circumstances in which your
25 Inquiry has been set up that those who advised the Governor
26 do not wish for this Inquiry to be a review of the
27 establishment or the methodology of past inquiries, and
28 especially where those inquiries were not investigations
29 into the manner and cause of death of members of LGBTIQ
30 communities.

31
32 We suggest, in fact, it is quite the contrary. We
33 respectfully submit that your Terms of Reference make it
34 clear that you are to avoid unnecessary duplications and to
35 have regard to - merely have regard to - the three previous
36 inquiries that are in paragraph C of the Terms of
37 Reference.

38
39 That does not mean, we submit, that those who advised
40 the Governor expect you to review the adequacy of those
41 findings in those three reports.

42
43 THE COMMISSIONER: May I just interrupt so that
44 I understand as we go. The Terms of Reference, you say,
45 merely, in effect, direct me to note the contents of those
46 reports and do no more?
47

1 MR TEDESCHI: Perhaps I could elaborate on that.

2

3 THE COMMISSIONER: Would you answer that question in the
4 first instance: do they direct me to merely note the
5 contents of those reports and do no more?

6

7 MR TEDESCHI: And not to investigate the adequacy --

8

9 THE COMMISSIONER: Is that to do no more? Mr Tedeschi,
10 I'm just trying to understand the point.

11

12 MR TEDESCHI: The answer is yes, Commissioner.

13

14 THE COMMISSIONER: Okay, so therefore I read them, I note
15 the contents, and what do I then do? Am I bound by them?
16 Do I just say they are interesting or what do I do with
17 them?

18

19 MR TEDESCHI: Might I come to that in the course of my
20 submissions?

21

22 THE COMMISSIONER: Certainly.

23

24 MR TEDESCHI: What we submit, Commissioner, is that
25 paragraphs A and B of your Terms of Reference specifically
26 direct you to inquire into the manner and cause of death in
27 unsolved cases of suspected hate crime murders of persons
28 who come within those categories of LGBTIQ communities.

29

30 Commissioner, we submit that the four topics that
31 I have mentioned that are to be raised this week and into
32 next week, and many of the documents foreshadowed to be
33 tendered by counsel assisting, in no way assist you to
34 determine the manner and cause of death of members of those
35 communities, which we submit should be the entire focus of
36 your Inquiry.

37

38 We submit that it is clear from the Terms of Reference
39 that those who advised the Governor did not want you to
40 write a history of the varying approaches and tactics of
41 the NSW Police towards hate crimes. Neither did they wish
42 you to conduct a review of whether those Flinders
43 University professors were the right people to review Task
44 Force Parrabell or whether their review was adequate or
45 inadequate. Neither did they wish you to conduct a review
46 of how the Hate Crime Unit or Operation Parrabell or Strike
47 Force Parrabell came to be in existence and whether or not

1 their methodology was appropriate, or whether the criteria
2 for designation of a crime as a hate crime were adequate or
3 inadequate.
4

5 Now, Commissioner, we would refer you to the final
6 report of the Gay and Transgender Hate Crimes Inquiry in
7 the New South Wales Legislative Council Standing Committee
8 on Social Issues that led to the creation of this present
9 Inquiry. Recommendation 1 of that inquiry was:

10
11 *That the NSW Government establish*
12 *a judicial inquiry or other form of expert*
13 *review to inquire into unsolved cases of*
14 *suspected gay and transgender hate crime*
15 *deaths.*
16

17 At paragraph 2.92 of that report on page 21, that inquiry,
18 in their final report, said this:

19
20 *Over the course of the two inquiries, there*
21 *have been mounting calls for a judicial*
22 *inquiry to be established as the means by*
23 *which unsolved cases of suspected gay hate*
24 *crime, including those resulting in death,*
25 *are reinvestigated.*
26

27 Finally, Commissioner, could I take you to the committee's
28 comments at page 34 in paragraphs 2.106 to 2.108, in which
29 that committee said:

30
31 *The committee acknowledges the call of*
32 *inquiry participants across both inquiries*
33 *seeking the reinvestigation of all unsolved*
34 *cases of suspected gay and transgender hate*
35 *crime, including those resulting in death.*
36 *In particular, the committee shares the*
37 *hope inspired by the outcome of the --*
38

39 and then there is a reference to a case --

40
41 *that [investigation] will prove fruitful.*
42

43 *While the committee notes the suggestion*
44 *that police investigations can proceed*
45 *without a judicial inquiry, the committee*
46 *is of the view that a judicial inquiry is*
47 *the most appropriate avenue for pursuing*

1 *justice for victims of historical gay and*
2 *transgender hate crimes. Particularly in*
3 *light of the receding window of opportunity*
4 *to obtain evidence from people who may have*
5 *been involved, witnessed or have knowledge*
6 *of those decades old crimes, the committee*
7 *believes that the coercive powers of*
8 *a judicial inquiry will assist in piecing*
9 *together an accurate account of the crimes*
10 *being investigated.*

11
12 *The committee therefore recommends that the*
13 *NSW Government establish a judicial inquiry*
14 *or other form of expert review to inquire*
15 *into unsolved cases of suspected gay and*
16 *transgender hate crimes deaths.*

17
18 Following that, your Honour, the relevant minister, the
19 Minister for Police and Emergency Services, the
20 Hon David Elliott, published to that standing committee
21 a letter dated 4 November 2021, in which was attached
22 a chart in which the New South Wales Government responded
23 to the various recommendations of the standing committee.

24
25 Recommendation 1, the one that recommended the
26 establishment of a judicial inquiry, had this as the
27 government's response:

28
29 *Supported.*
30 *The NSW Government supports the*
31 *establishment of a judicial inquiry or*
32 *other form of expert review to inquire into*
33 *unsolved cases of suspected gay and*
34 *transgender hate crime deaths.*

35
36 *The impact of unsolved hate crimes on*
37 *victims, survivors, their loved ones and*
38 *family and friends is immeasurable. The*
39 *evidence presented to the inquiry showed*
40 *how the associated grief and trauma has*
41 *affected the lives of so many. Solving*
42 *these crimes and delivering justice can*
43 *help in the healing process.*

44
45 *The NSW Police Force continues to actively*
46 *seek new information from the community in*
47 *relation to unsolved gay and transgender*

1 *hate crimes with mechanisms at its disposal*
2 *including Crime Stoppers, which regularly*
3 *makes appeals to the public in relation to*
4 *unsolved cases. Government rewards have*
5 *also provided assistance where appropriate*
6 *in successfully bringing perpetrators*
7 *before the courts. Consideration of*
8 *rewards in consultation with families and*
9 *loved ones of the victims forms part of the*
10 *Unsolved Homicide Review process.*

11
12 That was attached to a letter in which the minister said to
13 the chair of that committee:

14
15 *Please find attached the response of the*
16 *NSW Government to the recommendations.*

17
18 Now, Commissioner, we submit that that material which forms
19 the basis for the Terms of Reference that were drafted by
20 those who advised the government --

21
22 THE COMMISSIONER: And what relevance legally do you say
23 the report, or recommendations of the parliamentary
24 committee and/or the open letter of the minister, has in
25 relation to the construction of the Terms of Reference? Do
26 you say it is extraneous material, do you, as I would be if
27 I were construing a statute --

28
29 MR TEDESCHI: Precisely.

30
31 THE COMMISSIONER: You put your hand towards me as if to
32 acknowledge - no, I just want it for the transcript, what
33 you are telling me is I passed that exam. All right.

34
35 Now, tell me as a matter of law, Mr Tedeschi, in the
36 context of construction of Terms of Reference unlike that
37 of a statute and unlike the Interpretation Act of New South
38 Wales, how it is that I construe the Terms of Reference by
39 reference to extraneous remarks made by the minister, not
40 with the Terms of Reference in front of him, nor the
41 Parliament of New South Wales equally without the Terms of
42 Reference in front of them. They were simply statements
43 which were conforming to their own views in both cases and
44 expressing support for the Inquiry, but they both pre-dated
45 the actual Terms of Reference in this case, did they not?

46
47 MR TEDESCHI: They did indeed, Commissioner.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47

THE COMMISSIONER: So apart from support from various sections of the community, the parliament, and on the other hand the minister, would you be kind enough to answer my question precisely as a matter of law, what relevance do those statements have to do with the construction of the Terms of Reference?

MR TEDESCHI: What we submit, Commissioner, is that they assist you in understanding what we submit are the very clear words of the Terms of Reference itself, and they support our submissions on what those Terms of Reference mean.

THE COMMISSIONER: Insofar as the point you wish to make - namely, that a principal focus of the Terms of Reference is clearly manner and cause of death - the issue for me this morning is whether that is the sole focus, and at some point no doubt you will come to the Terms of Reference, because I think it's that document which is the foundation stone of this Inquiry that needs to be looked at.

MR TEDESCHI: Indeed. Indeed, Commissioner.

THE COMMISSIONER: I wonder if you would do that, subject of course to your own submissions, sooner rather than later.

MR TEDESCHI: What we submit, Commissioner, is that some of the material which your counsel assisting has indicated is going to be tendered this week, is going to be made available to the general public --

THE COMMISSIONER: Sorry, this is another point, then, is it?

MR TEDESCHI: There are really two points there, the relevance issue and also the issue of what should be made available to the public.

THE COMMISSIONER: But that's an entirely different point.

MR TEDESCHI: It is a totally different point.

THE COMMISSIONER: This is the first time I have heard - in fact, would you just tell me, it hasn't been tendered yet but it no doubt will become an exhibit, in Ms Marsic -

1 I think it is Ms Marsic, isn't it, who is instructing you -
2 in her letter, would you be kind enough to tell me where in
3 that letter she refers to her concerns, other than
4 relevance, in material being made public?

5
6 MR TEDESCHI: In the letter that was --

7
8 THE COMMISSIONER: I took the letter to be, as it were, an
9 early warning - I don't put that disrespectfully - of the
10 essence and substance of your submission. I must say when
11 I read it, apart from other matters to which a reference
12 may be made, the first eight paragraphs appear to me to be
13 directed to questions of relevance governing - and she
14 helpfully refers to the relevant statute and the Terms of
15 Reference. But I didn't see any note there about concern
16 about these documents being available to members of the
17 public.

18
19 MR TEDESCHI: Your Honour, paragraphs 5, 6 and 7 refer
20 directly to our concerns about the limitations, the
21 restrictions and the limitations on this Inquiry --

22
23 THE COMMISSIONER: Yes, but no particular --

24
25 MR TEDESCHI: -- without identifying individual documents.

26
27 THE COMMISSIONER: Mr Tedeschi, you and your side know
28 fully well the length of time over which we have been
29 acquiring documents from your client and the efforts that
30 both sides have made, I accept with goodwill, to try to
31 remove any material at all that would jeopardise
32 prosecutions.

33
34 You may also be aware that on 6 and 7 June this year
35 I had a private hearing with representatives of your client
36 for the very purpose of identifying those matters which may
37 be the subject of outstanding prosecutions. There is no
38 doubt that the Terms of Reference require me to avoid such
39 problems and I think, unless you can point to a particular
40 document that raises a particular problem, not just generic
41 objections, you will find the Commission and its staff
42 ready to accommodate your clients in relation to genuine
43 and substantive complaints or concerns about
44 confidentiality.

45
46 MR TEDESCHI: Your Honour, it is one thing - I am sorry,
47 Mr Commissioner, it is one thing for your Inquiry, your

1 counsel, to obtain a whole host of documents with a view to
2 finding those that are relevant to be tendered. It's
3 another thing for your counsel to identify those documents
4 which are going to be tendered, and another thing again to
5 identify those documents that are going to be made public.
6

7 We only received a list of the tender bundle for this
8 week --

9
10 THE COMMISSIONER: Mr Tedeschi --

11
12 MR TEDESCHI: -- one week ago.

13
14 THE COMMISSIONER: Mr Tedeschi, please. If your concern
15 today on behalf of the NSW Police is that you need more
16 time to consider the content of any document, you will not
17 have any opposition from the Commission, and indeed, the
18 correspondence, some of which may be tendered or become
19 public itself in due course, will indicate an iterative
20 process between solicitors who are instructing Mr Gray, his
21 counsel assisting him and others. There is no question
22 that you won't be given time to select out those documents
23 which you can justifiably indicate might indicate to the
24 public, if they were released, something or other which
25 should not be in the public interest out there.
26

27 MR TEDESCHI: Your Honour, our concern goes over and above
28 that, and it is --

29
30 THE COMMISSIONER: What is it? It is just getting
31 documents out there which are irrelevant. I understand
32 that point.
33

34 MR TEDESCHI: We have two generic concerns on which we
35 would wish to make submissions to you, Commissioner, today.
36

37 THE COMMISSIONER: Yes, you can, but you know what, I am
38 entitled, having read the letter, to direct you to matters
39 which are of concern to me.
40

41 MR TEDESCHI: Indeed.
42

43 THE COMMISSIONER: Mr Tedeschi, we have both been around
44 long enough to know that that is a perfectly appropriate
45 way to try to get to the heart of the problem. Please
46 continue.
47

1 MR TEDESCHI: Commissioner, I hope to get to the heart of
2 the problem in due course, and I should reiterate that we
3 have two concerns, one of which is that much of the
4 evidence to be led this week is irrelevant to the Terms of
5 Reference; and our subsidiary concern, which is allied to
6 that in a way, is that we are very concerned that even
7 though there are a lot of documents that we don't have any
8 specific objection to parts of them being redacted, because
9 we have reached agreement with your counsel assisting, we
10 have an overall concern about whether it is in the
11 interests of the Inquiry for many of these documents to be
12 placed in the public arena. So if I might address those
13 two issues.

14
15 THE COMMISSIONER: Certainly.

16
17 MR TEDESCHI: Commissioner, we submit that some of the
18 material which your counsel assisting has indicated is
19 going to be tendered this week, and is going to be made
20 available to the general public, should be the subject of
21 serious consideration by you prior to it being made
22 publicly available. We refer in particular to the case
23 summaries prepared by Task Force Parrabell, and there are
24 some other case summaries in which there are detailed
25 descriptions of the circumstances of 88 deaths and
26 a summary of the police evidence that had been obtained as
27 at that time.

28
29 THE COMMISSIONER: Mr Tedeschi, I hesitate always to
30 interrupt counsel, but I don't know whether you are aware
31 of this or not, but I understand - perhaps I have been
32 misinformed - that the case summaries have been on your
33 table, not yours personally, perhaps, for some time, and
34 I understood, perhaps wrongly again, that any number of
35 accommodations have already been made. Now, are you
36 telling me this morning either (a) you are unaware of that
37 process or (b) notwithstanding that process, you are now
38 instructed by the Commissioner of Police NSW, today, to
39 take objection, fresh objection, to all of the case
40 summaries all over again?

41
42 MR TEDESCHI: Your Honour, it is more akin to the latter.

43
44 THE COMMISSIONER: Well, when you say "more akin to the
45 latter", what on earth does that mean?

46
47 MR TEDESCHI: What we are suggesting is not that we have

1 a technical legal objection to the material but that it may
2 well run counter --

3
4 THE COMMISSIONER: But, Mr Tedeschi, I am really trying,
5 obviously against a deadline of 30 June next year, to get
6 this matter off and running in its various respects. What
7 I am anxious to do is understand not so much in generic
8 terms - that's important because you are instructed to put
9 them - but a lot of the matters that you are now referring
10 to will either die or not die in the detail. To say that
11 both sides, as I understand it - and I may be misinformed -
12 have reached accommodation on certain of the case
13 summaries, you come into the matter and you say, "No, but
14 I think, notwithstanding the fact that we cannot really say
15 that there is any problem in the existing case summaries,
16 as a matter of prudence, seemliness, decency" - I don't
17 know what it is - "we don't think you should make them
18 public."

19
20 I take it you have read Mr Gray's opening?

21
22 MR TEDESCHI: Yes.

23
24 THE COMMISSIONER: I take it that you have read carefully
25 the detail to which he went to in respect of a number of
26 the cases - not all, but a number?

27
28 MR TEDESCHI: Yes.

29
30 THE COMMISSIONER: Do you say that that should now be,
31 what, marked confidential?

32
33 MR TEDESCHI: Commissioner, we understand that it is still
34 the intention of counsel assisting to tender the Strike
35 Force Parrabell report into those 88 cases, with the
36 redactions --

37
38 THE COMMISSIONER: Mr Tedeschi, I'm going to stop you
39 again. We are going to proceed this way. Number 1, I will
40 hear you on the generic complaint or submission that there
41 are four topics that I can't look into. I am not going to
42 spend the day with, if I may say so for my own part,
43 general remarks without specificity about documents.

44
45 Now, I will hear particular arguments, if you wish, in
46 due course - I think next week we have a hearing that is
47 going to take place in relation to annexures to Mr Morgan's

1 affidavit. Now, as far as I'm concerned, I will give your
2 side every opportunity, if accommodation can't be reached,
3 to be heard on specific documents.
4

5 MR TEDESCHI: We would ask that the Parrabell report not
6 be placed into the public arena in the meantime.
7

8 THE COMMISSIONER: Mr Tedeschi, please correct me if I'm
9 wrong - would you please get instructions from those around
10 you, and I could be wrong - my understanding is that the
11 Parrabell report is a matter of public record and published
12 and available on the internet as we speak.
13

14 MR TEDESCHI: Not the case summaries. I'm referring to
15 the case summaries.
16

17 THE COMMISSIONER: You said "the Parrabell report".
18

19 MR TEDESCHI: I meant the case summaries.
20

21 THE COMMISSIONER: All right. I will come back to the
22 point I was at. As far as individual documents or
23 categories of documents are concerned, I cannot deal with
24 that and I will not deal with that generically. It's
25 neither fair to your side or to anybody else, and
26 particularly the public of New South Wales. If you want to
27 make a generic submission and not descend into the detail,
28 I will deal with it at a high level.
29

30 MR TEDESCHI: I'm ready to do that now, Commissioner.
31

32 THE COMMISSIONER: When you say "descend", what do you
33 mean, Mr Tedeschi?
34

35 MR TEDESCHI: What we submit is that the case summaries
36 prepared by Task Force Parrabell --
37

38 THE COMMISSIONER: Mr Tedeschi, I will say it one more
39 time. As present, anything that falls into a particular
40 category, such as case summaries, names of informants, the
41 usual categories of material that would more often than not
42 be redacted - I don't say case summaries would - I will
43 hear individual arguments aside. I'm anxious to get
44 Mr Crandell into the witness box, if that's possible, and
45 others. I will hear you on the generic concerns that you
46 have in the first instance about the creation of the crime
47 unit and the other matters, the four matters you have

1 identified.

2

3 MR TEDESCHI: Commissioner, we are not seeking to suggest
4 that the case summaries are not admissible before you.
5 They are clearly --

6

7 THE COMMISSIONER: I don't know whether you heard me,
8 Mr Tedeschi. What I'm trying to do for efficiency purposes
9 is simply to divide up, if it's possible, the arguments on
10 the Bias Crime Unit, the Parrabell strike force, et cetera,
11 et cetera, as topics for my investigation and deal with
12 that issue.

13

14 I would then, of course, give you and your side every
15 opportunity, over and above any accommodations that may
16 have been made, if you want to say whatever you want to say
17 today, tomorrow, the next day, about the particular
18 documents, either as classes of documents or by reason of
19 the particular detail in documents, but I see that as being
20 a different issue - that is, if I may put it this way,
21 a case-by-case analysis of particular documents or case
22 summaries, unless you say no case summary should go out for
23 whatever reason. But if the four points that you have made
24 are a discrete argument, I would prefer to get that done,
25 have a look at the Terms of Reference and the provisions of
26 the Act either today or whenever is convenient to you and
27 Mr Gray. I will deal with other matters.

28

29 But what I suspect I will need - it is an
30 old-fashioned term, Mr Tedeschi - I suspect I will need
31 some further and better particulars; in other words, I will
32 need you to state quite precisely in relation to classes of
33 documents or particular documents by letter or otherwise,
34 because letters don't seem to work in this case because
35 there has been a bit of a moving feast about what is agreed
36 and what is not agreed, but, that said, if you can let me
37 know in court or by letter precisely what you wish to have
38 excised or not in the public view, I will constitute
39 a separate hearing for that purpose.

40

41 MR TEDESCHI: Thank you.

42

43 THE COMMISSIONER: If that is convenient, for example, if
44 we were to deal with any additional documents for tender at
45 some other point or later today, but I am anxious in the
46 first instance, because of the form of the letter, to deal
47 with the four main topics that you have outlined, and

1 unless you tell me it can't be done this way, it doesn't
2 seem to me that it can't be done as a discrete issue.
3 Either those matters do fall or they don't fall within my
4 Terms of Reference.

5
6 If they do fall, then I would reserve unto you, of
7 course, particular documents or particular concerns you
8 might have about particular documents, but I think in the
9 first instance, your main point, as I understood
10 Ms Marsic's letter, was that I can't look into the matters
11 that you have articulated as the four areas, and I am
12 anxious to deal with that as a preliminary point, as it
13 were, or as a separate issue, and then, once I have done
14 that, then that will set the scene for any further debate,
15 perhaps.

16
17 MR TEDESCHI: Commissioner, what we submit in relation to
18 those four categories is that what was intended by those
19 who advised the Governor in setting up your Inquiry was
20 that you use the wide powers under the Special Commissions
21 of Inquiry Act in an attempt to determine those deaths in
22 which fresh evidence may eventually lead to prosecutions
23 for murders of members of LGBTIQ communities.

24
25 We submit that it is clear from the Terms of Reference
26 that this Inquiry is not meant to be a recitation or
27 analysis or assessment of past events; rather, it is an
28 opportunity for the future to elicit those cases in which
29 further admissible evidence could lead to possible
30 prosecutions.

31
32 Our submission is that what your Terms of Reference
33 task your Inquiry to do is to locate those few cases - and
34 it might be that ultimately they can be numbered on the
35 fingers of one hand - from the, I think, 220 boxes of
36 material that we have provided to your counsel assisting,
37 to isolate those few cases that warrant further
38 investigation and in which you, as Commissioner, may be
39 able to use the coercive powers that are available to you
40 to further those investigations to the point where either
41 the police can conduct further investigations or where
42 prosecutions can be commenced.

43
44 To put it another way, we submit that your Inquiry
45 should inform the Governor whether or not there are other
46 cases like the recent case that I won't mention the name
47 of, because it is subject to a trial at this stage, in

1 which further investigations may result in the disclosure
2 of additional evidence and the launching of prosecutions.

3
4 It may be that your Inquiry can identify cases in the
5 following categories: firstly, locating some witnesses who
6 have not been questioned before; secondly, locating some
7 witnesses who may have been previously --

8
9 THE COMMISSIONER: Mr Tedeschi, I am terribly sorry to do
10 this again. What you are putting to me, if I may say so,
11 is obvious from the terms of A and B of the Terms of
12 Reference. Make no mistake about it, if your side of the
13 Bar table thinks that we are not actively looking at those
14 matters, and that's one of the reasons why we have asked
15 your client, who, if I may say so with great respect, is
16 probably in some respects the sole, if not the sole
17 repository of relevant information concerning
18 investigations done in the past, I don't need to be told
19 what is bleeding obvious in A and B. What I do need to be
20 told, if I may say so, sooner rather than later, with some
21 precision, is as to why the four topics fall outside.

22
23 I put the point back to you again. If your
24 preliminary argument is that my sole activity is A and B,
25 everything else is to be noted and nothing more, and
26 therefore, for me to go into one or other of the four
27 topics identified puts me outside my Terms of Reference,
28 I understand that. What I would be assisted by is not what
29 I know I can do and what you tell me now, if I may say so
30 on a number of occasions, I can do. We are in furious
31 agreement. I don't need to be told what I can investigate.
32 What I need you to tell me is why I can't do one of the
33 four topics. Do I make myself plain?

34
35 MR TEDESCHI: Commissioner, it is very plain, very clear.

36
37 THE COMMISSIONER: Well, then, sooner rather than later
38 can we get to the point?

39
40 MR TEDESCHI: Commissioner, what we submit is that
41 paragraphs A and B of your Terms of Reference specifically
42 direct you and direct you solely to the manner and cause of
43 death in various cases.

44
45 THE COMMISSIONER: Yes, okay, thank you.

46
47 MR TEDESCHI: It directs you in regard to that - namely,

1 the investigation of manner and cause of death - to have
2 regard to the three previous inquiries that are referred
3 to. It directs you, in conducting that inquiry - that
4 inquiry being determining the manner and cause of death of
5 certain persons - to look in an appropriate manner for
6 evidence and information, including testimony from
7 witnesses, in a way that avoids unnecessary duplication and
8 minimises trauma to witnesses, and we would submit that
9 should also apply to the families of deceased persons.

10
11 Paragraph E, to avoid prejudice to criminal
12 investigations, including future criminal investigations --

13
14 THE COMMISSIONER: Mr Tedeschi, I'm reading it with you
15 and I must confess, this is not being read by me for the
16 first time.

17
18 MR TEDESCHI: I am sure it is not. But what we
19 respectfully submit is that there is nothing there --

20
21 THE COMMISSIONER: All right. Tell me what work F has to
22 do, would you mind?

23
24 MR TEDESCHI: There is nothing there --

25
26 THE COMMISSIONER: Tell me what work F has to do in the
27 Terms of Reference.

28
29 MR TEDESCHI: That's precisely what I'm coming to,
30 Commissioner. I was just about to come to F.

31
32 THE COMMISSIONER: Excellent.

33
34 MR TEDESCHI: I have done D and E and I'm now coming to F.

35
36 THE COMMISSIONER: Thank you.

37
38 MR TEDESCHI: You are not required to inquire into
39 a particular matter to the extent that you are satisfied
40 that the matter has been sufficiently and appropriately
41 dealt with or will be sufficiently and appropriately dealt
42 with.

43
44 What we submit is that that requires you,
45 Commissioner, to look at the evidence that has been
46 obtained in particular matters that come within the
47 categories and to determine whether or not the results of

1 inquiries to date warrant additional investigation either
2 by your staff or by the Commissioner of Police.

3
4 THE COMMISSIONER: So you say, so that I understand the
5 point, F excludes me forming any satisfaction at all about
6 the appropriateness and sufficiency of Parrabell?

7
8 MR TEDESCHI: It does not require you to --

9
10 THE COMMISSIONER: I'm not asking you about requirements.
11 I would respectfully ask you --

12
13 MR TEDESCHI: I'm trying to answer your question.

14
15 THE COMMISSIONER: Well, I'm not sure. Just let me think
16 out loud and then you tell me if my thoughts are erroneous.

17
18 Paragraph F says that I am not required - in other
19 words, another view of that might be "not necessary" - to
20 inquire into or continue into a particular matter, not
21 defined, pretty broad, to the extent that I am satisfied
22 that the matter has been or - and leaving "will be" - has
23 been sufficiently and appropriately dealt with by another
24 inquiry.

25
26 If you go back to C, I am asked, indeed, I am directed
27 in conducting this Commission, to have regard to the
28 findings of previous inquiries and reports, and I'm
29 specifically directed to Parrabell.

30
31 Parrabell is one of a number of particular matters.
32 So you tell me, if you will, as a matter of law, why and
33 how I would reach a level of satisfaction if I am not
34 entitled to investigate the methodology of a particular
35 matter that I am asked to pay regard to?

36
37 MR TEDESCHI: Because, Commissioner, paragraph F states
38 that you are not required to inquire into a particular
39 matter to the extent that you are satisfied --

40
41 THE COMMISSIONER: Correct.

42
43 MR TEDESCHI: -- that the matter has been sufficiently
44 and appropriately dealt with by another inquiry.

45
46 THE COMMISSIONER: Thank you. So you tell me that the
47 Terms of Reference are to be construed on this basis:

1 I must regard Parrabell as having been appropriate and
2 sufficiently inquired into? In other words, I am not
3 entitled to have a satisfaction in accordance with F
4 because I am told that Parrabell, by implication, because
5 it's not express, is something about which I am not able to
6 form a view, I have to accept, on the face of it, that the
7 inquiry or that the report was both sufficient and
8 appropriate; I must not go to it because the Terms of
9 Reference restrict me from ever forming any views at all
10 about the sufficiency or appropriateness of a particular
11 matter, eg, the findings of Parrabell?
12

13 MR TEDESCHI: Commissioner --

14
15 THE COMMISSIONER: Is that your construction?
16

17 MR TEDESCHI: No, it is not.
18

19 THE COMMISSIONER: Okay, well, tell me what it is you say.
20

21 MR TEDESCHI: What we submit is that if you combine
22 paragraphs C and F, that those advising the Governor do not
23 want you to go into an analysis of whether or not Parrabell
24 was well set up or well motivated or what its methodology
25 was to look into it --
26

27 THE COMMISSIONER: So, put another way, I am not able to
28 form any view as to whether Parrabell was appropriate or
29 sufficient?
30

31 MR TEDESCHI: Commissioner, what you are being tasked with
32 is to look at the evidence that has been obtained --
33

34 THE COMMISSIONER: Would you answer my question, please.
35

36 MR TEDESCHI: I'm attempting to do that.
37

38 THE COMMISSIONER: No, I don't think you are, Mr Tedeschi.
39 I put a direct question to you. I would like a response to
40 assist me. If you are going to say in front of me today
41 that I am not to inquire into Parrabell, then I need to
42 understand in simple terms - or complex terms - do you say
43 that F precludes me from coming to any view or
44 investigating whether Parrabell was a sufficient and
45 appropriate outcome?
46

47 MR TEDESCHI: We submit that you, Commissioner, looking

1 at all of the Terms of Reference in their entirety, not
2 just F on its own but the whole of the Terms of Reference,
3 would come to the conclusion that those who advised the
4 Governor did not want you to inquire into the adequacy or
5 inadequacy of Parrabell or the Standing Committee on Social
6 Issues or the AIDS Council of NSW, but merely to have
7 regard to the material which they have unearthed or
8 summarised or produced and then for your Inquiry to
9 determine whether there should be further inquiry --

10
11 THE COMMISSIONER: So to be relevant to the community of
12 New South Wales, because Terms of Reference are a request
13 or a direction by the executive for some person to provide
14 information in the public interest, I have to, even if
15 I thought, let's say, ACON got it wholly wrong in relation
16 to their manner and cause cases, or I think that
17 Parrabell's methodology was flawed, or that the
18 parliamentary committee did not hear from A, B or C or
19 questions weren't asked, I simply say, "Well, never mind,
20 those inquiries remain warts and all, flawed. I read them,
21 they are interesting, but they are bedside reading because
22 I am not going to look at them." And am I entitled to
23 express a view as to whether I think they were flawed
24 inquiries?

25
26 MR TEDESCHI: We submit that's not what you are being
27 tasked with.

28
29 THE COMMISSIONER: I am told really take as read, and does
30 that mean that you will ultimately put to me some
31 submission that I have to accept Parrabell's classification
32 of a particular case?

33
34 MR TEDESCHI: Not at all; quite the contrary.

35
36 THE COMMISSIONER: So how do I investigate, if I may ask,
37 whether or not to accept your submission ultimately that
38 Parrabell's conclusion on case X was appropriate unless
39 I have a look at how they got to their conclusion?

40
41 MR TEDESCHI: Because your staff have been provided with
42 77,000 electronic documents and 220 boxes of documents with
43 which to form a view whether, in any particular case, it
44 warrants further investigation and whether or not further
45 information --

46
47 THE COMMISSIONER: But isn't it relevant in the public

1 interest for me to look at the question of a publicly
2 available report like Parrabell, and do you tell me that if
3 I were to deign to disagree with any expression of opinion
4 in that, I couldn't tell the public of New South Wales,
5 "Police force of New South Wales looked at case X. They
6 then had academics have a look at it as well, and they
7 decided, for example, no evidence of bias crime." I've got
8 to look at case X. Let's assume it's one of the unsolved
9 cases. But do you say to me I can look at X but I must
10 dare not say that the NSW Police were wrong in their
11 attitude on case X? Is that what you are saying?
12

13 MR TEDESCHI: I'm not suggesting --

14
15 THE COMMISSIONER: Well then, how do I form a view as to
16 whether I disagree or agree ultimately with Parrabell
17 unless I understand how they went about their task and
18 precisely what methodology they used?
19

20 MR TEDESCHI: With respect, the setting up and methodology
21 is not the relevant information for you, Commissioner. The
22 relevant information is the case summaries and the
23 conclusions.
24

25 THE COMMISSIONER: But I'm not allowed to publish that -
26 but I can't publish those because that will be the second
27 rung of the argument, so is --
28

29 MR TEDESCHI: Commissioner, is it possible for me to make
30 submissions to you? Because I'm continually interrupted.
31

32 THE COMMISSIONER: It is entirely possible for you to make
33 submissions. It is also appropriate that you answer direct
34 questions. Now, you go on --
35

36 MR TEDESCHI: I'm attempting to answer questions but I'm
37 not able to finish my answers.
38

39 THE COMMISSIONER: Mr Tedeschi, please proceed and finish
40 the argument when it is convenient to do so. I will take
41 a break probably about 11.30, but I don't need to take it
42 then if you are mid flight. Of course I will continue.
43 There is no clock in here, Mr Tedeschi. It is about 5 to
44 11. But don't rush, take all the time you need.
45

46 MR TEDESCHI: Commissioner, we are not suggesting that you
47 can't disagree with Parrabell. What we are suggesting is

1 that --

2

3 THE COMMISSIONER: How would I disagree, with a Ouija
4 board or a coin, or am I entitled to understand the
5 reasoning process, and insofar as I am entitled to
6 understand the reasoning process, am I not entitled to
7 understand the methodology?

8

9 MR TEDESCHI: You have the underlying documentation that
10 was used.

11

12 THE COMMISSIONER: What do you want me to do? You would
13 prefer me, what, to do that all privately and then come out
14 at some point and say "Well, on case X, Parrabell says this
15 but I don't agree but I don't propose to tell the police,
16 nor the public of New South Wales, why I disagree." Do you
17 think that's what is intended in a public inquiry?

18

19 MR TEDESCHI: No. What we are suggesting, what we are
20 submitting, is that with the assistance of your staff, your
21 counsel and your staff, that you have access to the
22 underlying material, and what the Governor hopes for you to
23 do is to go through that material to decide for yourself
24 whether or not it is a hate crime; to decide for yourself
25 whether or not the investigation can be progressed further;
26 to make a decision, if it is to be progressed further,
27 whether that is to be done by you and those that assist you
28 or whether it is to be given to the police to conduct.
29 It's very similar to the task that is faced by a coroner in
30 an inquest.

31

32 Mr Commissioner, the Terms of Reference paragraphs A
33 and B are identical to the terms in the Coroners Act that
34 govern the conduct of an inquest. We submit that that
35 provides really an irrefutable indication of the way in
36 which the Governor wishes you to conduct this Inquiry;
37 namely, to determine whether there is sufficient evidence
38 to warrant the prosecution of any person and whether - and
39 for you --

40

41 THE COMMISSIONER: Mr Tedeschi, I don't know whether you
42 feel repetition makes the point better. We are, I will say
43 it hopefully for the last time, in furious agreement about
44 A and B. I don't think there is one thing you have said to
45 me this morning so far that I would disagree with.

46

47 MR TEDESCHI: I think where we are in disagreement,

1 Commissioner, is that it is not a necessary part of that
2 exercise and is not a task that accords with your Terms of
3 Reference to go into past history and look at the way in
4 which Parrabell was set up, the way in which it conducted
5 itself, whether the --

6
7 THE COMMISSIONER: All right. So if that is right, I am
8 entitled, am I, to ignore Parrabell entirely?

9
10 MR TEDESCHI: No; quite the contrary.

11
12 THE COMMISSIONER: Okay.

13
14 MR TEDESCHI: You are directed to have regard to Parrabell
15 by paragraph C

16
17 THE COMMISSIONER: Okay.

18
19 MR TEDESCHI: But we submit that whether Parrabell was
20 well set up or not well set up, whether their methodology
21 was good or not --

22
23 THE COMMISSIONER: All right, using your terminology,
24 please give me what you say is the content of "have regard
25 to".

26
27 MR TEDESCHI: The content that you would have regard to
28 is --

29
30 THE COMMISSIONER: No, not the content of what I look at;
31 tell me what the words that you have just used, I am
32 entitled to have regard to, tell me what that means in
33 relation to Parrabell: what am I entitled to have regard
34 to?

35
36 MR TEDESCHI: You, Commissioner, should have regard to
37 those three previous inquiries and their reports.

38
39 THE COMMISSIONER: No, Mr Tedeschi, in relation to
40 Parrabell, please tell me, assist me on behalf of the
41 NSW Police Force - would you kindly tell me your
42 terminology, in relation to Parrabell, what am I entitled
43 to have regard to?

44
45 MR TEDESCHI: You are entitled to have regard to the
46 report, including the case summaries of the final report of
47 Strike Force Parrabell.

1
2 THE COMMISSIONER: Am I entitled to have any regard to how
3 they came about their classifications?
4
5 MR TEDESCHI: We submit that's not relevant to your
6 Inquiry.
7
8 THE COMMISSIONER: Okay. How would I then have regard to
9 Parrabell in the sense of trying to make sense of whether
10 I agreed with it or not, unless I tried to understand why
11 they did what they did?
12
13 MR TEDESCHI: As I've already submitted to you,
14 Commissioner, you have the primary source materials with
15 which to form your own view --
16
17 THE COMMISSIONER: So I'm to have regard to Parrabell but
18 I'm not to have regard to the way in which they formed
19 their views?
20
21 MR TEDESCHI: That's why your Terms of Reference are
22 structured in that way.
23
24 THE COMMISSIONER: I understand. You are repeating
25 yourself. So "have regard to", then without me being
26 unfair, means read it and then privately come to a view
27 about each of the individual cases that Parrabell looked
28 at?
29
30 MR TEDESCHI: Yes.
31
32 THE COMMISSIONER: So when I am told to have regard to
33 Parrabell, in effect, it's note the fact that it occurred
34 and leave it at that?
35
36 MR TEDESCHI: It may well assist you and those that --
37
38 THE COMMISSIONER: How do you think it would assist me,
39 then, in relation to --
40
41 MR TEDESCHI: Assist you to have a summary of the case.
42
43 THE COMMISSIONER: No, how would Parrabell assist me if
44 I didn't try to understand how they came about their views?
45
46 MR TEDESCHI: Because it is a ready reckoner summary of
47 the case with which to assist you and those that assist you

1 in reviewing the material that formed the basis of each
2 investigation.

3
4 THE COMMISSIONER: Thank you.

5
6 MR TEDESCHI: I don't think there is anything further
7 I can submit in that regard.

8
9 THE COMMISSIONER: What I will do, then, Mr Tedeschi, is
10 this: I will hear from Mr Gray and I will hear you in
11 response. I will then form a view about this relevance
12 issue as a discrete topic. I will then, as I have
13 indicated, reserve unto your clients the desire, perhaps,
14 to put specific - subject to me forming a view as to these
15 four matters, if you want to put further and specific
16 arguments in relation to particular documents, let's say,
17 if that arises, both in terms of sensitivity,
18 confidentiality, inappropriateness, whatever - and I'm not
19 trying to be exclusive in the topics; in relation to
20 Mr Morgan next week there are quite specific claims for
21 confidentiality - but I would hear your client in respect
22 of any or all outstanding matters, having heard this matter
23 first.

24
25 MR TEDESCHI: Thank you.

26
27 THE COMMISSIONER: Is that a convenient course?

28
29 MR TEDESCHI: Yes, it is, Commissioner.

30
31 THE COMMISSIONER: Thank you. Yes, Mr Gray.

32
33 MR GRAY: Commissioner, firstly, may I say the timing of
34 this objection as to relevance is very late and on one view
35 very surprising. I will come in a minute to some of the
36 reasons why I say that. Firstly, may I turn to the Terms
37 of Reference.

38
39 You as Commissioner are directed to do three things
40 about A and B. You are to inquire into them; you are to
41 report; and you are to make recommendations.

42
43 Both A and B, referring to various categories of
44 unsolved death, refer to the manner and cause of those
45 deaths in a particular context, and the particular context
46 is, in the case of A, potentially motivated by gay hate
47 bias; and in the case of B, the language used is "suspected

1 hate crime deaths where the victim was a member of the
2 LGBTIQ community".

3
4 Immediately, I submit, it is plain among other things
5 that the task of the Special Commission is not simply
6 a mirror of the task of a coroner because of the embedding
7 into category A and category B of the gay hate bias factor.

8
9 May I briefly remind the Commission of what I said in
10 my opening address on 2 November, more than a month ago,
11 when I outlined what it was that the Special Commission
12 would be doing. I stressed within the first few minutes
13 that one of the reports that the Special Commission would
14 be looking at was the Parrabell report.

15
16 A little later on I outlined what the methodology of
17 the Parrabell report was - namely, and I'm summarising,
18 that the strike force was a purely paper review of matters
19 that had already been investigated by the police in the
20 past; that there was no reinvestigation of any of those
21 cases; and that the objective of the strike force was to
22 look at the historical material and form an opinion as to
23 whether a sexuality or gender bias or anti-gay bias or gay
24 hate had been involved in any of those deaths.

25
26 I went on to explain that the methodology of the
27 police officers comprising the strike force was to look at
28 the historical material and then to fill out a form called
29 a Bias Crime Indicators Form, which had been largely
30 adapted from a United States document, and respond to
31 10 prompts or indicators in the form, and having done so,
32 they were to assign the case to one of four possible
33 descriptions - one, evidence of bias crime; two, suspected
34 bias crime; three, no evidence of bias crime; or four,
35 insufficient evidence to establish a bias crime.

36
37 That was the methodology of the police part of
38 Parrabell, as I outlined in the opening on 2 November, and
39 I went on to outline that in the case of the academic
40 review, the Flinders academics, relevantly, the academics
41 were provided with the completed Bias Crime Indicator Forms
42 but not with the historical files or material on which
43 those forms were based.

44
45 I went on to say that the academics did not use or
46 rely upon the 10 bias crime indicators at all - indeed,
47 they expressed reservations about the appropriateness of

1 that method and instead devised a set of concepts and
2 definitions of their own.

3
4 Then when I addressed the Terms of Reference in the
5 opening I made a number of points, one of which I will now
6 make again in the context of this application, which is
7 this - and perhaps in a way I started with this: the
8 reference to "manner and cause" in A and B of the Terms of
9 Reference is indeed a terminology found in the Coroners
10 Act, but as I pointed out, this Inquiry is not a coronial
11 inquiry, there are several fundamental differences. The
12 first is, as I mentioned a moment ago, that the concept of
13 "manner and cause" for this Inquiry, for this Special
14 Commission, is specifically shaped by the Terms of
15 Reference in particular ways which don't find a place in
16 the Coroners Act.

17
18 The Terms of Reference tie this Inquiry to the
19 concepts of gay hate bias, the words used in category A,
20 and hate crime deaths, the words used in category B of
21 LGBTIQ people. So analysis of whether such a connection as
22 gay hate bias or hate crime was involved in relation to
23 each of these deaths is central to the particular "manner
24 and cause" task which is given to the Special Commission by
25 the language of the Terms of Reference.

26
27 There is a second fundamental difference, among
28 others, which is that a coroner is not bound by any strict
29 time limit in undertaking whatever investigations and
30 inquiries may be necessary, but this Special Commission is
31 bound by a time limit, and it is a tight one - namely,
32 30 June next year.

33
34 Now, as to Strike Force Parrabell and the Parrabell
35 report, Parrabell specifically considered whether there was
36 a bias factor, anti-gay or hate crime or the like, in those
37 80 or more deaths. It used two different methodologies in
38 doing so, as I have said, one methodology used by the
39 police, and an entirely different methodology used by the
40 academic review.

41
42 Those two methodologies produced the numerical results
43 that are tabulated in various pie charts and graphs in the
44 final report. So that question, the existence or otherwise
45 of LGBTIQ-related bias, is central to the task of this
46 Special Commission when inquiry into the manner and cause
47 of deaths is under consideration. That is the very

1 question that Strike Force Parrabell and the Parrabell
2 report examined. It did it by two different means, two
3 different methodologies. So my first submission today is
4 that the relevance of Parrabell and of its two separate
5 methodologies to the task of this Special Commission in
6 inquiring into the matters in Terms of Reference A and B is
7 obvious from that brief outline alone.

8
9 But in addition, Terms of Reference F, in our
10 submission, has a significance somewhat different from the
11 significance attributed to it by my learned friend.
12 Paragraph F provides that you as Commissioner are not
13 required to inquire or to continue to do so into
14 a particular matter to the extent that you are satisfied
15 that the matter, relevantly, has been sufficiently and
16 appropriately dealt with by another inquiry.

17
18 I should perhaps make it clear that at this stage,
19 subject to the evidence, of course, that will be given,
20 counsel assisting consider that one matter of central
21 relevance to the Terms of Reference, namely, the inquiry as
22 to whether the Parrabell deaths were motivated by gay hate
23 bias, may not have been sufficiently and appropriately
24 dealt with by the inquiry constituted by Strike Force
25 Parrabell and its academic review.

26
27 Now, in terms of the submissions today, my learned
28 friend, of course, as he said, advances two sets of
29 submissions, one, the oral submissions that he has made
30 today, and the anterior submissions were the letter of
31 2 December - that is, Friday of last week - which was sent
32 to the Special Commission, sent to you, indeed, or
33 addressed to you as Commissioner, as a submission. I will
34 need to say something in response to that written document
35 as well as to what has been said today.

36
37 The submissions in writing deal with two main topics.
38 The first is relevance and, to some extent, the public
39 release of documents, which is largely what my friend has
40 spoken about from the Bar table.

41
42 The second topic, the second main topic, which is
43 addressed in the submission found in the letter of
44 2 December, concerned difficulties said to be being faced
45 by the police in coping with the need to produce documents
46 in response to summonses issued by the Inquiry. So I will
47 need to respond to both of those, subject to your views,

1 Commissioner.

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

29

30

31

32

33

34

35

36

37

38

39

40

41

42

43

44

45

46

47

First of all, in order that the Commission has an understanding of how these issues have arisen, may I hand up a folder of relevant documents. It is a slim folder comprising only five or six documents.

I may have inadvertently given your Honour the wrong one. If yours has a copy for someone else on the front of it --

THE COMMISSIONER: It says "Copy for tender".

MR GRAY: There is another copy that says "Copy for Justice Sackar", so I perhaps should give you both of them.

THE COMMISSIONER: Thank you.

MR GRAY: The written submissions in the letter of 2 December are to be found at tab 5.

THE COMMISSIONER: Before you go any further, do you want to tender this - they're correspondence, I presume?

MR GRAY: I was just going to outline what's in it. The written submissions are at tab 5. At tab 1 is the summons issued on 25 August - that is, nearly three and a half months ago - to the Commissioner of Police to produce documents relevant to Parrabell and other matters.

At tab 2 is a letter of 20 December from the solicitor assisting the Commission to the Office of the General Counsel for the police requesting witness statements from various witnesses concerning, inter alia, Parrabell.

The third letter, which is at tab 3, is the letter from Ms Marsic, general counsel for the police, of 18 October 2022, which raised matters similar to the second topic that I mentioned as being raised in the letter of Friday, 2 December, concerning resourcing of the police and difficulties in complying with summonses; and the document at tab 4 is the response by the Special Commission solicitor to that letter, which is dated 21 October.

The final document at tab 6, which I have included in case it is relevant to the question of the publication or public availability of some documents, is a schedule of

1 redactions which have been made to the tender bundle that
2 I earlier suggested might become exhibit 6.

3
4 I will deal with this briefly, as I know that both
5 you, Commissioner, and our learned friends have seen all of
6 this material.

7
8 The summons at tab 1, which was summons 12 to the
9 police, required, as you see, Commissioner, on page 2,
10 first of all documents relating to Strike Force Parrabell,
11 including coordinating instructions, Terms of Reference and
12 the like; and number 5, documents evidencing or referring
13 to the methodology, protocols and/or arrangements pursuant
14 to which the Strike Force Parrabell team was to carry out
15 its work; at number 9, documents evidencing the history of
16 the selection and use of the Bias Crimes Indicator Form.

17
18 Then below item 10 there are documents sought in
19 relation to the academic review of Parrabell, including at
20 12(iii), the methodology, protocols and arrangements
21 pursuant to which the Strike Force Parrabell team and the
22 Flinders team were to carry out their tasks; then over the
23 page, on page 4, documents relating to Strike Force
24 Macnamir and Strike Force Neiwand.

25
26 At tab 2 is the letter of 20 September, where the
27 Commission sought statements from various witnesses
28 including, in the case of Assistant Commissioner Crandell,
29 a statement dealing with - your Honour sees the headings on
30 page 2 - "Prejudice Related Crime Data Collection Project",
31 the "Bias Crime Co-ordinator and Bias Crime Unit"; on
32 page 3, the "Engagement and Hate Crime Unit", and on
33 page 4, "Operation Parrabell", including its coordinating
34 instructions and Terms of Reference, and Strike Force
35 Parrabell, including its coordinating instructions and
36 Terms of Reference; and at 26:

37
38 *The reasons for the decision to obtain an*
39 *academic analysis ...*

40
41 At 27:

42
43 *The procedures by which Flinders ...*
44 *personnel came to be selected ...*

45
46 And 28:

1 *The methodology, protocols and arrangements*
2 *pursuant to which.*

3 *(a) the Strike Force [team and]*

4 *(b) the Flinders ... team were to, and/or*
5 *did, carry out their ... tasks.*

6
7 Then the Commission sought a statement from Professor
8 de Lint and/or Professor Dalton, the academic reviewers,
9 and among the topics they were asked to address, number 4
10 was the methodology, protocols and arrangements pursuant to
11 which the strike force and Flinders carried out their
12 tasks.

13
14 Then there was sought a statement from Sergeant Steer
15 in relation to the history and development of the Bias
16 Crime Coordinator position and the Bias Crime Unit and Bias
17 Crime Standard Operating Procedures and the like.

18
19 Now, that generated statements from the police as
20 requested, in which Mr Crandell and Professors de Lint and
21 Dalton and Sergeant Steer did address all of those topics
22 at some length and annexed documents relating to those very
23 topics - the methodologies and protocols by which Parrabell
24 was constituted and by which it carried out its task. So
25 in a sense, part of what seems to be happening today is
26 that the police are, in effect, objecting as irrelevant to
27 material which they themselves have put forward in
28 statements and in annexures to statements, but be that as
29 it may.

30
31 That is in a nutshell why I said at the outset that it
32 is a little surprising that an objection as to relevance be
33 taken on the Friday before this hearing, when these topics
34 have been the subject of a summons issued on 25 August,
35 have been the subject of many, many documents, possibly
36 hundreds, I'm not sure, possibly thousands, which have been
37 produced in response to that summons, and which have been
38 the subject of statements produced by the police, including
39 a statement by Mr Crandell, who is here to give evidence
40 today, and yet, on Friday afternoon before this hearing,
41 a letter comes in, namely, the letter of Friday,
42 2 December, to say that there is an objection of some
43 description to the relevance of more or less all of this
44 material - at least that is seemingly how one is to read
45 the letter of 2 December at tab 5 of this bundle.

46
47 May I make some particular responses to that letter,

1 because there is no written response, it having only been
2 received on Friday afternoon.

3
4 The first proposition seems to be that there is some
5 restriction on what is admissible by reason of the
6 provisions of section 9(2) and 9(3) of the Special
7 Commissions of Inquiry Act. In our respectful submission,
8 that is not the effect of section 9.

9
10 Section 9(2) provides that you are only to receive
11 evidence that appears to relate to a matter specified in
12 the Commission - presumably in the Terms of Reference. So
13 the criterion is "appears to relate". Section 9(3) says
14 that you are only to receive as evidence, or permit to be
15 given in evidence, a matter that, in your opinion, would be
16 likely to be admissible in evidence in civil proceedings.

17
18 Now, that, in some respects perhaps, brings into play
19 the rules governing the admissibility of evidence in civil
20 proceedings. However, the rules governing the
21 admissibility of evidence in civil proceedings necessarily
22 presuppose adversarial proceedings in which issues are
23 joined either on pleadings or in some other way. As to
24 what any such civil proceedings might be in the context of
25 section 9(3) of the Special Commissions of Inquiry Act may
26 be a little obscure, but in any event, in our submission,
27 the submission advanced in paragraph 1 of the letter of
28 2 December does not result in any constraint on your
29 capacity to receive the evidence that is now under
30 discussion.

31
32 There doesn't seem to be a claim of a public interest
33 immunity kind over any of this material. The objection
34 seems simply to the relevance.

35
36 Now, the suggestion in paragraph 3 of the letter is
37 that paragraph C of the Terms of Reference should be read
38 as indicating that you should not go over the same material
39 or conduct the same inquiries that have already been done
40 by the previous inquiries listed in paragraph C - namely,
41 for present purpose relevantly, the Parrabell report. But
42 in fact, in our submission, paragraph C of the Terms of
43 Reference has almost the opposite effect: you are directed
44 to have regard to not only the report but the report and
45 findings of Strike Force Parrabell.

46
47 Paragraphs C and F, when read together, are to the

1 effect that you are positively directed to have regard to
2 the report and findings of Strike Force Parrabell.

3
4 Paragraph F is a carve-out not necessarily applicable
5 to C, one might have thought, but in any event, not
6 applicable here - that is, you are not required to inquire
7 into a matter if you are satisfied that it has already been
8 adequately or sufficiently and appropriately dealt with by
9 another inquiry. As I have said, at this stage, subject to
10 the evidence, the position of counsel assisting is that
11 that may well not be so in the case of the Parrabell
12 report.

13
14 I should perhaps say something about paragraph 4 in
15 addition to what I have already said on this topic.
16 Because the Parrabell exercise was directed to whether
17 certain deaths had a gay hate bias factor, then, in our
18 submission, it is obvious that understanding Parrabell's
19 methodology will assist the Commission to understand that
20 very question, whether a particular death was affected by
21 a gay hate bias factor.

22
23 Paragraphs 5 and 6 go more to, as I read them, the
24 question of public availability of material rather than
25 relevance. If the argument in paragraph 5 were to be
26 accepted, it would presumably mean that you would be unable
27 to publicly inquire or report into any deaths except those
28 that the police regard as solved, which would be an
29 obviously pointless investigation. Because the submission
30 in 5 seems to involve the concept that if an inquiry in the
31 context of this Commission touched upon what might be
32 potential future investigations, ie, of unsolved cases,
33 then you should not proceed in that way, that would make
34 a nonsense of the Terms of Reference altogether.

35
36 As to paragraph 6, as I believe has been sorted out in
37 the considerable volume of correspondence in the last week
38 or two on this topic, and subject to any final refinement
39 of that, the Inquiry is not proposing to publish any
40 information about specific investigations, picking up the
41 terms of paragraph 6, of suspected hate crimes or about
42 informers or police methodology that is not already in the
43 public domain.

44
45 Paragraph 7 talks about section 65 of the current
46 Coroners Act, that of 2009, which of course is not of much
47 relevance, one might surmise, to the Taradale inquest in

1 2003/2004/2005. Reference is then made to section 34 of
2 the Coroners Act which was in force at the time, namely,
3 the Coroners Act 1980. But, Commissioner, it is worth
4 noting that in the course of the Taradale inquest, in
5 connection with the lengthy statement of Sergeant Page,
6 which was received into evidence, and which is one of the
7 documents I surmise to which the submission is now being
8 made about relevance and/or public availability is
9 directed, Deputy State Coroner Milledge said of the Page
10 statement:

11
12 *The document is now part of the exhibit and*
13 *if anyone wanted to look at it, they can.*
14

15 That was said on 31 March 2003 at transcript page 56 of
16 that day. The Commissioner of Police was represented by
17 counsel at that inquest, who took no objection to the
18 tender of the Page statement or to the remarks of
19 Coroner Milledge that I have just quoted.
20

21 Then in paragraph 8 of the letter of 2 December there
22 is a submission that refers to the fact that some topics
23 may have been ventilated in a published book and the
24 suggestion is that that is different somehow to
25 a disclosure of the same fact in a police document. The
26 logic of that submission somewhat escapes us, it must be
27 said. If something is in the public domain, it is in the
28 public domain.
29

30 Now, briefly on paragraphs 9 and 10 of the letter,
31 paragraph 9 refers to the concern about publication of the
32 direct work phone numbers and email addresses of members of
33 the police. The assertion is made that I had said that
34 I was going to tender material in a way that would result
35 in the publication of those matters and I am then said to
36 have resiled from this position. That is not a correct
37 account of how this matter has developed. I said in
38 correspondence through the solicitor assisting the
39 Commission that those matters would not be redacted unless
40 police provided evidence to support such a redaction being
41 made. Evidence was supplied and the redactions were then
42 agreed to. It is appropriate, in my submission, that
43 requests for redactions be supported by evidence, and that
44 is what was done.
45

46 As to paragraph 10, again referring to work phone
47 numbers and email addresses of serving police officers,

1 this seems to be moot, as we understand it, as the Inquiry
2 does not propose to publish those matters.
3

4 That's what I wanted to say about relevance. There is
5 this second topic, which starts in the letter of 2 December
6 at paragraph 11 and goes through to really the end of the
7 letter at paragraph 17. Various assertions, some of them
8 very serious, are made. The assertion bound up in
9 paragraphs 11 and 12 is that because many summonses have
10 been issued - and this appears in paragraph 14 as well -
11 because many summonses have been issued requiring the
12 production of documents by the police, considerable police
13 resources have had to be devoted to answering those
14 summonses and producing the documents.
15

16 But the submission which is of a serious nature for
17 today is the one in paragraph 12, which asserts that
18 apparently because the police have had to answer these
19 summonses, approximately 12 investigations and reviews by
20 the Unsolved Homicide Team have had to be placed on hold.
21 Then there is reference to more resources having had to be
22 obtained by the police, to the engagement of senior and
23 junior counsel and in some respects a private law firm, and
24 the letter does not ultimately seem to result in an
25 application or a submission except that in paragraph 17 the
26 police ask for consideration by you and Commission staff
27 concerning resourcing implications.
28

29 Now, the answer to that series of propositions is
30 essentially the answer that the solicitor assisting the
31 Commission provided to an earlier letter from the police
32 raising similar concerns. That earlier letter is at tab 3
33 of the bundle. It is the letter of 18 October. It raises
34 similar concerns of a resourcing nature, not peculiar to
35 the Parrabell summons but referring to 31 summonses which
36 had been issued up to that point, one of which was, indeed,
37 the Parrabell summons, summons 12.
38

39 In paragraph 6 of that letter, there again was the
40 assertion that the need to comply with the summonses had
41 resulted in the stalling of live investigations and
42 reviews, and in paragraph 9, the police requested of you as
43 Commissioner that:

44
45 *... if it is possible, a petition to*
46 *Government be made for funding to be*
47 *allocated to the NSW Police Force to*

1 *increase staffing levels available to the*
2 *[Unsolved Homicide Team] ...*

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

29

30

31

32

33

34

35

36

37

38

39

40

41

42

43

44

45

46

47

The reply to that letter came three days later, and it is at tab 4. That letter at tab 4, which I won't labour, does, however, place some of this correspondence in context. In the letter at tab 4 on page 2, the point is made, and I adopt this as my submission today, near the top of the page:

Obviously the primary source of information, in relation to every one of the historical deaths falling within both Category A and category B, is the material held by the NSW Police Force ... It is the [police] that investigated the deaths ... created and/or gathered all the records relating to the deaths and the investigations, and [it is the police] that retains control of that material.

Two paragraphs down, the point was made, and I must with some regret make it again in the light of the 2 December letter:

In respect of many of the summonses production by the [police] has been late and/or incomplete.

There follows a table, some seven or eight or nine pages long, which tabulates the degree to which production under the various summonses has variously been late and/or incomplete or both.

In the case of summons 12, which starts at the bottom of page 5, it was issued on 25 August, the date for production was 8 September, and as we see in the right-hand column, the police at that point, 21 October, had produced 33 volumes of material in tranches, and the tranches had been listed, and one sees immediately that all of the tranches were after 8 September and they were continuing through to the eighth tranche, which was 21 October, which was about six weeks late, and I believe I am right to say that more has been produced since.

Now, I am making those observations not to be nitpicking, because it is a lot of material and no doubt it

1 has taken time for it to be collated and produced, but this
2 Inquiry has a time limit. You are required to carry out
3 all the inquiring work necessary, including all the
4 investigative work necessary, and to deliver your report to
5 the Governor and to the Cabinet by 30 June next year, and
6 it is incumbent upon this Special Commission to obtain
7 material from those who have it as quickly as can be done.
8

9 It must have been obvious to the police from the
10 moment the Terms of Reference were published, which was
11 in April this year, that Parrabell would be one of the
12 matters that you would be looking into, and also obvious
13 that as the overwhelmingly dominant source of material
14 relevant to the Inquiry as a whole, summonses would
15 inevitably be issued for a great amount of documentation.
16 If the police have chosen not to resource themselves
17 sufficiently to meet those requirements, that is not
18 a problem which can be laid at the door of the Special
19 Commission.
20

21 At page 11 of this letter in tab 4, the solicitor
22 assisting the Commission described the concern of the
23 Commissioner about these delays, about inadequacies in the
24 mode of production, and at page 13, the last page of the
25 letter, the solicitor assisting the Commission made the
26 point that it is entirely a matter for the Commissioner of
27 Police to determine how resources are deployed within the
28 police force and whether additional resources are needed
29 and to make any request to the relevant minister for
30 additional funding if that is necessary.
31

32 As to paragraph 6 of Ms Marsic's letter, which is the
33 paragraph asserting that the effect of the demands for
34 documents or the requirements for the production of
35 documents was the stalling of live investigations and
36 reviews being conducted by the Unsolved Homicide Team, the
37 response of the solicitor assisting the Commission was that
38 such an allegation:
39

40 *... is completely inappropriate, is flatly*
41 *rejected, and should be withdrawn. If any*
42 *such impact on the work of the UHT [the*
43 *Unsolved Homicide Team] has occurred, that*
44 *is entirely attributable to resourcing*
45 *decisions taken, or not taken, by the*
46 *NSW [Police Force].*
47

1 Now, in the next paragraph, there is one other matter
2 which I will advert to and adopt in relation to today.
3 That is that as stated in the last sentence of that
4 paragraph, at no point - and this remains true today - has
5 the NSW Police Force objected to the production of any of
6 the material called for by any of these summonses or
7 advanced any suggestion - and this remains true today -
8 that the material sought was not properly called for.
9

10 That applies to summons 12, which concerns Strike
11 Force Parrabell, as much as to all of the other summonses.
12 Hence the surprise when, on Friday afternoon of last week,
13 an objection is now taken to the relevance of more or less
14 all of the documents relating to Strike Force Parrabell.
15 It is an objection which, in our respectful submission, the
16 Commission should refuse.
17

18 THE COMMISSIONER: Mr Tedeschi, would it assist if I took
19 a short break before you responded?
20

21 MR TEDESCHI: Yes, thank you.
22

23 THE COMMISSIONER: All right. Let's say I resume about
24 12.
25

26 MR TEDESCHI: Thank you.
27

28 THE COMMISSIONER: It is quarter to now. I will just
29 adjourn briefly.
30

31 **SHORT ADJOURNMENT**

32
33 MR GRAY: Commissioner, just before my learned friend
34 replies, there are two matters that I omitted to mention -
35 no, three. The first is that there was a submission made
36 that the recommendations of the parliamentary committee
37 should play a part, perhaps analogously with the use of
38 extraneous materials in connection with a statute, in
39 construing the Terms of Reference. In our submission, that
40 proposition should be rejected. Firstly, as you pointed
41 out, Commissioner, the recommendations pre-dated the Terms
42 of Reference. But, secondly, the recommendations were
43 those of a particular parliamentary committee. A different
44 body, namely, the Governor in Council, some considerable
45 time later, framed and decided upon the Terms of Reference.
46

47 The second matter is that my friend ultimately said

1 this, as I noted it, in answer to your question,
2 Commissioner, "What is it that I am entitled to have regard
3 to in relation to Parrabell?" And the answer as I noted it
4 was: "You are entitled to have regard to the final report
5 of Strike Force Parrabell and the case summaries."
6

7 Now, two things about that. The case summaries are
8 not - I stress not - part of the Parrabell report. Indeed,
9 the report very notably does not disclose the views of
10 either the strike force officers or the academics about any
11 of the particular 88 cases. Secondly, that being so, if
12 all you, as Commissioner, are entitled to do in having
13 regard to Parrabell is to read the report by itself, that
14 would, in our submission, be of almost no use whatsoever in
15 considering manner and cause of any of the 80 or more
16 deaths. That's the second matter.
17

18 The third matter is that I would tender that little
19 folder of materials.
20

21 THE COMMISSIONER: All right. I will mark it an
22 exhibit on the application, perhaps I will mark it
23 exhibit 1 on the application or on the submissions this
24 morning on Terms of Reference, thank you.
25

26 **EXHIBIT #1 ON THE SUBMISSIONS ON TERMS OF REFERENCE FOLDER**
27 **OF MATERIALS MARKED "BUNDLE OF MATERIAL RE RELEVANCE"**
28

29 MR TEDESCHI: Commissioner, very briefly in response to
30 the submissions of my learned friend, we submit that it is
31 one thing for summonses to be issued which are very
32 wide-ranging and which go perhaps even well beyond the
33 Terms of Reference in order to define the material that is
34 eventually going to be tendered, and it would not have been
35 appropriate for us at that early stage to suggest this is
36 not material that should be produced to you, you shouldn't
37 look at it, we shouldn't have to produce it because it goes
38 beyond your Terms of Reference. We submit that at that
39 stage, at the summons stage, this Inquiry is entitled to
40 take a very wide view. But when it comes to the process of
41 tendering, it is then that the Terms of Reference should
42 very clearly define what is admissible and what is not
43 admissible.
44

45 My learned friend took you to the terms of certain
46 sections in the Special Commissions of Inquiry Act and in
47 particular section 9. I don't really understand the

1 submission that was made but it was suggested that there is
2 some latitude to be given to the Inquiry in terms of
3 subsection (3) that evidence is only to be received by the
4 Commissioner if it would be likely to be admissible in
5 evidence in civil proceedings, and that somehow, because
6 there are no parties and no pleadings, that that means that
7 somehow the restrictions as to relevance in the
8 Evidence Act don't apply.

9
10 THE COMMISSIONER: But what would you determine - relevant
11 as to what if there are no pleadings? The most obvious
12 source is clearly the Terms of Reference.

13
14 MR TEDESCHI: Exactly.

15
16 THE COMMISSIONER: I accept that, but it is couched in
17 terms of a piece of legislation which was intended, after
18 '83, to govern whatever the government or executive thought
19 it required information upon, and so therefore I accept the
20 Terms of Reference are clearly relevant.

21
22 MR TEDESCHI: Yes.

23
24 THE COMMISSIONER: But other than that, words such as "as
25 far as practicable", and in subsection (2) "appears to
26 relate to a matter", certainly they don't say sections 55
27 or 56, or whatever, of the Evidence Act shall govern the
28 acceptance of evidence; nor do they say, I accept, "There
29 shall be no rules of evidence", so it is a hybrid position
30 which is no doubt governed or rather brought into play for
31 the purposes of giving some measure of protection clearly
32 to persons whose reputations or whatever it may be may be
33 the subject of public view, so that there is a sifting
34 process of some sort, and it's not just a free for all. So
35 there is a limitation.

36
37 But the language is rather liberal in the sense of
38 what does "as far as practicable" mean or "would be
39 likely" - they are not words which are mandatory; they are
40 words which clearly give the investigator a room to move
41 over and above pure questions of relevance in a civil case.
42 Relevance in a civil case, as we have discussed, would be
43 pleadings. Here, I accept Terms of Reference. But as
44 everybody knows, Terms of Reference are generally not - and
45 this one is an example of it - pleaded out with the
46 specificity of a statement of claim or a statement of
47 defence.

1
2 MR TEDESCHI: Commissioner, we don't disagree with that
3 analysis. We concede that it is a hybrid situation. We
4 agree that the Terms of Reference are the benchmark upon
5 which admissibility should be determined. We agree that
6 there is a certain flexibility on the interpretation of
7 that. So I don't really think we are in disagreement with
8 what you have said.
9

10 It doesn't arise at this stage, but if you were to
11 conclude that there was the possibility of criminal
12 proceedings, then there are much stricter requirements in
13 terms of publicity under subsection (4), but that doesn't
14 arise now.

15
16 THE COMMISSIONER: It doesn't arise now and it may arise
17 in terms of the mode of hearing or investigation - I accept
18 that.
19

20 MR TEDESCHI: Yes. Regarding the timing of this
21 application, we respectfully submit that it was only when
22 we received the list of tender bundle, which I think was
23 either early last week or the week before, we, within a few
24 days, sought to have a hearing, a directions hearing before
25 you, Commissioner, last week on Wednesday, which ended up
26 being cancelled for reasons that --
27

28 THE COMMISSIONER: Mr Tedeschi, let me just correct the
29 record. That directions hearing - and please correct me if
30 I'm wrong - was not to determine these general questions of
31 relevance; it was dedicated to determining what were then
32 extant, as I understood it, concerns about the contents of
33 the particular documents.
34

35 MR TEDESCHI: Indeed. It was about --
36

37 THE COMMISSIONER: And that went away largely because -
38 again, correct me if I am wrong - there appeared to be
39 a moment where truce broke out, but then truce was only in
40 existence for a short time and other matters were then
41 raised.
42

43 MR TEDESCHI: I just wish to place before you,
44 Commissioner, that it was our intention to raise it with
45 you then, prior to this week.
46

47 THE COMMISSIONER: If it was an intention to raise

1 relevance at that hearing, you had every opportunity to
2 say, "Hang on, we were/are concerned about particular
3 documents, but there's a bigger issue here and we need to
4 have" - nothing turns on it in my view very much because
5 you would say to me, and there would be some justification,
6 if I don't have jurisdiction, I don't have jurisdiction.
7 I understand the point.

8
9 MR TEDESCHI: In terms of what my learned friend said to
10 you by way of an interpretation of paragraphs A and B of
11 your Terms of Reference, his submission amounted to this:
12 that the relevance of the Parrabell report to paragraphs A
13 and B of your Terms of Reference are obvious. He didn't
14 really advance any reasons why it's obvious --

15
16 THE COMMISSIONER: Because it's pretty obvious to any
17 person accessing the internet and interested in Parrabell
18 that it purports to descend to a degree of specificity
19 about a connection, if any, between gay hate or gay bias
20 and a particular series of homicides or whatever they were.
21 That's precisely what A and B ask me to do. Now, A is
22 Parrabell; B, as your clients would well appreciate, was
23 a blank cheque. It has been an area which has required
24 a great deal of effort on our part to try to identify how
25 many cases fit into category B. But it is pretty obvious,
26 isn't it, that both were looking at, if not identical,
27 issues of causation so similar that it really would defy an
28 attempt to distinguish it?

29
30 MR TEDESCHI: There is a difference, Commissioner, that
31 Task Force Parrabell as opposed to Operation Parrabell was
32 not an investigation into any crimes. It was a summary of
33 the available evidence and then a determination or
34 attempted determination of whether or not it was a hate
35 crime or might be a hate crime. So it was an exercise not
36 in - it wasn't even an exercise in attempting to find cases
37 that might be suitable for reinvestigation. It was
38 a categorisation exercise more than anything and, in that
39 respect, it's different to Operation Parrabell, which
40 commenced as an exercise in reinvestigation and it was
41 immediately realised by Sergeant Steer that there were so
42 many matters that would require reinvestigation it might
43 take five years for the resources that he had available
44 then to be able to conduct such an exercise.

45
46 We respectfully submit that the exercise that you,
47 Commissioner, face is such that the 12 months indicates

1 that - well, it is an onerous task merely for you and your
2 staff to review those investigations and make a decision
3 whether any of those warrant reinvestigation, and if so,
4 where.

5
6 THE COMMISSIONER: I don't need to be told how onerous my
7 task is, Mr Tedeschi, I'm fully aware of that.

8
9 MR TEDESCHI: What we submit is that that is another
10 indication that your task does not include a review of the
11 analysis of the methodology or the setting up of --

12
13 THE COMMISSIONER: The opposite argument to that,
14 Mr Tedeschi, is that the Terms of Reference were quite
15 specific in those matters that I am directed to look at.
16 "Directed" means, whatever else I may look at, I am
17 directed to look at, amongst other things, Parrabell.

18
19 MR TEDESCHI: Yes.

20
21 THE COMMISSIONER: Now, that's the short-back-and-sides
22 approach: namely, you are not moving into a universe which
23 is untethered in any way, shape or form. The universe you
24 go into, the executive, is that which is to be informed in
25 particular by three things, amongst other things that you
26 might look at. I agree that it is a limitation, but it is
27 quite a specific direction.

28
29 MR TEDESCHI: And the direction is that you are --

30
31 THE COMMISSIONER: I understand what you --

32
33 MR TEDESCHI: -- to take them into account, not to --

34
35 THE COMMISSIONER: No, take into account, tick the box,
36 say, "Thank you very much, nicely written, well done,
37 beautifully presented", and there you go. I understand.

38
39 MR TEDESCHI: Commissioner, in relation to the final
40 submissions that were made by counsel assisting you about
41 delays and lateness of production of documents, there are
42 11 police officers who have been given the task of finding
43 the material that has been included in the summonses,
44 getting them into their possession from State Archives,
45 making them available to your Inquiry, and then
46 commensurate with that has been the task of documents being
47 identified by your counsel that need to be analysed by

1 police for possible redactions and then analysed also by
2 counsel assisting the police. The whole task has been
3 a very, very involved one, a very laborious one. We submit
4 that it has been an immense task for the police to perform
5 and they have performed it as best they possibly can with
6 the resources that they have available.

7
8 They have requested delays for the production of
9 documents and for redactions to be provided, which
10 generally have been agreed to by counsel assisting, but it
11 is not every police officer who can decide what documents
12 have to be produced or should be produced and what
13 redactions should be made. It requires a certain seniority
14 in the police force to be able to give instructions to the
15 legal officers that assist the police as to whether
16 redactions should be made and to request those. So we
17 submit that the criticisms made in the letters from those
18 who assist you are unjustified and don't take into account
19 the real requirements that have been placed on the police
20 force.

21
22 THE COMMISSIONER: All right. Mr Tedeschi, it goes
23 without saying that I fully understand and appreciate the
24 efforts which your clients have been legally obliged to
25 undertake, because when I have issued a summons, in each
26 and every case, the summons has been issued on a considered
27 basis.

28
29 I regret to say that Ms Marsic, who appears to be the
30 author of at least two of the letters, has made assertions
31 which I will publicly reject here and now. On two
32 occasions she has said expressly that my issuing summonses
33 has distracted police from police work which they would
34 otherwise be undertaking.

35
36 Now, if you are going to put that to me, or she is
37 going to put that to me in a letter, I suggest that she
38 thinks carefully about precisely what it is she is saying.

39
40 Every summons I have issued, I have exercised
41 a discretion to do so. Not one complaint was made. The
42 reason Mr Gray made the point he made was that if, in
43 truth - if, in truth - the resources of the NSW Police were
44 so slim or unappreciated, in terms of the quantum, then you
45 should have come to me sooner and you should have asked for
46 time or something else. But to accuse this Commission of
47 either wittingly or even unwittingly deliberately

1 interrupting the proper police work in relation to unsolved
2 homicides is frankly unacceptable. If it is intended to
3 put pressure on this Commission, it's not going to work.
4 If it is intended to be offensive, it worked, because it is
5 offensive and, if I may say so, last time it happened I was
6 very concerned about the tenor of the suggestion, because
7 I asked myself, what on earth am I being told this for? Is
8 it being suggested, as it were, anxious to wound but afraid
9 to strike? Is it being suggested that I have unreasonably
10 issued summonses? If so, nobody's stood up in a courtroom,
11 nobody's stood up before me and said, "You are interrupting
12 the serious police work that is undertaken."
13

14 Now, I regard both of her assertions in that regard as
15 entirely without foundation, because I don't actually know
16 what it is she is intending for me to understand by them.
17

18 I have asked for an apology once before. Quite
19 frankly, I am just happy to dismiss the allegation as
20 a misguided and misconceived assertion by someone who may
21 well have entirely underestimated the resources the
22 NSW Police need to perform the tasks, and if your people
23 did not appreciate from the very outset that of the 23 or
24 30 unsolved cases, and however many I would identify in
25 category B, your clients would not be one of the principal,
26 if not the principal, repositories of information, then
27 they did not read the Terms of Reference from on or about
28 the middle of April 2022.
29

30 So if your persons did not sit down and think to
31 themselves, either when you were retained or before you
32 were retained, what could this likely lead to in terms of
33 the documentation - and they must have appreciated that
34 your clients were the sole repository, in most cases; but
35 for coroners, perhaps hospitals and some other third
36 parties of lesser significance, that your clients were the
37 sole repositories of these documents, and this is nothing
38 to do with Parrabell - of course it is to do partly with
39 Parrabell, that's one aspect of all these unsolved crimes,
40 and much of the documentation that has been forthcoming is
41 in relation to some of these unsolved crimes. I have seen
42 the documents. In some unsolved cases there are boxes and
43 boxes and boxes. Who else would the Commission have got
44 them from but your client?
45

46 So to twice now accuse me, or the Commission, as it
47 were - I don't know precisely what it is that Ms Marsic has

1 intended by --

2

3 MR TEDESCHI: Your Honour --

4

5 THE COMMISSIONER: No, let me finish. I do not know
6 precisely what Ms Marsic is intending by suggesting that
7 what I have done in some way or other has interrupted
8 proper police inquiries or proper police solution of
9 crimes. That is rejected, Mr Tedeschi. I don't take very
10 much interest in such submissions at the moment. I have
11 too much to do. Both of them were inappropriately made and
12 should not have been made. The appropriate person to speak
13 to was your Commissioner or the relevant minister or to
14 come up here and say, "We can't answer this because we need
15 more time because we need police officers who know what
16 they are looking for", but it wasn't done. And that's part
17 of the problem with the delay, because I don't think your
18 client is entitled to make those assertions, not having
19 asked for an indulgence on that basis and having provided
20 evidence that people are being distracted from their
21 day-to-day police operations.

22

23 I am going to reserve the decision on this question of
24 those four categories. I will try to give you a judgment
25 later today. I may or may not be able to abide by that.
26 If I can't, I will certainly let you know. In fact, it is
27 20 past 12 now. So as not to inconvenience you or your
28 team, Mr Tedeschi, I will say that I will give judgment on
29 this question at 10 o'clock tomorrow morning.

30

31 MR TEDESCHI: Thank you.

32

33 THE COMMISSIONER: Then we can deal with other matters,
34 and would you kindly make Mr Crandell available, please, in
35 the event that I determine that he will give evidence.
36 Thank you. I will adjourn.

37

38 **AT 12.22PM THE COMMISSION OF INQUIRY WAS ADJOURNED**
39 **TO TUESDAY, 6 DECEMBER 2022 AT 10.00AM**

40

41

42

43

44

45

46

47

'

83 [1] - 580:18

1

1 [9] - 540:47, 545:9, 546:25, 552:39, 569:26, 570:8, 572:27, 579:23, 579:26

10 [11] - 537:26, 541:2, 541:36, 541:44, 541:46, 566:31, 566:46, 570:18, 574:30, 574:46, 586:29

10.00AM [1] - 586:39

10.00am [1] - 537:24

11 [6] - 541:34, 561:44, 575:6, 575:9, 577:21, 583:42

11.30 [1] - 561:41

12 [10] - 570:8, 575:9, 575:17, 575:19, 575:37, 576:35, 578:10, 578:24, 582:47, 586:27

12(iii) [1] - 570:20

12.22PM [1] - 586:38

121 [1] - 537:20

13 [1] - 577:24

136 [1] - 541:36

137 [1] - 541:37

14 [1] - 575:10

15 [2] - 541:36, 541:46

17 [2] - 575:7, 575:25

18 [2] - 569:38, 575:33

1970 [1] - 539:13

1976 [1] - 539:23

1980 [1] - 574:3

1991 [4] - 541:36, 541:46

2

2 [25] - 537:20, 541:1, 541:33, 541:35, 541:37, 541:43, 542:42, 566:10, 566:38, 568:31, 568:44, 569:20, 569:31, 569:40, 570:9, 570:26, 570:30, 571:42, 571:45, 572:28, 574:21, 575:5, 576:7, 576:23, 580:25

2.106 [1] - 545:28

2.108 [1] - 545:28

2.92 [1] - 545:17

20 [4] - 540:16, 569:31, 570:26, 586:27

2000 [1] - 539:23

2003 [1] - 574:15

2003/2004/2005 [1] - 574:1

2009 [1] - 573:46

2010 [1] - 539:13

2015 [2] - 539:21, 539:23

2018 [2] - 539:21, 539:27

2021 [1] - 546:21

2022 [7] - 537:9, 537:24, 540:16, 541:45, 569:38, 585:28, 586:39

2023 [2] - 540:2, 540:36

21 [5] - 541:32, 545:17, 569:43, 576:38, 576:42

220 [2] - 555:35, 560:42

23 [1] - 585:23

233 [1] - 542:1

233A [1] - 542:1

233B [1] - 542:1

25 [3] - 569:27, 571:34, 576:36

26 [1] - 570:36

27 [1] - 570:41

28 [1] - 570:46

3

3 [5] - 569:36, 570:32, 572:36, 575:32, 580:3

30 [4] - 552:5, 567:32, 577:5, 585:24

31 [2] - 574:15, 575:35

33 [1] - 576:39

34 [2] - 545:28, 574:1

4

4 [11] - 546:21, 569:42, 570:23, 570:33, 571:9, 573:14, 576:5, 576:7, 577:21, 581:13

40-year [1] - 539:12

5

5 [11] - 537:24, 549:19, 561:43, 569:20, 569:26, 570:12, 571:45, 573:23, 573:25, 573:30, 576:36

55 [1] - 580:26

56 [2] - 574:15, 580:27

6

6 [15] - 541:26, 542:1, 542:4, 542:8, 542:30, 549:19, 549:34, 569:45, 570:2, 573:23, 573:36, 573:41, 575:39, 577:32, 586:39

65 [1] - 573:45

7

7 [3] - 549:19, 549:34, 573:45

77,000 [1] - 560:42

8

8 [3] - 574:21, 576:37, 576:41

80 [3] - 539:22, 567:37, 579:15

88 [3] - 551:25, 552:35, 579:11

9

9 [6] - 570:15, 572:8, 574:30, 574:31, 575:42, 579:47

9(2) [2] - 572:6, 572:10

9(3) [3] - 572:6, 572:13, 572:25

A

abide [1] - 586:25

able [7] - 555:39, 559:5, 559:27, 561:37, 582:44, 584:14, 586:25

academic [10] - 540:7, 540:19, 540:39, 541:8, 566:39, 567:40, 568:25, 570:19, 570:39, 571:8

academics [8] -

539:30, 540:18, 543:17, 561:6, 566:40, 566:45, 579:10

accept [9] - 549:30, 559:6, 560:31, 560:37, 580:16, 580:19, 580:28, 580:43, 581:17

acceptance [1] - 580:28

accepted [1] - 573:26

access [1] - 562:21

accessing [1] - 582:17

accommodate [2] - 538:41, 549:42

accommodation [2] - 552:12, 553:2

accommodations [2] - 551:35, 554:15

accordance [1] - 559:3

accords [1] - 563:2

account [5] - 546:9, 574:37, 583:33, 583:35, 584:18

accurate [1] - 546:9

accuse [2] - 584:46, 585:46

acknowledge [1] - 547:32

acknowledges [1] - 545:31

ACON [1] - 560:15

acquiring [1] - 549:29

Act [14] - 547:37, 554:26, 555:21, 562:33, 567:10, 567:16, 572:7, 572:25, 573:46, 574:2, 574:3, 579:46, 580:8, 580:27

actively [2] - 546:45, 556:13

activity [1] - 556:24

actual [1] - 547:45

adapted [1] - 566:30

addition [2] - 568:9, 573:15

additional [7] - 540:40, 541:40, 554:44, 556:2, 558:1, 577:28, 577:30

address [4] - 551:12, 566:10, 571:9, 571:21

addressed [3] - 567:4, 568:33, 568:43

addresses [3] - 541:15, 574:32, 574:47

adequacy [3] - 543:40, 544:7, 560:4

adequate [2] - 544:44, 545:2

adequately [1] - 573:8

adjourn [2] - 578:29, 586:36

admissibility [3] - 572:19, 572:21, 581:5

admissible [7] - 554:4, 555:29, 572:5, 572:16, 579:42, 579:43, 580:4

admitting [1] - 542:14

adopt [2] - 576:8, 578:2

adopted [1] - 543:12

advance [2] - 538:46, 582:14

advanced [2] - 572:27, 578:7

advances [1] - 568:28

adversarial [1] - 572:22

advert [1] - 578:2

advised [6] - 543:25, 543:39, 544:39, 547:20, 555:19, 560:3

advising [1] - 559:22

affected [2] - 546:41, 573:20

affidavit [1] - 553:1

afraid [1] - 585:8

afternoon [3] - 571:40, 572:2, 578:12

ago [5] - 538:3, 550:12, 566:10, 567:12, 569:28

agree [6] - 538:37, 561:16, 562:15, 581:4, 581:5, 583:26

agreed [7] - 542:21, 542:34, 554:35, 554:36, 564:10, 574:42, 584:10

agreement [3] - 551:9, 556:31, 562:43

AIDS [1] - 560:6

akin [2] - 551:42, 551:44

alia [1] - 569:34

allegation [2] - 577:38, 585:19

- allied** [1] - 551:5
allocated [1] - 575:47
allowed [1] - 561:25
almost [2] - 572:43, 579:14
alone [1] - 568:7
altogether [1] - 573:34
amount [1] - 577:15
amounted [1] - 582:11
analogously [1] - 578:37
analysed [2] - 583:47, 584:1
analysis [7] - 554:21, 555:27, 559:23, 567:21, 570:39, 581:3, 583:11
Anders [1] - 537:44
annexed [1] - 571:22
annexures [2] - 552:47, 571:28
announce [1] - 538:12
answer [13] - 544:3, 544:12, 548:4, 558:13, 559:34, 561:33, 561:36, 575:18, 575:29, 575:30, 579:1, 579:3, 586:14
answering [1] - 575:13
answers [1] - 561:37
anterior [1] - 568:30
Anthony [1] - 540:24
anti [3] - 539:25, 566:23, 567:36
anti-gay [2] - 566:23, 567:36
anti-LGBTIQ [1] - 539:25
anticipated [2] - 540:22, 540:35
anxious [5] - 552:7, 553:43, 554:45, 555:12, 585:8
apart [2] - 548:2, 549:11
apology [1] - 585:18
apparent [1] - 543:23
appeals [1] - 547:3
appear [3] - 538:5, 538:13, 549:12
appearance [1] - 538:12
appeared [1] - 581:38
applicable [2] - 573:4, 573:6
application [5] - 567:6, 575:25, 579:22, 579:23, 581:21
applied [1] - 541:19
applies [1] - 578:10
apply [2] - 557:9, 580:8
appreciate [3] - 582:22, 584:23, 585:23
appreciated [1] - 585:33
approach [2] - 540:10, 583:22
approached [1] - 539:42
approaches [1] - 544:40
appropriate [14] - 545:1, 545:47, 547:5, 550:44, 557:5, 559:1, 559:8, 559:28, 559:45, 560:38, 561:33, 574:42, 579:35, 586:12
appropriately [7] - 557:40, 557:41, 558:23, 558:44, 568:16, 568:23, 573:8
appropriateness [3] - 558:6, 559:10, 566:47
April [4] - 541:36, 541:46, 577:11, 585:28
Archives [1] - 583:44
area [1] - 582:23
areas [1] - 555:11
arena [2] - 551:12, 553:6
argument [6] - 554:24, 556:24, 561:27, 561:40, 573:25, 583:13
arguments [4] - 552:45, 553:43, 554:9, 565:16
arise [4] - 581:10, 581:14, 581:16
arisen [1] - 569:4
arises [1] - 565:17
arrangements [4] - 570:13, 570:20, 571:1, 571:10
articles [1] - 541:8
articulated [1] - 555:11
aside [1] - 553:43
aspect [1] - 585:39
asserting [1] - 577:33
assertion [4] - 574:33, 575:8, 575:40, 585:20
assertions [4] - 575:7, 584:30, 585:14, 586:18
asserts [1] - 575:17
assessment [1] - 555:27
assign [1] - 566:32
assist [16] - 544:33, 546:8, 548:10, 559:40, 562:27, 563:40, 564:36, 564:38, 564:41, 564:43, 564:47, 573:19, 578:18, 584:15, 584:18
assistance [3] - 543:3, 547:5, 562:20
Assistant [2] - 540:24, 570:28
assisted [1] - 556:28
Assisting [8] - 537:29, 537:31, 537:32, 537:33, 537:34, 537:35, 537:36, 537:37
assisting [18] - 544:33, 548:30, 550:21, 551:9, 551:18, 552:34, 555:36, 568:20, 569:32, 573:10, 574:38, 575:30, 577:22, 577:25, 577:37, 583:40, 584:2, 584:10
associated [1] - 546:40
assume [1] - 561:8
AT [2] - 586:38, 586:39
attached [3] - 546:21, 547:12, 547:15
attempt [2] - 555:21, 582:28
attempted [1] - 582:34
attempting [3] - 559:36, 561:36, 582:36
attention [1] - 543:9
attitude [1] - 561:11
attributable [1] - 577:44
attributed [1] - 568:11
August [5] - 541:36, 541:46, 569:27, 571:34, 576:36
author [1] - 584:30
availability [3] - 569:47, 573:24, 574:8
available [14] - 548:32, 548:39, 549:16, 551:20, 551:22, 553:12, 555:39, 561:2, 576:1, 582:33, 582:43, 583:45, 584:6, 586:34
avenue [1] - 545:47
avoid [3] - 543:34, 549:38, 557:11
avoids [1] - 557:7
aware [3] - 549:34, 551:30, 583:7
-
- B**
-
- Bar** [2] - 556:13, 568:40
based [1] - 566:43
basis [5] - 547:19, 558:47, 565:1, 584:27, 586:19
beautifully [1] - 583:37
became [1] - 540:47
become [5] - 542:1, 542:4, 548:47, 550:18, 570:2
bedside [1] - 560:21
behalf [3] - 541:39, 550:15, 563:40
believes [1] - 546:7
below [1] - 570:18
benchmark [1] - 581:4
best [1] - 584:5
better [3] - 542:28, 554:31, 562:42
between [6] - 539:13, 539:21, 539:23, 543:17, 550:20, 582:19
beyond [2] - 579:32, 579:38
Bias [13] - 540:13, 540:30, 540:31, 543:11, 554:10, 566:29, 566:41, 570:16, 570:31, 571:15, 571:16
bias [21] - 539:25, 539:43, 540:12, 561:7, 565:47, 566:7, 566:23, 566:33, 566:34, 566:35, 566:46, 567:19, 567:22, 567:36, 567:45, 568:23, 573:17, 573:21, 582:19
bigger [1] - 582:3
bit [1] - 554:35
blank [1] - 582:23
bleeding [1] - 556:19
board [1] - 562:4
body [1] - 578:44
book [1] - 574:23
bottom [1] - 576:35
bound [4] - 544:15, 567:28, 567:31, 575:8
box [2] - 553:44, 583:35
boxes [5] - 555:35, 560:42, 585:42, 585:43
break [2] - 561:41, 578:19
brief [1] - 568:7
briefly [6] - 538:39, 566:9, 570:4, 574:30, 578:29, 579:29
bringing [1] - 547:6
brings [1] - 572:18
broad [1] - 558:21
broke [1] - 581:39
brought [1] - 580:30
bundle [12] - 540:47, 541:2, 541:4, 541:11, 541:23, 541:47, 542:4, 550:7, 570:1, 571:45, 575:33, 581:22
BUNDLE [1] - 579:27
-
- C**
-
- Cabinet** [1] - 577:5
Camporeale [1] - 537:38
cancelled [1] - 581:26
cannot [2] - 552:14, 553:23
capacity [1] - 572:29
carefully [2] - 552:24, 584:38
carried [5] - 539:21, 539:29, 540:18, 571:11, 571:24
carry [4] - 570:14, 570:22, 571:5, 577:2
carve [1] - 573:4
carve-out [1] - 573:4
case [45] - 545:39, 547:45, 551:22,

- 551:24, 551:32,
551:39, 552:12,
552:15, 553:14,
553:15, 553:19,
553:35, 553:40,
553:42, 554:4,
554:21, 554:22,
554:34, 555:46,
560:32, 560:38,
560:43, 561:5,
561:8, 561:11,
561:22, 562:14,
563:46, 564:41,
564:47, 565:46,
565:47, 566:32,
566:39, 569:46,
570:28, 573:11,
576:35, 579:5,
579:7, 580:41,
580:42, 584:26
- case-by-case** [1] -
554:21
- cases** [27] - 544:27,
545:13, 545:23,
545:34, 546:15,
546:33, 547:4,
547:43, 552:26,
552:35, 555:28,
555:33, 555:37,
555:46, 556:4,
556:43, 560:16,
561:9, 564:27,
566:21, 573:32,
579:11, 582:25,
582:36, 585:24,
585:34, 585:42
- categories** [8] -
544:28, 553:23,
553:41, 555:18,
556:5, 557:47,
565:43, 586:24
- categorisation** [1] -
582:38
- Category** [1] - 576:14
- category** [8] - 553:40,
566:7, 567:19,
567:20, 576:14,
582:25, 585:25
- causation** [1] - 582:27
- central** [3] - 567:23,
567:45, 568:20
- certain** [7] - 541:11,
552:12, 557:5,
573:17, 579:45,
581:6, 584:13
- certainly** [4] - 544:22,
551:15, 580:26,
586:26
- cetera** [2] - 554:10,
554:11
- chair** [1] - 547:13
- changes** [1] - 540:10
- characterisation** [1] -
543:13
- chart** [1] - 546:22
- charts** [1] - 567:43
- check** [3] - 542:24,
542:33, 542:42
- cheque** [1] - 582:23
- chosen** [1] - 577:16
- Christine** [1] - 537:32
- circumstances** [2] -
543:24, 551:25
- civil** [7] - 572:16,
572:19, 572:21,
572:24, 580:5,
580:41, 580:42
- claim** [2] - 572:32,
580:46
- claims** [1] - 565:20
- Claire** [1] - 537:37
- classes** [2] - 554:18,
554:32
- classification** [1] -
560:31
- classifications** [1] -
564:3
- clear** [6] - 543:34,
544:38, 548:11,
555:25, 556:35,
568:18
- clearly** [7] - 548:17,
554:5, 579:42,
580:12, 580:20,
580:31, 580:40
- client** [7] - 541:41,
549:29, 549:35,
556:15, 565:21,
585:44, 586:18
- clients** [7] - 549:42,
565:13, 582:22,
584:24, 585:25,
585:34, 585:36
- clock** [1] - 561:43
- Co** [1] - 570:31
- Co-ordinator** [1] -
570:31
- coercive** [2] - 546:7,
555:39
- cognisant** [1] - 538:40
- coin** [1] - 562:4
- collated** [1] - 577:1
- Collection** [1] - 570:30
- collectively** [1] -
540:46
- column** [1] - 576:38
- combine** [1] - 559:21
- coming** [3] - 557:29,
557:34, 559:43
- Command** [1] -
540:29
- commander** [1] -
540:25
- commence** [1] -
539:47
- commenced** [2] -
555:42, 582:40
- commensurate** [1] -
583:46
- comments** [1] -
545:28
- Commission** [38] -
537:9, 539:10,
539:11, 539:15,
549:41, 550:17,
558:27, 566:5,
566:9, 566:11,
566:13, 567:14,
567:24, 567:30,
567:46, 568:5,
568:32, 569:3,
569:32, 569:42,
570:27, 571:7,
572:12, 573:19,
573:31, 574:39,
575:26, 575:31,
577:6, 577:19,
577:22, 577:25,
577:37, 578:16,
584:46, 585:3,
585:43, 585:46
- COMMISSION** [1] -
586:38
- COMMISSIONER** [116]
- 538:1, 538:10,
538:16, 538:22,
538:30, 538:35,
538:46, 539:4,
542:7, 542:16,
542:26, 542:45,
543:43, 544:3,
544:9, 544:14,
544:22, 547:22,
547:31, 548:2,
548:15, 548:25,
548:34, 548:41,
548:45, 549:8,
549:23, 549:27,
550:10, 550:14,
550:30, 550:37,
550:43, 551:15,
551:29, 551:44,
552:4, 552:24,
552:30, 552:38,
553:8, 553:17,
553:21, 553:32,
553:38, 554:7,
554:43, 556:9,
556:37, 556:45,
557:14, 557:21,
557:26, 557:32,
557:36, 558:4,
558:10, 558:15,
558:41, 558:46,
559:15, 559:19,
559:27, 559:34,
559:38, 560:11,
560:29, 560:36,
560:47, 561:15,
561:25, 561:32,
561:39, 562:3,
562:12, 562:41,
563:7, 563:12,
563:17, 563:23,
563:30, 563:39,
564:2, 564:8,
564:17, 564:24,
564:32, 564:38,
564:43, 565:4,
565:9, 565:27,
565:31, 569:12,
569:17, 569:22,
578:18, 578:23,
578:28, 579:21,
580:10, 580:16,
580:24, 581:16,
581:28, 581:37,
581:47, 582:16,
583:6, 583:13,
583:21, 583:31,
583:35, 584:22,
586:5, 586:33
- Commissioner** [78] -
537:15, 538:5,
538:12, 538:24,
539:9, 540:24,
541:26, 541:30,
541:40, 542:13,
542:39, 543:4,
543:8, 543:21,
544:12, 544:24,
544:30, 545:5,
545:27, 547:18,
547:47, 548:9,
548:23, 548:29,
549:47, 550:35,
551:1, 551:17,
551:38, 552:33,
553:30, 554:3,
555:17, 555:38,
556:35, 556:40,
557:30, 557:45,
558:2, 558:37,
559:13, 559:31,
559:47, 561:21,
561:29, 561:46,
562:32, 563:1,
563:36, 564:14,
565:29, 565:33,
565:39, 568:12,
568:33, 569:1,
569:28, 570:5,
570:9, 570:28,
574:3, 574:16,
575:43, 577:23,
577:26, 578:33,
578:41, 579:2,
579:12, 579:29,
580:4, 581:2,
581:25, 581:44,
582:30, 582:47,
583:39, 586:13
- Commissions** [4] -
555:20, 572:7,
572:25, 579:46
- committee** [14] -
545:29, 545:31,
545:36, 545:43,
545:45, 546:6,
546:12, 546:20,
546:23, 547:13,
547:24, 560:18,
578:36, 578:43
- Committee** [2] -
545:7, 560:5
- committee's** [1] -
545:27
- communities** [4] -
543:30, 544:28,
544:35, 555:23
- community** [3] -
546:46, 548:3,
560:11
- community"** [1] -
566:2
- complaint** [2] -
552:40, 584:41
- complaints** [1] -
549:43
- completed** [1] -
566:41
- completely** [1] -
577:40
- complex** [1] - 559:42
- comply** [1] - 575:40
- complying** [1] -
569:41
- comprising** [2] -
566:27, 569:6
- concede** [1] - 581:3
- concept** [2] - 567:12,
573:30
- concepts** [2] - 567:1,
567:19
- concern** [8] - 549:15,
550:14, 550:27,
550:39, 551:5,
551:10, 574:31,
577:22
- concerned** [7] -
542:47, 551:6,

553:1, 553:23,
568:44, 582:2, 585:6
concerning [4] -
556:17, 569:34,
569:40, 575:27
concerns [11] - 549:3,
549:20, 549:43,
550:34, 551:3,
553:45, 555:7,
575:32, 575:34,
578:10, 581:32
conclude [1] - 581:11
conclusion [3] -
560:3, 560:38,
560:39
conclusions [1] -
561:23
conduct [8] - 544:42,
544:45, 555:41,
562:28, 562:34,
562:36, 572:39,
582:44
conducted [4] -
539:36, 539:46,
563:4, 577:36
conducting [2] -
557:3, 558:27
confess [1] - 557:15
confidential [3] -
541:17, 541:20,
552:31
confidentiality [3] -
549:44, 565:18,
565:21
configured [1] -
540:14
conforming [1] -
547:43
confused [1] - 542:28
connection [4] -
567:21, 574:5,
578:38, 582:19
consider [3] - 541:41,
550:16, 568:20
considerable [3] -
573:37, 575:12,
578:44
consideration [5] -
543:2, 547:7,
551:21, 567:47,
575:26
considered [3] -
541:12, 567:35,
584:26
considering [1] -
579:15
consists [1] - 541:2
constitute [1] - 554:38
constituted [2] -
568:24, 571:24
constraint [1] - 572:28
construction [4] -
547:25, 547:36,
548:6, 559:15
construe [1] - 547:38
construed [1] - 558:47
construing [2] -
547:27, 578:39
consultation [1] -
547:8
contains [1] - 541:4
content [4] - 550:16,
563:24, 563:27,
563:30
contents [4] - 543:45,
544:5, 544:15,
581:32
context [7] - 547:36,
565:45, 567:6,
572:24, 573:31,
576:7
continually [1] -
561:30
continue [4] - 550:46,
558:20, 561:42,
568:13
continues [1] - 546:45
continuing [1] -
576:41
contract [1] - 543:16
contrary [3] - 543:32,
560:34, 563:10
control [1] - 576:20
convenient [4] -
554:26, 554:43,
561:40, 565:27
coordinating [3] -
570:11, 570:33,
570:35
Coordinator [4] -
540:30, 540:33,
571:16
coping [1] - 568:45
copy [4] - 569:9,
569:12, 569:14
Coroner [2] - 574:9,
574:19
coroner [3] - 562:29,
566:6, 567:28
coroners [1] - 585:35
Coroners [6] - 562:33,
567:9, 567:16,
573:46, 574:2, 574:3
coronial [1] - 567:10
Corporate [1] - 540:26
correct [6] - 553:8,
558:41, 574:36,
581:28, 581:29,
581:38
correspondence [6] -
538:17, 550:18,
569:23, 573:37,
574:38, 576:6
couched [1] - 580:16
Council [3] - 545:7,
560:6, 578:44
Counsel [10] - 537:29,
537:31, 537:32,
537:33, 537:34,
537:35, 537:36,
537:37, 542:41,
569:33
counsel [20] - 544:33,
548:30, 550:1,
550:3, 550:21,
551:9, 551:18,
551:30, 552:34,
555:36, 562:21,
568:20, 569:37,
573:10, 574:17,
575:23, 583:40,
583:47, 584:2,
584:10
counter [1] - 552:2
course [16] - 540:20,
544:19, 545:20,
548:26, 550:19,
551:2, 552:46,
554:14, 555:7,
561:42, 565:27,
568:19, 568:28,
573:46, 574:4,
585:38
court [1] - 554:37
courtroom [1] -
585:10
courts [1] - 547:7
Crandell [9] - 538:47,
540:24, 541:31,
542:5, 553:44,
570:28, 571:20,
571:39, 586:34
created [1] - 576:17
creation [5] - 543:10,
543:14, 543:15,
545:8, 553:46
Crime [20] - 540:13,
540:28, 540:30,
540:31, 540:32,
540:33, 543:11,
544:46, 547:2,
554:10, 566:29,
566:41, 570:30,
570:31, 570:32,
571:16, 571:17
crime [21] - 544:27,
545:2, 545:14,
545:24, 545:35,
546:34, 553:46,
561:7, 562:24,
566:1, 566:33,
566:34, 566:35,
566:46, 567:20,
567:22, 567:36,
582:35
crimes [19] - 537:11,
539:12, 539:43,
539:44, 540:12,
543:13, 544:41,
546:2, 546:6, 546:9,
546:16, 546:36,
546:42, 547:1,
573:41, 582:32,
585:39, 585:41,
586:9
Crimes [3] - 539:11,
545:6, 570:16
criminal [4] - 541:18,
557:11, 557:12,
581:11
criteria [2] - 543:12,
545:1
criterion [1] - 572:13
criticisms [1] - 584:17
current [2] - 540:32,
573:45

D

Dalton [3] - 540:38,
571:8, 571:21
dare [1] - 561:10
Data [1] - 570:30
date [2] - 558:1,
576:36
dated [6] - 541:35,
541:44, 546:21,
547:44, 569:43,
578:41
dates [1] - 540:2
David [1] - 546:20
day-to-day [1] -
586:21
days [2] - 576:4,
581:24
de [4] - 537:33,
540:39, 571:8,
571:20
deadline [1] - 552:5
deal [12] - 553:23,
553:24, 553:28,
554:11, 554:27,
554:44, 554:46,
555:12, 568:37,
570:4, 582:24,
586:33
dealing [1] - 570:29
dealt [7] - 557:41,
558:23, 558:44,
568:16, 568:24,
573:8
death [11] - 543:29,
544:26, 544:34,
545:24, 545:35,
548:17, 556:43,
557:1, 557:4,
565:44, 573:20
deaths [22] - 539:12,
539:22, 545:15,
546:16, 546:34,
551:25, 555:21,
565:45, 566:1,
566:24, 567:20,
567:23, 567:37,
567:47, 568:22,
573:17, 573:27,
576:13, 576:16,
576:18, 579:16
debate [1] - 555:14
decades [1] - 546:6
deceased [1] - 557:9
December [16] -
537:24, 541:2,
541:47, 542:3,
542:42, 568:31,
568:44, 569:20,
569:31, 569:40,
571:42, 571:45,
572:28, 574:21,
575:5, 576:23
DECEMBER [1] -
586:39
decency [1] - 552:16
decide [3] - 562:23,
562:24, 584:11
decided [2] - 561:7,
578:45
decision [4] - 562:26,
570:38, 583:2,
586:23
decisions [1] - 577:45
dedicated [1] - 581:31
defence [1] - 580:47
defer [1] - 542:30
define [2] - 579:33,
579:42
defined [1] - 558:21
definitions [1] - 567:2
defy [1] - 582:27
degree [2] - 576:31,
582:18
deign [1] - 561:3
delay [1] - 586:17
delays [3] - 577:23,
583:41, 584:8
deliberately [1] -
584:47
deliver [1] - 577:4
delivering [1] - 546:42
demands [1] - 577:33

deployed [1] - 577:27
Deputy [1] - 574:9
Derek [1] - 540:38
descend [3] - 553:27, 553:32, 582:18
described [1] - 577:22
description [1] - 571:43
descriptions [2] - 551:25, 566:33
designation [1] - 545:2
desire [2] - 538:40, 565:13
detail [4] - 552:10, 552:25, 553:27, 554:19
detailed [1] - 551:24
Detective [1] - 540:37
determination [2] - 582:33, 582:34
determine [9] - 544:34, 555:21, 557:47, 560:9, 562:37, 577:27, 580:10, 581:30, 586:35
determined [1] - 581:5
determining [2] - 557:4, 581:31
developed [1] - 574:37
development [1] - 571:15
devised [1] - 567:1
devoted [1] - 575:13
die [2] - 552:10
difference [3] - 542:27, 567:27, 582:30
differences [1] - 567:11
different [11] - 548:41, 548:43, 554:20, 567:37, 567:39, 568:2, 568:3, 568:10, 574:24, 578:43, 582:39
difficulties [2] - 568:44, 569:41
direct [9] - 543:45, 544:4, 544:26, 550:38, 556:42, 559:39, 561:33, 574:32
directed [12] - 549:13, 558:26, 558:29, 563:14, 565:39, 572:43, 573:1, 573:16, 574:9, 583:15, 583:16, 583:17
direction [3] - 560:13, 583:27, 583:29
directions [2] - 581:24, 581:29
directly [2] - 541:23, 549:20
Director [1] - 537:38
directs [2] - 556:47, 557:3
disagree [7] - 561:3, 561:16, 561:47, 562:3, 562:16, 562:45, 581:2
disagreement [2] - 562:47, 581:7
disclose [1] - 579:9
disclosure [2] - 556:1, 574:25
discrete [3] - 554:24, 555:2, 565:12
discretion [1] - 584:41
discussed [1] - 580:42
discussion [1] - 572:30
dismiss [1] - 585:19
disposal [1] - 547:1
disrespectfully [1] - 549:9
distinct [1] - 543:10
distinguish [1] - 582:28
distracted [2] - 584:33, 586:20
Diversity [1] - 540:27
divide [1] - 554:9
document [9] - 548:20, 549:40, 550:16, 566:30, 568:34, 569:41, 569:45, 574:12, 574:25
documentation [4] - 562:9, 577:15, 585:33, 585:40
documents [61] - 541:5, 541:42, 541:43, 542:12, 542:14, 542:20, 542:22, 544:32, 549:16, 549:25, 549:29, 550:1, 550:3, 550:5, 550:22, 550:31, 551:7, 551:11, 552:43, 553:3, 553:22, 553:23, 554:18, 554:19, 554:21, 554:33, 554:44, 555:7, 555:8, 560:42, 565:16, 568:39, 568:45, 569:5, 569:6, 569:29, 569:47, 570:10, 570:12, 570:15, 570:18, 570:23, 571:22, 571:35, 574:7, 575:12, 575:14, 577:34, 577:35, 578:14, 581:33, 582:3, 583:41, 583:46, 584:9, 584:11, 585:37, 585:42
domain [3] - 573:43, 574:27, 574:28
dominant [1] - 577:13
done [14] - 554:24, 555:1, 555:2, 555:13, 556:18, 557:34, 562:27, 566:31, 572:39, 574:44, 577:7, 583:36, 586:7, 586:16
door [1] - 577:18
doubt [5] - 548:19, 548:47, 549:38, 576:47, 580:30
down [2] - 576:22, 585:30
drafted [1] - 547:19
due [4] - 540:20, 550:19, 551:2, 552:46
duplication [1] - 557:7
duplications [1] - 543:34
during [1] - 539:37

E

early [5] - 538:33, 540:36, 549:9, 579:35, 581:23
earth [2] - 551:45, 585:7
effect [7] - 543:45, 564:33, 571:26, 572:8, 572:43, 573:1, 577:33
efficiency [1] - 554:8
effort [1] - 582:24
efforts [2] - 549:29, 584:24
eg [1] - 559:11
eight [2] - 549:12, 576:30
eighth [1] - 576:42
either [12] - 551:36, 552:10, 554:18, 554:26, 555:3, 555:40, 558:1, 572:23, 579:10, 581:23, 584:47, 585:31
elaborate [1] - 544:1
electronic [1] - 560:42
elicit [1] - 555:28
Elliott [1] - 546:20
email [3] - 541:15, 574:32, 574:47
embedding [1] - 566:6
Emergency [1] - 546:19
emergency [1] - 538:7
enable [1] - 542:32
end [1] - 575:6
ended [1] - 581:25
engagement [1] - 575:22
Engagement [2] - 540:33, 570:32
entire [1] - 544:35
entirely [8] - 548:41, 561:32, 563:8, 567:39, 577:26, 577:44, 585:15, 585:21
entirety [1] - 560:1
entitled [18] - 550:38, 558:34, 559:3, 560:22, 562:4, 562:5, 562:6, 563:8, 563:32, 563:33, 563:42, 563:45, 564:2, 579:2, 579:4, 579:12, 579:39, 586:18
Enzo [1] - 537:38
equally [1] - 547:41
erroneous [1] - 558:16
escapes [1] - 574:26
especially [1] - 543:28
essence [1] - 549:10
essentially [1] - 575:30
establish [3] - 545:11, 546:13, 566:35
established [1] - 545:22
establishment [4] - 540:10, 543:27, 546:26, 546:31
et [2] - 554:10, 554:11
event [3] - 572:26, 573:5, 586:35
events [1] - 555:27
eventually [2] - 555:22, 579:34
Evidence [2] - 580:8, 580:27
evidence [44] - 538:28, 540:5, 540:23, 540:41, 540:45, 541:2, 542:14, 543:5, 546:4, 546:39, 551:4, 551:26, 555:22, 555:29, 556:2, 557:6, 557:45, 559:32, 561:7, 562:37, 566:33, 566:34, 566:35, 568:19, 571:39, 572:11, 572:14, 572:15, 572:16, 572:19, 572:21, 572:29, 573:10, 574:6, 574:40, 574:41, 574:43, 580:3, 580:5, 580:28, 580:29, 582:33, 586:20, 586:35
evidencing [2] - 570:12, 570:15
exactly [1] - 580:14
exam [1] - 547:33
examined [1] - 568:2
example [3] - 554:43, 561:7, 580:45
excellent [1] - 557:32
except [2] - 573:27, 575:25
excised [1] - 554:38
excludes [1] - 558:5
exclusive [1] - 565:19
executive [3] - 560:13, 580:18, 583:24
exercise [10] - 539:29, 542:28, 563:2, 573:16, 582:35, 582:36, 582:38, 582:40, 582:44, 582:46
exercised [1] - 584:40
EXHIBIT [1] - 579:26
exhibit [16] - 540:47, 541:1, 541:26, 541:33, 541:35, 541:37, 541:43, 542:1, 542:4, 542:8, 542:30, 548:47, 570:2, 574:12, 579:22, 579:23
existence [3] - 544:47,

567:44, 581:40
existing [1] - 552:15
expect [1] - 543:40
expected [1] - 540:4
expert [4] - 540:41,
 545:12, 546:14,
 546:32
explain [1] - 566:26
express [2] - 559:5,
 560:23
expressed [1] -
 566:47
expressing [1] -
 547:44
expression [1] - 561:3
expressly [3] - 539:16,
 540:43, 584:32
extent [1] - 581:32
extent [5] - 557:39,
 558:21, 558:39,
 568:14, 568:38
extraneous [3] -
 547:26, 547:39,
 578:38

F

face [2] - 559:6,
 582:47
faced [2] - 562:29,
 568:44
fact [8] - 543:32,
 548:46, 552:14,
 564:33, 572:42,
 574:22, 574:25,
 586:26
factor [4] - 566:7,
 567:36, 573:17,
 573:21
fair [1] - 553:25
fairly [1] - 538:41
fall [4] - 555:3, 555:6,
 556:21
falling [1] - 576:13
falls [1] - 553:39
families [2] - 547:8,
 557:9
family [2] - 538:7,
 546:38
far [5] - 553:1, 553:22,
 562:45, 580:25,
 580:38
fashioned [1] - 554:30
feast [1] - 554:35
February [1] - 540:2
few [4] - 555:33,
 555:37, 566:12,
 581:23
files [1] - 566:42
fill [1] - 566:28

final [11] - 540:6,
 540:44, 542:22,
 545:5, 545:18,
 563:46, 567:44,
 569:45, 573:38,
 579:4, 583:39
finally [1] - 545:27
findings [6] - 539:17,
 543:41, 558:28,
 559:11, 572:45,
 573:2
fingers [1] - 555:35
finish [3] - 561:37,
 561:39, 586:5
firm [1] - 575:23
first [24] - 539:28,
 539:47, 540:45,
 541:27, 542:7,
 542:13, 542:30,
 542:31, 544:4,
 548:45, 549:12,
 553:46, 554:46,
 555:9, 557:16,
 565:23, 566:12,
 567:12, 568:3,
 568:38, 569:3,
 570:10, 572:4,
 578:35
firstly [8] - 540:5,
 540:24, 541:4,
 543:10, 556:5,
 565:33, 565:36,
 578:40
fit [1] - 582:25
five [2] - 569:6, 582:43
fixed [1] - 540:2
flatly [1] - 577:40
flawed [3] - 560:17,
 560:20, 560:23
flexibility [1] - 581:6
flight [1] - 561:42
Flinders [8] - 540:39,
 543:17, 544:42,
 566:40, 570:22,
 570:43, 571:4,
 571:11
focus [7] - 542:47,
 543:5, 543:8,
 543:21, 544:35,
 548:16, 548:18
folder [3] - 569:5,
 579:19
FOLDER [1] - 579:26
folders [1] - 542:19
following [3] - 540:22,
 546:18, 556:5
follows [1] - 576:30
Force [40] - 539:17,
 539:20, 539:34,
 539:35, 540:5,

540:8, 540:9,
 540:25, 540:38,
 540:44, 543:11,
 543:15, 543:18,
 544:44, 544:47,
 546:45, 551:23,
 552:35, 553:36,
 563:41, 563:47,
 567:34, 568:1,
 568:24, 570:10,
 570:14, 570:21,
 570:23, 570:24,
 570:34, 571:3,
 572:45, 573:2,
 575:47, 576:15,
 578:5, 578:11,
 578:14, 579:5,
 582:31
force [11] - 554:10,
 561:5, 566:18,
 566:21, 566:27,
 571:11, 574:2,
 577:28, 579:10,
 584:14, 584:20
Force [1] - 577:46
foreshadowed [1] -
 544:32
form [14] - 545:12,
 546:14, 546:32,
 554:46, 559:6,
 559:28, 560:43,
 561:15, 564:15,
 565:11, 566:22,
 566:28, 566:31,
 583:23
Form [2] - 566:29,
 570:16
formed [2] - 564:18,
 565:1
former [2] - 540:25,
 540:30
formerly [1] - 540:29
forming [3] - 558:5,
 559:9, 565:14
Forms [1] - 566:41
forms [3] - 547:9,
 547:18, 566:43
forthcoming [1] -
 585:40
forward [1] - 571:27
foundation [2] -
 548:20, 585:15
four [16] - 540:43,
 543:10, 544:30,
 552:41, 553:47,
 554:23, 554:47,
 555:11, 555:18,
 556:21, 556:26,
 556:33, 565:15,
 566:32, 566:34,

586:24
fourthly [2] - 540:31,
 543:16
framed [1] - 578:45
frankly [2] - 585:2,
 585:19
free [1] - 580:34
fresh [2] - 551:39,
 555:22
Friday [9] - 538:25,
 542:41, 568:31,
 569:40, 571:33,
 571:40, 571:41,
 572:2, 578:12
friend [10] - 542:5,
 542:23, 568:11,
 568:28, 568:39,
 578:33, 578:47,
 579:30, 579:45,
 582:9
friends [2] - 546:38,
 570:5
front [4] - 547:40,
 547:42, 559:40,
 569:9
fruitful [1] - 545:41
fully [3] - 549:28,
 583:7, 584:23
fundamental [2] -
 567:11, 567:27
funding [2] - 575:46,
 577:30
furios [2] - 556:30,
 562:43
future [3] - 555:28,
 557:12, 573:32

G

gathered [1] - 576:17
Gay [1] - 545:6
gay [19] - 545:14,
 545:23, 545:34,
 546:1, 546:15,
 546:33, 546:47,
 565:46, 566:7,
 566:23, 567:19,
 567:22, 567:36,
 568:22, 573:17,
 573:21, 582:19
gender [1] - 566:23
Gender [1] - 540:26
general [5] - 548:32,
 551:20, 552:43,
 569:37, 581:30
General [2] - 542:41,
 569:32
generally [4] - 539:41,
 541:25, 580:44,
 584:10

generated [1] - 571:19
generic [6] - 549:40,
 550:34, 552:7,
 552:40, 553:27,
 553:45
generically [1] -
 553:24
genuine [1] - 549:42
Geoffrey [2] - 538:14,
 540:29
given [8] - 550:22,
 562:28, 567:24,
 568:19, 569:8,
 572:15, 580:2,
 583:42
goodwill [1] - 549:30
govern [4] - 543:22,
 562:34, 580:18,
 580:27
governed [1] - 580:30
governing [3] -
 549:13, 572:19,
 572:20
government [3] -
 547:4, 547:20,
 580:18
Government [6] -
 545:11, 546:13,
 546:22, 546:30,
 547:16, 575:46
government's [1] -
 546:27
Governor [12] - 543:2,
 543:25, 543:40,
 544:39, 555:19,
 555:45, 559:22,
 560:4, 562:22,
 562:36, 577:5,
 578:44
granted [1] - 538:18
graphs [1] - 567:43
GRAY [6] - 539:9,
 565:33, 569:14,
 569:19, 569:25,
 578:33
Gray [9] - 537:31,
 538:10, 538:39,
 539:7, 550:20,
 554:27, 565:10,
 565:31, 584:42
Gray's [1] - 552:20
great [3] - 556:15,
 577:15, 582:24
grief [1] - 546:40
Gráinne [1] - 537:35

H

half [1] - 569:27
hand [6] - 540:7,

547:31, 548:4,
555:35, 569:4,
576:37
hang [1] - 582:2
happy [1] - 585:19
hate [33] - 537:11,
539:12, 539:43,
540:12, 543:13,
544:27, 544:41,
545:2, 545:14,
545:23, 545:34,
546:2, 546:16,
546:34, 546:36,
547:1, 562:24,
565:46, 566:1,
566:7, 566:24,
567:19, 567:20,
567:22, 567:36,
568:22, 573:17,
573:21, 573:41,
582:19, 582:34,
582:35
Hate [7] - 539:11,
540:29, 540:32,
540:33, 544:46,
545:6, 570:32
headings [1] - 570:29
healing [1] - 546:43
hear [11] - 541:27,
542:9, 542:13,
552:40, 552:45,
553:43, 553:45,
560:18, 565:10,
565:21
heard [4] - 548:45,
553:3, 554:7, 565:22
hearing [20] - 538:40,
539:46, 540:4,
540:23, 540:36,
540:46, 540:47,
541:1, 541:24,
541:33, 549:35,
552:46, 554:39,
571:33, 571:40,
581:17, 581:24,
581:29, 582:1
hearings [1] - 539:10
heart [2] - 550:45,
551:1
Heath [1] - 537:34
held [1] - 576:15
help [1] - 546:43
helpfully [1] - 549:14
hence [1] - 578:12
hesitate [1] - 551:29
high [1] - 553:28
historical [7] - 539:21,
539:29, 546:1,
566:22, 566:28,
566:42, 576:13

history [5] - 540:13,
544:40, 563:3,
570:15, 571:15
hold [1] - 575:20
Homicide [5] - 547:10,
575:20, 576:2,
577:36, 577:43
homicides [3] -
539:36, 582:20,
585:2
Hon [1] - 546:20
Honour [9] - 542:11,
546:18, 549:19,
549:46, 550:27,
551:42, 569:8,
570:29, 586:3
Honourable [1] -
537:16
hope [2] - 545:37,
551:1
hopefully [1] - 562:43
hopes [1] - 562:22
hospitals [1] - 585:35
host [1] - 550:1
hundreds [1] - 571:36
hybrid [2] - 580:29,
581:3

I

inadequacy [1] -
560:5
inadequate [2] -
544:45, 545:3
inadvertently [1] -
569:8
inappropriate [1] -
577:40
inappropriately [1] -
586:11
inappropriateness [1]
- 565:18
include [3] - 540:4,
540:36, 583:10
included [3] - 541:46,
569:45, 583:43
including [2] [1] -
539:17, 539:43,
540:6, 540:9,
540:12, 540:44,
541:3, 541:8,
545:24, 545:35,
547:2, 557:6,
557:12, 563:46,
570:11, 570:19,
570:28, 570:33,
570:35, 571:38,
577:3
incomplete [2] -
576:28, 576:33
inconvenience [1] -
586:27
increase [1] - 576:1
incumbent [1] - 577:6
indeed [12] - 547:47,
548:23, 550:17,
550:41, 558:26,
566:46, 567:9,
568:32, 575:36,
579:8, 581:35
independent [1] -
543:18
indicate [4] - 541:42,
550:19, 550:23
indicated [6] - 538:2,
538:17, 538:26,
548:30, 551:18,
565:13
indicates [1] - 582:47
indicating [1] - 572:38
indication [2] -
562:35, 583:10
Indicator [2] - 566:41,
570:16
Indicators [1] - 566:29
indicators [2] -
566:31, 566:46
individual [4] -
549:25, 553:22,
553:43, 564:27

indulgence [1] -
586:19
inevitably [1] - 577:15
inform [1] - 555:45
informants [1] -
553:40
information [14] -
541:14, 541:16,
541:17, 546:46,
556:17, 557:6,
560:14, 560:45,
561:21, 561:22,
573:40, 576:12,
580:19, 585:26
informed [1] - 583:24
informers [1] - 573:42
inquest [5] - 562:30,
562:34, 573:47,
574:4, 574:17
inquire [13] - 544:26,
545:13, 546:14,
546:32, 557:38,
558:20, 558:38,
559:41, 560:4,
565:40, 568:13,
573:6, 573:27
inquired [1] - 559:2
inquiries [15] - 543:27,
543:28, 543:36,
545:20, 545:32,
557:2, 558:1,
558:28, 560:20,
560:24, 563:37,
567:30, 572:39,
572:40, 586:8
inquiring [3] - 539:11,
568:6, 577:3
inquiry [26] - 545:9,
545:12, 545:17,
545:22, 545:32,
545:45, 545:46,
546:8, 546:13,
546:26, 546:31,
546:39, 557:3,
557:4, 558:24,
558:44, 559:7,
560:9, 562:17,
567:11, 567:46,
568:16, 568:21,
568:24, 573:9,
573:30
Inquiry [44] - 537:9,
539:10, 539:34,
539:41, 540:16,
540:46, 541:12,
541:19, 541:25,
542:47, 543:23,
543:25, 543:26,
544:36, 545:6,
545:9, 547:44,

548:21, 549:21,
549:47, 551:11,
555:19, 555:21,
555:26, 555:33,
555:44, 556:4,
560:8, 562:36,
564:6, 567:10,
567:13, 567:18,
568:46, 572:7,
572:25, 573:39,
575:1, 577:2,
577:14, 579:39,
579:46, 580:2,
583:45
INQUIRY [1] - 586:38
Inquiry's [1] - 539:40
insofar [2] - 548:15,
562:5
inspired [1] - 545:37
instance [5] - 542:31,
544:4, 553:46,
554:46, 555:9
instead [1] - 567:1
instructed [2] -
551:38, 552:8
instructing [4] -
538:25, 542:18,
549:1, 550:20
instructions [5] -
553:9, 570:11,
570:34, 570:35,
584:14
insufficient [1] -
566:35
intended [6] - 555:18,
562:17, 580:17,
585:2, 585:4, 586:1
intending [2] - 585:16,
586:6
intention [3] - 552:34,
581:44, 581:47
inter [1] - 569:34
interest [6] - 541:21,
550:25, 560:14,
561:1, 572:32,
586:10
interested [1] - 582:17
interesting [2] -
544:16, 560:21
interests [1] - 551:11
internet [2] - 553:12,
582:17
interpretation [2] -
581:6, 582:10
Interpretation [1] -
547:37
interrupt [2] - 543:43,
551:30
interrupted [2] -
561:30, 586:7

interrupting [2] - 585:1, 585:11	551:13, 569:4, 572:22, 582:27	542:41, 562:43, 568:31, 573:37, 577:24, 578:3, 578:12, 581:23, 581:25, 585:5	574:21, 574:30, 575:5, 575:7, 575:24, 575:31, 575:32, 575:33, 575:39, 576:4, 576:5, 576:7, 576:24, 577:21, 577:25, 577:32, 584:37	583:26
Intersex [1] - 540:27	issuing [1] - 584:32	late [4] - 565:34, 576:27, 576:32, 576:43	letters [5] - 541:35, 541:45, 554:34, 584:17, 584:30	looked [3] - 548:21, 561:5, 564:27
investigate [4] - 544:7, 556:31, 558:34, 560:36	item [1] - 570:18	lateness [1] - 583:41	Level [1] - 537:20	looking [6] - 556:13, 559:47, 566:14, 577:12, 582:26, 586:16
investigated [3] - 546:10, 566:19, 576:16	iterative [1] - 550:19	latitude [1] - 580:2	level [2] - 553:28, 558:33	loud [1] - 558:16
investigating [1] - 559:44	itself [4] - 548:11, 550:19, 563:5, 579:13	latter [2] - 551:42, 551:45	levels [1] - 576:1	loved [2] - 546:37, 547:9
Investigation [1] - 540:37	<hr/> J <hr/>	launching [1] - 556:2	Level [1] - 537:20	<hr/> M <hr/>
investigation [13] - 539:44, 540:11, 545:41, 554:11, 555:38, 557:1, 558:1, 560:44, 562:25, 565:2, 573:29, 581:17, 582:32	jeopardise [1] - 549:31	law [4] - 547:35, 548:5, 558:32, 575:23	level [2] - 553:28, 558:33	Macnamir [3] - 539:35, 540:9, 570:24
investigations [18] - 539:35, 541:18, 543:28, 545:44, 555:40, 555:41, 556:1, 556:18, 557:12, 567:29, 573:32, 573:40, 575:19, 575:41, 576:19, 577:35, 583:2	John [1] - 537:16	lay [1] - 540:40	LGBTIQ [11] - 537:11, 539:10, 539:12, 539:25, 539:37, 543:29, 544:28, 555:23, 566:2, 567:21, 567:45	Macquarie [1] - 537:20
investigative [1] - 577:4	joined [1] - 572:23	lead [3] - 555:22, 555:29, 585:32	LGBTIQ-related [1] - 567:45	MADDEN [2] - 538:12, 538:20
investigator [1] - 580:40	judgment [2] - 586:24, 586:28	leader [1] - 540:31	liberal [1] - 580:37	Madden [3] - 537:45, 538:13, 538:16
involve [1] - 573:30	judicial [8] - 545:12, 545:21, 545:45, 545:46, 546:8, 546:13, 546:26, 546:31	learned [8] - 542:23, 568:11, 568:27, 570:5, 578:33, 579:30, 579:45, 582:9	light [3] - 539:40, 546:3, 576:23	main [6] - 543:5, 543:8, 554:47, 555:9, 568:37, 568:42
involved [4] - 546:5, 566:24, 567:22, 584:3	June [5] - 539:27, 549:34, 552:5, 567:32, 577:5	least [2] - 571:44, 584:30	likely [5] - 540:40, 572:16, 580:4, 580:39, 585:32	Manager [1] - 540:28
involving [1] - 539:24	Justice [2] - 537:16, 569:15	leave [5] - 538:2, 538:3, 538:13, 538:17, 564:34	limit [3] - 567:29, 567:31, 577:2	mandatory [1] - 580:39
irrefutable [1] - 562:35	justice [2] - 546:1, 546:42	leaving [1] - 558:22	limitation [2] - 580:35, 583:26	manner [15] - 543:29, 544:26, 544:34, 548:17, 556:42, 557:1, 557:4, 557:5, 560:16, 565:44, 567:8, 567:13, 567:23, 567:46, 579:15
irrelevant [3] - 550:31, 551:4, 571:26	justifiably [1] - 550:23	led [2] - 545:8, 551:4	limitations [2] - 549:20, 549:21	March [1] - 574:15
Ismail [1] - 540:32	justification [1] - 582:5	legal [2] - 552:1, 584:15	Lint [3] - 540:39, 571:8, 571:20	mark [2] - 579:21, 579:22
isolate [1] - 555:37	juvenile [1] - 541:15	Legal [1] - 537:38	list [2] - 550:7, 581:22	Mark [1] - 537:43
issue [9] - 548:17, 548:38, 554:12, 554:20, 555:2, 555:13, 565:12, 582:3	<hr/> K <hr/>	legally [2] - 547:22, 584:24	listed [2] - 572:40, 576:40	MARKED [1] - 579:27
issued [13] - 568:46, 569:27, 571:34, 575:10, 575:11, 575:36, 576:36, 577:15, 579:31, 584:25, 584:26, 584:40, 585:10	Kate [1] - 537:39	legislation [1] - 580:17	live [2] - 575:41, 577:35	marked [1] - 552:31
Issues [2] - 545:8, 560:6	Kathleen [1] - 537:34	Legislative [1] - 545:7	lives [1] - 546:41	marking [1] - 542:8
issues [5] - 543:1,	KC [1] - 537:43	length [2] - 549:28, 571:22	locate [1] - 555:33	Mars [1] - 537:33
	Ken [1] - 537:45	lengthy [1] - 574:5	locating [2] - 556:5, 556:6	Marsden [1] - 537:35
	kind [3] - 548:4, 549:2, 572:33	less [2] - 571:43, 578:13	Lockery [1] - 537:39	Marsic [6] - 548:47, 549:1, 569:37, 584:29, 585:47, 586:6
	kindly [2] - 563:41, 586:34	lesser [1] - 585:36	logic [1] - 574:26	Marsic's [2] - 555:10, 577:32
	Kirgiz [1] - 540:32	letter [47] - 538:25, 542:40, 542:43, 546:21, 547:12, 547:24, 549:2, 549:3, 549:6, 549:8, 550:38, 554:33, 554:37, 554:46, 555:10, 568:30, 568:43, 569:19, 569:31, 569:36, 569:39, 569:43, 570:26, 571:41, 571:45, 571:47, 572:27, 572:36,	look [23] - 552:41, 554:25, 555:10, 557:5, 557:45, 559:25, 559:32, 560:22, 560:39, 561:1, 561:6, 561:8, 561:9, 563:3, 563:30, 566:22, 566:27, 574:13, 579:37, 583:15, 583:16, 583:17,	MATERIAL [1] - 579:27
	knowledge [1] - 546:5			material [37] - 538:27, 541:11, 541:23, 547:18, 547:26, 548:30, 549:4, 549:31, 551:18, 552:1, 553:41,
	knows [1] - 580:44			
	<hr/> L <hr/>			
	laborious [1] - 584:3			
	labour [1] - 576:5			
	laid [1] - 577:18			
	language [3] - 565:47, 567:25, 580:37			
	largely [3] - 566:29, 568:39, 581:37			
	last [11] - 540:46,			

555:36, 560:7,
562:22, 562:23,
565:1, 566:22,
566:28, 566:42,
570:6, 571:27,
571:44, 572:33,
572:38, 573:24,
574:34, 576:14,
576:20, 576:39,
576:47, 577:7,
577:13, 578:6,
578:8, 579:33,
579:36, 583:43
materials [3] - 564:14,
578:38, 579:19
MATERIALS [1] -
579:27
matter [30] - 539:42,
547:35, 548:5,
552:6, 552:13,
552:16, 553:11,
557:39, 557:40,
558:20, 558:22,
558:32, 558:35,
558:39, 558:43,
559:11, 565:22,
568:14, 568:15,
568:20, 572:11,
572:15, 573:7,
574:37, 577:26,
578:1, 578:47,
579:16, 579:18,
580:26
matters [29] - 541:28,
542:4, 549:11,
549:36, 550:38,
552:9, 553:47,
554:27, 555:3,
555:10, 556:14,
557:46, 558:31,
565:15, 565:22,
566:18, 568:6,
569:29, 569:38,
574:35, 574:39,
575:2, 577:12,
578:34, 581:40,
582:42, 583:15,
586:33
McCann [3] - 541:34,
541:35, 541:44
mean [7] - 543:39,
548:13, 551:45,
553:33, 560:30,
573:26, 580:38
means [9] - 538:35,
542:29, 542:34,
545:22, 563:32,
564:26, 568:2,
580:6, 583:16
meant [2] - 553:19,
555:26
meantime [1] - 553:6
measure [1] - 580:31
mechanisms [1] -
547:1
media [1] - 541:8
meet [1] - 577:17
Meg [1] - 537:36
Melis [1] - 537:32
member [1] - 566:1
members [6] - 540:39,
543:29, 544:34,
549:16, 555:23,
574:32
mention [2] - 555:46,
578:34
mentioned [3] -
544:31, 567:12,
569:39
merely [5] - 543:35,
543:45, 544:4,
560:6, 583:1
method [1] - 567:1
methodologies [6] -
540:6, 567:37,
567:42, 568:3,
568:5, 571:23
methodology [23] -
543:15, 543:16,
543:27, 545:1,
558:34, 559:24,
560:17, 561:18,
561:20, 562:7,
563:20, 566:16,
566:26, 566:37,
567:38, 567:39,
570:13, 570:20,
571:1, 571:10,
573:19, 573:42,
583:11
mid [1] - 561:42
middle [1] - 585:28
might [18] - 538:39,
539:24, 541:47,
544:19, 550:23,
551:12, 555:8,
555:34, 558:19,
570:2, 572:24,
573:5, 573:31,
573:47, 582:35,
582:37, 582:42,
583:26
Milledge [2] - 574:9,
574:19
mind [2] - 557:22,
560:19
minimises [1] - 557:8
minister [7] - 546:18,
547:12, 547:24,
547:39, 548:4,
577:29, 586:13
Minister [1] - 546:19
minute [1] - 565:35
minutes [1] - 566:12
mirror [1] - 566:6
misconceived [1] -
585:20
misguided [1] -
585:20
misinformed [2] -
551:32, 552:11
mistake [1] - 556:12
mode [2] - 577:24,
581:17
moment [4] - 567:12,
577:10, 581:39,
586:10
Monday [1] - 537:24
month [2] - 540:46,
566:10
months [2] - 569:28,
582:47
moot [1] - 575:1
Morgan [2] - 540:37,
565:20
Morgan's [1] - 552:47
morning [6] - 538:33,
548:18, 551:36,
562:45, 579:24,
586:29
most [3] - 545:47,
580:11, 585:34
motivated [3] -
559:24, 565:46,
568:22
mounting [1] - 545:21
move [1] - 580:40
moving [2] - 554:35,
583:22
murders [2] - 544:27,
555:23
must [9] - 549:10,
557:15, 559:1,
559:8, 561:9,
574:26, 576:22,
577:9, 585:33
Mykkeltvedt [2] -
537:44, 541:39
Mykkeltveldt [1] -
538:6

N

name [2] - 543:11,
555:46
named [1] - 540:13
namely [1] - 548:16,
556:47, 562:37,
566:17, 567:31,
568:21, 571:41,
572:40, 574:2,
578:44, 583:22
names [3] - 541:14,
541:19, 553:40
nature [2] - 575:16,
575:34
near [1] - 576:8
nearly [1] - 569:27
necessarily [2] -
572:21, 573:4
necessary [8] -
539:38, 542:29,
558:19, 563:1,
567:30, 577:3,
577:4, 577:30
need [21] - 550:15,
554:29, 554:30,
554:32, 556:18,
556:19, 556:31,
556:32, 559:41,
561:41, 561:44,
568:34, 568:45,
568:47, 575:40,
582:3, 583:6,
583:47, 585:22,
586:14, 586:15
needed [1] - 577:28
needs [1] - 548:21
Neiwand [4] - 539:34,
540:8, 540:38,
570:24
never [1] - 560:19
New [11] - 537:21,
541:16, 545:7,
546:22, 547:37,
547:41, 553:26,
560:12, 561:4,
561:5, 562:16
new [1] - 546:46
next [11] - 540:1,
543:6, 543:9,
544:32, 552:5,
552:46, 554:17,
565:20, 567:32,
577:5, 578:1
nicely [1] - 583:36
nine [1] - 576:30
nitpicking [1] - 576:47
nobody's [2] - 585:10,
585:11
nonsense [1] - 573:34
notably [1] - 579:9
note [6] - 538:1,
543:45, 544:4,
544:14, 549:15,
564:33
noted [3] - 556:25,
579:1, 579:3
notes [1] - 545:43
nothing [5] - 556:25,
557:19, 557:24,
582:4, 585:37
noting [1] - 574:4
notwithstanding [2] -
551:37, 552:14
November [7] -
540:47, 541:32,
541:44, 546:21,
566:10, 566:38
NSW [31] - 537:43,
537:44, 539:20,
539:31, 539:36,
539:42, 540:11,
540:17, 540:26,
541:6, 541:11,
542:41, 543:11,
543:17, 544:41,
545:11, 546:13,
546:30, 546:45,
547:16, 550:15,
551:38, 560:6,
561:10, 563:41,
575:47, 576:15,
577:46, 578:5,
584:43, 585:22
number [13] - 539:16,
540:17, 541:4,
551:34, 552:25,
552:26, 552:39,
556:30, 558:31,
567:5, 570:12,
570:15, 571:9
numbered [1] - 555:34
numbers [3] - 541:15,
574:32, 574:47
numerical [1] - 567:42
nutshell [1] - 571:31

O

o'clock [1] - 586:29
objected [1] - 578:5
objecting [1] - 571:26
objection [12] - 542:8,
551:8, 551:39,
552:1, 565:34,
571:32, 571:42,
572:33, 574:17,
578:13, 578:15
objections [1] -
549:41
objective [1] - 566:21
obliged [1] - 584:24
obscure [1] - 572:26
observations [1] -
576:46
obtain [4] - 546:4,
550:1, 570:38, 577:6
obtained [5] - 541:5,
551:26, 557:46,

559:32, 575:22
obvious [11] - 556:11,
 556:19, 568:7,
 573:18, 577:9,
 577:12, 580:11,
 582:13, 582:14,
 582:16, 582:25
obviously [3] - 552:5,
 573:29, 576:11
occasions [2] -
 556:30, 584:32
occupy [1] - 539:47
occurred [3] - 539:22,
 564:33, 577:43
October [5] - 569:38,
 569:43, 575:33,
 576:38, 576:42
OF [4] - 579:26,
 579:27, 586:38
offenders [1] - 541:15
offensive [2] - 585:4,
 585:5
Office [1] - 569:32
officer [1] - 584:11
officers [12] - 539:28,
 539:32, 540:7,
 540:18, 540:20,
 541:16, 566:27,
 574:47, 579:10,
 583:42, 584:15,
 586:15
often [1] - 553:41
old [2] - 546:6, 554:30
old-fashioned [1] -
 554:30
omitted [1] - 578:34
ON [2] - 579:26
once [2] - 555:13,
 585:18
one [42] - 540:7,
 541:31, 546:25,
 549:46, 549:47,
 550:12, 551:3,
 553:38, 555:35,
 556:14, 556:26,
 556:32, 558:31,
 561:8, 562:44,
 565:34, 566:13,
 566:32, 566:33,
 567:5, 567:31,
 567:38, 568:20,
 568:29, 569:9,
 571:44, 573:5,
 573:47, 574:6,
 575:17, 575:36,
 576:12, 576:40,
 577:11, 578:1,
 579:31, 580:45,
 584:3, 584:41,
 585:25, 585:39

onerous [2] - 583:1,
 583:6
ones [2] - 546:37,
 547:9
ongoing [1] - 541:18
open [2] - 538:39,
 547:24
opening [5] - 541:32,
 552:20, 566:10,
 566:38, 567:5
Operating [1] - 571:17
Operation [5] -
 543:14, 544:46,
 570:33, 582:31,
 582:39
operations [1] -
 586:21
opinion [3] - 561:3,
 566:22, 572:15
opportunity [7] -
 542:21, 542:23,
 546:3, 553:2,
 554:15, 555:28,
 582:1
opposed [1] - 582:31
opposite [2] - 572:43,
 583:13
opposition [1] -
 550:17
oral [4] - 538:26,
 540:23, 542:39,
 568:29
order [2] - 569:3,
 579:33
ordinator [1] - 570:31
otherwise [3] -
 554:33, 567:44,
 584:34
Ouija [1] - 562:3
outcome [2] - 545:37,
 559:45
outline [3] - 566:39,
 568:7, 569:25
outlined [4] - 554:47,
 566:11, 566:16,
 566:38
outset [2] - 571:31,
 585:23
outside [3] - 543:22,
 556:21, 556:27
outstanding [2] -
 549:37, 565:22
overall [1] - 551:10
overwhelmingly [1] -
 577:13
own [6] - 547:43,
 548:26, 552:42,
 560:2, 564:15, 567:2
O'Brien [1] - 537:36

P

Page [3] - 574:5,
 574:9, 574:18
page [15] - 545:17,
 545:28, 570:9,
 570:23, 570:30,
 570:32, 570:33,
 574:15, 576:7,
 576:9, 576:36,
 577:21, 577:24
pages [1] - 576:30
Palmer [1] - 537:37
paper [2] - 539:29,
 566:18
paragraph [32] -
 543:36, 545:17,
 557:11, 558:18,
 558:37, 563:15,
 568:12, 572:27,
 572:36, 572:37,
 572:40, 572:42,
 573:4, 573:14,
 573:25, 573:36,
 573:41, 573:45,
 574:21, 574:31,
 574:46, 575:6,
 575:7, 575:10,
 575:17, 575:25,
 575:39, 575:42,
 577:32, 577:33,
 578:1, 578:4
Paragraphs [1] -
 572:47
paragraphs [13] -
 544:25, 545:28,
 549:12, 549:19,
 556:41, 559:22,
 562:32, 573:23,
 574:30, 575:9,
 576:22, 582:10,
 582:12
Parliament [1] -
 547:41
parliament [1] - 548:3
parliamentary [4] -
 547:23, 560:18,
 578:36, 578:43
Parrabell [9] -
 539:18, 539:20,
 539:27, 540:5,
 540:7, 540:19,
 540:25, 540:45,
 543:14, 543:16,
 544:44, 544:46,
 544:47, 551:23,
 552:35, 553:5,
 553:11, 553:17,
 553:36, 554:10,
 558:6, 558:29,

558:31, 559:1,
 559:4, 559:11,
 559:23, 559:28,
 559:41, 559:44,
 560:5, 561:2,
 561:16, 561:47,
 562:14, 563:4,
 563:8, 563:14,
 563:19, 563:33,
 563:40, 563:42,
 563:47, 564:9,
 564:17, 564:27,
 564:33, 564:43,
 566:14, 566:17,
 566:38, 567:34,
 567:35, 568:1,
 568:4, 568:22,
 568:25, 569:29,
 569:34, 570:10,
 570:14, 570:19,
 570:21, 570:33,
 570:35, 571:23,
 572:41, 572:45,
 573:2, 573:11,
 573:16, 575:35,
 575:37, 577:11,
 578:11, 578:14,
 579:3, 579:5, 579:8,
 579:13, 582:12,
 582:17, 582:22,
 582:31, 582:39,
 583:17, 585:38,
 585:39
Parrabell's [5] -
 543:19, 560:17,
 560:31, 560:38,
 573:18
part [15] - 538:40,
 539:28, 539:30,
 541:33, 541:43,
 547:9, 552:42,
 563:1, 566:37,
 571:25, 574:12,
 578:37, 579:8,
 582:24, 586:16
participants [1] -
 545:32
particular [39] - 541:4,
 545:36, 549:23,
 549:39, 549:40,
 551:22, 552:45,
 553:39, 554:17,
 554:19, 554:21,
 554:33, 555:7,
 555:8, 557:39,
 557:46, 558:20,
 558:31, 558:34,
 558:38, 559:10,
 560:32, 560:43,
 565:16, 565:45,
 567:15, 567:23,

568:14, 571:47,
 573:20, 578:43,
 579:11, 579:47,
 581:33, 582:2,
 582:20, 583:25
particularly [2] -
 546:2, 553:26
particulars [1] -
 554:31
parties [2] - 580:6,
 585:36
partly [1] - 585:38
parts [2] - 539:28,
 551:8
passed [1] - 547:33
past [6] - 543:27,
 555:27, 556:18,
 563:3, 566:20,
 586:27
pay [1] - 558:35
peculiar [1] - 575:34
people [6] - 539:37,
 544:43, 546:4,
 567:21, 585:22,
 586:20
perform [1] - 550:44
perform [2] - 584:4,
 585:22
performed [1] - 584:5
perhaps [16] - 541:47,
 544:1, 551:31,
 551:33, 551:34,
 555:15, 565:13,
 567:7, 568:18,
 569:15, 572:18,
 573:14, 578:37,
 579:22, 579:32,
 585:35
period [2] - 539:13,
 539:37
permission [1] -
 538:32
permit [1] - 572:14
perpetrators [1] -
 547:6
person [4] - 560:13,
 562:38, 582:17,
 586:12
personal [1] - 541:13
personally [1] -
 551:33
personnel [1] - 570:44
persons [7] - 541:19,
 541:21, 544:27,
 557:5, 557:9,
 580:32, 585:30
Peter [1] - 537:31
petition [1] - 575:45
phone [3] - 541:15,
 574:32, 574:46

picking [1] - 573:40
pie [1] - 567:43
piece [2] - 538:33, 580:17
piecing [1] - 546:8
place [5] - 540:2, 552:47, 567:15, 576:6, 581:43
placed [4] - 551:12, 553:6, 575:20, 584:19
plain [3] - 556:33, 556:35, 566:4
play [3] - 572:18, 578:37, 580:30
pleaded [1] - 580:45
pleadings [4] - 572:23, 580:6, 580:11, 580:43
point [27] - 541:30, 544:10, 548:15, 548:19, 548:34, 548:41, 548:43, 549:39, 550:32, 553:22, 554:45, 555:9, 555:12, 555:40, 556:23, 556:38, 558:5, 562:14, 562:42, 575:36, 576:7, 576:22, 576:38, 577:26, 578:4, 582:7, 584:42
pointed [2] - 567:10, 578:40
pointless [1] - 573:29
points [3] - 548:37, 554:23, 567:5
police [60] - 539:28, 539:31, 540:7, 540:18, 540:19, 541:16, 545:44, 551:26, 555:41, 561:5, 562:15, 562:28, 566:19, 566:27, 566:37, 567:39, 568:45, 569:33, 569:37, 569:40, 570:9, 571:19, 571:26, 571:38, 573:28, 573:42, 574:25, 574:33, 574:40, 574:47, 575:12, 575:18, 575:22, 575:26, 575:31, 575:42, 576:16, 576:19, 576:27, 576:38, 577:9, 577:16, 577:28, 583:42, 584:1, 584:2, 584:4, 584:11, 584:14, 584:15, 584:19, 584:33, 585:1, 585:12, 586:8, 586:15, 586:21
Police [32] - 537:43, 537:44, 539:20, 539:31, 539:36, 539:42, 540:11, 540:17, 540:26, 541:6, 541:11, 541:40, 542:41, 543:11, 543:17, 544:41, 546:19, 546:45, 550:15, 551:38, 558:2, 561:10, 563:41, 569:28, 574:16, 575:47, 576:15, 577:27, 577:46, 578:5, 584:43, 585:22
Policy [1] - 540:28
position [6] - 541:41, 542:37, 571:16, 573:10, 574:36, 580:29
positively [1] - 573:1
possession [1] - 583:44
possibility [1] - 581:11
possible [9] - 539:36, 553:44, 554:9, 555:29, 561:29, 561:32, 566:32, 575:45, 584:1
possibly [5] - 539:24, 543:9, 571:35, 571:36, 584:5
potential [1] - 573:32
potentially [1] - 565:46
powers [3] - 546:7, 555:20, 555:39
practicable [2] - 580:25, 580:38
pre [2] - 547:44, 578:41
pre-dated [2] - 547:44, 578:41
precisely [10] - 547:29, 548:5, 554:32, 554:37, 557:29, 561:18, 582:21, 584:38, 585:47, 586:6
precision [1] - 556:21
precludes [1] - 559:43
predominantly [1] - 543:13
prefer [2] - 554:24, 562:13
Prejudice [1] - 570:30
prejudice [2] - 541:18, 557:11
preliminary [2] - 555:12, 556:24
prepared [3] - 541:35, 551:23, 553:36
Present [1] - 537:41
present [4] - 541:24, 545:8, 553:39, 572:41
presented [2] - 546:39, 583:37
pressed [1] - 541:43
pressure [1] - 585:3
presumably [2] - 572:12, 573:26
presume [1] - 569:23
presuppose [1] - 572:22
pretty [3] - 558:21, 582:16, 582:25
Prevention [1] - 540:28
previous [5] - 543:35, 557:2, 558:28, 563:37, 572:40
previously [2] - 538:2, 556:7
primary [2] - 564:14, 576:11
Principal [1] - 537:39
principal [3] - 548:16, 585:25, 585:26
private [2] - 549:35, 575:23
privately [2] - 562:13, 564:26
problem [6] - 549:40, 550:45, 551:2, 552:15, 577:18, 586:17
problems [1] - 549:39
procedures [1] - 570:43
Procedures [1] - 571:17
proceed [4] - 545:44, 552:39, 561:39, 573:33
proceedings [7] - 572:16, 572:20, 572:21, 572:22, 572:24, 580:5, 581:12
process [9] - 546:43, 547:10, 550:20, 551:37, 562:5, 562:6, 579:40, 580:34
produce [3] - 568:45, 569:28, 579:37
produced [10] - 560:8, 567:42, 571:37, 571:38, 576:38, 576:44, 577:1, 579:36, 584:12
producing [1] - 575:14
production [9] - 575:12, 576:27, 576:31, 576:37, 577:24, 577:34, 578:5, 583:41, 584:8
Professor [2] - 571:7, 571:8
professors [1] - 544:43
Professors [2] - 540:38, 571:20
Programs [1] - 540:28
progressed [2] - 562:25, 562:26
Project [1] - 570:30
prompts [1] - 566:31
proper [3] - 585:1, 586:8
properly [1] - 578:8
propose [3] - 542:3, 562:15, 575:2
proposed [2] - 538:27, 538:28
proposing [1] - 573:39
proposition [2] - 572:4, 578:40
propositions [1] - 575:29
prosecution [1] - 562:38
prosecutions [6] - 549:32, 549:37, 555:22, 555:30, 555:42, 556:2
protection [1] - 580:31
protocols [5] - 570:13, 570:20, 571:1, 571:10, 571:23
prove [1] - 545:41
provide [4] - 540:17, 543:3, 543:18, 560:13
provided [9] - 540:20, 547:5, 555:36, 560:41, 566:41, 574:40, 575:31, 584:9, 586:19
provides [3] - 562:35, 568:12, 572:10
provisions [2] - 554:25, 572:6
prudence [1] - 552:16
pseudonyms [1] - 541:19
public [33] - 539:9, 540:4, 540:45, 547:3, 548:32, 548:39, 549:4, 549:17, 550:5, 550:19, 550:24, 550:25, 551:12, 551:20, 552:18, 553:6, 553:11, 553:26, 554:38, 560:14, 560:47, 561:4, 562:16, 562:17, 568:38, 569:47, 572:32, 573:24, 573:43, 574:8, 574:27, 574:28, 580:33
publication [3] - 569:46, 574:31, 574:35
publications [1] - 541:7
publicised [1] - 539:24
publicity [1] - 581:13
publicly [4] - 551:22, 561:1, 573:27, 584:31
publish [4] - 561:25, 561:26, 573:39, 575:2
published [4] - 546:20, 553:11, 574:23, 577:10
pure [1] - 580:41
purely [1] - 566:18
purports [1] - 582:18
purpose [3] - 549:36, 554:39, 572:41
purposes [2] - 554:8, 580:31
pursuant [4] - 570:13, 570:21, 571:2, 571:10
pursuing [1] - 545:47
put [17] - 542:31, 542:32, 547:31, 549:9, 552:8, 554:20, 555:44, 556:23, 559:27,

- 559:39, 560:30,
565:14, 565:15,
571:27, 584:36,
584:37, 585:3
puts [1] - 556:27
putting [1] - 556:10
-
- Q**
-
- quantum** [1] - 584:44
quarter [1] - 578:28
questioned [1] - 556:6
questions [6] -
549:13, 560:19,
561:34, 561:36,
580:41, 581:30
quickly [2] - 542:19,
577:7
quite [8] - 543:32,
554:32, 560:34,
563:10, 565:20,
583:14, 583:27,
585:18
quoted [1] - 574:19
-
- R**
-
- raise** [4] - 541:28,
542:5, 581:44,
581:47
raised [5] - 543:1,
544:31, 569:38,
569:39, 581:41
raises [2] - 549:40,
575:33
raising [1] - 575:32
ranging [1] - 579:32
rather [8] - 538:37,
548:26, 555:27,
556:20, 556:37,
573:24, 580:30,
580:37
RE [1] - 579:27
reach [1] - 558:33
reached [3] - 551:9,
552:12, 553:2
read [15] - 544:14,
549:11, 550:38,
552:20, 552:24,
557:15, 560:20,
560:29, 564:26,
571:44, 572:37,
572:47, 573:23,
579:13, 585:27
reading [2] - 557:14,
560:21
ready [3] - 549:42,
553:30, 564:46
real [2] - 543:1, 584:19
realised [1] - 582:41
- really** [10] - 548:37,
552:4, 552:14,
560:29, 562:35,
575:6, 579:47,
581:7, 582:14,
582:27
reason [4] - 554:18,
554:23, 572:5,
584:42
reasoning [2] - 562:5,
562:6
reasons [7] - 540:9,
542:30, 556:14,
565:36, 570:38,
581:26, 582:14
receding [1] - 546:3
receive [3] - 572:10,
572:14, 572:29
received [10] - 538:24,
540:45, 541:1,
541:25, 542:43,
550:7, 572:2, 574:6,
580:3, 581:22
recent [2] - 541:10,
555:46
recitation [1] - 555:26
reckoner [1] - 564:46
recommendation [2] -
545:9, 546:25
recommendations [7]
- 546:23, 547:16,
547:23, 565:41,
578:36, 578:41,
578:42
recommended [1] -
546:25
recommends [1] -
546:12
record [2] - 553:11,
581:29
recording [2] -
539:44, 540:12
records [2] - 539:21,
576:17
redacted [5] - 541:12,
541:45, 551:8,
553:42, 574:39
redaction [1] - 574:40
redactions [10] -
541:13, 542:33,
552:36, 570:1,
574:41, 574:43,
584:1, 584:9,
584:13, 584:16
refer [4] - 545:5,
549:19, 551:22,
565:44
Reference [75] -
539:15, 539:40,
540:44, 543:2,
543:22, 543:24,
543:33, 543:37,
543:44, 544:25,
544:38, 547:19,
547:25, 547:36,
547:38, 547:40,
547:42, 547:45,
548:7, 548:11,
548:12, 548:16,
548:19, 549:15,
549:38, 551:5,
554:25, 555:4,
555:25, 555:32,
556:12, 556:27,
556:41, 557:27,
558:47, 559:9,
560:1, 560:2,
560:12, 562:32,
563:3, 564:21,
565:37, 567:4,
567:9, 567:15,
567:18, 567:25,
568:6, 568:9,
568:21, 570:11,
570:34, 570:36,
572:12, 572:37,
572:43, 573:34,
577:10, 578:39,
578:42, 578:45,
579:24, 579:33,
579:38, 579:41,
580:12, 580:20,
580:43, 580:44,
581:4, 582:11,
582:13, 583:14,
585:27
REFERENCE [1] -
579:26
reference [6] - 545:39,
547:39, 549:11,
567:8, 574:1, 575:21
referred [2] - 540:43,
557:2
referring [6] - 552:9,
553:14, 565:43,
570:12, 574:46,
575:35
refers [4] - 549:3,
549:14, 574:22,
574:31
refinement [1] -
573:38
refuse [1] - 578:16
regard [34] - 539:16,
539:38, 539:41,
543:35, 556:47,
557:2, 558:27,
558:35, 559:1,
560:7, 563:14,
563:24, 563:27,
563:32, 563:33,
563:36, 563:43,
563:45, 564:2,
564:8, 564:17,
564:18, 564:25,
564:32, 565:7,
572:44, 573:1,
573:28, 579:2,
579:4, 579:13,
585:14
regarding [1] - 581:20
regret [2] - 576:23,
584:29
regularly [1] - 547:2
reinvestigated [1] -
545:25
reinvestment [6] -
545:33, 566:20,
582:37, 582:40,
582:42, 583:3
reiterate [1] - 551:2
reject [1] - 584:31
rejected [3] - 577:41,
578:40, 586:9
relate [2] - 572:11,
580:26
relate" [1] - 572:13
related [1] - 567:45
Related [1] - 570:30
relating [7] - 539:22,
540:5, 570:10,
570:23, 571:22,
576:18, 578:14
relation [25] - 538:27,
541:41, 546:47,
547:3, 547:25,
549:42, 552:47,
554:32, 555:17,
560:15, 563:33,
563:39, 563:42,
564:39, 565:16,
565:19, 567:22,
570:19, 571:15,
576:12, 578:2,
579:3, 583:39,
585:1, 585:41
release [1] - 568:39
released [1] - 550:24
relevance [26] -
542:12, 542:32,
547:22, 548:5,
548:38, 549:4,
549:13, 565:11,
565:34, 568:4,
568:21, 568:38,
571:32, 571:43,
572:34, 573:25,
573:47, 574:8,
575:4, 578:13,
580:7, 580:41,
580:42, 581:31,
582:1, 582:12
RELEVANCE [1] -
579:27
relevant [23] - 538:47,
539:35, 539:37,
540:13, 541:7,
541:24, 546:18,
549:14, 550:2,
556:17, 560:11,
560:47, 561:21,
561:22, 564:5,
569:5, 569:29,
569:46, 577:14,
577:29, 580:10,
580:20, 586:13
relevantly [3] -
566:40, 568:15,
572:41
rely [1] - 566:46
remain [1] - 560:20
remains [2] - 578:4,
578:7
remarks [3] - 547:39,
552:43, 574:18
remind [1] - 566:9
remove [1] - 549:31
repeating [1] - 564:24
repetition [1] - 562:42
replies [1] - 578:34
reply [1] - 576:4
report [34] - 539:17,
539:27, 540:6,
540:44, 543:19,
545:6, 545:17,
545:18, 547:23,
552:35, 553:5,
553:11, 559:7,
561:2, 563:46,
565:41, 566:14,
566:17, 567:35,
567:44, 568:2,
572:41, 572:44,
573:2, 573:12,
573:27, 577:4,
579:4, 579:8, 579:9,
579:13, 582:12
report" [1] - 553:17
reports [9] - 539:17,
540:43, 541:8,
543:41, 543:46,
544:5, 558:28,
563:37, 566:13
repositories [2] -
585:26, 585:37
repository [2] -
556:17, 585:34
representatives [1] -
549:35
represented [1] -

- 574:16
reputations [1] - 580:32
request [3] - 560:12, 577:29, 584:16
requested [4] - 540:16, 571:20, 575:42, 584:8
requesting [1] - 569:33
requests [3] - 541:10, 541:12, 574:43
require [3] - 549:38, 558:8, 582:42
required [10] - 539:16, 557:38, 558:18, 558:38, 568:13, 570:9, 573:6, 577:2, 580:19, 582:23
requirement [1] - 538:2
requirements [5] - 558:10, 577:17, 577:34, 581:12, 584:19
requires [2] - 557:44, 584:13
requiring [1] - 575:11
reservations [1] - 566:47
reserve [3] - 555:6, 565:13, 586:23
resiled [1] - 574:36
resource [1] - 577:16
resources [8] - 575:13, 575:21, 577:27, 577:28, 582:43, 584:6, 584:43, 585:21
resourcing [4] - 569:40, 575:27, 575:34, 577:44
respect [6] - 552:25, 556:15, 561:20, 565:21, 576:26, 582:39
respectful [2] - 572:7, 578:15
respectfully [5] - 543:33, 557:19, 558:11, 581:21, 582:46
respectively [1] - 541:37
respects [4] - 552:6, 556:16, 572:18, 575:23
respond [2] - 566:30, 568:47
responded [2] - 546:22, 578:19
response [11] - 546:27, 547:15, 559:39, 565:11, 568:34, 568:46, 569:42, 571:37, 572:1, 577:37, 579:29
responses [1] - 571:47
restrict [1] - 559:9
restriction [1] - 572:5
restrictions [2] - 549:21, 580:7
result [4] - 556:1, 572:28, 574:34, 575:24
resulted [1] - 575:41
resulting [3] - 539:27, 545:24, 545:35
results [2] - 557:47, 567:42
resume [1] - 578:23
retained [3] - 539:31, 585:31, 585:32
retains [1] - 576:20
reveal [1] - 541:17
Review [1] - 547:10
review [23] - 539:20, 539:29, 539:30, 540:19, 540:40, 542:19, 543:18, 543:26, 543:40, 544:42, 544:43, 544:44, 544:45, 545:13, 546:14, 546:32, 566:18, 566:40, 567:40, 568:25, 570:19, 583:2, 583:10
reviewers [1] - 571:8
reviewing [1] - 565:1
reviews [3] - 575:19, 575:42, 577:36
rewards [2] - 547:4, 547:8
Richards [1] - 538:6
right-hand [1] - 576:37
room [2] - 539:2, 580:40
rule [1] - 541:30
rules [3] - 572:19, 572:20, 580:29
run [1] - 552:2
rung [1] - 561:27
running [1] - 552:6
rush [1] - 561:44
- ## S
- Sackar** [2] - 537:16, 569:15
satisfaction [3] - 558:5, 558:33, 559:3
satisfied [5] - 557:39, 558:21, 558:39, 568:14, 573:7
SC [1] - 537:31
scene [1] - 555:14
schedule [1] - 569:47
second [15] - 539:9, 539:30, 539:46, 540:1, 540:23, 540:35, 542:32, 561:26, 567:27, 568:42, 569:38, 575:5, 578:47, 579:16
secondly [7] - 540:8, 540:27, 541:5, 543:14, 556:6, 578:42, 579:11
section [8] - 572:6, 572:8, 572:10, 572:13, 572:25, 573:45, 574:1, 579:47
sections [3] - 548:3, 579:46, 580:26
see [5] - 542:21, 549:15, 554:19, 570:9, 576:37
seek [3] - 538:32, 541:1, 546:46
seeking [2] - 545:33, 554:3
seem [4] - 554:34, 555:2, 572:32, 575:24
seemingly [1] - 571:44
seemliness [1] - 552:16
sees [2] - 570:29, 576:40
select [1] - 550:22
selected [1] - 570:44
selection [1] - 570:16
senior [1] - 575:22
Senior [1] - 537:31
seniority [1] - 584:13
sense [4] - 564:9, 571:25, 580:37
sensitive [1] - 541:13
sensitivity [1] - 565:17
sent [3] - 542:40, 568:31, 568:32
sentence [1] - 578:3
separate [3] - 554:39, 555:13, 568:4
September [4] - 540:16, 570:26, 576:37, 576:41
Sergeant [10] - 537:45, 538:14, 540:29, 540:32, 540:37, 543:13, 571:14, 571:21, 574:5, 582:41
series [3] - 541:10, 575:29, 582:20
serious [4] - 551:21, 575:8, 575:16, 585:12
Services [1] - 546:19
servicing [1] - 574:47
set [7] - 543:25, 555:14, 559:24, 563:4, 563:20, 567:1
sets [1] - 568:28
setting [3] - 555:19, 561:20, 583:11
seven [1] - 576:30
several [1] - 567:11
sexuality [1] - 566:23
Sexuality [1] - 540:26
shall [2] - 580:27, 580:29
shape [1] - 583:23
shaped [1] - 567:14
shares [1] - 545:36
Sharma [1] - 540:27
Shobha [1] - 540:27
short [3] - 578:19, 581:40, 583:21
short-back-and-sides [1] - 583:21
showed [1] - 546:39
side [5] - 549:27, 553:2, 553:25, 554:14, 556:12
sides [3] - 549:30, 552:11, 583:21
sifting [1] - 580:33
significance [3] - 568:10, 568:11, 585:36
similar [5] - 562:29, 569:38, 575:32, 575:34, 582:27
simple [1] - 559:42
simply [5] - 547:42, 554:9, 560:19, 566:5, 572:34
sit [1] - 585:30
situation [1] - 581:3
six [2] - 569:6, 576:43
slim [2] - 569:5, 584:44
Social [2] - 545:8, 560:5
sole [6] - 548:18, 556:16, 556:24, 585:34, 585:37
solely [1] - 556:42
Solicitor [10] - 537:39, 542:19, 542:33, 569:31, 569:43, 574:38, 575:30, 577:21, 577:25, 577:37
solicitors [1] - 550:20
solution [1] - 586:8
solved [1] - 573:28
solving [1] - 546:41
someone [2] - 569:9, 585:20
somewhat [2] - 568:10, 574:26
sooner [5] - 538:37, 548:26, 556:20, 556:37, 584:45
sorry [3] - 548:34, 549:46, 556:9
sort [1] - 580:34
sorted [1] - 573:36
sought [8] - 541:33, 541:40, 570:18, 570:27, 571:7, 571:14, 578:8, 581:24
source [4] - 564:14, 576:11, 577:13, 580:12
sources [2] - 541:7, 541:17
South [11] - 537:21, 541:16, 545:7, 546:22, 547:37, 547:41, 553:26, 560:12, 561:4, 561:5, 562:16
special [2] - 569:42, 577:6
Special [18] - 537:9, 539:10, 539:11, 539:15, 555:20, 566:5, 566:11, 566:13, 567:13, 567:24, 567:30, 567:46, 568:5, 568:32, 572:6, 572:25, 577:18, 579:46
specific [8] - 551:8, 553:3, 565:14, 565:15, 565:20, 573:40, 583:15,

- 583:27
specifically [5] - 544:25, 556:41, 558:29, 567:14, 567:35
specificity [3] - 552:43, 580:46, 582:18
specified [1] - 572:11
spend [1] - 552:42
spoken [1] - 568:40
Sponsor [1] - 540:26
staff [7] - 549:41, 558:2, 560:41, 562:20, 562:21, 575:26, 583:2
staffing [1] - 576:1
stage [10] - 539:47, 540:1, 540:36, 555:47, 568:18, 573:9, 579:35, 579:39, 581:10
stages [1] - 539:46
stalling [2] - 575:41, 577:35
Standard [1] - 571:17
standing [2] - 546:20, 546:23
Standing [2] - 545:7, 560:5
started [1] - 567:7
starts [2] - 575:5, 576:35
state [1] - 554:32
State [2] - 574:9, 583:44
statement [11] - 541:34, 541:44, 570:29, 571:7, 571:14, 571:39, 574:5, 574:10, 574:18, 580:46
statements [11] - 540:17, 540:20, 541:5, 547:42, 548:6, 569:33, 570:27, 571:19, 571:28, 571:38
states [1] - 558:37
States [1] - 566:30
statute [4] - 547:27, 547:37, 549:14, 578:38
Steer [7] - 537:45, 538:14, 540:29, 543:14, 571:14, 571:21, 582:41
Stephen [3] - 541:34, 541:35, 541:44
Steven [1] - 540:37
still [1] - 552:33
stone [1] - 548:21
stood [2] - 585:10, 585:11
stop [1] - 552:38
Stoppers [1] - 547:2
Street [1] - 537:20
stress [1] - 579:8
stressed [1] - 566:12
strict [1] - 567:28
stricter [1] - 581:12
strike [7] - 554:10, 566:18, 566:21, 566:27, 571:11, 579:10, 585:9
Strike [28] - 539:17, 539:20, 539:34, 539:35, 540:5, 540:8, 540:9, 540:25, 540:38, 540:44, 544:46, 552:34, 563:47, 567:34, 568:1, 568:24, 570:10, 570:14, 570:21, 570:23, 570:24, 570:34, 571:3, 572:45, 573:2, 578:10, 578:14, 579:5
structured [1] - 564:22
subject [14] - 542:4, 548:25, 549:37, 551:20, 555:47, 565:14, 568:19, 568:47, 571:34, 571:35, 571:38, 573:9, 573:38, 580:33
submission [29] - 549:10, 552:40, 553:27, 555:32, 560:31, 560:37, 568:3, 568:10, 568:33, 568:43, 572:7, 572:26, 572:27, 572:42, 573:18, 573:29, 574:7, 574:22, 574:26, 574:42, 575:16, 575:25, 576:8, 578:15, 578:35, 578:39, 579:14, 580:1, 582:11
submissions [22] - 538:26, 538:36, 542:11, 542:40, 543:4, 544:20, 548:12, 548:26, 550:35, 561:30, 561:33, 568:27, 568:29, 568:30, 568:37, 569:19, 569:26, 579:23, 579:30, 583:40, 586:10
SUBMISSIONS [1] - 579:26
submit [37] - 542:12, 543:21, 543:23, 543:33, 543:39, 544:24, 544:30, 544:35, 544:38, 547:18, 548:9, 548:10, 548:29, 551:17, 553:35, 555:17, 555:25, 555:44, 556:40, 557:8, 557:19, 557:44, 559:21, 559:47, 560:26, 562:34, 563:19, 564:5, 565:7, 566:4, 579:30, 579:38, 581:21, 582:46, 583:9, 584:3, 584:17
submitted [1] - 564:13
submitting [1] - 562:20
subsection [3] - 580:3, 580:25, 581:13
subsidiary [1] - 551:5
substance [1] - 549:10
substantive [1] - 549:43
successfully [1] - 547:6
sufficiency [2] - 558:6, 559:10
sufficient [4] - 559:7, 559:29, 559:44, 562:37
sufficiently [9] - 557:40, 557:41, 558:23, 558:43, 559:2, 568:15, 568:23, 573:8, 577:17
suggest [7] - 541:25, 543:5, 543:8, 543:32, 554:3, 579:35, 584:37
suggested [4] - 570:2, 580:1, 585:8, 585:9
suggesting [6] - 551:47, 561:13, 561:46, 561:47, 562:19, 586:6
suggestion [5] - 545:43, 572:36, 574:24, 578:7, 585:6
suitable [1] - 582:37
summaries [18] - 551:23, 551:24, 551:32, 551:40, 552:13, 552:15, 553:14, 553:15, 553:19, 553:35, 553:40, 553:42, 554:4, 554:22, 561:22, 563:46, 579:5, 579:7
summarised [1] - 560:8
summarising [1] - 566:17
summary [5] - 551:26, 554:22, 564:41, 564:46, 582:32
summons [15] - 541:6, 569:26, 570:8, 571:34, 571:37, 575:35, 575:37, 576:35, 578:10, 579:39, 584:25, 584:26, 584:40
summonses [17] - 568:46, 569:41, 575:9, 575:11, 575:14, 575:19, 575:35, 575:40, 576:26, 576:32, 577:14, 578:6, 578:11, 579:31, 583:43, 584:32, 585:10
Supervisor [1] - 540:37
supplementary [1] - 541:3
supplied [1] - 574:41
support [5] - 542:40, 547:44, 548:2, 548:12, 574:40
supported [2] - 546:29, 574:43
supports [1] - 546:30
surmise [2] - 573:47, 574:7
surprise [1] - 578:12
surprising [2] - 565:35, 571:32
survivors [1] - 546:37
suspect [2] - 554:29, 554:30
suspected [12] - 539:12, 539:43, 540:12, 544:27, 545:14, 545:23, 545:34, 546:15, 546:33, 565:47, 566:33, 573:41
swiftly [1] - 538:42
Sydney [1] - 537:21
-
- ## T
-
- tab** [16] - 541:34, 569:20, 569:26, 569:31, 569:36, 569:42, 569:45, 570:8, 570:26, 571:45, 575:32, 576:5, 576:7, 577:21
table [4] - 551:33, 556:13, 568:40, 576:30
tabs [2] - 541:36, 542:1
tabulated [1] - 567:43
tabulates [1] - 576:31
tactics [1] - 544:40
talks [1] - 573:45
Taradale [2] - 573:47, 574:4
task [17] - 555:33, 561:17, 562:29, 563:2, 566:5, 566:6, 567:24, 567:45, 568:5, 571:24, 583:1, 583:7, 583:10, 583:42, 583:46, 584:2, 584:4
Task [6] - 543:15, 543:18, 544:43, 551:23, 553:36, 582:31
tasked [2] - 559:31, 560:27
tasks [4] - 570:22, 571:5, 571:12, 585:22
Team [5] - 540:28, 575:20, 576:2, 577:36, 577:43
team [10] - 539:30, 540:8, 540:31, 540:40, 570:14, 570:21, 570:22, 571:3, 571:4, 586:28
technical [1] - 552:1
Tedeschi [34] - 537:43, 538:1, 541:27, 542:7, 542:36, 544:9, 547:35, 549:27,

- 550:10, 550:14,
550:43, 551:29,
552:4, 552:38,
553:8, 553:33,
553:38, 554:8,
554:30, 556:9,
557:14, 559:38,
561:39, 561:43,
562:41, 563:39,
565:9, 578:18,
581:28, 583:7,
583:14, 584:22,
586:9, 586:28
TEDESCHI [107] -
538:5, 538:24,
538:32, 538:44,
539:2, 542:11,
542:18, 542:39,
542:47, 544:1,
544:7, 544:12,
544:19, 544:24,
547:29, 547:47,
548:9, 548:23,
548:29, 548:37,
548:43, 549:6,
549:19, 549:25,
549:46, 550:12,
550:27, 550:34,
550:41, 551:1,
551:17, 551:42,
551:47, 552:22,
552:28, 552:33,
553:5, 553:14,
553:19, 553:30,
553:35, 554:3,
554:41, 555:17,
556:35, 556:40,
556:47, 557:18,
557:24, 557:29,
557:34, 557:38,
558:8, 558:13,
558:37, 558:43,
559:13, 559:17,
559:21, 559:31,
559:36, 559:47,
560:26, 560:34,
560:41, 561:13,
561:20, 561:29,
561:36, 561:46,
562:9, 562:19,
562:47, 563:10,
563:14, 563:19,
563:27, 563:36,
563:45, 564:5,
564:13, 564:21,
564:30, 564:36,
564:41, 564:46,
565:6, 565:25,
565:29, 578:21,
578:26, 579:29,
580:14, 580:22,
581:2, 581:20,
581:35, 581:43,
582:9, 582:30,
583:9, 583:19,
583:29, 583:33,
583:39, 586:3,
586:31
tender [18] - 540:47,
541:2, 541:4,
541:11, 541:23,
541:33, 541:42,
541:47, 542:3,
550:7, 552:34,
554:44, 569:23,
570:1, 574:18,
574:34, 579:18,
581:22
tender" [1] - 569:12
tendered [9] - 538:27,
544:33, 548:31,
548:46, 550:2,
550:4, 550:18,
551:19, 579:34
tendering [1] - 579:41
tenor [1] - 585:6
term [1] - 554:30
terminology [3] -
563:23, 563:42,
567:9
terms [16] - 552:8,
556:11, 559:42,
562:33, 565:17,
568:27, 573:41,
579:45, 580:2,
580:17, 581:13,
581:17, 582:9,
584:44, 585:32
Terms [75] - 539:15,
539:40, 540:43,
543:2, 543:22,
543:23, 543:33,
543:36, 543:44,
544:25, 544:38,
547:19, 547:25,
547:36, 547:38,
547:40, 547:41,
547:45, 548:7,
548:11, 548:12,
548:16, 548:19,
549:14, 549:38,
551:4, 554:25,
555:4, 555:25,
555:32, 556:11,
556:27, 556:41,
557:27, 558:47,
559:8, 560:1, 560:2,
560:12, 562:32,
563:2, 564:21,
565:36, 567:4,
567:8, 567:14,
567:18, 567:25,
568:6, 568:9,
568:21, 570:11,
570:34, 570:36,
572:12, 572:37,
572:42, 573:34,
577:10, 578:39,
578:41, 578:45,
579:24, 579:33,
579:38, 579:41,
580:12, 580:20,
580:43, 580:44,
581:4, 582:11,
582:13, 583:14,
585:27
TERMS [1] - 579:26
terribly [1] - 556:9
testimony [1] - 557:6
themselves [3] -
571:27, 577:16,
585:31
therefore [4] - 544:14,
546:12, 556:26,
580:19
they have [4] - 560:7,
584:5, 584:6, 584:8
thinks [2] - 556:13,
584:38
third [3] - 569:36,
579:18, 585:35
thirdly [4] - 540:10,
540:29, 541:7,
543:15
thoughts [1] - 558:16
thousands [1] -
571:36
three [11] - 541:42,
543:35, 543:41,
557:2, 563:37,
565:39, 566:34,
569:27, 576:4,
578:35, 583:25
tick [1] - 583:35
tie [1] - 567:18
tight [1] - 567:31
timing [2] - 565:33,
581:20
TO [1] - 586:39
to" [1] - 563:25
today [22] - 538:1,
538:5, 539:47,
550:15, 550:35,
551:38, 554:17,
554:26, 554:45,
559:40, 568:3,
568:27, 568:30,
568:35, 571:25,
571:40, 575:17,
576:8, 578:2, 578:4,
578:7, 586:25
together [2] - 546:9,
572:47
tomorrow [2] -
554:17, 586:29
took [4] - 549:8,
574:17, 578:18,
579:45
top [1] - 576:8
topic [7] - 565:12,
568:42, 569:39,
573:15, 573:38,
575:5
topics [16] - 543:10,
543:22, 544:30,
552:41, 554:11,
554:47, 556:21,
556:27, 556:33,
565:19, 568:37,
571:9, 571:21,
571:23, 571:33,
574:22
totally [1] - 548:43
touched [1] - 573:31
towards [2] - 544:41,
547:31
tranche [1] - 576:42
tranches [3] - 576:39,
576:41
transcript [2] - 547:32,
574:15
transgender [6] -
545:14, 545:34,
546:2, 546:16,
546:34, 546:47
Transgender [1] -
545:6
trauma [2] - 546:40,
557:8
trial [1] - 555:47
trials [1] - 541:18
tried [1] - 564:10
truce [2] - 581:39
true [2] - 578:4, 578:7
truth [2] - 584:43
try [5] - 549:30,
550:45, 564:44,
582:24, 586:24
trying [6] - 544:10,
552:4, 554:8,
558:13, 564:9,
565:19
TUESDAY [1] - 586:39
turn [1] - 565:36
turns [1] - 582:4
twice [1] - 585:46
two [26] - 539:27,
539:46, 540:18,
541:3, 541:35,
541:45, 542:30,
545:20, 548:37,
550:34, 551:3,
551:13, 566:33,
567:37, 567:42,
568:2, 568:4,
568:28, 568:37,
573:38, 576:22,
578:34, 579:7,
584:30, 584:31
-
- U**
-
- UHT** [1] - 577:42
ultimately [6] -
555:34, 560:30,
560:37, 561:16,
575:24, 578:47
unable [1] - 573:26
unacceptable [1] -
585:2
unappreciated [1] -
584:44
unaware [1] - 551:36
under [5] - 555:20,
567:47, 572:29,
576:31, 581:13
underestimated [1] -
585:21
underlying [2] - 562:9,
562:22
understood [3] -
551:34, 555:9,
581:32
undertake [1] - 584:25
undertaken [1] -
585:12
undertaking [2] -
567:29, 584:34
unearthed [1] - 560:7
unfair [1] - 564:26
unfortunately [1] -
538:6
uniform [3] - 539:2,
539:4, 539:5
Unit [9] - 540:13,
540:31, 540:33,
543:11, 544:46,
554:10, 570:31,
570:32, 571:16
unit [2] - 543:12,
553:47
United [1] - 566:30
universe [2] - 583:22,
583:23
University [3] -
540:39, 543:18,
544:43
unjustified [1] -
584:18
unless [7] - 549:39,
554:22, 555:1,

560:38, 561:17,
564:10, 574:39
unlike [2] - 547:36,
547:37
unnecessary [2] -
543:34, 557:7
unreasonably [1] -
585:9
unrelated [1] - 541:20
Unsolved [5] - 547:10,
575:20, 576:2,
577:36, 577:43
unsolved [17] -
544:27, 545:13,
545:23, 545:33,
546:15, 546:33,
546:36, 546:47,
547:4, 561:8,
565:44, 573:32,
585:1, 585:24,
585:39, 585:41,
585:42
untethered [1] -
583:23
unto [2] - 555:6,
565:13
unwittingly [1] -
584:47
up [17] - 543:25,
554:9, 555:19,
559:24, 561:20,
563:4, 563:20,
569:5, 573:40,
575:8, 575:36,
581:25, 583:11,
585:10, 585:11,
586:14
usual [1] - 553:41

V

various [13] - 541:5,
541:7, 542:33,
546:23, 548:2,
552:6, 556:43,
565:43, 567:43,
569:34, 570:27,
575:7, 576:32
variously [2] - 540:13,
576:32
varying [1] - 544:40
ventilated [1] - 574:23
versions [2] - 541:45,
542:20
victim [1] - 566:1
victims [5] - 541:14,
541:20, 546:1,
546:37, 547:9
view [18] - 545:46,
550:1, 554:38,

558:19, 559:6,
559:28, 559:43,
560:23, 560:43,
561:15, 564:15,
564:26, 565:11,
565:14, 565:34,
579:40, 580:33,
582:4
views [6] - 547:43,
559:9, 564:19,
564:44, 568:47,
579:9
volume [1] - 573:37
volumes [4] - 541:3,
542:22, 576:39

W

Wales [11] - 537:21,
541:16, 545:7,
546:22, 547:38,
547:41, 553:26,
560:12, 561:4,
561:5, 562:16
warning [1] - 549:9
warrant [4] - 555:37,
558:1, 562:38, 583:3
warrants [1] - 560:44
warts [1] - 560:20
ways [2] - 539:42,
567:15
Wednesday [1] -
581:25
week [22] - 538:8,
538:28, 540:1,
543:5, 543:9,
544:31, 544:32,
548:31, 550:8,
550:12, 551:4,
551:19, 552:46,
565:20, 568:31,
573:37, 578:12,
581:23, 581:25,
581:45
weeks [1] - 576:43
welcome [1] - 539:4
were/are [1] - 582:2
whatsoever [1] -
579:14
whole [4] - 550:1,
560:2, 577:14, 584:2
wholly [1] - 560:15
wide [3] - 555:20,
579:32, 579:40
wide-ranging [1] -
579:32
widely [1] - 539:23
Willem [1] - 540:39
William [1] - 537:33
window [1] - 546:3

wish [14] - 541:26,
541:27, 542:18,
542:24, 542:39,
543:3, 543:26,
544:41, 544:45,
548:15, 550:35,
552:45, 554:37,
581:43
wished [1] - 538:26
wishes [3] - 541:28,
542:5, 562:36
withdrawn [1] -
577:41
witness [4] - 540:17,
541:5, 553:44,
569:33
witnessed [1] - 546:5
witnesses [10] -
540:22, 540:35,
541:14, 541:20,
556:5, 556:7, 557:7,
557:8, 569:34,
570:27
wittingly [1] - 584:47
wonder [1] - 548:25
words [10] - 548:11,
554:31, 558:19,
559:2, 563:31,
567:19, 567:20,
580:24, 580:39,
580:40
worth [1] - 574:3
wound [1] - 585:8
write [1] - 544:40
writing [1] - 568:37
written [5] - 568:34,
569:19, 569:26,
572:1, 583:36
wrongly [1] - 551:34

Y

year [5] - 549:34,
552:5, 567:32,
577:5, 577:11
years [2] - 540:14,
582:43
yourself [3] - 562:23,
562:24, 564:25