

**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 Tuesday, 28 February 2023 at 10.00am**

**(Day 29)**

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

**Also Present:**

**Mr Mark Tedeschi KC with Mr Anders Mykkeltvedt and  
Ms Amber Richards for NSW Police**

1 THE COMMISSIONER: Before we recommence this morning,  
2 Mr Gray and Mr Tedeschi, there are a number of witnesses  
3 scheduled for this week. Some of them, indeed, many of  
4 them, are from interstate or overseas. We've got Victoria,  
5 South Australia, Tasmania and the United States.  
6

7 I'd like, if I can, both from you, Mr Gray, and from  
8 you, Mr Tedeschi, to get an idea of timing so that we can  
9 schedule, because next week, I'm scheduled to do other  
10 matters concerning the Inquiry and I would prefer not to  
11 eat into that time.  
12

13 So we've got former Detective Page, then at the  
14 moment, I think, Associate Professor Derek Dalton,  
15 Professor Willem de Lint, Professor Asquith, Associate  
16 Professor Lovegrove, and then Martha Coakley from the  
17 United States. I think at the moment I'm scheduling her  
18 for Friday morning at about 9.30, which works US time.  
19

20 But can we just go back to each of them, Mr Gray, if  
21 you can just give me a very rough idea and then, in turn,  
22 Mr Tedeschi might be able to help, so that we know how  
23 I can schedule the week, because I have other matters. For  
24 example, tomorrow, I have to interrupt the public hearings  
25 to do a matter in private so I want to make sure I can  
26 achieve my objectives.  
27

28 MR GRAY: Commissioner, with Mr Page, I would expect to be  
29 perhaps half an hour. With Dr Dalton, perhaps the better  
30 part of a day. With Dr de Lint, an hour or two. With each  
31 of Professors Lovegrove and Asquith an hour or perhaps a  
32 little more than an hour, and with Ms Coakley I would think  
33 less than an hour.  
34

35 THE COMMISSIONER: All right. Mr Tedeschi, bearing in  
36 mind, as I've said, I want to do Ms Coakley on Friday  
37 morning - that's the best time for her in the United States  
38 time frame - can you just, if you can, give me an idea in  
39 relation to each of the other persons?  
40

41 MR TEDESCHI: The present witness I think will be about  
42 half an hour. Sergeant Page, I would think a fairly  
43 similar time to Sergeant Morgan, which is about an hour, an  
44 hour and a half. Professor Dalton - Commissioner, as you  
45 know, there are two types of counsel, there are counsel who  
46 routinely underestimate the time they're going to take and  
47 counsel who are fairly accurate and I'm in the latter

1 category, but I suspect, with the greatest of respect to my  
2 friend, that he's in the former, so it might be that  
3 Dr Dalton takes longer than he thinks. I think I would be  
4 at most a couple of hours.

5  
6 THE COMMISSIONER: Okay.

7  
8 MR TEDESCHI: But I would suggest to you, Commissioner,  
9 that because the American witness is overseas, perhaps that  
10 should be fixed and whatever --

11  
12 THE COMMISSIONER: What I was intending to say, if  
13 I haven't made it clear, is that I am going to fix her for  
14 Friday morning so everyone knows at least that that Friday  
15 morning we will have her. We will come back to her in a  
16 minute. What about the Professor de Lint and the others?

17  
18 MR TEDESCHI: It is very hard for me to estimate that but  
19 I would think again an hour to two for each of them.

20  
21 THE COMMISSIONER: All right. And Ms Coakley?

22  
23 MR TEDESCHI: Again very difficult to assess. Probably an  
24 hour.

25  
26 THE COMMISSIONER: Okay. All right. Just so that  
27 everyone knows, I'm going to try to finish all of that  
28 evidence this week. If we can't finish it this week,  
29 though, Mr Tedeschi, I'm going to proceed next Monday.  
30 I don't know whether that places you in any --

31  
32 MR TEDESCHI: When you say you are going to proceed, with  
33 this hearing?

34  
35 THE COMMISSIONER: Yes, I'm not going to down tools with  
36 this current group of witnesses only because they've been  
37 brought in from interstate and so on, and I don't want them  
38 to be sent home.

39  
40 MR TEDESCHI: We're available.

41  
42 THE COMMISSIONER: Okay, good. All right, thank you.

43  
44 Mr Morgan, would you be kind enough, please, to come  
45 back into the witness box? Please take a seat, thank you.

46  
47 Yes, Mr Tedeschi.

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<STEVEN MORGAN, on former affirmation: [10.01am]

<EXAMINATION BY MR TEDESCHI CONTINUING:

MR TEDESCHI: Q. Sergeant, yesterday afternoon when we adjourned I was asking you questions in relation to Mr Russell?

A. Yes.

Q. And particularly I was asking you about the report of Dr Cala, which was at volume 6, tab 157 [SCOI.10386.00142\_0001], and I think I brought to your attention his conclusions in his report, which are basically at page 3 of his report, if I can take you to that very briefly and just remind you of it?

A. Yes.

Q. In the second paragraph, the second line:

*I cannot exclude foul play.*

A. Yes, I see that.

Q.

*I am not aware if there was any evidence to support suicide. The blood alcohol level and the presence of other drugs are not detailed ... and would be of relevance ...*

A. Yes.

Q. And the last sentence:

*The possibility still exists that this man has met with foul play and might have been forcibly thrown off the cliff.*

A. Yes.

Q. Now, could I take you, please, to his evidence at inquest, which is at volume 14, tab 327 [SCOI.02751.00152\_0003]. He gave evidence at the inquest about a number of topics, his conclusions as to the possible cause of death, his reaction to being informed about the blood alcohol reading, which I think I took you to yesterday afternoon?

- 1 A. Yes.  
2  
3 Q. And also he was asked questions about both the hair  
4 and the jersey?  
5 A. Yes.  
6  
7 Q. Do you have that transcript in front of you?  
8 A. No. Sorry, what tab was it?  
9  
10 Q. It's tab 327.  
11 A. This folder doesn't appear to go that far. I've got  
12 324B as the last tab in this.  
13  
14 MR TEDESCHI: If 327 could be made available to him.  
15  
16 Q. Could I take you to page 9, please.  
17 A. Sorry, I'm just having some difficulties. Page 9?  
18  
19 Q. Page 9.  
20 A. Yes, I have that document.  
21  
22 Q. At about line 40 he is asked:  
23  
24 *Would a person just land flat or would*  
25 *there be some movement as a result of the*  
26 *fall ...*  
27  
28 And his answer was:  
29  
30 *I think either is possible, I have to say*  
31 *of course I haven't seen any or read any*  
32 *experiments of this sort of activity*  
33 *because it's clearly impossible to do [so].*  
34 *But based on the description of people who*  
35 *are seen to fall and are later found*  
36 *deceased I think either are possible.*  
37  
38 Then over the page, page 10 at line 9, it was pointed out  
39 to him that his legs were facing towards the sea?  
40 A. Yes.  
41  
42 Q. His head towards the cliff. Do you recall from the  
43 photographs whether he was face up or face down?  
44 A. I thought he was on his side, left side.  
45  
46 Q. In fact, the majority of the injuries were on the  
47 left-hand side.

- 1 A. Correct.  
2
- 3 Q. Which caused Dr Cala to conclude that he must have  
4 actually hit the bottom of the cliff on his left-hand side?  
5 A. Correct.  
6
- 7 Q. And Dr Cala was asked some questions about whether  
8 it's unusual for a body at the bottom of the cliff to be  
9 found in that way with the legs towards the sea and the  
10 head towards the cliff?  
11 A. Yes.  
12
- 13 Q. And he said at line 9:  
14  
15 *Yes. That's an unusual position, most*  
16 *people that are found around the Gap or*  
17 *North Head, around the cliffs of Sydney are*  
18 *not in that position. Their head is facing*  
19 *towards the ocean and their feet towards*  
20 *the cliff.*  
21
- 22 A. Yes.  
23
- 24 Q. Now, people whose bodies are generally found at the  
25 Gap or at North Head, are they generally people who have  
26 committed suicide?  
27 A. Correct.  
28
- 29 Q. So is that a different scenario to the one that you  
30 favoured of misadventure?  
31 A. Yes, it is.  
32
- 33 Q. The top of the cliff above where the body was found,  
34 there were photographs that were taken of that?  
35 A. Yes.  
36
- 37 Q. Can you describe the area between the footpath and the  
38 edge of the cliff? Was that sloping downwards?  
39 A. I believe it was, yes.  
40
- 41 Q. And are you able to say how far there was on that  
42 sloping area between the footpath and the edge of the  
43 cliff?  
44 A. Oh, I couldn't tell you that now, but I'm aware that  
45 the total fall was around about 12 metres, 12.1 - 12 metres  
46 or thereabouts.  
47

1 Q. I'm interested more in the area at the top of the  
2 cliff?  
3 A. Yes.  
4  
5 Q. There were some bushes there?  
6 A. I believe so, yes.  
7  
8 Q. They were the subject of the evidence from Crime Scene  
9 Officer Cameron?  
10 A. Correct.  
11  
12 Q. Who went to the scene very early in the piece?  
13 A. Yes.  
14  
15 Q. Did he go and inspect the cliff at the time the body  
16 was found, or later?  
17 A. Yes - shortly after the body was found.  
18  
19 Q. Shortly after?  
20 A. Yes.  
21  
22 Q. Now, going back to the evidence of Dr Cala at line 41,  
23 the question he was asked is:  
24  
25 *I mean is it conceivable that a person*  
26 *might have ended up that way by reason of*  
27 *accident, if those are the only facts*  
28 *known.*  
29  
30 And of course the known facts are that he's referring - the  
31 questioner is referring to the position of the body?  
32 A. Yes.  
33  
34 Q.  
35 *There are additional facts which I will put*  
36 *to you, but if that's right?*  
37  
38 And Dr Cala said:  
39  
40 *I think that's unlikely. I couldn't say*  
41 *it's impossible but I think it's unlikely,*  
42 *I think if somebody's affected by alcohol*  
43 *and they back over the cliff I'd still*  
44 *expect that they would fall and that their*  
45 *head would be closer to the ocean than in*  
46 *this case.*  
47

1 A. Yes.

2

3 Q. Do you assume from that answer that what Dr Cala was  
4 talking about was somebody who had fallen down with their  
5 head going out as they fall?

6 A. Yes, that would be my understanding of it.

7

8 Q. If somebody slipped on the sloping part of the ground  
9 between the path and the cliff so that their feet went  
10 first, that might account for why the feet were pointing  
11 out towards the sea?

12 A. I'm certainly not an expert, but it may well explain  
13 it.

14

15 Q. If you go, please, to page 12.

16 A. Yes.

17

18 Q. He provided an answer at line 11 about the hair. He  
19 said:

20

21 *I think it's unlikely that it's just fallen*  
22 *out, I think it's more likely that it's*  
23 *been tugged out. If it's come from*  
24 *Mr Russell's head, there are a number of*  
25 *explanations I would think that might*  
26 *explain it, but it is unusual and to me*  
27 *tends to suggest that it came from the head*  
28 *of somebody else, perhaps.*

29

30 A. That's correct.

31

32 Q. Do you know if Dr Cala was aware that, in fact, there  
33 had been some injury to the scalp of Mr Russell in the  
34 vicinity of his hair?

35 A. At the time of giving this evidence I would imagine he  
36 would be aware of it but that's just - I can't say for  
37 definite.

38

39 Q. Then it's brought to his attention further down that  
40 page about the 0.255 level of alcohol?

41 A. Yes. It's originally recorded as 0.225 but then it's  
42 corrected over the next page.

43

44 Q. Corrected over the page and at line 9 he says:

45

46 *I think it's a possibility that Mr Russell*  
47 *may have met his death accidentally,*



1            *I can't exclude that possibility.*

2

3            A.    Correct.

4

5            Q.    Then he's asked some questions about the jersey,  
6            which, as you have noted in previous answers, was slightly  
7            pulled up on the body?

8            A.    Yes.   I believe it was above the midriff.

9

10           Q.    He was asked some questions further down that  
11           page about that and at line 26 he said this:

12

13           *If somebody even fell accidentally I would*  
14           *expect that the jersey, it looks very loose*  
15           *in fact and would tend to be positioned*  
16           *over the beltline of the jeans, I would*  
17           *expect. But it's not - it is quite a long*  
18           *way up his body and that again makes me*  
19           *wonder whether it's been actually forcibly*  
20           *retracted in some way by another person.*

21

22           A.    Yes, I see that.

23

24           Q.    And then he's asked:

25

26           *So at least an educated guess, perhaps*  
27           *I might be doing your opinion a disservice*  
28           *in that regard, it might be that there was*  
29           *something which occurred before his fall*  
30           *which occasioned his jumper to be in that*  
31           *position and accordingly it was in that*  
32           *position when he was found, would that be*  
33           *fair?*

34

35           And he replied:

36

37           *Yes, I think that would be fair, but*  
38           *I certainly would not say that that would*  
39           *be the only explanation for the way that*  
40           *the sweater could end up in this position.*  
41           *Given the way that he's fallen it may be*  
42           *that when he's landed that the sweater has*  
43           *struck a bit of ledge of rock and it's been*  
44           *pulled up by that.*

45

46           A.    Yes.

47

1 Q. What Detective Cala [sic] didn't consider in that  
2 answer was the possibility that he may have impacted with  
3 either some ground or some rock or bushes or something on  
4 the way down --

5 A. Yes.

6

7 Q. -- as he's falling?

8 A. Yes.

9

10 Q. Later on he's asked some questions about the  
11 possibility of billowing as he's falling?

12 A. Yes.

13

14 Q. And whether that might have some effect on a loose  
15 sweater or jersey?

16 A. Yes.

17

18 Q. Could I take you to questions asked by Mr Saidi on  
19 page 17 - sorry, page 18 in relation to the jersey?

20 A. Yes.

21

22 Q. Line 35:

23

24 *You would expect the clothing to have been*  
25 *pushed up prior to the actual point of*  
26 *impact itself, am I correct?*

27

28 His answer is:

29

30 *I guess it might have been, if you mean*  
31 *that the clothing, that red jersey might*  
32 *billow as a result of a vertical drop. If*  
33 *you're suggesting that and by the way that*  
34 *it might billow out from the deceased's*  
35 *body and then appear to be pulled up, in*  
36 *this photograph. That's a possible*  
37 *explanation.*

38

39 A. Yes.

40

41 Q. So he seems to accept that possibility that it might  
42 have billowed. Then he's asked what the more probable  
43 scenario is, and at line 55 he says:

44

45 *No I don't really think I can give an order*  
46 *of probability, I'm just suggesting these*  
47 *as possible explanations and I think any is*

1           *quite possible.*

2

3           A.    Yes.

4

5           Q.    So would it be fair to say that, in your mind, you can  
6           consider very similar possibilities in terms of the jersey  
7           to what Dr Cala considered?

8           A.    Yes.

9

10          Q.    So there was a possibility that it had been affected  
11          by something on the way down?

12          A.    Yes.

13

14          Q.    Possibility it was affected when he landed at the  
15          bottom, the jersey?

16          A.    That's possible, yeah.

17

18          Q.    And a possibility that somebody might have lifted it  
19          up at the top?

20          A.    Prior to the fall.

21

22          Q.    Prior to the fall. All of those were possibilities?

23          A.    Yes.

24

25          Q.    Now, in terms of his ultimate conclusion, could I take  
26          you to page 17. These are questions by Mr Saidi.

27          A.    Yes.

28

29          Q.    Do you know which police officer was providing  
30          instructions to Mr Saidi during the inquest?

31          A.    No, I don't.

32

33          Q.    Do you know if Sergeant Page was in attendance at the  
34          inquest?

35          A.    I would imagine he would have been but I don't know  
36          that for certain.

37

38          Q.    Could I take you to line 35 on page 17.

39          A.    Yes.

40

41          Q.    Sorry, I'll start at line 24:

42

43                   *So we've got this possibility then that*  
44                   *Mr Russell was indeed assaulted.*

45

46          Answer, "Yes":

47

1           *Hit to various parts of his body and limbs*  
2           *and then pushed over the cliff, after the*  
3           *assault, that appears to be a possible*  
4           *scenario.*

5  
6           Answer, "Yes"?

7  
8           A.    I see that.

9  
10          Q.    You acknowledge that as a possibility?

11          A.    It's possible.

12  
13          Q.    Then next question:

14  
15                *Or indeed it may be that he was assaulted*  
16                *and himself stumbled over the side of the*  
17                *cliff after or during the assault.*

18  
19          Answer, "Yes"?

20          A.    Yes.

21  
22          Q.    That's also a possibility, do you acknowledge?

23          A.    I acknowledge it's possible.

24  
25          Q.    Then:

26  
27                *They appear to be, looking at the injuries,*  
28                *the most probable scenarios, do they not,*  
29                *having regard to the injuries themselves?*

30  
31          Answer, "Yes".

32          A.    That's what he said.

33  
34          Q.    Question:

35  
36                *If we accept them as the most probable*  
37                *scenario it would follow that any theory*  
38                *that he in fact came to fall over the cliff*  
39                *by himself as a result of being intoxicated*  
40                *could be discounted to a large extent,*  
41                *would you agree?*

42  
43          Answer, "Yes"?

44          A.    Yes, I see that.

45  
46          Q.    Question:

47

1                   And when I say discounted, I'm talking  
2                   about discounted in terms of probabilities.

3

4                   Answer, "Yes".

5

6                   So does it appear from those questions and answers  
7                   that Dr Cala is advancing the theory that the most likely  
8                   or most probable scenario, in his view, was the scenario  
9                   that he was assaulted and stumbled over the side of the  
10                  cliff either after or during the assault?

11                 A.     That appears to be where he's heading, yes.

12

13                 Q.     And correct me if I'm wrong, but that's not your view  
14                 about the most probable cause of his death?

15                 A.     No.

16

17                 Q.     You will correct me if I'm wrong again. Your view is  
18                 that most probable cause is that he fell due to  
19                 misadventure due to the degree of intoxication?

20                 A.     That's my belief, yes.

21

22                 Q.     That was your belief during the time of Neiwand?

23                 A.     Yes.

24

25                 Q.     And that's still your belief to this day?

26                 A.     Correct.

27

28                 Q.     Now, you were asked some questions by Counsel  
29                 Assisting, and it was suggested to you that the views  
30                 advanced by Dr Duflou were almost identical to those of  
31                 Dr Cala, and you agreed with that?

32                 A.     Largely, yes.

33

34                 Q.     I want to suggest to you that in fact Dr Duflou came  
35                 to different conclusions and I want to come --

36

37                 THE COMMISSIONER:   Is this examination or  
38                 cross-examination of your witness?

39

40                 MR TEDESCHI:    Oh, it's --

41

42                 THE COMMISSIONER:   If you're going to put to him that the  
43                 concession he made should be withdrawn on the basis of your  
44                 theory of the case, then I would have to permit Mr Gray to  
45                 take him back, because that is putting a counter theory to  
46                 the one that your own witness has accepted unequivocally,  
47                 seemingly, in his evidence.

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MR TEDESCHI: He has accepted it, Commissioner.

THE COMMISSIONER: Well, then where do you go, Mr Tedeschi? You may have your own theory, which I doubt in due course you would be hesitant in putting to me, but can you undermine your own witness, not only in this respect - and I won't go any further on that point - but can you really undermine your own witness by having him now seek to change a concession he made in circumstances where he wasn't under any pressure, as I observed, and he simply agreed with Counsel Assisting? How can you possibly come in now and say, "Well, upon reflection, given what I'm now saying to you, would you like to change your mind", without undermining his credit?

Now, you may want to do that for other reasons, and I wouldn't stop you, of course, if that's what you want to do.

MR TEDESCHI: What I understood his evidence to be - and I haven't got it directly in front of me - was that it was substantially similar, and what I wish to do is to go --

THE COMMISSIONER: But you want to put to him, as I understand it, that that concession was, what, ill considered?

MR TEDESCHI: I think what I wish to do is to clarify exactly what he meant when he said it was substantially similar.

THE COMMISSIONER: You tell me. I'll have him go outside, perhaps.

Mr Morgan, would you just go outside for a moment?

THE WITNESS: Certainly.

(The witness left the courtroom)

THE COMMISSIONER: First of all, let's have a look at what he did say, perhaps if you can take me to it.

MR TEDESCHI: Page 2258. Bear with me just for a moment.

THE COMMISSIONER: Which line?

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MR TEDESCHI: I'm not seeking, Commissioner, to cross-examine him; I'm seeking to put the conclusions of Dr Cala to him to give him another - to give him an opportunity to say what he sees as being the similarities and the differences.

THE COMMISSIONER: Mr Tedeschi, I know this is partly instinct, and perhaps even a modicum of experience on my part. It sounds like and tastes like you want to change his testimony from what he says. Now, I'm not going to apply strict rules here because this is not re-examination, but tell me the bit that you say you would like him to reflect upon and why?

MR TEDESCHI: At that page, 2258, he says - question:

*So on that topic, the position of the body, his opinion, you would agree, is substantially the same as Dr Cala's ...*

THE COMMISSIONER: Yes, and he doesn't embrace the word "substantially", his own terminology, "it's very similar".

MR TEDESCHI: Yes.

THE COMMISSIONER: Now, you want to go and, what, put to him that when he said it's very similar, he shouldn't have said that, he should have said, what, something else?

MR TEDESCHI: What I wish to do is to give him an opportunity to elaborate.

THE COMMISSIONER: But what opportunity comes out of the page as to why - you see, this is my problem. You've looked at it and you've come to the view that that concession perhaps was inappropriate or whatever it is that you want, and therefore you want to say to him, "Would you please have another look at this, and whilst you agree with Counsel Assisting it was very similar, having now heard what I've had to say, Mr Morgan, do you wish to change or clarify what you said?" Is that, in effect, what you want to do?

MR TEDESCHI: It comes very close to that.

THE COMMISSIONER: All right. If you want to undermine

1 the credit of your own witness I'm certainly not going to  
2 stop you, because this is not a strict forensic  
3 environment, but it seems to me that if this was  
4 re-examination, it couldn't possibly pass muster for  
5 re-examination. There's nothing there. The witness has  
6 not embraced the phrase used or the characterisation used  
7 by the cross-examiner or the examiner. He said, "It's very  
8 similar". So he hasn't embraced "substantially the same".  
9 So why would I come away thinking that the witness has not  
10 given thought to the answer, rejected the characterisation  
11 that was put by Counsel Assisting, adopted his own, which  
12 is, I think, characteristically, or rather, should I say,  
13 qualitatively different, because "substantially the same"  
14 I would not think is identical to "very similar".  
15

16 So you want to go back in and say, "Well, when you  
17 were asked whether it was substantially the same and you  
18 said it was very similar, what you really want to say, or  
19 perhaps I invite you to say, having now looked at Dr Cala  
20 again and Professor Duflou again, is that they weren't very  
21 similar at all." Now, if you want to do that, I'm not  
22 going to stop you, but it will have consequences, I expect.  
23 But by all means --  
24

25 MR TEDESCHI: Commissioner, if I could take you to  
26 page 2260, he's read a section of what I assume is  
27 Dr Duflou's evidence and report.  
28

29 THE COMMISSIONER: Yes.  
30

31 MR TEDESCHI: Then he is asked a question, which  
32 I objected to but which you allowed. Commissioner, you  
33 said, "he can ask him to draw the conclusion or inference".  
34

35 THE COMMISSIONER: Yes. Look, Mr Tedeschi, let's not  
36 waste any more time. I am not going to stop you, as I say;  
37 I just wanted to understand what you're trying to do.  
38

39 MR TEDESCHI: I will attempt to do it in a non --  
40

41 THE COMMISSIONER: No, Mr Tedeschi, it is not  
42 a traditional adversarial context and I'm not going to be  
43 strict about it. But when I come to review the evidence,  
44 especially concessions he has made and other concessions he  
45 has made, I will take a view or not, as the case may be, as  
46 to which is the more reliable evidence.  
47



1 MR TEDESCHI: If the Commissioner pleases.

2

3 (The witness returned to the hearing room)

4

5 THE COMMISSIONER: Mr Morgan, take a seat again,  
6 thank you. Yes, Mr Tedeschi.

7

8 MR TEDESCHI: Q. Sergeant Morgan, can I just remind you  
9 that Dr Cala's view, as expressed in the inquest, was that  
10 he favoured the probability of an assault and a fall as  
11 a consequence of that assault --

12 A. Yes.

13

14 Q. -- by the deceased, Mr Russell?

15 A. Yes.

16

17 Q. Could I take you, please, to the report of Dr Duflou.

18 A. Sorry, whereabouts is that?

19

20 Q. That's at tab 171 [SCOI.10385.00060\_0001].

21

22 THE COMMISSIONER: That's volume 6, isn't it?

23

24 MR TEDESCHI: Yes.

25

26 THE WITNESS: Yes, I have that document.

27

28 MR TEDESCHI: Q. All right. Can I take you, please, to  
29 page 6 of 9 down the bottom.

30 A. Yes.

31

32 Q. Could I take you to answer 12(a), at the top of that  
33 page --

34 A. Yes.

35

36 Q. -- where he's asked for his opinion as to what the  
37 injuries and the position of the body suggest was the  
38 manner and cause of death.

39 A. Yes.

40

41 Q. He says, quite logically:

42

43 *The injuries observed on the body are in my*  
44 *opinion indicative of a person having*  
45 *struck the ground following a fall from*  
46 *a height.*

47

1 A. Yes.

2

3 Q. He then goes on to say this:

4

5 *The pattern and distribution of the*  
6 *injuries, in my opinion, do not allow one*  
7 *to differentiate between an accidental*  
8 *fall, an intentional fall on the part of*  
9 *the deceased (ie with self-harm or suicidal*  
10 *intent) or a fall assisted in some way by*  
11 *one or more other persons.*

12

13 A. Yes.

14

15 Q. Can I take you to the last paragraph on that page.

16

17 THE COMMISSIONER: Why don't you read the next sentence?

18

19 MR TEDESCHI: Q. The next sentence is:

20

21 *The position of the body is somewhat*  
22 *unusual for an accidental or suicidal fall,*  
23 *in that the deceased likely faced towards*  
24 *the walkway when he commenced his fall.*  
25 *Much more commonly, in my experience,*  
26 *a person accidentally or suicidally falling*  
27 *would have been facing in the direction of*  
28 *the fall. However, I cannot exclude as*  
29 *entirely reasonable the possibility that*  
30 *the deceased was walking backwards at the*  
31 *time he fell (for example as a result of*  
32 *trying to move away from a person) --*

33

34 A. Yes.

35

36 Q. --

37

38 *or the possibility of the deceased having*  
39 *been pushed over the cliff face and falling*  
40 *backwards but landing face down as*  
41 *a result.*

42

43 A. Yes.

44

45 Q. So is this what Dr Duflou appears to be saying, that  
46 he cannot distinguish between accident, intentional or  
47 being involved in an assault?

- 1 A. Yes. That appears to be what he's saying.  
2
- 3 Q. That the position of the body is somewhat unusual, but  
4 it could result from him having, in effect, fallen  
5 backwards, down that slope at the top of the cliff?  
6 A. Yes.  
7
- 8 Q. In the manner that we've discussed previously?  
9 A. Yes.  
10
- 11 Q. At the bottom of that page, he says:  
12  
13 *In conclusion I am unable to provide an*  
14 *opinion, on the basis of the body location*  
15 *and the injuries, whether the deceased died*  
16 *of an accident, or as a result of suicide*  
17 *or the result of the action of another*  
18 *person or persons.*  
19
- 20 A. Correct.  
21
- 22 Q. Then in terms of the position of the body on page 8,  
23 in the middle of the page, he says:  
24  
25 *My answer to question (a) applies. In*  
26 *summary, I am of the opinion it's possible*  
27 *for the deceased to have fallen backwards,*  
28 *ie facing towards land, or to have been*  
29 *pushed backwards while facing towards land.*  
30
- 31 A. Yes.  
32
- 33 Q. Now, you were asked a number of questions by Counsel  
34 Assisting about the differences and similarities between  
35 Dr Cala, in his report and in his evidence, and Dr Duflou?  
36 A. Yes.  
37
- 38 Q. What do you say now about any difference or similarity  
39 that you perceived between the position of Dr Cala that he  
40 took ultimately at the inquest and the position of  
41 Dr Duflou in this report?  
42 A. I would say that whilst there are some similarities  
43 there are also some differences in opinion.  
44
- 45 Q. And what are those differences?  
46 A. Well, it appears that Dr Cala definitely favoured  
47 assault as being the cause of death, whereas I think

1 Dr Duflou's or Professor Duflou's theory is somewhat less  
2 than that. He considers it a possibility, but he also  
3 concedes that it could have been due to an accidental fall  
4 as well.

5

6 THE COMMISSIONER: Q. Mr Morgan, can I ask you this: in  
7 the course of your working with Mr Chebl, did you ever  
8 discuss or show Professor Duflou Dr Cala's evidence before  
9 Coroner Milledge?

10 A. I couldn't tell you that. I don't know, sir.

11

12 Q. You wouldn't know one way or the other?

13 A. No, I don't know one way or the other.

14

15 Q. Can you tell me now whether you were even aware of  
16 Dr Cala's evidence before Coroner Milledge when you  
17 procured the report from Professor Duflou?

18 A. I believe I would have been, but I don't recall it.

19

20 Q. It would be commonsensical, though, wouldn't it, given  
21 the fact that Professor Duflou was never going to be  
22 cross-examined by anyone, to have shown him Dr Cala's  
23 answers to Mr Saidi at the inquest?

24 A. I probably would have shown those.

25

26 Q. But you have no recollection whether it was done or  
27 not?

28 A. No, I don't.

29

30 Q. And if it was done, you certainly didn't ask  
31 Professor Duflou, in the light of having read the  
32 transcript of Dr Cala, whether he continued to agree or  
33 disagree with anything Dr Cala had said?

34 A. No, I didn't - I didn't personally deal with  
35 Dr Duflou.

36

37 Q. No, but leaving aside whether you did or Chebl or  
38 somebody else did, the only piece of paper that you ever  
39 had from Professor Duflou was the 16 August 2017 opinion?

40 A. Sorry, what was that, sir?

41

42 Q. The only report that you ever had from  
43 Professor Duflou, as I understand it, was his expert  
44 opinion dated August 2017?

45 A. Yes.

46

47 Q. And if he ever was shown Dr Cala's transcript - and

1 you don't know one way or the other - he certainly wasn't  
2 asked to descend into writing as to whether he maintained  
3 or disagreed or agreed with anything Dr Cala had said at  
4 the inquest in his evidence?

5 A. No.

6  
7 THE COMMISSIONER: Thank you.

8  
9 Yes, Mr Tedeschi.

10  
11 MR TEDESCHI: Q. Sergeant, moving now to the inquest,  
12 could I take you to the submissions that were made by  
13 Counsel Assisting at volume 14, tab 323  
14 [SC0I.02751.00159\_0001]? I will take you to page 5.

15 A. Yes.

16  
17 Q. At line 19, Counsel Assisting refers to the previous  
18 coronial inquest into Mr Russell's death and said:

19  
20 *Your Honour on 2 July 1990 the then State*  
21 *Coroner, or the Coroner, at the first*  
22 *inquest gave the following finding: "That*  
23 *Mr Russell died of the effects of multiple*  
24 *injuries sustained then and there, when he*  
25 *fell from a cliff to the rocks below, but*  
26 *whether he fell accidentally or otherwise*  
27 *the evidence does not enable me to say."*

28  
29 A. Yes.

30  
31 Q. Then he continues in his submission to  
32 Coroner Milledge:

33  
34 *The possibility your Honour of an*  
35 *accidental fall has to be considered,*  
36 *having regard to Mr Russell's blood alcohol*  
37 *reading of .255 grams per 100 mls of*  
38 *blood. As to how he came to fall the*  
39 *evidence does not enable firm conclusions*  
40 *to be drawn other than to state that when*  
41 *he fell he was in the company of persons*  
42 *unknown.*

43  
44 Then in the next paragraph, Counsel Assisting, Mr Lakatos,  
45 referred to two particular pieces of the evidence in  
46 support of the proposition that when Mr Russell fell, he  
47 was in the company of persons unknown. At line 37, he said

1           this:

2

3

4

5

6

7

8

9

10

11

Do you see that?

12

A.    Yes, I do see that.

13

14

Q.    Then he refers to the evidence of Dr Cala.

15

A.    Yes.

16

17

Q.    Then over the page at line 5, Counsel Assisting said:

18

19

20

21

22

23

24

25

26

27

28

29

30

31

A.    Yes.

32

33

Q.    Her Honour, of course, came to the conclusion that this was a homicide?

34

35

A.    Yes.

36

37

38

39

Q.    Now, can I just indicate that having made that submission, her Honour actually immediately remarked:

39

40

*Indeed, yes, I agree with that.*

41

42

A.    Yes.

43

44

45

46

47

Q.    Does it appear from the Coroner's findings that the Coroner also substantially relied upon those same two pieces of evidence - namely, the position of the body and the presence of the hair?

1 A. Yes.

2

3 Q. During Neiwand, did you obtain some fresh evidence in  
4 relation to those two aspects that had been relied upon by  
5 Counsel Assisting and the Coroner?

6 A. Well, certainly there were opinions given in relation  
7 to the hair. However, all those, obviously because the  
8 hair exhibit itself had become lost back on or around 1989,  
9 they were purely looking at colour photographs to try and  
10 determine whether it was likely to have been Mr Russell's  
11 hair or somebody else's.

12

13 Q. But you had the fresh evidence of Dr Duflou?

14 A. Yes. That was in relation to the position of the body  
15 and the like, yes.

16

17 Q. And you had fresh evidence from Dr Moynham about the  
18 blood alcohol level - that it was unlikely to have been  
19 increased because of putrefaction of the body?

20 A. That's correct.

21

22 Q. Did you also have some evidence from the senior  
23 forensic scientist Elizabeth Brooks about the hair on the  
24 back of Mr Russell's hand?

25 A. There was some evidence from a person in relation to  
26 the hair, yes.

27

28 Q. If we go to paragraph 123 of the summary in relation  
29 to Mr Russell, quoted from the report of forensic scientist  
30 Elizabeth Brooks - this is at tab 173 [SCOI.74882\_0001].

31 A. Sorry, which page?

32

33 Q. Could I take you to page 32, where there is a heading  
34 "Hair sample".

35 A. Yes.

36

37 Q. In paragraph 125, the summary states that Strike Force  
38 Neiwand investigators met with Boehme, who was an AFP  
39 forensic biologist?

40 A. Yes.

41

42 Q. At the AFP office at Majura in the ACT?

43 A. Yes.

44

45 Q.

46 *During this time, Boehme stated she*  
47 *conducted a review of a number of cases*

1           *from around Australia and found a number of*  
2           *examples where the victim of a homicide*  
3           *(where they sustained injuries to their*  
4           *head) had a bundle of their own displaced*  
5           *hair on or around their body.*

6

7           A.    Yes:

8

9           Q.    And:

10

11           *Boehme further stated that generally in*  
12           *homicides if an offender's hair is left in*  
13           *the crime scene it would generally be*  
14           *a single strand of hair rather than*  
15           *a bundle. Boehme also stated it's highly*  
16           *probable, as Russell had a 7.5cm laceration*  
17           *to the back of his head, that the hair from*  
18           *around the wound would be displaced.*

19

20           A.    Yes.

21

22           Q.    Did you consider that that material provided an  
23           explanation - a possible explanation for the hair?

24

25

26           Q.    So bearing in mind - you have also referred to the  
27           evidence of Sergeant Cameron about, and I quote:

28

29           *There was a small amount of damage to the*  
30           *vegetation. In my opinion, this could only*  
31           *have occurred if one person were to walk in*  
32           *that area.*

33

34           A.    Yes.

35

36           Q.    So bearing in mind the additional material you had  
37           obtained from Dr Duflou and Dr Moynham, bearing in mind  
38           Elizabeth Brooks and Sergeant Cameron, did you consider  
39           that it was appropriate for Neiwand to reconsider the  
40           question of the manner and cause of death of Mr Russell,  
41           even though the Coroner had made a finding of probable  
42           homicide?

43

44

45           Q.    And apart from that evidence that I've referred to  
46           just now, you also had in mind the blood alcohol reading of  
47           0.255?



1 A. Yes.

2

3 Q. Now, could I take you to the summary where --

4

5 THE COMMISSIONER: Before you do.

6

7 Q. I take it, Mr Morgan, you did take regard of what  
8 Professor Duflou had said in every respect?

9 A. Yes.

10

11 Q. Why?

12 A. Because it was new evidence.

13

14 Q. But you also regarded he was highly qualified to  
15 express the views he expressed?

16 A. Yes.

17

18 Q. One of the questions you asked him was in relation to  
19 the hairs, wasn't it?

20 A. Yes.

21

22 Q. Or did you forget that a moment ago when you agreed  
23 with Mr Tedeschi that his evidence seemingly was confined  
24 to the position of the body? Did you remember that you had  
25 asked him to express a view about the hair?

26 A. Well, when you say "you", sir --

27

28 Q. Well, and if not you, Mr Chebl - somebody --

29 A. Yes.

30

31 Q. -- I know that you had nothing to do with any of this,  
32 apparently, but in relation to Professor Duflou, did you  
33 participate in choosing him as an expert?

34 A. There were discussions along those lines.

35

36 Q. Well, does that mean "yes"?

37 A. Yes.

38

39 Q. All right. If you would have a look, please, at his  
40 report, it is at tab 171 [SCOI.10385.00060\_0001]. The very  
41 last question - I say "you", and forgive me if I'm  
42 nominating the wrong person, Mr Chebl or somebody - asked  
43 him was about the hair, and I take it you took into account  
44 his answer?

45 A. Yes. He said:

46

47 *... it is relatively unlikely to have*

1           *originated from the head of the deceased*  
2           *although I do not absolutely exclude*  
3           *this --*  
4

5           Q.    Correct, he goes on to say that.  But you did take  
6           into account that his view was that it was relatively  
7           unlikely, which was very similar to the view expressed by  
8           Dr Cala, wasn't it?

9           A.    There were - there were similarities between the two.  
10

11          Q.    Well, on that point, did they not both say, in effect,  
12          that they thought it was unlikely, or relatively unlikely,  
13          to have come from the deceased's head?  Couldn't be  
14          excluded because of the laceration, but it was relatively  
15          unlikely.  Because the theory is, I suppose, whether he  
16          falls or is pushed, you can't explain, nobody can explain,  
17          why someone would be pulling their own hair out?

18          A.    No, I certainly can't explain that.  I'm not an  
19          expert.  
20

21          Q.    Okay.  And as an experienced person, apparently, in  
22          the area of suicide, unless it's some extraordinary event,  
23          you would think it relatively unlikely, if someone was  
24          jumping, that at the same time they are pulling their hair  
25          out?

26          A.    Yes, it's - it would, I would think, be unlikely but  
27          not impossible.  
28

29          THE COMMISSIONER:  Not impossible.  That's what  
30          Professor Duflou says.  Thank you, Mr Morgan.  
31

32                         Yes, Mr Tedeschi.  
33

34          MR TEDESCHI:  Q.    Sergeant, could I take you, please, to  
35          the last paragraph of the summary in relation to the death  
36          of John Russell.

37          A.    Yes.  
38

39          Q.    Paragraph 154 begins by saying:  
40

41                         *In 2017, Forensic Pathologist*  
42                         *Professor Duflou, stated that he was unable*  
43                         *to provide an opinion on whether Russell*  
44                         *died due to an accident, suicide or*  
45                         *homicide, based on the location of the body*  
46                         *and injuries, which contrasts with that*  
47                         *provided by Dr Cala.*

- 1  
2 A. Yes. I see that.  
3  
4 Q. The summary then goes on to say:  
5  
6 *Dr Adine Boehme, Biology & Forensics, was*  
7 *unable to provide an opinion in relation to*  
8 *the origins of the hairs depicted in the*  
9 *crime scene photographs.*  
10  
11 A. Yes.  
12  
13 Q.  
14 *Russell's level of intoxication and related*  
15 *impairment may have also led to him falling*  
16 *from the cliff.*  
17  
18 A. Yes.  
19  
20 Q.  
21 *The walk way around Mackenzies Point*  
22 *(slight incline/decline) had no barriers*  
23 *and there was a steep drop from the cliff's*  
24 *edge.*  
25  
26 A. Yes.  
27  
28 Q. Then he comes to a conclusion:  
29  
30 *The available facts could support death by*  
31 *misadventure and/or homicide.*  
32  
33 A. Correct.  
34  
35 Q. And then it recommends that the death should be  
36 reclassified as "undetermined", despite the finding of  
37 homicide by the Coroner?  
38 A. Yes.  
39  
40 Q. Was that your view when this summary was done in 2017?  
41 A. Yes. That was the consensus from Strike Force  
42 Neiwand.  
43  
44 THE COMMISSIONER: All right. I've got some further  
45 questions.  
46  
47 Q. In paragraph 153 --

1 A. Yes.

2

3 Q. -- you say:

4

5 *One of the photographs depicted loose hairs*  
6 *on the rear of Russell's hand, which*  
7 *Dr Cala claimed were not his.*

8

9 Do you see that?

10 A. I do see that.

11

12 Q. And at the same time, you also knew that  
13 Professor Duflou said it was relatively unlikely that they  
14 were the hairs of the deceased?

15 A. Yes.

16

17 Q. Those two factors alone would have pointed way away  
18 from accidental death, wouldn't they? If someone else's  
19 hair was there, it would indicate someone else was at the  
20 top of the cliff when this man fell?

21 A. I don't believe either of the forensic pathologists --

22

23 Q. Would you like to answer my question, though, please.  
24 I will give you a chance in a minute to clarify, if you  
25 need clarification. On the basis of your recording of what  
26 Dr Cala had to say and what you knew Professor Duflou said  
27 about the relative unlikelihood of it being the deceased's  
28 hair, those two opinions alone would support the presence  
29 of another person, wouldn't they?

30 A. That would do, yes.

31

32 Q. And that would trump any idea of accidental fall due  
33 to intoxication - not entirely but it would certainly bring  
34 into account a very real and tangible possibility contrary  
35 to that of intoxicated falling?

36 A. Of homicide.

37

38 Q. Of homicide. Well, it doesn't mean he wasn't drunk,  
39 but the fact is, the presence of someone else's hair on his  
40 hand wouldn't be there, that he'd picked it up in the  
41 afternoon at the pub having 12 or 15 middies and went up to  
42 the top of the cliff with the hair on the back of his  
43 head [sic]. That evidence alone was a viable alternative  
44 scenario which was contrary to accidental fall due to  
45 intoxication, wasn't it?

46 A. It appears to be, yes.

47

1 THE COMMISSIONER: Thank you.

2

3 Yes, Mr Tedeschi.

4

5 MR TEDESCHI: Q. The Commissioner has suggested to you  
6 that homicide was a viable alternative based upon,  
7 predominantly, the presence of the hairs?

8 A. Yes.

9

10 Q. Do you agree with that now?

11 A. No, I don't.

12

13 Q. Do you agree that homicide was a viable alternative as  
14 a possibility - as a possible scenario?

15 A. Certainly a possibility, yes.

16

17 THE COMMISSIONER: Q. Why did you disagree with the  
18 answer a moment ago, then?

19

20 Sorry, put it again, Mr Tedeschi, or perhaps I will  
21 put it for you

22

23 Q. Do you accept that on the basis of your recording of  
24 Dr Cala's view of the hair being other than that of the  
25 deceased, which was accorded with the view of your  
26 Professor Duflou - forgive my using that pronoun, but  
27 Professor Duflou - who said "relatively unlikely" --

28 A. Yes.

29

30 Q. -- do you agree that homicide was a viable  
31 alternative?

32 A. It's a viable alternative.

33

34 Q. All right. But not one that you preferred?

35 A. No.

36 Q. So you rejected Professor Cala's view about the hair  
37 and its provenance, and you then rejected  
38 Professor Duflou's view of the relative unlikelihood of it  
39 being the deceased's hair?

40 A. Well, neither of the medical experts, Commissioner,  
41 appeared absolute. They both considered that there were  
42 possibilities in the alternative.

43

44 Q. And the other possibility was, because of his  
45 metabolism, he could well have metabolised that amount of  
46 alcohol if he was used to drinking it regularly?

47 A. I think Professor Moynham negated that suggestion.

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THE COMMISSIONER: All right.

Yes, all right, Mr Tedeschi.

MR TEDESCHI: Q. Did Professor Moynham say that anybody would be affected to some degree by that amount of alcohol in their blood?

A. Yes. And he also gave a range, and obviously the range that was found in the blood level of Mr Russell was within that range for the size of Mr Russell and the amount that we know he had to drink that night.

Q. All right. Sergeant, Dr Cala was of one view, that he preferred the possibility of an assault and a fall?

A. Yes.

Q. Counsel Assisting was of the view that the finding should be, although you couldn't exclude misadventure, that it was more probably an assault?

A. Yes.

Q. The Coroner found that in all probability it was an assault?

A. Yes.

Q. You've stated your view, that is the one that was in that summary, that there are three possible alternatives, you can't distinguish between them?

A. Well, I don't believe it was suicide. I don't think there is any suggestion of suicides.

Q. Sorry, you are quite right. There are two possible alternatives, misadventure and an assault, and you don't prefer one over the other?

A. Personally, I do still feel it was misadventure. But I understand it's very subjective and I understand if others see it differently.

Q. Do you accept that other people might have different views to your own as to the probabilities in relation to those two possible scenarios?

A. Yes.

THE COMMISSIONER: Q. Including the Coroner; correct?

A. Yes. Well, clearly the Coroner found it was homicide.

1 MR TEDESCHI: Q. So your view now is the same as the  
2 view that was expressed in the summary?

3 A. Yes.  
4

5 Q. And did anybody in the Police Force suggest to you at  
6 the time during Neiwand or prior to Neiwand that you should  
7 come to that view?

8 A. No.  
9

10 Q. Did anybody suggest to you that you should seek to  
11 modify the findings of the Coroner?

12 A. No.  
13

14 Q. Did you receive any direction or suggestion or any  
15 influence whatsoever to suggest what your findings in  
16 relation to the death of Mr Russell should be?

17 A. Definitely not.  
18

19 Q. In particular, did you receive any sort of indication  
20 from then Superintendent Willing as to what the conclusion  
21 in relation to Mr Russell should be?

22 A. No.  
23

24 Q. Or from Inspector Lehmann?

25 A. No.  
26

27 Q. Once again, I ask you, did you gain any benefit or  
28 advantage in your career as a police officer by pursuing or  
29 exploring or advancing the hypothesis of misadventure in  
30 the case of Mr Russell?

31 A. Certainly not.  
32

33 Q. Are you aware of any benefit or advantage that  
34 Sergeant Chebl got from advancing that proposition?

35 A. No, he did not.  
36

37 Q. Moving away now from Mr Russell to some general  
38 questions --

39

40 THE COMMISSIONER: Before you do.  
41

42 Q. You have taken exception in a number of questions that  
43 I put to you with my using the term "yours" or "you"?

44 A. Yes.  
45

46 Q. But perhaps for the last time, can I proceed upon the  
47 basis that these summaries are views which you carefully

1 read and endorsed, otherwise you would never have accepted  
2 them?

3 A. As I explained, Commissioner, I think yesterday,  
4 clearly, it's been shown over the last three days --

5  
6 Q. Mr Morgan, the mere fact that you have accepted in  
7 various questions and answers that there are defects, or  
8 whatever you might call them --

9 A. Yes.

10  
11 Q. -- at the time these documents were produced by  
12 Mr Chebl, do you take responsibility for them or not?

13 A. I accept that I reviewed them.

14  
15 Q. Do you take responsibility for them or not?

16 A. Well, clearly, sir, there are errors in there, of  
17 which I wasn't aware.

18  
19 Q. No, Mr Morgan, I'm not being hard on you, I'm asking  
20 you a straightforward question: when you accepted these  
21 documents, does that not represent to the senior persons in  
22 the Police Force that you were taking full responsibility  
23 for these summaries and the terms of them?

24 A. I did take responsibility for them.

25  
26 Q. Well "did"; but "do" is the point. Whether you have  
27 a view now which is the same or not, or different views or  
28 not, at the time these documents were prepared and you  
29 accepted them, you were taking, were you not, according to  
30 your superiors, full responsibility for the content of each  
31 of these summaries?

32 A. Yes.

33  
34 THE COMMISSIONER: Thank you.

35  
36 Yes, Mr Tedeschi.

37  
38 MR TEDESCHI: Q. Sergeant, as a result of the  
39 conclusions that were reached by Strike Force Neiwand and  
40 that were detailed in the three summaries that you have  
41 been questioned about?

42 A. Yes.

43  
44 Q. To your mind at the time, were those findings or those  
45 conclusions intended by you or anybody else to play any  
46 role at all in relation to the investigation by Strike  
47 Force Macnamir into the death of Scott Johnson?



- 1 A. Certainly not.  
2
- 3 Q. Are you aware whether the conclusions or the findings  
4 in the Neiwand summaries in fact, to your knowledge, had  
5 any effect or influence on the activities or the findings  
6 of Strike Force Macnamir into the death of Scott Johnson?  
7 A. I'm totally unaware of any result.  
8
- 9 Q. Could I take you, please, to volume 14, tab 285  
10 [NPL.0115.0004.3512]?  
11 A. Yes.  
12
- 13 Q. This is an email that was brought to your attention by  
14 Counsel Assisting?  
15 A. It was.  
16
- 17 Q. Dated 26 February 2016, from you to two members of  
18 your previous team that you were involved in, I think in  
19 the Southern Region?  
20 A. Correct.  
21
- 22 Q. And you were asked a number of questions about the  
23 sentence that reads as follows:  
24  
25 *Apparently it is going to be a political*  
26 *and media-driven hot potato later this*  
27 *year ...*  
28
- 29 A. Yes.  
30
- 31 Q.  
32 *... and the Boss wants to be able to say*  
33 *that his squad are further investigating*  
34 *the matter.*  
35
- 36 A. Yes.  
37
- 38 Q. And you identified that "the Boss" was then  
39 Superintendent Mick Willing?  
40 A. Correct.  
41
- 42 Q. Is there anything in that email that suggests that  
43 Superintendent Willing wanted the Coroner's findings to be  
44 downgraded or changed?  
45 A. No.  
46
- 47 Q. Is there anything in that email to suggest that

1 Superintendent Willing wanted a cursory review or a cursory  
2 reinvestigation?

3 A. No.

4

5 Q. Of the Taradale matters?

6 A. No, there is not.

7

8 Q. Is there anything in that email to suggest that  
9 Superintendent Willing wanted Strike Force Taradale and/or  
10 Sergeant Page to be criticised?

11 A. No, there is not.

12

13 Q. Was it your understanding at that time that  
14 Superintendent Willing wanted a fulsome, proper,  
15 professional reinvestigation of the matters?

16 A. Yes.

17

18 Q. I ask you once again: was there any direction or  
19 suggestion from him as to what the findings should be?

20 A. No, there was no such direction.

21

22 MR TEDESCHI: Commissioner, would you pardon me for  
23 a moment?

24

25 THE COMMISSIONER: Yes, of course.

26

27 MR TEDESCHI: Yes, thank you very much.

28

29 THE COMMISSIONER: Yes. I've got a matter I need to  
30 attend to in chambers. I gather the next witness is  
31 Mr Page. I will just go off the bench. Perhaps if I take  
32 the break now, Mr Tedeschi, that wouldn't inconvenience  
33 your side, I take it?

34

35 MR TEDESCHI: Not at all. Not at all.

36

37 THE COMMISSIONER: All right. I will take the break now  
38 and when we resume there will be Sergeant or former Police  
39 Officer Page. All right. I will adjourn.

40

41 **SHORT ADJOURNMENT**

42

43 THE COMMISSIONER: I gather Mr Morgan is still here. What  
44 I am going to do is excuse him, or formally excuse him, so  
45 I will do that. I haven't really completed what I meant to  
46 do, Mr Tedeschi. We've got, as you can imagine, other  
47 things to do. What I'll do is I'll allow Mr Morgan to go

1 and I'll come back on in a few minutes. All right.  
2 Thank you.  
3  
4 <THE WITNESS WITHDREW  
5  
6 **SHORT ADJOURNMENT**  
7  
8 THE COMMISSIONER: Yes, Mr Gray.  
9  
10 MR GRAY: Your Honour, I call Stephen Page.  
11  
12 THE COMMISSIONER: Thank you. Mr Page, will you take an  
13 oath or an affirmation? It is a matter of indifference to  
14 me.  
15  
16 THE WITNESS: Oath, sir.  
17  
18 <STEPHEN PAGE, sworn: [11.27am]  
19  
20 THE COMMISSIONER: Thank you. Please sit down.  
21  
22 Yes, Mr Gray.  
23  
24 <EXAMINATION BY MR GRAY:  
25  
26 MR GRAY: Q. Mr Page, you are a former Detective  
27 Sergeant of Police?  
28 A. That's right.  
29  
30 Q. And you have made a statement in the Special  
31 Commission dated 16 February 2023?  
32 A. Yes, I have.  
33  
34 Q. Do you have that statement with you?  
35 A. No, I don't.  
36  
37 Q. Could Mr Page have his own statement, please. It is  
38 at tab 253 of volume 12, [SCOI.82472\_0001]. Now, Mr Page,  
39 I think there is one correction that you need to make of  
40 a minor nature at paragraph 62.  
41 A. Sorry, just that tab number again, if I could, please?  
42  
43 Q. It is tab 253, I'm sorry.  
44 A. Thank you. Yes.  
45  
46 Q. If you could turn to paragraph 62?  
47 A. Yes.

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Q. I think there's a correction you need to make there in that the paragraph number referred to in that first line should be 60 rather than 59; is that right?

A. That's correct.

Q. You were the officer in charge of Operation Taradale back in 2001/2002?

A. Yes, I was.

Q. When you embarked upon that operation, what was your approach, in the sense did you approach it with a view that you only had one particular line of inquiry in mind, or did you have an open mind, or how would you describe to the Commissioner what your general approach was?

A. The investigation grew as we went along in relation to the deceased that we were looking at, but, you know, my role is to, you know, be objective, gather whatever information is available, put it in a brief of evidence and put it before the Coroner. So no focus on any particular inquiry - any particular line of inquiry.

Q. As your operation went on, one line of inquiry, among others, was the individuals and groups or gangs who it became clear were known to have been operating in the Bondi, Tamarama, Marks Park area in the late '80s and early '90s?

A. Yes.

Q. That awareness came from various sources, one of which was the work of Detective Sergeant McCann and others back at about that time, in the late '80s, early '90s?

A. That's correct.

Q. And you became aware of those reports or statements by, among others, Sergeant McCann and Sergeant Ingleby?

A. Yes.

Q. And you pursued inquiries relating to that line of possibilities, among others?

A. That's right.

Q. Did you also, in the case of the three deaths or disappearances that you were ultimately looking at in Taradale - namely, the death of Mr Warren [sic] and the disappearances, as they were then known to be, of Mr Warren and Mr Mattaini - did you explore other possibilities

1 besides that of violence from individuals or gangs?

2 A. Absolutely. Had to, you know, keep an open mind and  
3 look at other options, so such as, you know, accident,  
4 suicide and the like.

5

6 Q. Now, the term "victimology" means approximately what,  
7 in your understanding?

8 A. Victimology's a study of the victim and trying to  
9 understand, you know, why them and why then. So you're  
10 doing a deep dive on them, and hopefully that study will  
11 point you towards an offender. You're looking at their  
12 associates, their work patterns, their habits, their  
13 financial, you know, state of affairs, medical matters as  
14 well, and you basically create a category list and you go  
15 through that and it helps you build a profile in relation  
16 to a person.

17

18 Q. Did Taradale, as you were participating in it and  
19 leading it, pursue those lines of inquiry as well?

20 A. Absolutely. So speaking with, you know, family,  
21 friends, associates, workmates, partners, to form an  
22 opinion in relation to, you know, the deceased.

23

24 Q. Now, you've become aware, I think, around towards the  
25 end of last year, of the existence of Strike Force Neiwand?

26 A. That's right.

27

28 Q. Until you were made aware of the existence of that  
29 strike force by the Special Commission, did you have any  
30 idea that it had existed?

31 A. No idea whatsoever.

32

33 Q. And you've now had the opportunity to read the three  
34 Neiwand summaries in respect of Messrs Mattaini, Warren and  
35 Russell?

36 A. Yes, I have.

37

38 Q. And you've given some evidence in your statement, at  
39 least in summary form, about some aspects of those three  
40 summaries?

41 A. That's right.

42

43 Q. Now, one of the accusations made in those three  
44 summaries, each of them, in fact, is that Taradale, and  
45 thus you yourself, relied on investigation confirmation  
46 bias. Do you remember noticing that?

47 A. Yes, I do.

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Q. And Neiwand described "confirmation bias" as:

*The tendency to bolster an hypothesis by seeking consistent evidence while disregarding inconsistent evidence.*

Do you remember noticing that that's what Neiwand said confirmation bias was?

A. Yes, I do.

Q. You and Taradale were said in each of these three summaries to have disregarded inconsistent evidence. Did you do that?

A. Absolutely not.

Q. Elsewhere in I think all three of those summaries, but certainly two of them, the Neiwand summaries alleged that Taradale had been guilty of tunnel vision in focusing only on one line of inquiry. What do you say to that?

A. Absolutely false. The Taradale brief of evidence shows examinations in multiple areas including suicide and the like.

Q. I want to ask you some questions about the Mattaini case in particular, and in relation to Mr Mattaini's partner, Mr Musy. How did it come about that Mr Wyszynski and Mr Musy approached the police in about August 2002? What happened, as you understand it?

A. My understanding in relation to that, they approached us after seeing some material in the media in relation to investigations of deaths of gay men around Bondi. I can best describe it as a light bulb moment for them, and Mr Wyszynski reached out to police. I literally turned up at work and there was a note that he'd been in touch and I contacted him.

Q. Now, pausing there, on 25 July 2002, you had completed and signed off on your very long statement in Taradale - you'd recall that?

A. That's right.

Q. Of some 250 or 280 pages, I think?

A. Yes.

Q. With about 280-odd annexures. And that statement related to the cases of Warren and Russell and DM; is that

1 right?  
2 A. Yes.  
3  
4 Q. And it was just not long after that that Mr Wyszynski,  
5 and then Mr Musy, came to see the police; is that right?  
6 A. That's right.  
7  
8 Q. You have said that Mr Wyszynski actually came to the  
9 police station and left a note with, I assume, a telephone  
10 number?  
11 A. I believe it was a phone contact with the police  
12 service.  
13  
14 Q. I see.  
15 A. I'm not sure who it was that took the call. I can't -  
16 I don't recall now. But I certainly had a note when  
17 I arrived at work to contact him in relation to the matter.  
18  
19 Q. And did you then contact him?  
20 A. Yes.  
21  
22 Q. And did he come in?  
23 A. Yes.  
24  
25 Q. Did you take a statement from him?  
26 A. Yes.  
27  
28 Q. And did he tell you that he was coming in because he'd  
29 been prompted by what he'd read in the media?  
30 A. Yes.  
31  
32 Q. Among the things he told you, I take it, was that  
33 Mr Musy had been Mr Mattaini's partner?  
34 A. That was one of the things.  
35  
36 Q. And were you then given some telephone numbers or  
37 other means of contacting Mr Musy?  
38 A. I don't recall exactly how I contacted Mr Musy, but  
39 I certainly did, and we made arrangements to meet.  
40  
41 Q. Now, he came in?  
42 A. Yes.  
43  
44 Q. Now, you may or may not remember this: the statement  
45 of Mr Musy, which is before the Commission, bears a date  
46 3 August. In your own statement to the Milledge inquiry,  
47 you refer to having prepared a statement for Mr Musy on

1 14 August. Do you have a recollection now as to which of  
2 those dates is likely to be right?

3 A. With the passage of time I'm not sure but I would tend  
4 to err towards 3 August. I don't have access to systems  
5 but I can check - you know, it could be checked by working  
6 out when that statement was uploaded to the e@gle.i  
7 program.

8  
9 Q. Well, according to the Mattaini summary produced by  
10 Neiwand, it was on 1 August that Mr Wyszynski made contact  
11 with the police, and is your recollection that you saw  
12 Mr Wyszynski and obtained a statement from him and saw  
13 Mr Musy and obtained a statement from him shortly after  
14 that approach?

15 A. Yes.

16  
17 Q. In the case of Mr Musy, when he came in and you took  
18 a statement from him, how did that happen physically,  
19 logistically? What was the process?

20 A. I met him at - I met Mr Musy at Paddington Police  
21 Station. I had an office near the front counter. We both  
22 went into that - our work room. I sat down beside him and  
23 we had a computer in front of us. He was beside me looking  
24 at the computer.

25  
26 Q. Do you mean to say that you asked him some questions  
27 and then typed his answers or what do you mean?

28 A. My normal process is I don't tend to get bogged down  
29 with writing notes or conversations outside of a statement  
30 because, you know, you can get lost in translation, you can  
31 forget to bring bits in or what have you. It's asking -  
32 just engaging with the witness and typing as we go. At  
33 prior jobs to this one I used to send telegrams for  
34 Australia Post so I can type at pace, so as it's said it's  
35 pretty well typed.

36  
37 Q. So you were a fast typist?

38 A. Yes.

39  
40 Q. And you were sitting down at the computer screen  
41 typing as Mr Musy spoke?

42 A. Yes.

43  
44 Q. And he was watching what you were typing, as you typed  
45 it on the screen?

46 A. I believe so.

47



1 Q. I'm going to take you to the statement, Mr Musy's  
2 statement, which is in volume 6, tab 159  
3 [SCOI.02744.00381\_0001].

4 A. I have that.

5

6 Q. Do you have tab 159?

7 A. Yes, I do.

8

9 Q. As I mentioned, the date at the top of the page is  
10 3 August 2002. That's the basis for the question I asked  
11 you a little while ago.

12 A. And I note the summary also says the same date.

13

14 Q. Yes, the cover summary at the front. Yes. Now, you  
15 have a memory, as you've just been explaining, of Mr Musy  
16 coming in and sitting next to you as you typed on the  
17 screen. In the third - sorry, in paragraph numbered 5, the  
18 second paragraph on page 2, and then paragraph numbered 6,  
19 the third paragraph on that page, there are references to  
20 two suicide attempts by Mr Mattaini.

21 A. Yes.

22

23 Q. What's your recollection as to how it came about that  
24 those two paragraphs were included in the statement?

25 A. It would have been an open-ended question along the  
26 lines of, you know, "What can you tell me about any history  
27 of self-harm", and they were given to me in that order, and  
28 I know they're out of sequence in relation to when they've  
29 occurred but that's the order I would have been given it,  
30 open-ended - an open-ended question and just typed that  
31 statement as we discussed it.

32

33 Q. Did he say anything else to you in relation to suicide  
34 or suicidal thoughts on this occasion in the police station  
35 as you were typing on the screen, besides what appears in  
36 those paragraphs?

37 A. No.

38

39 Q. Did Mr Musy say to you on that occasion anything to  
40 the effect that Mr Mattaini had ever said that he preferred  
41 death to life?

42 A. No.

43

44 Q. Did Mr Musy say to you on that occasion anything to  
45 the effect that Mr Mattaini had ever said that if he were  
46 to commit suicide, he would do it in a way that his body  
47 would not be found?

- 1 A. No.
- 2
- 3 Q. If Mr Musy had said anything to that effect, would you  
4 have included that in your statement?
- 5 A. Oh, absolutely. Those statements, as far as I'm  
6 concerned, are almost show-stoppers. You've got to capture  
7 that, and they would have landed in the statement.
- 8
- 9 Q. Now, I think you've had occasion to look again, or to  
10 look in recent times, at the transcript of what Mr Musy  
11 said before Coroner Milledge?
- 12 A. Yes.
- 13
- 14 Q. And you are aware that in his oral evidence, he did  
15 refer to Mr Mattaini at a particular point in time having  
16 had the outlook of preferring death to life?
- 17 A. Yes.
- 18
- 19 Q. But your evidence is that he had never said any such  
20 thing to you?
- 21 A. At the time of the taking of the statement, no.
- 22
- 23 Q. And subsequently?
- 24 A. No.
- 25
- 26 Q. Now, you're aware, aren't you, that the Neiwand  
27 summary in relation to Mr Mattaini accuses you of  
28 deliberately withholding important evidence from the  
29 Coroner?
- 30 A. Yes.
- 31
- 32 Q. Is that true?
- 33 A. No.
- 34
- 35 Q. What do you say about Neiwand not giving you any  
36 opportunity to respond to that accusation?
- 37 A. Look, as a matter of fairness, I should have been  
38 given the opportunity to respond. Whether I would have  
39 been listened to is another thing.
- 40
- 41 Q. Why do you say that?
- 42 A. I think the report that I read was certainly focused  
43 on being absolutely critical against Taradale. I don't  
44 think I would have had a voice and I don't think it would  
45 have been considered.
- 46
- 47 Q. As I've asked you already, there were many other

1 accusations against Taradale and you in these three  
2 summaries, including tunnel vision and confirmation bias  
3 and various other supposed errors and defects on the part  
4 of Taradale and/or yourself?

5 A. Yes.

6

7 Q. You are aware of that? And are you aware that  
8 Sergeant Morgan yesterday and in recent days has  
9 essentially acknowledged that all or most of the criticisms  
10 of you and Taradale by Neiwand were unwarranted?

11 A. Yes.

12

13 Q. In the light of that acknowledgment by Sergeant  
14 Morgan, again, do you have a view about your having been  
15 given no opportunity to respond?

16 A. Look, I can't say any more than I have on that. I  
17 think - I don't think it would have been - would have added  
18 value from their end. It would have been disregarded.

19

20 Q. You are aware, I take it, from the evidence before  
21 this Commission in recent days, that these summaries have  
22 been published - that is, the three Neiwand summaries have  
23 been published - within the NSW Police Force to all of  
24 those with relevant access to e@gle.i?

25 A. Yes.

26

27 Q. And you are aware that the post operational assessment  
28 which contains many of the criticisms of you from the  
29 summaries, has been published as high as the Commander  
30 Homicide and the Director of Crime Operations and the  
31 Commander of State Crime Command?

32 A. Yes.

33

34 Q. What is your view or what do you say about those  
35 accusations, now apparently withdrawn, having been  
36 published in those various ways and to such high-ranking  
37 officers?

38 A. I think my reputation was, you know, absolutely  
39 professionally destroyed in those reports.

40

41 Q. And how does that make you feel?

42

43 MR TEDESCHI: I object. Relevance.

44

45 THE COMMISSIONER: I will allow it.

46

47 MR GRAY: Q. You are allowed to answer that question.

1 A. It feels like I wasted a lot of time with Taradale.  
2 A lot of the gains that we had along the way were almost  
3 for nothing.  
4

5 Q. And apart from the impact of this on you, what's your  
6 reaction in terms of what it means for the families?

7 A. That was my big concern. I - you know, I've got broad  
8 shoulders, I'll cop it. But my main concern was it seemed  
9 strategic. I was pushed out of the way so that there could  
10 be a free swing at the families - or more the deceased, I  
11 should say.  
12

13 THE COMMISSIONER: Can I just interrupt, Mr Gray.  
14

15 Q. Mr Page, apart from yourself, who were the other  
16 police officers assisting you on Taradale?

17 A. Oh, sir, there was probably 12 at various stages.  
18

19 Q. Would you be able to name some of them or all of them?

20 A. Graham Nicholas, Brad Dagg. They're the main  
21 supporters that I had with Taradale.  
22

23 Q. And was the group of 12 with you most of the time or  
24 did they come and go?

25 A. Most of the time.  
26

27 THE COMMISSIONER: Thank you.  
28

29 MR GRAY: Q. Yesterday, Sergeant Morgan gave some  
30 evidence particularly about the investigation into  
31 John Russell originally, the 1989 investigation. And  
32 I think you're aware that, in his view, that 1989  
33 investigation, led by Plain Clothes Constable Dunbar was,  
34 in Sergeant Morgan's words, "to the standard of the day".  
35 Are you aware that he said that?

36 A. Yes.  
37

38 Q. What's your own response to that or your own view  
39 about that 1989 investigation?

40 A. I've got a different view, and no disrespect to  
41 Constable Dunbar, but I think she was very junior, and my  
42 experience as a junior detective in the late 1980s is  
43 whenever it appeared you had a suspicious death, you would  
44 be supported by much more senior police officers. They  
45 would take the lead.  
46

47 Q. In this instance, the presence of the hairs on the

1 back of Mr Russell's hand immediately alerted, or should  
2 have alerted, those investigating the matter to at least  
3 the possibility of foul play?

4 A. Yes.

5

6 Q. That's your understanding?

7 A. Yes.

8

9 Q. And are you saying that as soon as that factor was  
10 recognised, somebody more senior than Detective Senior  
11 Constable, or Detective Constable, rather, Dunbar, should  
12 have been brought in, or would have been brought in, in  
13 your experience?

14 A. Probably go back one step. I think she was even  
15 a plain clothes constable, hadn't even done the detectives  
16 course.

17

18 Q. You are quite right. Plain clothes is the  
19 appellation, that's right.

20 A. And, yeah, my personal view and my experience is with  
21 similar - you know, with suspicious matters, is that a more  
22 senior police officer would take the lead role.

23

24 Q. Had that happened, or in any event, what else comes to  
25 your mind as steps that should have been taken or could  
26 have been taken in 1989 but were not?

27 A. I think the disappearance of Ross Warren was known at  
28 the time of the death of John Russell, and shortly after,  
29 we had the assault of DM, you know, in reasonable close  
30 proximity. There should have been alarm bells that there  
31 was a problem with assaults on gay men in that era in that  
32 area, and I think also the evidence of Sergeant Ingleby at  
33 the Coroner's Court certainly suggested that it was  
34 prevalent and well known to police.

35

36 Q. Now, as to the hairs, there was a suggestion yesterday  
37 that DNA technology or the use of DNA testing had not come  
38 in in New South Wales, at least, as at this time, 1989.  
39 What can you tell us in that regard?

40 A. That's true. It wasn't commonly used. Any - I think  
41 at that stage, in the early stages, samples had to be flown  
42 I think even to the UK to get tested. It was very  
43 expensive. But for volume offences, there was other  
44 avenues available. So we used to be able to get hair  
45 tested and it would - if the - you know, the follicles were  
46 attached, you could get blood groups, as an example, of the  
47 owner of the hair.

1  
2 Q. Was that something called PGM testing?  
3 A. That was part of the process on those scientists, but  
4 that was - they would give you, you know, some data in  
5 relation to the characteristics of that hair sample.  
6  
7 Q. And one thing that could be established, if you had  
8 the follicles, would be the blood type?  
9 A. Yes.  
10  
11 Q. And that would tell you or it would be likely to tell  
12 you whether the hair was from the deceased person or not?  
13 A. Yes.  
14  
15 Q. It's your recollection, is it, that as at this time,  
16 1989, DNA testing had begun to be used elsewhere, for  
17 example, in the UK?  
18 A. I - just in my readings I - certainly in the late '80s  
19 overseas it was starting to be used.  
20  
21 Q. And was it a development which, in Sydney, it was  
22 anticipated would be coming our way some time in the  
23 future?  
24 A. I think everyone, you know, certainly in law  
25 enforcement, with investigators, we knew it was - we knew  
26 it was an emerging technology that was coming, probably  
27 similar to us today knowing that AI is just around the  
28 corner.  
29  
30 THE COMMISSIONER: Can I just interrupt again, I'm sorry.  
31  
32 Q. Mr Page, something more fundamental. If the hair had  
33 been available, first, a direct comparison could have been  
34 made between its colour and texture as against that of the  
35 deceased; correct?  
36 A. Yes.  
37  
38 Q. And, secondly, it could have been checked to see  
39 whether it had come from the deceased's head as part of  
40 a laceration?  
41 A. Absolutely.  
42  
43 THE COMMISSIONER: Thank you.  
44  
45 MR GRAY: I have nothing further, Commissioner.  
46  
47 THE COMMISSIONER: Yes, Mr Tedeschi.

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<EXAMINATION BY MR TEDESCHI:

MR TEDESCHI: Q. Mr Page, you were asked some questions by Counsel Assisting about the disappearance and presumed death of Mr Mattaini.

A. Yes.

Q. I would like to ask you some questions about that. You are aware, I take it, from papers that have been provided to you by those assisting this Inquiry that there was an investigator's note that was created during the course of the Neiwand strike force?

A. Yes.

Q. About a conversation between Mr Musy and Detective Sergeant Chebl?

A. Yes.

Q. Have you had an opportunity to look at that in recent times?

A. In the last weeks, yes, certainly.

MR TEDESCHI: Perhaps if that could be made available to him, tab 167A in volume 6, [SCOI.10389.00042\_0001].

THE WITNESS: I have that document in front of me.

MR TEDESCHI: Q. Can I take you to page 4. The last paragraph on that page says this:

*Musy stated throughout his relationship with Mattaini he found him to be comfortable with death and would speak openly about dying on his own accord rather than naturally. Musy elaborated on this by saying, following Mattaini's --*

and then he talks about his two suicide attempts. If that was in fact what Mr Musy said to Sergeant Chebl, do you accept that it appears to be Musy saying something that happened during the course of his relationship with Mr Mattaini, accepting it at face value?

MR GRAY: I object, your Honour. The document speaks for itself. Mr Page's interpretation of it will not add anything.

1  
2 THE COMMISSIONER: That may be, but I'll allow Mr Tedeschi  
3 to ask the question, and if it's shown later that it's  
4 contextually inappropriate, then no doubt I'll have that  
5 pointed out to me. Yes, Mr Tedeschi.  
6  
7 MR TEDESCHI: Q. If you accept that at face value and  
8 accept that that's what Musy said, whether he did or didn't  
9 I'm not putting to you, but what I'm suggesting to you is  
10 that if you accept that at face value, it would appear,  
11 just from this entry, that what Mr Musy has said is that he  
12 was speaking about suicide during their relationship?  
13 A. That's right.  
14  
15 Q. That, of course, was different to the material that  
16 you had from Mr Musy?  
17 A. Yes.  
18  
19 Q. What you had gleaned from Mr Musy was that any  
20 suicidal ideation had occurred well before their  
21 relationship?  
22 A. That's right.  
23  
24 Q. But if you accept at face value this as being  
25 accurate, it would appear to be some different information  
26 about suicidal ideation to what you had?  
27 A. That's right.  
28  
29 Q. Now, if the Neiwand investigators accepted this  
30 evidence, it could provide some additional evidence of  
31 suicide?  
32 A. Yes.  
33  
34 Q. Supporting suicide?  
35 A. Yes.  
36  
37 Q. At the inquest, do you recall that Mr Musy had given  
38 evidence?  
39 A. Yes.  
40  
41 Q. Have you had an opportunity to read his evidence at  
42 the inquest in recent times?  
43 A. Yes, I have.  
44  
45 Q. Do you agree that Mr Musy gave evidence that there had  
46 been some relationship problems between himself and  
47 Mr Mattaini in recent times?



- 1 A. Yes.
- 2
- 3 Q. Including their intimate relations?
- 4 A. Yes.
- 5
- 6 Q. Do you accept that there was some evidence from
- 7 Mr Musy at the inquest that Mr Mattaini was worried to some
- 8 extent about his visa situation in Australia?
- 9 A. That's right.
- 10
- 11 Q. It is correct, isn't it, that there was no evidence at
- 12 all about the place and the time of Mr Mattaini's death?
- 13 A. That's right.
- 14
- 15 Q. Mr Mattaini was not a man who was known to go to gay
- 16 beats?
- 17 A. Correct.
- 18
- 19 Q. Do you agree that the evidence as to his - the very
- 20 meagre evidence as to his last sighting had him in the
- 21 northern part of Bondi heading in a northerly direction
- 22 away from Marks Park?
- 23 A. Yes.
- 24
- 25 Q. Taradale had conducted extensive investigations into
- 26 a lot of persons of interest?
- 27 A. That's right.
- 28
- 29 Q. I think - correct me if I'm wrong - you had, in fact,
- 30 monitored or listened to or considered something like
- 31 17,000 phone calls?
- 32 A. Yes.
- 33
- 34 Q. But none of them had provided any link between gangs
- 35 or gay hate - members of gay hate gangs to the
- 36 disappearance of Mr Mattaini?
- 37 A. None that met a standard for prosecution, no.
- 38
- 39 Q. It was clear, wasn't it, from Mr Musy's contact with
- 40 Taradale, that he had immediately, on being informed about
- 41 Mr Mattaini's disappearance, concluded that his partner had
- 42 suicided?
- 43 A. I don't know whether it was immediately but that was
- 44 one of the - the conclusion that he came to, that he
- 45 believed it to be suicide.
- 46
- 47 Q. Can I suggest that he told you that he had been so

- 1 overcome by emotion when he heard about the disappearance  
2 that he had basically been under the effect of prescription  
3 drugs for some weeks and had not taken part in any  
4 inquiries about Mr Mattaini himself but left it to other  
5 friends?  
6 A. That's right.  
7  
8 Q. Because he believed that Mr Mattaini must have  
9 committed suicide?  
10 A. Yes.  
11  
12 Q. And he believed that Mr Mattaini must have committed  
13 suicide from 1985 until 2002 when he had contact with  
14 Taradale?  
15 A. Yes.  
16  
17 Q. It would appear as though the other family members, in  
18 particular Mr Mattaini's mother, had accepted that he must  
19 have committed suicide?  
20 A. Yes.  
21  
22 Q. At the inquest, were you present during the whole of  
23 the inquest?  
24 A. Most of it, yes.  
25  
26 Q. The Counsel Assisting was a Mr Lakatos?  
27 A. That's right.  
28  
29 Q. I think he took silk very shortly after this inquiry?  
30 A. Yes, he did.  
31  
32 Q. And then a couple of years later became a District  
33 Court judge?  
34 A. That's right.  
35  
36 Q. The police service was represented by Mr Saidi?  
37 A. Yes.  
38  
39 Q. And did you provide ongoing assistance to Mr Saidi  
40 during the course of the inquiry?  
41 A. Yes.  
42  
43 Q. Do you recall that at the inquest in relation to  
44 Mr Mattaini, the submission that was made by Counsel  
45 Assisting was this:  
46  
47 *The manner and cause of the death of*

1           *Mr Mattaini and Mr Warren remain unknown.*  
2           *On the present state of the evidence*  
3           *your Honour it is submitted that*  
4           *your Honour should bring in an open finding*  
5           *in relation to the deaths of Mr Mattaini*  
6           *and Mr Warren.*

7  
8           A.    That's right.

9  
10          Q.    Do you agree that that submission was a perfectly  
11          reasonable submission for Counsel Assisting to make based  
12          upon the evidence that was then available?

13          A.    Yes.

14  
15          Q.    Of course, the Coroner came to what might be called  
16          a stronger conclusion, that she thought that it was likely  
17          that he was --

18  
19          THE COMMISSIONER:   Well, Mr Tedeschi, that is not  
20          accurate. She made a finding and, in the context of the  
21          finding, she made some comments - that is a more accurate  
22          way of putting the position.

23  
24          MR TEDESCHI:    It is more accurate.

25  
26          THE COMMISSIONER:   And you are, I thought, addressing the  
27          finding, and the finding, it seems to me, is on all fours  
28          with the submission made, wasn't it?

29  
30          MR TEDESCHI:    I will correct that.

31  
32          Q.    The finding was that it was an open finding?

33          A.    In relation to Mr Mattaini?

34  
35          Q.    In relation to Mr Mattaini?

36          A.    Yes.

37  
38          Q.    But she found or she noted that he may have been the  
39          victim of a gay hate crime like the other two?

40          A.    Yes.

41  
42          Q.    Now, do you agree that, based upon the evidence that  
43          was available, that if one accepted the additional material  
44          that I've brought to your attention in the investigator's  
45          note, that was an important piece of evidence if it was  
46          correctly recorded?

47          A.    Yes.

1  
2 Q. And it would point more towards suicide than towards  
3 gay hate crime or accident?  
4 A. That's right, if it was correctly recorded.  
5  
6 Q. And can I suggest to you that it's based upon an  
7 acceptance of that material that it was a rational and  
8 acceptable conclusion to conclude that Mr Mattaini may well  
9 have taken his own life rather than met with foul play?  
10 A. If that material was accepted, yes.  
11  
12 Q. So is it a situation where different minds may have  
13 different opinions about the same evidence?  
14 A. Yes.  
15  
16 Q. And is it quite common in such cases, where there  
17 are - particularly where there's no body that is found, so  
18 there's a lack of forensic evidence, that different police  
19 officers might have different opinions about the likely  
20 cause of death?  
21 A. That can happen, yes.  
22  
23 Q. And do you agree that the Mattaini disappearance is  
24 one of those cases, where different minds may legitimately  
25 have different views?  
26 A. I agree with that.  
27  
28 Q. In relation to Mr Warren, that was also a case where  
29 no body was located?  
30 A. Yes.  
31  
32 Q. Therefore there was no crime scene analysis that was  
33 done, in any event?  
34 A. That's right.  
35  
36 Q. This was a case where I think a Detective Bowditch  
37 conducted the initial investigation?  
38 A. That's right.  
39  
40 Q. And that was the subject of really serious criticism  
41 by Coroner Milledge?  
42 A. Yes.  
43  
44 Q. Although there was no body located, Mr Warren's car  
45 and his keys had been found in the vicinity of Marks Park?  
46 A. Yes.  
47

1 Q. Which made it probably more likely than not that he  
2 had disappeared in the vicinity of Marks Park?

3 A. That was my conclusion.  
4

5 Q. At the inquest in relation to Mr Warren, the same  
6 submission was made by Counsel Assisting, namely, this:  
7

8 *In my submission your Honour, the situation*  
9 *so far as the evidence discloses is that*  
10 *the manner and cause of the deaths of*  
11 *Mr Mattaini and Mr Warren remain unknown.*  
12 *As I have said there are real suspicions*  
13 *that they met their deaths by foul play and*  
14 *by being the subject of gay hate attacks,*  
15 *however there is no reliable evidence that*  
16 *this conclusion can firmly be drawn.*  
17

18

19 That was the submission made by Mr Lakatos?

20 A. Yes.  
21

22 Q. In your view, was that a perfectly reasonable and  
23 acceptable and logical submission to make based upon the  
24 evidence that was then available?

25 A. Perfectly fair submission but I wasn't aligned with  
26 the opinion in relation to Warren.  
27

28 Q. So you had a different opinion in relation to  
29 Mr Warren?

30 A. Yes.  
31

32 Q. Different to Counsel Assisting?

33 A. Yes.  
34

35 Q. The final concluding submission made by Mr Lakatos  
36 was:  
37

38 *On the present state of the evidence*  
39 *your Honour it is submitted that*  
40 *your Honour should bring in an open finding*  
41 *in relation to the deaths of Mr Mattaini --*  
42

43 A. Yes.  
44

45 Q. --  
46

47 *and Mr Warren.*

1  
2 Is it that you held a different opinion at the time?  
3 A. At the time, I believed Warren was a victim of  
4 homicide - personally, I - Mr Lakatos was certainly  
5 entitled to put forward what he put forward, but my  
6 personal view was differing in relation to Warren.  
7  
8 Q. And once again, is it a situation where different  
9 minds may legitimately place different emphasis on parts of  
10 the evidence and come to different conclusions or different  
11 possibilities or probabilities?  
12 A. Yes.  
13  
14 Q. In relation to Mr Warren, were you aware that he had  
15 some photographs in his home of two men whom it would  
16 appear he was interested in in a romantic sense?  
17 A. Yes.  
18  
19 Q. And that he had been rejected by them?  
20 A. Yes.  
21  
22 Q. Did you also know that he had failed to obtain  
23 employment with a major television network?  
24 A. I wasn't aware that he'd failed to obtain employment -  
25 that wasn't shared with me along the way. But I knew that  
26 he was pursuing employment with a major network.  
27  
28 Q. And are you aware that since Taradale, it's been  
29 suggested that he may have been concerned about having been  
30 exposed to HIV?  
31 A. I've read that. I don't know that to be true.  
32  
33 Q. If those were accepted as being true, those three  
34 aspects, they would be relevant to a consideration of  
35 manner and cause of death?  
36 A. I wouldn't suggest the employment aspect would, you  
37 know, be a major consideration in relation to, say,  
38 a suicide theory. It's possible, but not probable, in my  
39 mind, and in relation to HIV, I don't know what his mind  
40 set was at that time, so --  
41  
42 Q. But if you accept for the moment that those things  
43 were made available to Neiwand, do you accept that they  
44 were relevant considerations for the members of Neiwand to  
45 take into account in formulating their view?  
46 A. Yes.  
47

- 1 Q. And do you accept, again, that in relation to those  
2 facts and the other facts that were available to Taradale,  
3 that minds may legitimately differ?  
4 A. Minds can differ but I don't believe the material that  
5 I've read was sufficient to sway me away from anything  
6 other than murder for Warren.  
7
- 8 Q. But do you accept that other police officers may  
9 legitimately have come to a different conclusion and  
10 favoured the possibility of death by some other means?  
11 A. They may well have.  
12
- 13 Q. And that's just because, in a case like this, where  
14 there's no body and there was an inadequate investigation  
15 to begin with, it's very hard to come up with any  
16 definitive answer at all?  
17 A. Yes.  
18
- 19 Q. And the Coroner might have one view, Counsel Assisting  
20 might have one view, the police might have another view -  
21 some people might focus on some pieces of evidence, other  
22 people might think that that's not important?  
23 A. That's right.  
24
- 25 Q. You get a lot of differences of opinion in such cases  
26 because of the inherent uncertainties in the actual cause  
27 of death?  
28 A. That's right.  
29
- 30 Q. Going to Mr Russell, this, of course, was a case where  
31 the body had been found at the base of the cliff?  
32 A. Yes.  
33
- 34 Q. And as you've noted, there was some hair found in the  
35 vicinity of his hand. It wasn't clutched in his hand, was  
36 it?  
37 A. That's right.  
38
- 39 Q. It was actually on top of his hand; is that right?  
40 A. Yes.  
41
- 42 Q. Could you tell from the photographs - because that's  
43 all you had, the photographs, wasn't it?  
44 A. That's right.  
45
- 46 Q. Could you tell from the photographs whether it was  
47 adhering to his hand because of any blood, or some other

1 reason, why it was stuck to his hand?  
2 A. I couldn't tell, no.  
3  
4 Q. So you couldn't see any blood in the vicinity of the  
5 hairs?  
6 A. That's right.  
7  
8 THE COMMISSIONER: Q. It was the police who took the  
9 photographs, was it?  
10 A. That's right, sir.  
11  
12 THE COMMISSIONER: Yes. Thank you, Mr Tedeschi.  
13  
14 MR TEDESCHI: Q. And of course, the loss of the hairs is  
15 inexcusable?  
16 A. It is.  
17  
18 Q. Whether DNA was available or not, as you've said,  
19 there were other tests that could have been done at that  
20 time, including, as the Commissioner has mentioned,  
21 comparing the colour and the appearance and the shape and  
22 the texture of the hair with his own hair so that if it was  
23 different it would strongly suggest that there was somebody  
24 else involved?  
25 A. That's right. That could have been done at the scene.  
26  
27 Q. And I think you made inquiries and found that you  
28 could not determine who was responsible for the loss of the  
29 hairs; is that right?  
30 A. I made inquiries but Sergeant McCann made inquiries  
31 a decade before me and he also couldn't locate the hair.  
32  
33 Q. Were you able to locate who was responsible for the  
34 loss of the hair?  
35 A. No.  
36  
37 Q. When the Coroner came to consider the case of Russell,  
38 there were two particular facts that were important to her  
39 in relation to her findings, as stated in her findings, and  
40 do you agree that that was the hair that had been found --  
41 A. Yes.  
42  
43 Q. -- the hairs that had been found? And the position  
44 of the body?  
45 A. Yes.  
46  
47 Q. And Dr Cala had given evidence about the position of



1 the body suggesting that, for him, he thought it was more  
2 likely that he'd been the victim of an assault rather than  
3 a fall?

4 A. That's right.

5

6 Q. There was no consideration at all that Mr Russell may  
7 have committed suicide, was there?

8 A. No.

9

10 Q. He was perfectly happy in his life; it was not  
11 a consideration?

12 A. I found no evidence of, you know, a suggestion of  
13 suicide whatsoever.

14

15 Q. And Counsel Assisting made this submission to the  
16 Coroner, and I quote:

17

18 *In my respectful submission the surrounding*  
19 *circumstances give rise to significant*  
20 *suspensions of foul play, whilst the*  
21 *evidence adduced does not permit the*  
22 *absolute exclusion of the proposition the*  
23 *death was occasioned accidentally. This*  
24 *possibility remains slight, the*  
25 *preponderance of the evidence being in*  
26 *support of a finding that death occurred by*  
27 *foul play, and that is the finding I would*  
28 *invite your Honour to come to.*

29

30 A. Yes.

31

32 Q. And in the transcript at that point, her Honour  
33 immediately added:

34

35 *Indeed, yes, I agree with that.*

36

37 Was that your view at the time?

38 A. That's my recollection.

39

40 Q. Are you aware from the papers that you've been shown  
41 that the members of Strike Force Neiwand obtained some  
42 fresh evidence in relation to those two pieces of evidence?

43 A. Yes.

44

45 Q. Are you aware that particularly in relation to the  
46 blood alcohol reading of .255, that Dr Moynham expressed  
47 the view that he did not think that the blood alcohol level

1 would have significantly increased after death?  
2 A. Yes.  
3  
4 Q. Were you aware that Dr Duflou had given evidence to  
5 basically say that, in his view, the position of the body  
6 did not allow him to differentiate between either  
7 accidental fall or a fall assisted by another person?  
8 A. He did say that.  
9  
10 Q. Do you agree that that's a difference in emphasis  
11 between Dr Cala and Dr Duflou?  
12 A. On that one single point, yes.  
13  
14 Q. Yes. That Dr Cala says he prefers the view that there  
15 was an assault and a fall, whereas Dr Duflou says, in  
16 essence, he can't distinguish between a misadventure fall  
17 and a fall following from an assault?  
18 A. That's right.  
19  
20 Q. So that there's a difference in emphasis there, do you  
21 agree?  
22 A. Yes.  
23  
24 Q. You were aware that there was a senior forensic  
25 scientist, Elizabeth Brooks, who was of the view that the  
26 hair found on the back of Mr Russell's hand could have come  
27 from the deceased's own scalp?  
28 A. Yes.  
29  
30 Q. And are you aware of whether there was a laceration on  
31 the scalp of the deceased?  
32 A. Yes, we had post-mortem notes.  
33  
34 Q. So he did have a laceration?  
35 A. I - just going back through my recent readings, yeah,  
36 I believe so.  
37  
38 Q. So bearing in mind the evidence from the forensic  
39 scientist that the hair could have come from the deceased's  
40 own scalp, Dr Moynham's evidence that the deceased likely  
41 had that high level of blood alcohol at the time of his  
42 death, and the evidence of Dr Duflou, do you agree that,  
43 again, minds may differ in terms of the emphasis as to  
44 which of those possibilities may have been the likely cause  
45 of death?  
46 A. I agree that minds may differ but I believe there  
47 should have been more to the decision-making in relation to

1 what happened to John Russell. Dr Duflou made a number of  
2 other points which tended to corroborate Dr Cala. I think  
3 taking that all into account, there might have been  
4 a different view.

5  
6 Q. All right. In relation to Dr Duflou, his report  
7 refers to the hairs?

8 A. Yes.

9  
10 Q. He says he thinks it's unlikely it came from himself,  
11 but he couldn't exclude that possibility?

12 A. That's right.

13  
14 Q. And I think Dr Cala had also given evidence about the  
15 jersey which was worn by the deceased which was up around  
16 his upper torso?

17 A. Yes.

18  
19 Q. And Dr Duflou, in his report, said that that could  
20 have been caused either during the fall or at the base of  
21 the fall, he was unable to say?

22 A. That's right.

23  
24 Q. Bearing all of that in mind, do you accept that minds  
25 may differ and that some minds might legitimately prefer  
26 the view that it was an accidental fall?

27 A. Minds may differ, but I'm - I have my own opinion in  
28 relation to it.

29  
30 THE COMMISSIONER: Mr Tedeschi, I'm sorry to do this, but  
31 you have not - no criticism necessarily, but if you read  
32 Professor Duflou in its entirety on the hairs, you will see  
33 that it's a little bit more than "relatively unlikely".  
34 Matter for you. I will read, just so that you are assisted  
35 by what I'm thinking about --

36  
37 MR TEDESCHI: Yes.

38  
39 THE COMMISSIONER: He says:

40  
41 *Relatively unlikely that it originated from*  
42 *the head of the deceased although I don't*  
43 *absolutely exclude the possibility given*  
44 *the laceration. Taking into account that*  
45 *the deceased very likely moved very little*  
46 *if at all following the impact with the*  
47 *ground, it would follow that it is unlikely*

1           *that the deceased would have been able to*  
2           *touch his head with his left arm given the*  
3           *position of that arm under his trunk.*  
4

5           You have omitted that every time you've referred to  
6           Professor Duflou's material. That is, in fact, a stronger  
7           view procured by Neiwand than indeed Dr Cala.

8  
9           MR TEDESCHI: I accept that, Commissioner.

10  
11          Q. Mr Page, you've heard the full account about the hair  
12          from Dr Duflou?

13          A. Yes.

14  
15          Q. The latter part of what the Commissioner read to you  
16          relates to the unlikelihood of the deceased having, in  
17          effect, ripped out his own hair at the base of the cliff.  
18          Do you acknowledge that there's always a possibility that,  
19          at the top of the cliff, as he was falling from whatever  
20          cause, it might have resulted in a laceration and him  
21          having his own hair in his - the vicinity of his hand?

22          A. Anything is possible but I would consider that  
23          unlikely.

24  
25          Q. All right. Your preference in relation to Mr Russell  
26          is that he was the victim of a homicide?

27          A. Yes.

28  
29          Q. That was, I think, the preference of Counsel  
30          Assisting?

31          A. Yes.

32  
33          Q. It was certainly the preference of Mr Saidi, counsel  
34          representing the police?

35          A. Yes.

36  
37          Q. And it was certainly the finding by her Honour?

38          A. Yes.

39  
40          Q. But you accept that in the light of the additional  
41          evidence obtained by those who were in Strike Force  
42          Neiwand, that they might have a different view?

43          A. They may have a different view.

44  
45          Q. Do you agree that if you approach different people  
46          with the same evidence, they might, quite legitimately and  
47          professionally, have a different view about the same

1 evidence in relation to this sort of material?  
2 A. That can happen, yes.  
3  
4 MR TEDESCHI: Your Honour, would you pardon me for  
5 a moment?  
6  
7 THE COMMISSIONER: Certainly.  
8  
9 MR TEDESCHI: Thank you. Nothing further.  
10  
11 THE COMMISSIONER: Mr Page, that concludes your evidence.  
12 I can thank you very much and excuse you from further  
13 attendance. Thank you very much.  
14  
15 THE WITNESS: Thank you, Commissioner.  
16  
17 **<THE WITNESS WITHDREW**  
18  
19 MR GRAY: Commissioner, the next witness would be Dr Derek  
20 Dalton.  
21  
22 THE COMMISSIONER: Okay. I think Dr Dalton is in fact in  
23 the hearing room, so if he comes forward and we will get  
24 sorted.  
25  
26 **<DEREK DALTON, sworn: [12.26pm]**  
27  
28 THE COMMISSIONER: Please take a seat. A couple of  
29 things, Professor, you may not be familiar with the  
30 procedure. Mr Gray will ask you some questions. Those  
31 assisting him will put hard copies of documents in front of  
32 you. They will also come up on the screen. Whatever your  
33 preferred method of - they may not always come up on the  
34 screen, I should say, but most likely they will. Whatever  
35 your preferred method of taking on board the detail, please  
36 follow, and thank you.  
37  
38 Yes, Mr Gray.  
39  
40 THE WITNESS: The screen will be good. Just a matter of -  
41 to get things right, and I respect your deference, I'm not  
42 a professor, I'm an associate professor.  
43  
44 THE COMMISSIONER: I'm so sorry.  
45  
46 THE WITNESS: And indeed, having left the university  
47 I guess I could even be formally addressed just as

1 "Doctor".

2

3 THE COMMISSIONER: All right. Thank you, Doctor.

4

5 <EXAMINATION BY MR GRAY:

6

7 MR GRAY: Q. Doctor, you along with Dr de Lint and  
8 Dr Tyson were the team of three academic reviewers of the  
9 work of Strike Force Parrabell?

10 A. That's correct, yes.

11

12 Q. You'll recall, I take it, that the strike force  
13 itself - that is, the police officers who constituted the  
14 police side of Strike Force Parrabell - embarked upon the  
15 task of looking at what turned out to be I think 85 cases  
16 of deaths in a period between 1976 and 2000; is that right?

17 A. Yeah, to the best of my recollection. I'm not  
18 entirely sure about the precision of the number 85. It  
19 started at 88. There were various cases excluded as things  
20 went on, Scott Johnson being one, because it went - was  
21 before the Coroner. So - but to the best of my ability, 85  
22 seems to be correct.

23

24 Q. Yes. Well, as you say, there had been media publicity  
25 about a number which was 88?

26 A. Sure.

27

28 Q. And indeed, there was a list in existence?

29 A. Mmm-hmm.

30

31 Q. One of perhaps a number of lists, but there was a list  
32 that did have 88 names on it. And it was that list of 88  
33 which were going to be reviewed by Strike Force Parrabell,  
34 but for, in the case of one or two or three, for whatever  
35 reason, those cases weren't looked at and the number was  
36 slightly less than 88?

37 A. Very fair assertion.

38

39 Q. Pardon?

40 A. Very fair, yes.

41

42 Q. Thank you, yes. Now, you were aware at all times,  
43 I take it, that the exercise that Strike Force Parrabell -  
44 that is, the police - were going to embark upon was  
45 a review on the papers in respect of those cases?

46 A. Yes.

47

1 Q. That is, they were not going to reinvestigate any of  
2 them?  
3 A. Correct.  
4  
5 Q. They were going to assemble the historical paper  
6 material available in respect of any given case and they  
7 were going to look at what the papers showed?  
8 A. Yes, correct.  
9  
10 Q. And so they only had available to them whatever  
11 historical documents there were in any given case to look  
12 at?  
13 A. My understanding is what they had available were  
14 whatever was in their cardboard Homicide file boxes. Other  
15 legal extraneous material from Coroners Courts or from  
16 other task force or strike forces. I couldn't with any  
17 degree of clarity specify in terms of what police had at  
18 their disposal, what was in or out.  
19  
20 Q. Didn't you understand, though, that what the police  
21 were attempting to do was to assemble from where they  
22 could, be it their own police files or the Coroner's files,  
23 as you say, or perhaps, in some cases, elsewhere, whatever  
24 there was by way of paper record about the case?  
25 A. Yes.  
26  
27 Q. Now, the objective of Strike Force Parrabell - that  
28 is, the police officers - was to form a view, based on  
29 whatever had been written in the documents generated in  
30 those earlier times, as to whether there was a bias factor  
31 involved?  
32 A. Yes, that sounds correct.  
33  
34 Q. Now, the way they went about it, as you know, was by  
35 using a particular - or included the use of a particular  
36 form, the Bias Crime Indicator Review Form?  
37 A. Mmm-hmm.  
38  
39 Q. That form, do you recall, included within it  
40 10 indicators, so called?  
41 A. Yes.  
42  
43 Q. Nine of the indicators had come from a United States  
44 document?  
45 A. I thought all of them, from memory, had come from the  
46 United States instrument.  
47

1 Q. Well, we'll come to that. Assume for the moment that  
2 nine of them had come from the United States, and the tenth  
3 had been generated by the NSW Police themselves. I'll take  
4 you to the material that demonstrates that.  
5 A. Sure.  
6  
7 Q. Just assume that. But the form had in it more than  
8 the 10 indicators, didn't it?  
9 A. Well, it had a - from memory, it had a case summary of  
10 sorts at the start, and the sections with the descriptors.  
11 As to what else it had, you'd have to put it to me and I'll  
12 see if I can remember.  
13  
14 Q. All right. Well, I'll come to that. First of all,  
15 could Dr Dalton please have volume 1, and if you'd turn to  
16 tab 15 [SCOI.75071\_0001]  
17 A. Mmm-hmm. That doesn't open very easily.  
18  
19 Q. Have you found tab 15?  
20 A. Tab 15, yes.  
21  
22 Q. Do you see that's the document described as  
23 "Coordinating Instructions"?  
24 A. Yes.  
25  
26 Q. And that's a document you have seen before?  
27 A. Six or so years ago, yes.  
28  
29 Q. And starting at page 4, and through to the second-last  
30 page, is the blank "Bias Crime Indicator Form"?  
31 A. Seven?  
32  
33 Q. Pardon?  
34 A. What are you asking me? I don't understand what you  
35 are asking me.  
36  
37 Q. Do you see that on pages 4 and following the blank or  
38 a blank Bias Crime Indicator Form?  
39 A. Sure. It runs to, what, right through to 13 or so.  
40  
41 Q. That's right. So at the bottom of page 2 of this  
42 document --  
43 A. Mmm-hmm.  
44  
45 Q. -- on the last paragraph, the statement is made:  
46  
47 *[The strike force] has been established to*



1           *review these previously reported deaths of*  
2           *persons between 1976 and 2000 to determine*  
3           *if a sexuality or gender bias was*  
4           *a contributing factor.*

5

6           That's right?

7           A.    Yes.

8

9           Q.    That's what you understood the police to be doing?

10          A.    Looking at it now, with the passage of time, the term  
11          "sexuality or gender bias" is so general that I was given  
12          to understand from memory that, actually, there was more  
13          precision to it, that we were looking to see whether the  
14          crimes could be classified as hate crimes. That's a more  
15          general sort of term, isn't it, "sexuality or gender"?

16

17          Q.    You've had this "Coordinating Instructions" document,  
18          or you had it at the time, didn't you?

19          A.    Yes.

20

21          Q.    So you read it, I suppose?

22          A.    Definitely.

23

24          Q.    So you saw that that's what it said?

25          A.    It strikes - the problem is, you know, a background  
26          sort of document is a background document. Once you're in  
27          discussions with the police, et cetera, it - this -  
28          I certainly was - the task was certainly more specific than  
29          this generic "sexuality or gender bias", although I guess -  
30          because - there were no cases, from memory, involving -  
31          it's - I'm - the task that I feel we were doing is, I will  
32          have to say, a little bit more specific than this general  
33          descriptor.

34

35          Q.    Tell us what you think they were doing, the police?

36          A.    Reviewing - as far as I could tell, they were  
37          reviewing the cases for evidence or an indicator of gay  
38          hate bias.

39

40          Q.    So at the top of page 3 there's a heading "Mission";  
41          do you see that?

42          A.    Pardon?

43

44          Q.    Do you see the heading "Mission" on the top of page 3?

45          A.    Mmm-hmm, yes.

46

47          Q.    The "Mission" is said to be:

1  
2           *To conduct a review of [police] holdings in*  
3           *relation to potential gay hate crimes*  
4           *resulting in death.*

5  
6           A.    Yes.

7  
8           Q.    So the expression "gay hate crimes" is used in that  
9           sentence.

10          A.    That strikes more of a chord with me in terms of what  
11          I was doing than the previous phrase.

12  
13          Q.    The second sentence:

14  
15                *This review will relate to police*  
16                *investigations conducted between 1970s to*  
17                *2000.*

18  
19          And then third sentence:

20  
21                *The purpose of the review is to determine*  
22                *if an anti-gay bias was involved in any of*  
23                *the deaths.*

24  
25          Do you see that?

26          A.    Yes.

27  
28          Q.    That's clear enough, isn't it?

29          A.    Very clear, it seems to me.

30  
31          Q.    Whether or not there was an anti-gay bias involved.

32          A.    Yes.

33  
34          Q.    Under the heading "Execution", the police say:

35  
36                *Investigators will commence a systematic*  
37                *review of the [police] case file holdings*  
38                *to identify if there is evidence indicative*  
39                *of bias crime.*

40  
41          So this is a different expression, "bias crime"?

42          A.    Yeah, the problem is "bias crime", "gay hate crime",  
43          "anti-gay bias"; they tend to get used as synonyms to  
44          a certain degree.

45  
46          Q.    And are you saying that you yourself thought that the  
47          actual task was not any of the other synonyms but only "gay

1 hate"?

2 A. I feel like you're trying to corner me. No, certainly  
3 it wasn't so broad as to just look at sexuality or gender,  
4 it was certainly to look at whether they - there was  
5 anti-gay bias, gay hate - I'd be comfortable with those two  
6 terms.

7

8 Q. Under the heading "Execution", the second paragraph,  
9 there is a definition of "Bias Crime Indicators", which it  
10 is attributed to the Massachusetts model. Do you see that?

11 A. Yes.

12

13 Q. And the definition of "Bias Crime Indicators" given  
14 is:

15

16 *Objective facts, circumstances or patterns*  
17 *attending a criminal act or acts, which,*  
18 *standing alone or in conjunction with other*  
19 *facts or circumstances suggest that the*  
20 *offender's actions were motivated, in whole*  
21 *or in part, by any form of bias.*

22

23 A. Yes.

24

25 Q. Now, is that a definition of a Bias Crime Indicator  
26 that you agreed with?

27 A. Yes, as a - as a generic, because there are different  
28 types of bias crimes, as a generic descriptor, "any form of  
29 bias" seems to make sense, but of course in the cases we  
30 were looking at, they were more heavily calibrated towards  
31 gay hate as opposed to, I don't know, hatred of Muslims or  
32 hatred of whatever other category you might want to put to  
33 me.

34

35 Q. The definition is relating to bias generally, as we  
36 can see?

37 A. Yes, yes.

38

39 Q. And the point that I want to direct your attention to  
40 in particular is that the definition includes, as part of  
41 the concept, factors that suggest that the offender's  
42 actions were motivated in whole or in part by any form of  
43 bias.

44 A. Yes.

45

46 Q. That is, there would be an indication of a bias crime  
47 if there was a factor that may have contributed to the

1 crime, even though it may not have been the only  
2 contributor? That's what, in whole or in part, it's  
3 getting at; do you agree?

4 A. In part - yes, that certainly is what this definition  
5 says.

6  
7 Q. Now, the second-bottom paragraph - well, I'll go to  
8 the paragraph - I'll go through all of them. The  
9 paragraph immediately below that points out that Parrabell  
10 was only going to review matters that have already been  
11 investigated.

12 A. Yes.

13

14 Q. You knew that?

15 A. Mmm-hmm.

16

17 Q. There's an indication of what the holdings would be -  
18 namely, things like witness statements, crime scene  
19 evidence, records of interview, contemporaneous police  
20 notes, et cetera?

21 A. Yes.

22

23 Q. Then the next paragraph says that there won't be  
24 a reinvestigation the primary focus of the bias crime  
25 review would be, and I'm quoting:

26

27 *... in determining whether any of the*  
28 *identified deaths were in fact motivated by*  
29 *an anti-gay bias, rather than identifying*  
30 *and prosecuting offenders.*

31

32 You understood that to be what Parrabell was doing?

33 A. Can you put that to me again, please?

34

35 Q. Can you read it, as I'm reading it out to you from the  
36 page in front of you?

37 A. Well, I was trying to read it there.

38

39 Q. If you prefer the screen, by all means. The assertion  
40 in this document is that the proposed bias crime review  
41 would have as its primary focus determining whether any of  
42 the identified deaths were in fact motivated by an anti-gay  
43 bias.

44 A. Yes.

45

46 Q. So that required, did it, the police officers to form  
47 a view as to whether the motivation of the perpetrator had

1 an anti-gay factor?

2 A. Yes.

3

4 Q. The next paragraph says that the review would use  
5 a list of Bias Crime Indicators, being indicators published  
6 by the US Department of Justice?

7 A. Mmm-hmm.

8

9 Q. The next sentence says:

10

11 *These indicators assist investigators in*  
12 *systematically determining if a bias was*  
13 *a motivating factor in the incident leading*  
14 *to the death.*

15

16 Do you see that?

17 A. Yes.

18

19 Q. The paragraph concludes:

20

21 *These indicators are used by the*  
22 *[NSW Police] Bias Crime Unit.*

23

24 A. Yes.

25

26 Q. Then what appears is that investigators, meaning  
27 Parrabell investigators, have created the form, have  
28 created the Bias Crime Indicators Review Form - do you see  
29 that?

30 A. Yes.

31

32 Q. And according to this document, the form was the one  
33 that runs through starting from the bottom of page 4 for  
34 the next 10 pages or so. And what is pointed out at the  
35 top of page 4 is that among what is included in the form  
36 are not just the 10 indicators, but what is described in  
37 the top line of page 4 as "four possible findings". Do you  
38 see that?

39 A. Yes.

40

41 Q. And the findings are - the alternative findings are:  
42 1, "Bias Crime"; 2, "Suspected Bias Crime"; 3, "Not Bias  
43 Crime"; 4, "Insufficient Information"; agreed?

44 A. Yes.

45

46 Q. And so, for example, on page 5, which is the blank  
47 form, with reference to the first indicator, which is

1 "Differences", those four possible findings are set out one  
2 after the other with a box to the right of them to be  
3 filled in "Yes", or "No".

4 A. Yes.

5

6 Q. Now, do you see with "Bias Crime", the top one, the  
7 first one, what is required of the police officer doing  
8 this work, according to this form, is to tick yes or no to  
9 this:

10

11 *Sufficient evidence/information exists to*  
12 *prove beyond a reasonable doubt that the*  
13 *incident was either wholly or partially*  
14 *motivated by bias towards one of the*  
15 *protected categories and constitutes*  
16 *a criminal offence.*

17

18 Do you see that?

19 A. Mmm-hmm.

20

21 Q. So the criterion that had to be answered yes or no had  
22 embedded within it the concept of beyond reasonable doubt?

23 A. Yes.

24

25 Q. Which is a high standard in the criminal law, as you  
26 know?

27 A. Absolutely. Absolutely.

28

29 Q. And the topic was - the topic to which beyond  
30 reasonable doubt was being applied was - whether  
31 information or evidence existed to prove that the incident  
32 was wholly or partially motivated by bias; agreed?

33 A. Yes.

34

35 Q. Well, would you agree that the introduction of the  
36 standard of the criminal law "beyond a reasonable doubt"  
37 necessarily meant that, on a paper review, there would be  
38 many cases where it would be impossible to reach  
39 satisfaction to the criminal standard that there was  
40 evidence existing to prove such a thing, from the papers?

41 A. In terms of what they were doing?

42

43 Q. Yes.

44 A. Yes, I guess that's - you're right. "Beyond  
45 reasonable doubt" is certainly a very high standard.

46

47 Q. Very high standard, and it's being applied to not the

1 commission of a crime but whether or not evidence existed  
2 on these papers. They were only able to say "yes" to bias  
3 crime if whatever was written in the historic papers proved  
4 bias beyond a reasonable doubt. That's a very high  
5 standard, isn't it?

6 A. Yes, it is.

7

8 Q. And would you agree that necessarily, just speaking in  
9 the broad, that was going to mean that not many cases would  
10 get a "yes" in the context of a paper review like this one,  
11 for that option, bias crime?

12 A. If they were certainly to tether it to the "beyond  
13 a reasonable doubt", yes, that would - I guess I'd say yes.

14

15 Q. Thank you.

16 A. But could I elaborate?

17

18 Q. Do.

19 A. I'm not entirely sure, despite - this is the thing -  
20 the text here, that a lot of the detectives doing this  
21 actually did hold their determination to that very high  
22 standard.

23

24 Q. And why do you say that?

25 A. Just from very vague, crude, big brush stroke memories  
26 of some of the conversations we had.

27

28 Q. Well, give us an example of a memory or two in that  
29 regard?

30 A. No, I can't, they're such big brush strokes that  
31 I can't, but I - but I do recall having fruitful  
32 discussions that - that they certainly - that some of the  
33 cases that they determined - I can't even remember the  
34 numbers - must surely have, in a way, transcended that  
35 particularly high standard as is written.

36

37 Q. Are you aware that the Bias Crime Indicator Form that  
38 the officers used changed part way through their exercise?

39 A. No.

40

41 Q. So is it your understanding - and this is not  
42 a criticism - is it your understanding that this form, as  
43 it appears in front of you in the document we're looking  
44 at, was always the form they used, from the beginning to  
45 the end?

46 A. Couldn't say. The only thing I recognised about it  
47 was its crude length, shape. The categories and

1 subheadings were obviously familiar in terms of the crude  
2 order, in terms of differences, et cetera. But in terms of  
3 the minutiae, in terms of the bullet points and the text,  
4 I no longer have my copies in my possession so I would have  
5 to speculate as to whether this was an earlier version,  
6 a later version, I couldn't say with any degree of clarity.

7  
8 Q. I'm not asking you to speculate. I'm asking you  
9 whether you ever knew that they had started off with a form  
10 in one format with one set of components, and partway  
11 through their task, they changed to this form?

12 A. I thought you'd already asked me that question and  
13 I answered.

14  
15 Q. Well, you don't seem to have answered, as I understand  
16 it. But did you know that to be so? The answer is no, is  
17 it?

18 A. Put the question to me again, please.

19  
20 Q. Did you know that there was a change partway through  
21 the police exercise?

22 A. No, I did not.

23  
24 Q. Right. So did you assume that this was always the one  
25 from the beginning?

26  
27 MR TEDESCHI: I object.

28  
29 THE WITNESS: Yeah. Yeah.

30  
31 MR TEDESCHI: The question is unclear.

32  
33 THE COMMISSIONER: Well, I don't know that he has, but if  
34 he wasn't aware --

35  
36 Q. Dr Dalton, you've indicated you weren't aware that  
37 there was a change. Assuming for the moment that there was  
38 a change in the form, and I take it from that you wouldn't  
39 be able to say one way or the other whether you always  
40 thought the form was in this form or some other form?

41 A. That seems fair.

42  
43 Q. Well, does it follow for perhaps other reasons that  
44 you may not have focused from time to time on the precise  
45 form that was being used?

46 A. Yeah, that seems fair, because one - I think I assumed  
47 it wouldn't have changed because they were - yeah, I would



1 have seen no reason to presume that, all of a sudden, the  
2 instrument would have changed.

3

4 Q. All right. And as you presently sit here, I take it,  
5 you have no independent recollection of it having been  
6 brought to your attention that the form changed in some way  
7 or other?

8 A. The fact that the form has changed is only an idea  
9 that has been put to me today. I have had no idea prior to  
10 walking into this room that the form had changed.

11

12 THE COMMISSIONER: Okay, thank you.

13

14 MR GRAY: Could Dr Dalton have exhibit 1, tab 2  
15 [SCOI.02362\_0001], which is the Parrabell report itself.

16

17 Q. Would you turn to tab 2. This is the actual final  
18 report which contains the police section in the first 46  
19 pages and then the Flinders section in the balance?

20 A. Yeah, could I make a point about this report, if --

21

22 THE COMMISSIONER: Just wait a moment, perhaps if you  
23 answer the questions, you won't be stopped from saying  
24 whatever you would like to say, but let's follow the  
25 sequence first.

26

27 THE WITNESS: Sure.

28

29 MR GRAY: Q. You remember, I imagine, that the first  
30 part of the report was the part written by the police?

31 A. Correct, yes.

32

33 Q. And then the second part, starting at page 47, is the  
34 part written by the Flinders academics, including you?

35 A. Yes.

36

37 Q. An appendix to the Flinders report, or the Flinders  
38 part of the report, was the form, the Bias Crime Indicators  
39 Review Form, starting at page 121?

40 A. Yes, a blank copy, yes.

41

42 Q. A blank copy, quite.

43 A. Mmm-hmm.

44

45 Q. So that is the form that you were saying in your final  
46 report was the form which the police used?

47 A. Hmm, no, the question for me is at some stage I must -

1 we must have been furnished with - I think we were  
2 furnished with a couple of versions of a blank form. To  
3 the extent that I attached it, cut and pasting, was it  
4 a PDF or was it a Word version of the document, certainly  
5 my memory is because - I'm not that clear, actually, but  
6 I can't remember whether - I think we attached to the end  
7 of our report, my sense is that it's not as though, in  
8 assembling their Strike Force Parrabell report, that they  
9 have put it in at the back, but I have no strong memory, to  
10 be honest, of that, if you follow my logic. I can't  
11 remember - I guess what I'm saying to be clear is --

12  
13 THE COMMISSIONER: Q. No, I don't think you're being  
14 asked to recall something at the moment. I think you're  
15 being asked to just, if you like, make an assumption that  
16 what is on the screen is the document or the start of the  
17 document that appears at the end of your report --

18 A. Yes, okay.

19

20 Q. -- in the final Parrabell. So if you just make that  
21 assumption for the moment --

22 A. Mmm-hmm, that's it, okay.

23

24 Q. -- and then Mr Gray will ask you some questions.

25

26 MR GRAY: Q. That form that you've appended as  
27 appendix B to your report, seems to be a form in the same  
28 form as the one I've been asking you about from the  
29 Coordinating Instructions.

30 A. "In the same form" meaning they loosely kind of  
31 resemble each other?

32

33 Q. No, not that they loosely kind of resemble each other,  
34 but that they're the same?

35 A. No, I couldn't say. I couldn't say. Because you'd  
36 have to point out to me what the differences are,  
37 et cetera.

38

39 THE COMMISSIONER: Q. Dr Dalton, please, it's being put  
40 to you quite directly that there are no differences, that  
41 the form that is appendix B to your report is identical in  
42 every respect, as I understand it, to the document you have  
43 been shown a few moments ago by Mr Gray. Now, if you're  
44 not happy with making that assumption, maybe he can take  
45 a different course. If you're happy to make that  
46 assumption, then, please, work on the basis that the  
47 document he showed you a few moments ago, which included

1 the phrase "beyond reasonable doubt", is identical to the  
2 form which is now on the screen and which was appendix B to  
3 your report or annexure B to your report - just make that  
4 assumption.

5 A. Well, I'm struggling to make the assumption for two  
6 reasons, because you put it to me that at some stage during  
7 the course of this process, that the police changed their  
8 instrument.

9  
10 Q. Correct, but what he's putting to you presently -  
11 notwithstanding the fact that no doubt he will get to the  
12 changed document - is that the document that he has  
13 currently asked to be put on the screen, and which is on  
14 the screen, was, first of all, annexure B to your final  
15 Parrabell report; secondly, that is in identical form, if  
16 you would be kind enough to make that assumption, to the  
17 document he showed you a few moments ago. Leave aside  
18 whatever changes may have otherwise occurred.

19 A. I guess if you use the term "assumption", yes.

20

21 MR GRAY: Q. Okay. Now, just to perhaps seek some  
22 further clarification of this, can I ask you what material  
23 you, the academic team, were given?

24 A. To do the review?

25

26 Q. Yes.

27 A. We were given, to be very precise, three copies of  
28 some folders, so they were numbered 1, 2 and 3. Each  
29 version of - or suite of documents was two folders roughly  
30 of this size (indicating), and so I had one copy, Professor  
31 de Lint had another, and Dr Tyson took delivery, I can't  
32 recall whether I sent it. I think it might have come to me  
33 originally, or whether the police sent it to her directly,  
34 but we had three copies of the folders.

35

36 Q. Have a look at page 57 of the report?

37 A. Mmm-hmm. Sure. I will read it off the screen. That  
38 might be easier, thank you.

39

40 Q. I'm directing your attention to the footnote on  
41 page 57?

42 A. Mmm-hmm.

43

44 Q. Footnote 12. Which refers to the voluminous nature of  
45 the case file data. Do you see that?

46 A. Yes.

47

- 1 Q. Your report says in this footnote:  
2  
3 *The two large case folders provided to each*  
4 *academic team member contained*  
5 *approximately 1700 pages.*  
6
- 7 A. Yes.  
8
- 9 Q. Now, as I understand it, but correct me if this is not  
10 right, those 1700 pages consisted of the completed,  
11 filled-in Bias Crime Indicator Review Forms for the 85 or  
12 so cases?  
13 A. Yes.  
14
- 15 Q. Now, very roughly - I'm sure this is not and obviously  
16 isn't precisely accurate - if the forms were about 20 pages  
17 long when filled in, times 85, it gets us to 1700. Is that  
18 what you had, 85 completed Bias Crime Indicator Forms?  
19 A. Yes, eventually, some were provided later in the  
20 piece.  
21
- 22 Q. Sure. But that's the totality of what you had, you  
23 had nothing else, is what I'm asking?  
24 A. Only at the start of the process, they provided -  
25 I think there was some information about Strike Force  
26 Taradale; there was some PowerPoint slides about the police  
27 Bias Crime Unit, supplementary material, I guess you could  
28 call it.  
29
- 30 Q. Okay, fair enough.  
31 A. But principally, yes, two folders each.  
32
- 33 Q. But so far as the 85 cases are concerned themselves --  
34 A. Mmm-hmm.  
35
- 36 Q. -- what you had was the 85 completed Bias Crime  
37 Indicator Review Forms?  
38 A. Yes, that's my recollection.  
39
- 40 Q. And nothing else about the cases?  
41 A. No, apart from - I mean, the Bias Crime Indicator  
42 Form, which I don't recall that well today, had the case  
43 summary at the start.  
44
- 45 Q. Yes, it was filled in - in each case, it had been  
46 populated with text in all the blanks, and there were 85 of  
47 those, adding up to about 1700 pages?

1 A. Yes.

2

3 MR GRAY: Is that a convenient time?

4

5 THE COMMISSIONER: Yes. I will adjourn until 2 o'clock,  
6 thank you.

7

8 **LUNCHEON ADJOURNMENT**

9

10 THE COMMISSIONER: Yes, please come back, Dr Dalton,  
11 thank you. Please take a seat. Yes, thank you, Mr Gray.

12

13 MR GRAY: Q. Could Dr Dalton have volume 1 again,  
14 please, tab 15 [SCOI.75071\_0001]. Tab 15, if you could  
15 turn to that, please, Dr Dalton. This is the "Coordinating  
16 Instructions" that I was asking you about before lunch.

17

18

19 Q. Just on page 3 do you see in the footnote down the  
20 bottom about indicators 1 to 9 having come from the United  
21 States and indicator 10 having been developed in New South  
22 Wales? Does that ring a bell now that you see that?

23

24

25 Q. Well, this morning you said you thought all 10 had  
26 come from the United States but you can see that the tenth  
27 came from New South Wales?

28

29

30

31 Q. That's all I asked. Thank you. Now, on the next  
32 page, page 4, I was taking you through those four  
33 alternative findings that were available, the first one  
34 being "Bias Crime", and that it was the one that had  
35 a requirement of "beyond reasonable doubt" included within  
36 it? Do you remember I asked you some questions about that?

37

38

39

40

41

42

43

44

45

46

47

You just need to answer for the transcript - just say yes  
or --

A. Yes.

Q. Thank you. Now, the second possible finding is  
"Suspected Bias Crime"; do you see that?

A. Mmm-hmm.

Q. You can read it for yourself, but as you understand  
it, was the proposition being explained that where there  
was some evidence or information that the incident may have

1 been motivated by bias, but that could not be proven beyond  
2 a reasonable doubt, then the case would need to be  
3 relegated to the second category of "Suspected Bias Crime"?

4 A. Yes.

5  
6 Q. Then the third alternative or optional finding is "Not  
7 a Bias Crime", and you can see that there, what the  
8 officers were required to do was to nominate that as the  
9 appropriate category, if the incident has been determined  
10 as either not motivated by bias towards a protected group,  
11 or, although bias motivation is in evidence, it does not  
12 relate to a protected group?

13 A. Yes.

14  
15 Q. So in that one, there's no standard of proof offered;  
16 it doesn't say that it has to be beyond reasonable doubt or  
17 indeed any other criteria?

18 A. No, it doesn't.

19  
20 Q. Did you notice that as you looked at it?

21 A. I don't recall.

22  
23 Q. You don't recall whether you did or not?

24 A. No, I don't.

25  
26 Q. And then the fourth one is "Insufficient Information",  
27 meaning insufficient information has been recorded, back in  
28 the day, to make a determination one way or the other about  
29 bias; agreed?

30 A. Yes.

31  
32 Q. Now, in --

33  
34 THE COMMISSIONER: Can I just interrupt, I am sorry,  
35 Mr Gray.

36  
37 Q. Doctor, in the penultimate, where it talked about  
38 "protected group", first, what did you understand by that,  
39 and, secondly, would that have made a difference pre or  
40 post 1984 in New South Wales?

41 A. I don't have my notes anymore and I don't recall  
42 what - I don't recall the definition or the specificities.  
43 I had lots of handwritten notes, lots of material, most of  
44 which I haven't seen for six years, so I don't recall.

45  
46 THE COMMISSIONER: All right, thank you.

47

1 MR GRAY: Q. Could Dr Dalton have exhibit 1 again, tab 2  
2 [SCOI.02632\_0001], being the Parrabell report itself.  
3 Could you turn in tab 2, being the report, to page 65,  
4 please. This is in the academic section of the Parrabell  
5 report.

6 A. Sure.

7  
8 Q. Do you see there's a heading towards the bottom of  
9 that page, "iii. Strike Force Parrabell: mandate and  
10 method"?

11 A. Yes.

12  
13 Q. I don't know if this helps you or not, Doctor, it may  
14 not, but there is a screen right next to you, to your  
15 right?

16 A. This one's pretty --

17  
18 Q. You use whichever one you like.

19 A. This one's okay, yeah.

20  
21 Q. In that paragraph, you and your fellow authors refer  
22 to these Coordinating Instructions, don't they, that I've  
23 just been taking you through?

24 A. Yes.

25  
26 Q. And on the next page, 66, you set out quite  
27 understandably that - and I'm looking at the fifth line:

28  
29 *... the mandate was explicitly not an*  
30 *investigation of all homicides in that*  
31 *period to determine which may have been*  
32 *anti-gay bias. It was narrower.*

33  
34 Namely, it was restricted to the 88 in the list?

35 A. Yes.

36  
37 Q. You then quote from the Coordinating Instructions in  
38 that indented passage there, beginning:

39  
40 *The proposed bias crime review ...*

41  
42 Correct, you are quoting from the Coordinating  
43 Instructions?

44 A. Yes.

45  
46 Q. And at page 67, there's a heading "Scoring the cases"?

47 A. Mmm-hmm.

1  
2 Q. And you say that a team of detectives, fluctuating  
3 between 6 and 10 over the period, reviewed and scored each  
4 case. That's correct, is it? They gave numbers, or  
5 scoring numbers, did they, in the form?  
6 A. Can you just - where's the word "scored" - you said?  
7  
8 Q. There is the heading, "Scoring the cases" and then the  
9 first sentence says --  
10 A. Yeah, I think scoring - from memory - "scoring the  
11 cases" is --  
12  
13 Q. -- that the detectives reviewed each case?  
14 A. "Scoring the cases" I think is Professor de Lint's  
15 language. He uses this term "scoring". It's not a term  
16 I would have ever sort of just naturally used.  
17  
18 Q. But we're talking here about what the detectives did,  
19 not what you and Professor de Lint did. Are you saying  
20 there that the detectives engaged in a scoring process?  
21 A. Well, I don't want to get into semantics, but what do  
22 you mean by "scoring"?  
23  
24 Q. I'm asking you, what do you mean by "scoring"? It's  
25 your document.  
26 A. Well, it's my document but I have to relate to what  
27 they told me they did. My understanding is they read the  
28 case material that they had and they used the Bias Crime  
29 Indicator Form, they would occasionally tick it, type  
30 notes, et cetera, do various things with it, and, as  
31 a result of that, determine the cases.  
32  
33 Q. So not scoring in the sense of attributing numbers or  
34 scores in the way that word is usually understood; is that  
35 right?  
36 A. I think that's right, yes.  
37  
38 Q. You say then at the paragraph below that that they  
39 used the Bias Crime Indicators Review Form, and you set out  
40 the fact that the form, you say, comprised 10 bias  
41 indicators. It actually contained 10 bias indicators as  
42 well as other components, didn't it?  
43 A. Yes.  
44  
45 Q. And you say on page 68 that indicators 1 to 9 were  
46 derived from the American document, and that indicator 10  
47 was developed by the New South Wales Bias Crime Unit - so



1 you're aware of that?

2 A. Yes.

3

4 Q. Then you set out the four findings that are in the  
5 form that I've been taking you through - the ones that are  
6 in bold on your pages 68 and 69, "Evidence of Bias Crime";  
7 "Suspected Bias Crime"; "No Evidence of Bias Crime",  
8 "Insufficient Information"?

9 A. Yes.

10

11 Q. Again, you say in the next paragraph:

12

13 *The detectives scored each case using the*  
14 *[independent] indicators ...*

15

16 But are we to understand by that you don't mean a scoring  
17 of any numerical kind, but a kind of arriving at a view?

18 A. Yeah, I think, to use this phrase, "arriving at  
19 a view", would be more accurate.

20

21 Q. In terms of how they arrived at the view, could you go  
22 to the next paragraph down that page beginning "Although  
23 each indicator was scored"; do you see that?

24 A. Yes.

25

26 Q. Accepting for the moment that when the word "scored"  
27 is used, it should be understood in the way you've just  
28 explained, you say:

29

30 *The summary conclusion or finding was not*  
31 *determined by counting the number of "Yes"*  
32 *or "No" indicators et cetera --*

33

34 eg, seven out of 10 indicators?

35 A. Sure.

36

37 Q. You say:

38

39 *Rather, the process was described as*  
40 *intuitive and relied on qualitative data in*  
41 *the form of contextual information derived*  
42 *from analysing each case.*

43

44 Do you see that?

45 A. Mmm-hmm, yes.

46

47 Q. So "intuitive". And then lower down that paragraph,

1 you say that having taken notice of the requisite  
2 indicators of bias, they would also take into account  
3 the "Summary of Findings" section which was an amalgam of  
4 the "General Comments" section corresponding to all  
5 10 indicators?

6 A. Yes.

7

8 Q. Right. And they're all - what you're referring to  
9 there are narrative - that is, textual - fillings in of the  
10 blank form?

11 A. Yes, to the best of my ability, that's what we --

12

13 Q. And you say:

14

15 *The summary was often rich in detail and -*  
16 *when viewed in concert with*  
17 *the ... indicators - allowed a view of*  
18 *whether bias was involved to emerge.*

19

20 A. The one word I want to draw attention to there was  
21 "often", it was often rich in details, but not always.

22

23 Q. Okay, thank you for that. What I'm asking you - what  
24 I want to ask you about is you describe the process of  
25 arriving at the view as intuitive, don't you?

26 A. Yes.

27

28 Q. That is, the process that the detectives were using in  
29 the strike force?

30 A. Yeah - yes.

31

32 Q. And by engaging in this intuitive process, and reading  
33 the totality of what had been written including the  
34 "General Comments" sections, they would arrive at a view as  
35 to whether this was a bias case or a not bias or  
36 a suspected bias and so on.

37 A. Yeah, I suspect so. You've got to remember that I'm  
38 relying - clearly I wrote this at the time, so some six or  
39 so years ago. This would have been based on conversations  
40 that I had with them in good faith, and that must have been  
41 the impression I formed.

42

43 Q. Yes. I'm not criticising it.

44 A. Sure.

45

46 Q. I'm just trying to explore this, really: would you  
47 agree that what's being described there in that

1 paragraph in that way, which I'm not challenging --  
2 A. Sure, sure, sure.  
3  
4 Q. -- amounts to, in the end, the emergence of  
5 a subjective view on the part of the officer or officers  
6 who are handling each particular case?  
7 A. Yeah, you'd have to say it's subjective, yes.  
8  
9 Q. It is subjective?  
10 A. Yes, I will agree with that.  
11  
12 Q. It's a matter of opinion?  
13 A. Mmm.  
14  
15 Q. No doubt taking into account these various things, but  
16 it's subjective and it's a matter of opinion?  
17 A. Yeah, that seems fair.  
18  
19 Q. Now, I asked you before lunch, and you answered,  
20 whether you were aware at any point that this Bias Crime  
21 Indicator Form had ever changed, and you said no, you  
22 weren't aware; if that happened, you didn't know that. Can  
23 I just ask - you'd better have that put aside for the  
24 moment and be shown volume 2 of the tender bundle,  
25 exhibit 6. If you go to tab 59 [SC0I.77317\_0001] in that  
26 bundle --  
27 A. Remember it's like the Seinfeld joke where George gets  
28 the wedding invitations, right at the back, which are the  
29 cheapest and it has the poisonous - has anyone seen that  
30 episode of Seinfeld? Right at the back?  
31  
32 Q. You're ahead of me there, Doctor, but all credit to  
33 you. This is a document you perhaps have never seen  
34 before, but I'll ask you, it is called the "Induction  
35 Package" for the Strike Force Parrabell. Can you recall  
36 whether you ever saw that?  
37 A. Induction Package? I don't - I don't recall seeing  
38 the Induction Package.  
39  
40 Q. No, and I'm not putting to you that you have.  
41 A. No, I know.  
42  
43 Q. I'm just inquiring.  
44 A. Sure, sure, that's fair.  
45  
46 Q. So you don't recall seeing it. Okay. Well, can you  
47 see that under the heading "Execution" on page 3, there are

1 various paragraphs there which have some similarity to the  
2 Coordinating Instructions that I showed you earlier, but  
3 are plainly not the same, identically, and in particular,  
4 do you see down the bottom of that page, they, in this  
5 document, nominate four findings as being available - the  
6 four bullet points?

7 A. Yes.

8

9 Q. Now, you can probably recall that they're not quite  
10 the same as the four in the form itself that was ultimately  
11 used, as you understand it?

12 A. They're certainly not.

13

14 Q. They're not. And if you look at the form that forms  
15 part of this document, starting on page 4, "Bias Crime  
16 Indicators Form", it is different from the one that we were  
17 looking at earlier. For example, on page 4, under the  
18 heading "Indicators", can you see that there are only three  
19 findings offered, rather than four, first of all?

20 A. Yes.

21

22 Q. And among other things, there is no reference to  
23 "beyond reasonable doubt", or any of those qualifiers that  
24 we went through in the other one?

25 A. No, there's not.

26

27 Q. Now, if you assume - and I ask you to assume for the  
28 sake of this question - that for a period of time up to  
29 about June 2016 - that is, the first 10 or so months that  
30 the officers were engaged in their work - they were using  
31 a form, a Bias Crime Indicators Form of this kind, and then  
32 after June 2016 they were using a form of the kind that  
33 I showed you before lunch, does that have any impact on  
34 your views as to how they did or didn't go about their task  
35 or is it something that you can't comment on?

36 A. Well, as you said, presuming, as I said, the  
37 instrument had changed, it would potentially have a serious  
38 effect, because you've changed the instrument.

39

40 Q. Quite.

41 A. And the earlier instrument had higher standards, in  
42 terms of beyond reasonable doubt.

43

44 Q. Well - yes, when you say "the earlier instrument",  
45 it's actually the later instrument.

46 A. The later instrument, apologies.

47

1 Q. Yes.  
2 A. Oh, so, to be clear, this was the earlier instrument?  
3  
4 Q. Earlier one, that's right.  
5 A. Okay, right.  
6  
7 Q. So the earlier one doesn't have the requirement of  
8 beyond reasonable doubt, et cetera, that we went through  
9 this morning. The later one that I'm inviting you to  
10 accept came into operation from about July 2016 did, and  
11 it's the one that is attached as an appendix to your report  
12 and it's also in the Coordinating Instructions.  
13 A. Yes. Certainly if the criteria have changed, and then  
14 looking at each criteria and they're different, there is  
15 less, there are three instead of four, et cetera, you've  
16 got an imprecise instrument that's --  
17  
18 Q. It means, doesn't it - it may mean more than this but  
19 one thing it means, would you agree, is that it's pretty  
20 hard to know and pretty hard for you to have known what  
21 criteria they actually used throughout the course of their  
22 year and a half's work, since the criteria changed halfway  
23 through, according to the document?  
24 A. Certainly. It's complicated, because you could -  
25 theoretically you could imagine someone using an instrument  
26 and picking it up and having to fill it in, and perhaps  
27 they've been - had the instrument explained to them, so  
28 there's an additional layer of - so you certainly - it's  
29 confusing.  
30  
31 Q. It's confusing. And as you say, another dimension to  
32 it would be what explanations may or may not have been  
33 given surrounding either or both documents, quite right.  
34 But one possibility, perhaps among many, might be that up  
35 to June 2016, they were approaching it in one way, and  
36 after June 2016, they approached it in another way, given  
37 the two different forms - that's one possibility?  
38 A. It would - that would seem a fair proposition.  
39  
40 Q. And another possibility is that although the form  
41 changed, they continued to approach it in the real world,  
42 Monday to Friday, in exactly the same way they had been  
43 doing all along?  
44 A. That's also a reasonable proposition, isn't it?  
45  
46 Q. And of course you don't know - and again I'm not  
47 criticising this - you don't know which of those

1 possibilities or some other possibility is the right one?  
2 A. No, I don't.

3

4 Q. But the fact which I'm asking you to assume, that this  
5 change did occur, renders the reliability or the level of  
6 comfort that one could have or that you could have in their  
7 process lower than you had thought before today; is that  
8 right?

9

10 MR TEDESCHI: I object.

11

12 THE COMMISSIONER: Why?

13

14 MR TEDESCHI: Commissioner, might I be heard in the  
15 absence of the witness?

16

17 THE COMMISSIONER: Sure. Doctor, would you mind just  
18 stepping out into the corridor, close the door behind you,  
19 and we will let you know when you can come back in.  
20 Thank you.

21

22 (The witness left the hearing room)

23

24 MR TEDESCHI: I haven't been able to look at the  
25 transcript of Assistant Commissioner Crandell's evidence,  
26 but my memory of his evidence is that this document behind  
27 tab 58 was used - or 59, sorry, was used as an induction  
28 document, and the BCI form, the other one that this witness  
29 has been shown, was throughout the process used to, in  
30 effect, score and do the process that resulted in findings  
31 that were made. My friend has asked him to assume --

32

33 THE COMMISSIONER: Well, I don't know who is right and who  
34 is wrong about this. If what Mr Gray is putting - I don't  
35 have as - I must confess I do not have a - I certainly have  
36 a clear recollection that Mr Gray put the various forms and  
37 versions of the form to Mr Crandell. I certainly have no  
38 distinct recollection of what he said happened. So why  
39 don't we find it?

40

41 MR TEDESCHI: I'm just wondering if --

42

43 THE COMMISSIONER: One of two things can happen, either  
44 Mr Gray continues, you find it and you can raise it with  
45 Dr Dalton, or if you raise it with Mr Gray, if he has  
46 misstated the position, so be it, but at the moment I'm  
47 assuming that - as I said, I have a recollection, I don't

1 think my current recollection would really permit me to say  
2 either way, but I certainly have a recollection of  
3 Mr Crandell being asked about the change in the  
4 instructions and the change in the form, but I do not now  
5 recall whether you asked him, as it were, or Mr Gray got it  
6 out of him.

7  
8 Mr Gray, are you able to assist me?  
9

10 MR GRAY: Yes, I can assist. First of all, Mr Crandell  
11 did agree that the form changed, and that it did so at  
12 about that time. I went through this with him. I don't  
13 have the precise tab numbers in my mind, but I went through  
14 this with him --

15  
16 THE COMMISSIONER: Yes, I recall that.  
17

18 MR GRAY: -- towards the end of his evidence. And then,  
19 since then, there has also been produced and is now in the  
20 tender bundle at volume 14, tab 294 [NPL.0115.0002.3383]  
21 the email from Mr Bignell.

22  
23 THE COMMISSIONER: Sorry, 294?  
24

25 MR GRAY: That's right, in which Mr Bignell sends to some  
26 Parrabell officers the "new Indicator Form". The "new  
27 Indicator Form" is the one that finds its way ultimately  
28 into the Coordinating Instructions and is appendix B to the  
29 Parrabell report. And there is other material, the  
30 tab numbers of which I just don't have in my head, which  
31 established that prior to that it was this earlier form.  
32 Mr Crandell's evidence - Mr Crandell readily accepted that.  
33

34 THE COMMISSIONER: He what?  
35

36 MR GRAY: Mr Crandell accepted that. There was no  
37 controversy about it.  
38

39 THE COMMISSIONER: But Mr Tedeschi I presume, by inference  
40 at least, has some recollection, which I frankly don't have  
41 one way or the other, as to whether Mr Crandell either  
42 indicated the earlier form was not being used by detectives  
43 at some point and/or that it was purely used as part of an  
44 induction process.  
45

46 MR GRAY: I would not be certain precisely what he said  
47 about those two things, but what he did agree was that the

1 form in the - as it appears in the Coordinating  
2 Instructions and as an appendix to the report did not come  
3 into existence until June/July 2016.

4  
5 THE COMMISSIONER: And there's no doubt, is there, that  
6 Parrabell started before that?

7  
8 MR GRAY: It started in August 2015, 10 months earlier.

9  
10 THE COMMISSIONER: Yes. And there's no doubt - sorry,  
11 there's no doubt. There is evidence that the process  
12 undertaken by the detectives had begun on or shortly  
13 after August 2015.

14  
15 MR GRAY: That's so.

16  
17 THE COMMISSIONER: Mr Tedeschi --

18  
19 MR TEDESCHI: I --

20  
21 THE COMMISSIONER: No, no, look, it seems like years ago,  
22 but it clearly wasn't. Mr Gray's on notice, you're going  
23 to check it. Let's deal with it, but for the moment, I'll  
24 allow this line of questioning, subject to any revelation  
25 that you wish to draw to my attention having had the  
26 benefit of having heard what Mr Gray said and having  
27 another look at Mr Crandell.

28  
29 MR TEDESCHI: If the Commission pleases.

30  
31 (The witness returned to the hearing room)

32  
33 THE WITNESS: Commissioner, I'd just like to apologise for  
34 my Seinfeld joke. I was so nervous when I had to turn to  
35 this big heavy folder that I thought of it.

36  
37 THE COMMISSIONER: The only criticism I would make,  
38 Dr Dalton, is that you didn't disclose the full provenance  
39 of the joke, you didn't say it was Seinfeld [sic], so  
40 taking some sort of credit for it may be the only sin  
41 you've committed. That's perfectly fine, thank you.

42  
43 MR GRAY: Q. Now, generally, as to the use of the Bias  
44 Crime Indicators Review Form, putting aside for the moment  
45 the complication that I've just been asking you about, but  
46 generally as to its use, you agree, I take it, that the  
47 academic team came to the view that the form was not one



1 that they could endorse?  
2 A. Yeah, absolutely.  
3  
4 Q. Absolutely, did you say?  
5 A. Yeah - well, as a - the form - yes, the form - yes.  
6 The form itself.  
7  
8 Q. Yes.  
9 A. Yes.  
10  
11 THE COMMISSIONER: Q. So when you used the term  
12 "absolutely" there, just so that I'm clear, you meant by  
13 that affirmatively "yes", as opposed to "not entirely"?  
14 A. Ask me the question again perhaps might be a good  
15 idea.  
16  
17 MR GRAY: Q. Did the academic team come to the view that  
18 the form itself was not a form that they could endorse?  
19 A. Yes.  
20  
21 Q. Thank you. And perhaps a slightly different question  
22 but very similar. You came to the view - the academic team  
23 came to the view - that the methodology of the police in  
24 using the form and the indicators embedded in it was not  
25 a methodology that you could endorse?  
26 A. Endorse as, what, reliable or --  
27  
28 Q. Yes.  
29 A. Yes, I seem to recall saying something at the start of  
30 the process like, "It was a shame you used this  
31 instrument". I think they were struggling to find  
32 something to use in the absence of many other alternatives,  
33 but certainly - I think even from recollection, they, in  
34 speaking about it, had serious reservations about the form  
35 themselves, but there aren't many instruments out there.  
36  
37 Q. Well, let me just unpack that a little bit. When you  
38 say that you seem to recall them saying that they had  
39 reservations about the form themselves, do you mean from  
40 the beginning or during the process or by the end? What do  
41 you mean?  
42 A. I can't remember - I guess, we're coming in - I think  
43 we came in roughly halfway through.  
44  
45 Q. Well --  
46 A. And so --  
47

1 Q. -- you came in, if I can help orient you with dates,  
2 as far as we can all tell, you came in in about October.

3 A. It's not so much the calendar month that's important,  
4 it's how many --

5

6 Q. I appreciate that. I'm just trying to orient you  
7 there. The police strike force began its work, so the  
8 evidence is, in or very soon after August 2015.

9 A. Mmm-hmm.

10

11 Q. They had, the police, got substantially to the end of  
12 their work by the end of 2016, although not entirely -  
13 I don't suggest they had actually finished, but they'd got  
14 through most of it by the end of 2016. There were some  
15 exceptions to that, in particular, the three Taradale cases  
16 were added late in the day, and that happened, it seems, in  
17 2017. And there might have been one or two other  
18 exceptions. But between August 2015 and the end of 2016,  
19 the police strike force had largely completed its work.  
20 That's the evidence before the Special Commission?

21 A. Mmm-hmm.

22

23 Q. You, the academic team, start work, and the first  
24 significant thing that happens seems to have been your  
25 visit to Sydney, which was in October 2016. So that's  
26 a year and two months after the police had started?

27 A. Mmm-hmm.

28

29 Q. And only a few months before the police finished,  
30 subject to the exceptions that I mentioned. So does that  
31 help you in terms of a continuum?

32 A. Yeah. Yes.

33

34 Q. Right. Good. Well, then, when you say that the  
35 police said to you something to the effect that they  
36 themselves had reservations about the form, when did they  
37 say that to you - as soon as you came in and started or at  
38 some later point?

39 A. I don't honestly recall. I only recall the discussion  
40 about how clunky the instrument was in terms of some of the  
41 stuff about graffiti, as though - as if they're going to  
42 spray hate graffiti at the scene of the crime, that sort of  
43 thing. We would have discussions like that.

44

45 Q. Yes.

46 A. But no, I really - if I could precisely recall on my  
47 oath I would tell you, but I don't recall.

1  
2 Q. Well, can I invite you to accept, without taking the  
3 time to get all these things out, that in early 2017 -  
4 I think January but it might have been February -  
5 you emailed Sergeant Steer and asked him - and I'm  
6 paraphrasing - "Have you got any academic literature or  
7 other support for the use of this form?" Do you remember  
8 asking a question along those lines?  
9 A. I didn't until you put it to me but now that you put  
10 it to me I do recall something of the nature of that tenor.  
11  
12 Q. And his reply, again, I'm paraphrasing, was to the  
13 effect, "Well, no, I don't have academic literature" - and  
14 I will come to these emails, actually - "This form is for  
15 the use of policemen in the field" --  
16 A. Yes.  
17  
18 Q. -- "as they are in the course of actually  
19 investigating an incident"?  
20 A. Mmm-hmm.  
21  
22 Q. "It's not a form" - I'll go back a step, I will  
23 withdraw that question. These indicators are for the use  
24 of policemen in the field when they are investigating an  
25 incident. He was telling you that?  
26 A. Yes, I seem to recall that's what he was saying.  
27  
28 Q. And he was saying that, "That being so, it's not a set  
29 of indicators that I have sought to obtain academic support  
30 for; it's a practical set of indicators for police on the  
31 spot to have regard to."  
32 A. Yeah, I seem to recall the phrase that was bandied  
33 around was that it was an aide-memoire.  
34  
35 Q. Yes. And indeed, and I will come to this, but do you  
36 recall him saying to you, either orally or in emails, that,  
37 in his view, the way the indicators were being used in this  
38 form for the Parrabell exercise was misconceived or wrong  
39 or not the way to go about it?  
40 A. Yeah, I actually - he was very clear - he was adamant  
41 about that.  
42  
43 Q. Okay. That volume could go back, and could  
44 Dr Dalton - well, unless it is the right volume, I need  
45 Dr Dalton to have the report itself, exhibit 1, tab 2  
46 [SCOI.02632\_0001]. Yes, tab 2, the report itself.  
47 A. Oh, wrong one. Okay.

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Q. If you could turn to page 68 --

A. Yes.

Q. -- or it probably starts at 67. At 67, you're referring to the fact that the form was used and it had the 10 bias indicators in it?

A. Yes.

Q. And then there's the first full paragraph on page 68 where you say that numbers 1 to 9 are from the United States document, and you say that those indicators are widely used in training law enforcement and victim support officers across the USA. Do you see that? Just towards the bottom of that first main paragraph on page 68.

A. Yes.

Q. And there is a footnote, 20. Do you see that?

A. Mmm-hmm.

Q. And the footnote, 20, says:

*Whilst [the police] place great faith in this instrument, the academic team were surprised to discover that scarcely any academic literature exists that has evaluated or critiqued this instrument.*

Do you see that?

A. Yes.

Q. And then I won't read it all out but you see that you couldn't find even one article, and neither could they, and then you say:

*In the face of an apparent dearth of such literature, the academic team are reluctant to endorse these indicators.*

That was your view, wasn't it?

A. Yes.

Q. And that was the view of your team, not just yourself?

A. Yes.

Q. While we're there, do you see that footnote 21, which is a footnote to the sentence at the end of that top

1 paragraph where you say accurately that indicator 10 had  
2 been developed by the New South Wales Bias Crimes Unit -  
3 that is so on the evidence before the Commission - footnote  
4 21 says:

5  
6 *The descriptive meaning and nuances of*  
7 *these ten Indicators will be critiqued in a*  
8 *subsequent section of the report, ...*  
9

10 Do you see that?

11 A. Yes.

12  
13 Q. But in fact, as best I can see, there is no critique  
14 to be found later in the report. Is that your  
15 recollection?

16 A. It's not my recollection at all, but perhaps  
17 factually, if there is no such critique in the subsequent  
18 section, it would - it either got removed in the editing  
19 stage or we neglected to do it. I can't quite give a good  
20 accounting for that.

21  
22 Q. Sure. Okay. Okay. Can we just go, then, to page 70.  
23 Turn over one page.

24 A. Mmm-hmm.

25  
26 Q. Here you talk about the academic review of the cases.  
27 At that bottom paragraph beginning "As academics", it  
28 begins:

29  
30 *As academics, we commenced our assessment*  
31 *of the [Strike Force Parrabell] review with*  
32 *a query concerning the authorities cited by*  
33 *the police to support the use of the BCIRF*  
34 *instrument.*  
35

36 Do you see that?

37 A. Yes.

38  
39 Q. If you accept my dates for the moment, that query, at  
40 least the query to Sergeant Steer about whether he could  
41 point to any literature and so on, wasn't right at the  
42 commencement of your work in October; it was in  
43 about January or February. And the reason I'm asking that  
44 is did you, in fact, have a query or a wondering about the  
45 form even before you asked Sergeant Steer about it?

46 A. I don't recall. I don't recall, other than I think it  
47 would have become immediately apparent using the - looking

1 at the instrument, that it was not the most rigorous  
2 instrument in town.

3

4 Q. No. Again, I won't read it all out but if you read to  
5 yourself that paragraph beginning "As academics", at the  
6 bottom of page 70, and just read it through down to the  
7 first 10 lines or so of page 71.

8 A. Mmm-hmm.

9

10 Q. You say five lines down on page 71:

11

12 *While we most often agreed on the result,*  
13 *we were less enthused about the means.*

14

15 A. Yes.

16

17 Q. And in summary, in that paragraph you are saying,  
18 aren't you, that, in your view, the form was not fit for  
19 purpose; it was just not suitable to the task at hand?

20 A. Well, it was certainly a very imperfect instrument.

21

22 Q. So much so that you took the view that you yourselves  
23 wouldn't rely on it at all as a methodology; you would in  
24 fact come up with a taxonomy of your own by which to assess  
25 these cases?

26 A. Yes, well, it's a complicated explanation, but  
27 sometimes it's not just wise to replicate the use of an  
28 instrument and just see if you get a different result using  
29 the same instrument. We came to the view ultimately that  
30 it was better to engineer a different instrument.

31

32 Q. Understood. But in addition to needing to do the work  
33 your own way rather than replicate theirs, you also formed  
34 the view, as I understand what has been said at 70 and 71  
35 and in that footnote, that the methodology they used,  
36 deploying the form, was not adequate or sufficient to the  
37 task?

38 A. Finding it hard to answer "Yes" or "No", because it's  
39 like there's a lot of qualifiers to it - wasn't sufficient  
40 to the task? It was the best that they had and I think  
41 they were using it in good faith.

42

43 Q. Well, you said in the footnote that you were  
44 "reluctant to endorse these indicators", didn't you?

45 A. Yes.

46

47 Q. And indeed, you did not endorse them?

1 A. No, we didn't.

2

3 Q. Rather than endorse them, you pointed out their  
4 shortcomings or the shortcomings of the instrument, didn't  
5 you?

6 A. Yes.

7

8 Q. And isn't it right to read it - isn't the fair reading  
9 of what you have written that, in your view, the form,  
10 including the use in the form of the indicators, was not an  
11 approach that you regarded as fit for purpose?

12 A. I - I'm only struggling to answer because the  
13 determination of bias is such a profoundly difficult thing  
14 to do, and certainly their instrument wasn't particularly  
15 good, but nor was it so wholly terrible that it was, like,  
16 embarrassing or anything of that nature. It just, because  
17 of the fact it came from America and the nature of the way  
18 it had been put together, wasn't a sort of wonderful way to  
19 go about it.

20

21 Q. Well, all right. It had the various defects that you  
22 summaries in that paragraph from the bottom of page 70 to  
23 halfway down 71. You agree? You just need to say  
24 something.

25 A. Sorry, what --

26

27 Q. You agree that it had the defects --

28 A. Oh, yes, it had defects.

29

30 Q. -- that you summarise in that paragraph - at 70 and  
31 71?

32 A. Yes, I agree. I agree. Not shying away from the  
33 defects.

34

35 Q. No. And the defects included as well, do you agree,  
36 that although it had the appearance of a kind of rigorous  
37 or somehow objective process, actually, ultimately, as you  
38 said this morning, what emerged was a set of subjective  
39 opinions?

40 A. I wouldn't call them wholly subjective. I think  
41 that's not particularly fair.

42

43 Q. I thought you did agree to that?

44 A. I mean, if I could make a point that I think it is  
45 very helpful for everyone to keep in mind is, we are  
46 fixating on the instrument, right, as well you might, but  
47 the wider problem is the paucity of data that the

1 instrument is applied to. You would often read these  
2 cases, sometimes they would run to 20 pages, and there was  
3 almost nothing in it - they were enigmatic. There was none  
4 in it that often any instrument could discover and I would  
5 suggest that that is because back in the 1980s and '90s,  
6 et cetera, a lot of police officers were only thinking  
7 about gay and lesbian subjectivity, they were not thinking  
8 about GLBTIQ, and the sort of nuanced things that could  
9 have been observed objectively, registered, counted,  
10 written down and collected, that might have gleaned a much  
11 more valuable insight into these crimes, wasn't captured.  
12

13 So it's as though, focusing so much attention on the  
14 instrument is to misunderstand that it's the paucity of  
15 data that's actually in a way the problem.  
16

17 Q. Well, putting that another way without seeking to  
18 debate that point with you - in fact, I'll come back to  
19 that point - because there was such a paucity of data in  
20 particular with the older cases, the elaborate apparatus of  
21 the form was apt to conceal - I don't mean intentionally -  
22 apt to conceal the near impossibility of the task?

23 A. Yeah, if you divest it of any sense of blame or -  
24 I could go along with that.  
25

26 Q. Yes, I'm not putting it in the sense of blame.

27 A. That does --  
28

29 Q. I'm putting it in the sense of as a matter of reality,  
30 the form might look as though it's got lots of factors and  
31 alternatives and criteria and so on, but if there's not  
32 much to work with in paper, and all you're working with is  
33 paper, such a form isn't going to get you very far?

34 A. Well I guess you're working with more than paper.  
35 There's stuff that sits behind that that's been captured  
36 that goes on the paper, but that seems a reasonable  
37 assertion.  
38

39 Q. Well, if I may just press you, the Parrabell officers  
40 were only working with paper. That's all they had. We've  
41 established that.

42 A. Yeah, but "paper" is an oblique term. They're working  
43 with opinions from forensic psychologists, with witness  
44 sentiment, with other forms of evidence that have been  
45 captured.  
46

47 Q. Sure.



1 A. So to reduce it to a sort of one dimensional  
2 description that it is just paper I think is not quite  
3 accurate.  
4  
5 Q. Sure. Well, by all means factor that in, I accept  
6 that. With that matter being pointed out, all they had was  
7 a paper review, including papers such as opinions of  
8 experts and so on, and if there wasn't much there, there  
9 was little for any form to engage with.  
10 A. That seems a fair proposition.  
11  
12 Q. Now, just on that same page, 71 --  
13 A. Yes.  
14  
15 Q. -- but I will come back to this more generally, you  
16 say that you determined that you needed to get behind the  
17 police instrument and reinterpret what you call the summary  
18 evidence, by which you mean the contents of the completed  
19 forms; correct?  
20 A. Yes.  
21  
22 Q. And you say that you became aware that you needed to  
23 distinguish the direction of the animus because it appeared  
24 that there were many cases in which there was a potential  
25 to over-categorise anti-gay bias?  
26 A. Yes.  
27  
28 Q. Why was there such a potential in the work done by the  
29 police using their form?  
30 A. To over-categorise?  
31  
32 Q. Yes.  
33 A. I can't recall without my handwritten notes that  
34 I destroyed. I would have had some summation about that.  
35 I can't honestly recall why I would have typed that.  
36  
37 THE COMMISSIONER: Q. But one thing you didn't do,  
38 Doctor, when you, as it were, created your own  
39 methodology - one thing you didn't do yourself, nor  
40 Professor de Lint, was to go back and recreate from your  
41 own perception the narrative or narratives or summaries  
42 which had already been created?  
43 A. Correct.  
44  
45 THE COMMISSIONER: Thank you.  
46  
47 MR GRAY: Q. Could Dr Dalton please have volume 12. And

1 could you turn in that to tab 258 [SC0I.82365\_0001].

2 A. 258?

3

4 Q. So that's the response document that you and  
5 Professor de Lint have provided to this Special Commission  
6 responding to some expert reports by Professors Lovegrove  
7 and Asquith and Ms Coakley; correct?

8 A. Yes.

9

10 Q. This one, it says at the top, was written by  
11 Dr de Lint and endorsed by you?

12 A. Correct.

13

14 Q. Did he write the entire thing and you simply said  
15 "I agree", or what happened?

16 A. That's correct, he wrote the entirety of it.

17

18 Q. But you agreed with it?

19 A. I agreed with - yeah, almost all of the sentiments,  
20 such that I could endorse it as a - in its entirety.

21

22 Q. I want to take you to other aspects of this later, but  
23 for the moment, on page 2 there is a heading, "Evaluation  
24 and Evaluation Tools"; do you see that?

25 A. Mmm-hmm.

26

27 Q. And Dr de Lint, with your endorsement, is talking  
28 there about your form, the "BCIF", as he calls it, do you  
29 see that? You just need to say "yes"?

30 A. Yes.

31

32 Q. Thank you. And he says in the second paragraph:

33

34 *The evaluation of bias crime by police for*  
35 *purposes of recording crime and otherwise*  
36 *is fraught. It is dependent on subjective*  
37 *evaluation or non-objective consensus or*  
38 *concordance-seeking devices.*

39

40 Do you see that?

41 A. Yes.

42

43 Q. So when he gives those two alternatives, "subjective  
44 evaluation", or "non-objective consensus", that's two sides  
45 of the same coin, I take it; it depends on subjective  
46 evaluation or, putting it another way, non-objective; is  
47 that right?

1 A. Yeah, he writes - it's his sentence but yes, I think  
2 that's right.

3  
4 Q. But that's - I mean, I can't see any other likely  
5 meaning.

6 A. I can't either. I can't either.

7  
8 Q. Thank you.

9 A. But it's hard when you don't write the sentence  
10 yourself.

11  
12 Q. Well, so he seems to be saying that recording or  
13 evaluating bias crime is dependent on subjective  
14 evaluation.

15 A. Yes, he does.

16  
17 Q. He does. And what I would like to suggest to you is  
18 that that is indeed what was ultimately the output of the  
19 police in using their form: ultimately, as you said, it  
20 was intuitive, and it led to the emergence of a view and it  
21 was ultimately subjective?

22 A. Yeah, but I think in saying something is subjective,  
23 we can understand what "subjective" means, but it doesn't  
24 mean it's incorrect. Often --

25  
26 Q. Well, for the moment, I'm not putting it's incorrect,  
27 just that it's subjective, and I thought had you agreed  
28 with that this morning?

29 A. Yes.

30  
31 Q. Righto. And then the next sentence in this document  
32 says "It" - that is, the evaluation of bias crime by  
33 police:

34  
35 *it requires but cannot deliver on an*  
36 *objective weighing of the role of all*  
37 *necessary and sufficient factors or*  
38 *"indicators".*

39  
40 So it requires objectivity but it cannot deliver it.  
41 That's something that you agree with?

42 A. He seems to have put it particularly forcefully there,  
43 but - do I agree with it? "Deliver on an objective  
44 weighting of the role of all necessary and sufficient  
45 factors". It feels like we're sort of getting bogged down  
46 somewhat in semantics in some ways because, for some of the  
47 cases I recall looking at, whether they were or weren't was

1 actually really quite clear when you looked at all the  
2 factors. So to sort of reduce the totality saying all of  
3 them are objective or subjective --  
4

5 THE COMMISSIONER: Q. Sorry, I'm just interrupting.  
6 When you say "it became clear" does that mean you'd know it  
7 when you saw it, is that the kind of analogy?

8 A. No, no, no, no, no.  
9

10 Q. Well, what are you talking about then?

11 A. In the totality of reading the material and taking  
12 everything into account. There were some cases that were  
13 profoundly clear that hate bias was involved, and others  
14 where there weren't.  
15

16 Q. Okay. And do I take it that this statement is one  
17 that you now do not endorse or do endorse - the one that  
18 you're being asked about?

19 A. I don't endorse - I mean, you can endorse --  
20

21 Q. No, look, not "you can" do it, you can do a lot of  
22 things, Doctor. We've taken a fair bit of time to,  
23 obviously, cooperate with you and Professor de Lint in  
24 providing information to this Inquiry.  
25

26 Now, the top of the heading in this document says you  
27 endorse these views. I'm simply asking, given some of the  
28 hesitation I've perceived in the last few minutes, that the  
29 particular sentence you are being asked about now is  
30 something you don't endorse. I'm simply asking you do you  
31 continue to endorse it or not?

32 A. I endorse it, actually. I endorse it.  
33

34 THE COMMISSIONER: Okay, good.  
35

36 MR GRAY: Q. Then on page 5 in the same document, do you  
37 see there's a heading at the top of the page on page 5,  
38 "How are indicators or factors weighed or scored"?

39 THE COMMISSIONER: In the copy in my folder, it's at the  
40 bottom of page 4. So we've got a --  
41  
42

43 MR GRAY: Q. At any rate, can you find the heading  
44 "3. How are indicators or factors weighed or scored"?

45 THE COMMISSIONER: Perhaps in your copy as well,  
46 Dr Dalton, it might be at the bottom of page 4.  
47

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THE WITNESS: It's on page 4, yes.

MR GRAY: Q. I don't want to take you to all of this but do you see that the document that you endorse says - having quoted an aspect of what Associated Professor Lovegrove says, the document says:

*As described briefly in our report, we were unable to follow [the police] in applying the BCIF to score the cases.*

Do you see that?

A. Mmm-hmm.

Q. And then the document - the document that you and Dr de Lint produced - goes on to set out various unhelpful and occasionally incorrectly designated features of the form.

A. Yes.

Q. And Professor Lovegrove is then cited again as pointing to particular features of the form that he has noted. Do you see that?

A. Yes.

Q. And in the paragraph beneath that, beginning, "As he observes", can you see that what your document says is this:

*As he --*

that is, Professor Lovegrove:

*As he very helpfully suggests, since they describe circumstances in very gross dimensions that may just as easily describe non-bias homicides this leaves a great deal open to subjective interpretation concerning the attribution of hate crime in the particular case.*

Do you see that?

A. Mmm-hmm.

Q. So it would appear that you and Dr de Lint are agreeing with what Professor Lovegrove has said - namely,

1 that a great deal is left open in using the form to  
2 subjective interpretation; agreed?  
3 A. Put that to me again, sorry?  
4  
5 Q. See the last sentence in that paragraph beginning "As  
6 he very helpfully suggests"?  
7 A. I'm trying to read it. Sorry, the very last  
8 paragraph, is it?  
9  
10 Q. The one beginning, "As he observes".  
11 A. Yes, "As he very helpfully" - yes, I've read that,  
12 yes.  
13  
14 Q. So that sentence, beginning "As he very helpfully  
15 observes [sic]", is you and Dr de Lint agreeing with  
16 Professor Lovegrove that using the form in the way that it  
17 seems to be intended leaves a great deal open to subjective  
18 interpretation.  
19 A. Yes.  
20  
21 Q. Now, in terms of why it was that you and your team  
22 were not prepared to endorse the methodology of the police,  
23 reliant as it was on the form, I think the only reason, but  
24 certainly a reason that you give, is that they weren't able  
25 to produce any academic literature or similar in support of  
26 it. That was certainly one reason you gave?  
27 A. Yes, yes.  
28  
29 Q. Now, was the ultimate reliance on subjectivity another  
30 reason why you felt unable to endorse the police  
31 methodology?  
32 A. I can't recall. I mean, you - I just can't recall.  
33  
34 Q. Was the concern raised by Sergeant Steer, namely, that  
35 the police in Parrabell were using the independent  
36 indicators in the wrong way - was that another reason why  
37 you were reluctant to endorse the police methodology?  
38 A. Yes, if you put it that way, yes, I think that would  
39 be fair.  
40  
41 Q. Now, a couple of things about the report itself --  
42  
43 THE COMMISSIONER: Just before you go on.  
44  
45 Q. And it was also clear to you, was it not, Dr Dalton,  
46 that a number of the questions were simply not directed to  
47 gay hate bias at all; they were directed to other forms of

1 discrimination or marginalisation?  
2 A. In the bias instrument?  
3  
4 Q. Yes.  
5 A. Yes.  
6  
7 MR GRAY: Q. Sorry to keep changing between volumes.  
8 A. No, that's okay. You don't have to apologise for  
9 that.  
10  
11 Q. That's the world we are in.  
12 A. Yeah, that's all right.  
13  
14 Q. You need exhibit 1, tab 2 [SCOI.02362\_0001] again, the  
15 report itself.  
16 A. Thank you.  
17  
18 Q. Now, tab 2 in that volume. I want to just take you to  
19 the police part of the report briefly?  
20 A. Mmm-hmm.  
21  
22 Q. Which is the first 30 or 40 pages. And could you turn  
23 to page 21. Down the bottom, there's a heading, "Is there  
24 evidence of a bias crime"?  
25 A. Mmm-hmm.  
26  
27 Q. Now, what the police say there is this:  
28  
29 *Consistent with police methodology, this*  
30 *was the foundational question that allowed*  
31 *greater classification certainty from*  
32 *a policing perspective.*  
33  
34 Pausing there, I won't go over this again, but you may have  
35 noticed on the way through this afternoon that that  
36 question, "Is there evidence of a bias crime", was one of  
37 the questions in the earlier version of the form, but it's  
38 not a question in the later, more detailed version of the  
39 form. I don't know if you noticed that on the way through.  
40 A. Yeah, you put that to me before, yes.  
41  
42 Q. Yes. So when he says, or when the police say, "This  
43 was the foundational question", it's not the question in  
44 the form as it finally emerged. You've seen that?  
45 A. "Foundational question that allowed" - no, I guess  
46 it's not. It's a strange sort of sentence.  
47

1 Q. Yes. And then the police paragraph goes on:

2  
3 *This position created value in the process*  
4 *of academic review because the academic*  
5 *research team did not necessarily adopt the*  
6 *same classification interpretation, which*  
7 *is one reason for differences between*  
8 *findings of both teams.*

9  
10 Now, pausing there, the academic research team not only did  
11 not necessarily adopt the same classification  
12 interpretation, they deliberately, for the reasons they  
13 gave, chose quite different classification interpretations,  
14 didn't they?

15 A. Yes.

16  
17 Q. Right. And on the top of the next page, this sentence  
18 appears:

19  
20 *While different findings and*  
21 *classifications were made, each team*  
22 *understood and endorsed the systemic*  
23 *approach of the other.*

24  
25 Do you see that?

26 A. Yes.

27  
28 Q. Now, that's, with great respect to the author of this  
29 document, just not right, is it?

30 A. No, it's not true.

31  
32 Q. It's not correct.

33 A. It's not true, I agree.

34  
35 Q. No, because your team did not endorse the systemic  
36 approach of the police?

37 A. Correct.

38  
39 Q. If you'd just flick over now to the couple of aspects  
40 of academic part of the report, go to page 50?

41 A. Mmm-hmm.

42  
43 Q. I'll come back to this in slightly more detail  
44 probably in the morning, but on page 50, you talk about -  
45 in fact, it starts at 49, really. This is in the executive  
46 summary of your part of the report?

47 A. Yes.



1  
2 Q. You talk about your taxonomy, which breaks bias into  
3 type A, type B and type C; correct?  
4 A. Mmm-hmm.  
5  
6 Q. Yes?  
7 A. Yes.  
8  
9 Q. And on page 50 at about seven or eight lines from the  
10 top, do you see you say:  
11  
12 *Anti-gay bias homicide is not typically*  
13 *a case of serial homicide offending where*  
14 *offenders or associates are linked to more*  
15 *than one case.*  
16  
17 Do you see that?  
18 A. Yes.  
19  
20 Q. Now, what do you base that on?  
21 A. I don't recall because I destroyed my piles of  
22 homicide literature before I left the university. If I had  
23 my notes about when I was putting some of this stuff  
24 together, I would recall, but it's - so I don't recall.  
25  
26 Q. I see. Well, it's a rather declaratory and definitive  
27 assertion, isn't it, perhaps about anti-gay bias homicide  
28 generally?  
29 A. Yes, but when you don't have your research material  
30 anymore, you know, if you're trying to make me look a bit  
31 threadbare because I don't have it, I can't rely on it,  
32 I had to destroy it.  
33  
34 Q. I'm not trying to make you look anything. I'm trying  
35 to --  
36 A. Well, you're saying it's declaratory, but unlike -  
37 you've all had this material for X amount of years and  
38 you've been combing through it, I haven't seen it for  
39 approximately six years. It was sitting in a filing  
40 cabinet before I left the university. So I can't rely on  
41 it, my memory of it, in the way that you can.  
42  
43 Q. At any rate, sitting there today, you're not sure what  
44 the basis was for you making that statement?  
45 A. No, I'm not.  
46  
47 THE COMMISSIONER: Q. Was it meant to be a reference to

1 or an exclusion of gangs?

2 A. Honestly, if I could tell you, I would. I have no  
3 idea.

4

5 Q. Well, presumably, if you crafted or agreed with  
6 someone else's crafting of the words, "anti-gay bias  
7 homicide is not typically a case of serial homicide  
8 offending where offenders or associates are linked to more  
9 than one case" - the question I've asked you is does that  
10 mean that the allegation or assertion, perhaps, that gangs  
11 are involved is to be excluded from the anti-gay homicide  
12 cases? I just don't understand what the reference to "more  
13 than one case" could mean?

14 A. I don't either with the passage of time. But  
15 certainly if you asked me, we certainly were not excluding  
16 the potential involvement of gangs. That wouldn't have  
17 made any sense, because there was - I have a vague  
18 recollection of some of the cases actually centring around  
19 gangs.

20

21 Q. That's what I'm trying to get to the bottom of, I'm  
22 not quite sure - anyway, at the moment, you've got no  
23 recollection?

24 A. I don't.

25

26 THE COMMISSIONER: Okay, thank you.

27

28 MR GRAY: Q. Of course, in fairness to you - presumably  
29 you have noticed this - in the next couple of sentences you  
30 talk about numbers and statistics from within the 88 that  
31 you had been looking at, as to how many were cases  
32 involving more than one offender, and so on. So of course  
33 that's there. But the reason I was asking you the question  
34 is whether you were only relying on that material from  
35 within the 88 in support of that sentence or whether you  
36 had some broader basis for it?

37 A. I'm - I'm struggling to answer because it's just -  
38 I feel it's kind of a convoluted point and I'm not  
39 following it. I'm doing my best, but I'm struggling.

40

41 Q. Right. Two paragraphs down, do you see the  
42 paragraph beginning, "A significant number of cases  
43 involved large age differences"?

44 A. Yes, yes.

45

46 Q. And you then say:

47

1           *Anti-paedophile animosity underwrote*  
2           *a substantial amount of lethal violence in*  
3           *the homicide cases under review.*

4  
5       A.    Yes.

6  
7       Q.    And as you point out in the sentence coming at the end  
8       of that paragraph, in your number system, you have counted,  
9       of the 85 cases, 17 of them as being anti-gay bias and  
10       another 12 as being anti-paedophile animus.

11       A.    Yes, that must - that would - yes.

12  
13       Q.    In other words, the 12 that you regarded as  
14       anti-paedophile, you excluded from the set of anti-gay?

15       A.    No, no, that's not - that's not my recollection at  
16       all. I'd put it a different way. It didn't seem helpful  
17       to categorise anti-paedophile animus merely as anti-gay  
18       hate animus. But it certainly counted as anti-gay but it  
19       was put into a subcategory, to the best of my recollection.

20  
21       Q.    Well, let's just have a little look at that. If we  
22       turn over in your part of the report to page 92 --

23       A.    Mmm-hmm.

24  
25       Q.    There's a chart there of your findings, isn't there?

26       A.    Yes.

27  
28       Q.    In fact, if you go back one page, there's a chart of  
29       the strike force findings, the police findings?

30       A.    Mmm-hmm.

31  
32       Q.    And their four categories, consistent with the  
33       document we looked at this morning, are: 1, "Evidence of  
34       Bias Crime; 2, "Suspected Bias Crime"; 3, "Insufficient  
35       Information"; 4, "No Evidence of Bias Crime"?

36       A.    Yes.

37  
38       Q.    Yours are, on page 92: 1, Anti-Gay Bias; 2,  
39       Anti-Paedophile Animus; 3, Insufficient Information; and 4,  
40       No Evidence of Bias Crime; correct?

41       A.    Yes.

42  
43       Q.    So you appear to distinguish and separate anti-gay  
44       from anti-paedophile?

45       A.    Yes, absolutely.

46  
47       Q.    But you say that somewhere in the report we will find

1 something that says anti-paedophile was to be treated as  
2 a subset of anti-gay?

3 A. Irrespective of what is in this table and what the  
4 sentences say, my recollection is that when we noticed that  
5 the animus appeared to be anti-paedophile we made  
6 a distinction to treat it separately.

7  
8 Now, the problem is I'm in a minefield here as I open  
9 my mouth because, you know, I don't want to appear some  
10 apologist for paedophiles, although I was - if I'm honest,  
11 I was quite shocked that Professor Gail Mason had some sort  
12 of quote where she seemed to think that a paedophile was  
13 undeserving of victim status, I didn't totally understand  
14 that, to be honest, because I think they can be victims,  
15 but it didn't seem helpful - it gets really messy, because  
16 back in the '90s, et cetera, for some men who hated  
17 homosexuals, a paedophile and a rock spider and a poofter  
18 and a this and a that, they were all inter-dispersed and  
19 they made no distinction between the two.

20  
21 Just to complicate things even more, in some other  
22 categories I think there perhaps were men who might have  
23 just been able to distinguish the two and not have them  
24 conflated but still hate either or both of them. So it's  
25 as though the second you have to start using these very  
26 precise terms, it's helpful to be precise, but I just - we  
27 could not see any - any sort of valid social science  
28 justification to count different a phenomenon as being  
29 amorphous, like it's the same thing. Does that make  
30 sense?.

31  
32 Q. Did you regard a case where there was present in  
33 whichever proportions both some element of anti-gay bias --

34 A. I can't --

35  
36 Q. -- and some element of anti-paedophile bias?

37 A. I can't - without my notes that were very voluminous,  
38 I had pages and pages --

39  
40 THE COMMISSIONER: Q. Doctor, please, would you just  
41 listen and do your best. You've made the point more than  
42 once that you haven't got your notes. But just listen,  
43 please, to the question and do your best, please.

44  
45 THE WITNESS: That's what I'm attempting to do.

46  
47 MR GRAY: Q. I'm not asking you about - sorry.

1 A. That's what I'm attempting to do.

2

3 Q. Well, you started answering before I had finished the  
4 question. So just let me ask the question. Was your  
5 approach this: that if you found a case where there  
6 appeared to be an element of anti-gay bias and also an  
7 element of anti-paedophile bias, in whichever proportion,  
8 you would exclude that as being anti-gay bias?

9 A. No.

10

11 Q. You say in such a case, it would be included in the  
12 Anti-Gay Bias column, do you?

13 A. No, I seem - I seem to recall that one had to then  
14 make a distinction to not double-count it. That's - and  
15 that we were worried about double-counting. But I cannot  
16 recall the precise mechanism by which we disaggregated.  
17 But we were certainly - didn't want to double-count.

18

19 Q. I'll just come back to that topic a little bit more --

20

21 THE COMMISSIONER: Q. Is that another way of saying if  
22 you didn't want to double-count, that you excluded  
23 anti-paedophile cases from them being characterised as gay  
24 hate related?

25 A. No. No. It's merely that --

26

27 Q. Well, then precisely what do you mean?

28 A. -- it didn't - you couldn't - double-counting in terms  
29 of the statistics would have been problematic.

30 Professor de Lint would be able to speak better to that  
31 than me. He is better with the statistics.

32

33 MR GRAY: Q. By "not double-counting", you mean you'd be  
34 sure not to put in the "Anti-Gay Bias" column a case which  
35 you regarded as "Anti-Paedophile Bias"; is that what you  
36 mean?

37 A. I don't - in a way, I don't recall. I'm feeling very  
38 confused by the way you're putting it. I'm doing my best,  
39 but it was six years ago.

40

41 THE COMMISSIONER: Q. Do your best, if I may ask,  
42 without overly persisting, why did you draw the distinction  
43 at all?

44 A. Between anti-paedophile animus and anti-gay bias?

45

46 Q. Yes. Why did you even bother drawing the distinction?  
47 What was the purpose of drawing the distinction?

1 A. Wow, I thought it was most helpful to distinguish  
2 between different phenomena, and the animus --  
3  
4 Q. Why?  
5 A. Because it seems to me that if you're attacking  
6 someone and you're doing so because you hate paedophiles,  
7 as opposed to whether you just hate gay people, that the  
8 distinction is worth preserving.  
9  
10 Q. Does that mean that the anti-paedophile would not be  
11 regarded or counted as an anti-gay offence?  
12 A. No, my sense was it was counted.  
13  
14 Q. Then I get back the point. What is the point of the  
15 distinction if you're going to count them as equal?  
16 A. What do you mean by "equal"? I don't understand what  
17 you mean by "equal".  
18  
19 Q. You are drawing a distinction because you want to be  
20 clear about the animus involved, and do I understand you to  
21 say that if you detected that the animus was an  
22 anti-paedophile animus, it would not be characterised as an  
23 anti-gay bias offence?  
24 A. I don't - this is the problem with this sort of  
25 process - I don't - I don't accurately recall.  
26  
27 Q. You can't even explain it now?  
28 A. Oh, no, I can't.  
29  
30 MR GRAY: Q. You see, lower down on the page, 50, just  
31 below where you've put some of the numbers forward - the  
32 paragraph beginning, "Our view" - this is on page 50 - you  
33 say that there can be a problem of over-reporting and  
34 recording of bias. Do you see that?  
35 A. "Our view is that over-reporting and recording can  
36 produce unfortunate consequences", yes.  
37  
38 Q. That's the paragraph I'm directing you to,  
39 A. Mmm-hmm.  
40  
41 Q. You say that's fuelled by a confirmation bias. What  
42 do you mean by - what did you have in mind there? What  
43 were you saying? What was your point about confirmation  
44 bias? And who were you saying was, as it were, guilty of  
45 such a thing?  
46 A. I recall that when we wrote that section we were  
47 talking very generally about the general concept of over or

1 under-reporting.

2

3 Q. Well, it's right in the middle of a section dealing  
4 with the topic of paedophilia, isn't it?

5 A. It may well be, but I can't quite - I don't recall why  
6 it's placed there.

7

8 Q. Because the next paragraph goes on:

9

10 *In addition to over-recording,*  
11 *mis-recording may occur where different*  
12 *kinds of bias motivation are collected*  
13 *under one categorisation. If the motive is*  
14 *complex, over-recording may occur where the*  
15 *subtlety of that motivation cannot be*  
16 *registered. For instance, we believe that*  
17 *a person who acts out once in sudden*  
18 *violence or without planning on apparent*  
19 *animus or fear towards a much older male*  
20 *may well not be homophobic ...*

21

22 Do you see that?

23 A. Yes, thank you for highlighting it. Hang on. Yes.

24

25 Q. What was the relevance of saying that?

26 A. I think, and I'm not sure, that it relates to the  
27 early discussion about the complexities of latent  
28 homosexuality in men who ostensibly think they're  
29 heterosexual but have homosexual desires and then, in a  
30 particular context, those desires get triggered and they  
31 find them profoundly confronting in terms of the psychology  
32 of their sexual identity.

33

34 Q. The example that you're giving, the person who acts  
35 out once in sudden violence or without planning on apparent  
36 animus or fear, you seem to be saying, well, that sort of  
37 incident may not be an example of gay hate bias or anti-gay  
38 bias, simply because it's someone acting out once in sudden  
39 violence, et cetera.

40 A. If you put it that way, it's regrettable that the  
41 sentence is expressed that way, then, yes.

42

43 THE COMMISSIONER: Q. But more to the point, you use the  
44 example of a much older male. You are adverting at least  
45 implicitly, are you not, to a paedophilic reaction on the  
46 part of the much younger person?

47 A. The tricky thing is with these reports that --

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44  
45  
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47

Q. No, look, sorry --

A. No, no, allow me --

Q. No, no.

A. Please allow me to speak.

Q. No, Dr Dalton, you can speak as much as you like, but I won't have speeches. What I'm asking you: is that --

A. I wasn't going to deliver a speech.

Q. Would you please listen. Is that not a reference in clear but perhaps implicit terms to an exercise or an event, first of all, it's once, it's not serial, but secondly, the juxtaposition is between a much older male and, by inference, a much younger person, male, not being homophobic, because he is reacting out of an animus or fear towards a paedophile? Isn't that what you are saying implicitly at the very least?

A. To be clear, I think Professor de Lint wrote that section, and so when people write particular sections in a report, often the logic that is being conveyed is very much in their head rather than the other co-author's head. So I suspect that might be the case with this particular sentence.

MR GRAY: Q. And the analogy that then follows is:

*... just as a woman who acts out  
aggressively against an unwanted sexual  
solicitation by a male is not necessarily  
anti-heterosexual.*

Is that an analogy that you would actually endorse and adopt?

A. I seem to recall that I didn't write those sentences, and so you'd perhaps have to ask Professor de Lint about them.

Q. I'm asking you is that an analogy that you would adopt and endorse?

A. A woman who acts out aggressively against an unwanted sexual solicitation by a male is not necessarily anti-heterosexual. Yes, I guess so.

Q. So that's a suitable analogy to the example of a male acting out once against an older male?



1 A. I guess so.  
2  
3 Q. In the next paragraph, you say that, in your analysis,  
4 you sought to ensure a concordance between offender  
5 motivation and target category, target category being  
6 a reference to what?  
7 A. The people being subjected to the crime, I guess.  
8  
9 Q. Well, what's the concordance that is being sought?  
10 I mean, the people being subjected to crime here are men  
11 who have met their death, where there is a possibility,  
12 which is being looked at, as to whether it might have had  
13 a bias factor. So what does "target category" mean in that  
14 context?  
15 A. I don't recall.  
16  
17 Q. And your approach, which I'll come to, the type A,  
18 type B, type C, et cetera --  
19 A. Mmm-hmm.  
20  
21 Q. -- required, didn't it, a conclusion or a view to be  
22 formed about offender motivation?  
23 A. Insofar as it was possible to do so, yeah.  
24  
25 Q. Well, that's what this sentence is referring to, and  
26 you develop it at greater length later, but you wanted to  
27 ensure a concordance between offender motivation and target  
28 category. So offender motivation was central to the way  
29 you went about it?  
30 A. I - put that to me again, sorry, I just --  
31  
32 Q. Offender motivation - identifying that - was central  
33 to the way you went about your task?  
34 A. In those cases where that would become apparent, it  
35 certainly wasn't apparent in all of them.  
36  
37 Q. Well, in all cases, it says:  
38  
39 *... in our analysis, we sought to ensure*  
40 *a concordance between offender motivation*  
41 *and target category.*  
42  
43 All I'm asking you is whether that means what it says,  
44 namely, that your approach involved the importance of  
45 identifying offender motivation?  
46 A. I don't recall.  
47

1 Q. In the next sentence you say:

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*As reviewers, we found the need to distinguish anti-paedophile animosity from anti-gay bias in the more generic form.*

So you did distinguish between anti-paedophile on the one hand and anti-gay on the other hand?

A. Absolutely we did.

Q. Just lastly while I'm here on this part of the report, which is the executive summary, on page 53, you say:

*... the policy question on combating anti-gay bias is not as simple as some moral crusaders make it out to be.*

Who were the moral crusaders you had in mind?

A. Anyone who was promulgating the idea that there was a major and serious problem with too many homicides, proportionate to other places or cities in the world - that there was an epidemic, if you like, or whatever the phrases were that were being touted at the time.

Q. Well, who was doing that, according to you? Who were these moral crusaders?

A. People that seemed to be in the media reports.

Q. Like who?

A. I don't know. I don't recall. I don't have my notes.

Q. Do you mean Sue Thompson?

A. Yes.

Q. Was she one of the moral crusaders you had in mind when you wrote that sentence?

A. Yes, but in - you will note, and this is why I think I'm being misconstrued, I showed great respect and deference to Sue Thompson in the Strike Force Parrabell report and said that she was doing a good job, a well-intentioned good job, because drawing attention to the problem of how many homicides there are was a worthwhile thing to do.

Q. She is one of the moral crusaders you're referring to, though?

A. I think so, yes.

1  
2 Q. And Stephen Tomsen?  
3 A. Yes.  
4  
5 Q. Who else?  
6 A. I couldn't say, that's - anyone who would support that  
7 proposition, I guess.  
8  
9 Q. And just to be clear, the proposition that you say  
10 those two were supporting - correct me if I'm wrong - is  
11 that there had been a lot of murders in the '80s and '90s  
12 that may well have been gay hate?  
13 A. A lot - that there were - that there were many, that  
14 there were 88, that this total, this number of 88, that  
15 they were all gay hate crimes.  
16  
17 Q. So anyone who said that there were as many as up to 88  
18 deaths which were or might have been gay hate was a moral  
19 crusader?  
20 A. Yeah, it sounds like such a pejorative sort of term,  
21 doesn't it, but Professor de Lint used it in a  
22 non-pejorative way, that they were - yes, that they were -  
23 they were trying to draw attention to a problem.  
24  
25 Q. Well, it does look a bit pejorative, to use your word,  
26 and why was it put so pejoratively?  
27 A. Because it seemed as though, from the second I started  
28 doing this work, if you were to find that there was any  
29 number less than 88, you were somehow a police apologist,  
30 which is an offensive sort of assertion.  
31  
32 Q. So you were concerned that the police not be unfairly  
33 criticised?  
34 A. No, not at all. Let's be honest, and I think we made  
35 reference in the report, they did a terrible job in the  
36 '80s and '90s of policing hate crimes and other general  
37 crimes relating to violence against gay men. I think  
38 that's universally agreed upon.  
39  
40 Q. Let me just turn to another topic, which is how it was  
41 that you came to tender for this job and --  
42 A. Certainly.  
43  
44 Q. -- be selected. So that volume could be put away  
45 for the moment, and could Dr Dalton first of all have  
46 volume 10.  
47

1 THE COMMISSIONER: Q. So did you think that the moral  
2 crusaders were engaged in a gross exaggeration of the  
3 numbers?  
4 A. Perhaps not a gross exaggeration but an exaggeration.  
5  
6 MR GRAY: Q. In volume 10, would you turn to tab 244  
7 [SCOI.79884\_0001]?  
8 A. Mmm-hmm.  
9  
10 Q. This is an email from - the bottom one is an email  
11 from Jackie Braw of the police to you on 24 June 2016; do  
12 you see that?  
13 A. Mmm-hmm.  
14  
15 Q. She says:  
16  
17 *Nicole Asquith gave me your name and*  
18 *suggested you may be interested in*  
19 *submitting a proposal.*  
20  
21 Do you see that?  
22 A. Yes.  
23  
24 Q. And the topic, the subject line is, "Seeking proposals  
25 to conduct an independent review 'Strike Force Parrabell'?"  
26 A. Yes.  
27  
28 Q. Now, is that the beginning of the raising of this  
29 topic with you? Is this when it was first broached with  
30 you?  
31 A. I can't recall whether it was this email or whether it  
32 was a telephone call. It was one or the other, and I guess  
33 it may well have been the email. It was either an email or  
34 a telephone call. I seem to recall that it was actually  
35 a telephone call first.  
36  
37 Q. First?  
38 A. But I could be wrong.  
39  
40 Q. You could be wrong. But in any event, you received  
41 this email at about, I assume, the same time as any such  
42 phone call?  
43 A. Yes, yes.  
44  
45 Q. Perhaps shortly after?  
46 A. Yes, it would appear so.  
47

1 Q. And she gives an account of what they're doing with  
2 Parrabell?

3 A. Mmm-hmm.  
4

5 Q. And says they'd like an independent qualified  
6 assessment or evaluation, and she says:

7  
8 *We expect the following to be included.*  
9

10 And then there's 10 or so bullet points?

11 A. Mmm-hmm.  
12

13 Q. Now, I'm sorry, but there is a sequence of volumes.  
14 We now need volume 13. And you need to turn to tab 267  
15 [SCOI.81750\_0001].

16 A. Yes.  
17

18 Q. Now, starting from the bottom of this email chain,  
19 which is at the very bottom of the first page, do you see  
20 there is one that says, "From: Jacqueline Braw, 30 June",  
21 and if we turn over the page we see what that said. This  
22 is six days later than the one I just looked at with it  
23 you?

24 A. Mmm-hmm.  
25

26 Q. It says:

27  
28 *Hi Derek.*  
29 *I had a meeting with my manager and*  
30 *mentioned your possible interest in*  
31 *submitting a proposal.*

32  
33 *If you are still keen, just let me know but*  
34 *don't work on a detailed proposal yet.*

35  
36 *... we will be sending you and the other*  
37 *interested parties ... a "Request for*  
38 *quote" ...*  
39

40 Et cetera?

41 A. Yes.  
42

43 Q. You respond to that the next day:

44  
45 *Dear Jackie.*  
46 *I was going to email you the entire tender*  
47 *(including budget) Monday morning but will*

1           *hold off in light of what you have just*  
2           *advised.*

3  
4           So does that tell us that in the six days between 24 June,  
5           when she sent you that initial email, and 30 June, or  
6           1 July, you had already prepared at least a draft or the  
7           beginnings of a tender?

8           A.    I guess so. I don't have a strong memory, but I guess  
9           that's - yeah.

10  
11          Q.    Well, the next email above that is from a Mr Tulsi --  
12          A.    Yes.

13  
14          Q.    -- who was someone from Flinders --  
15          A.    Yes, I know the man well.

16  
17          Q.    -- to Jackie Braw asking her did she know when the  
18          deadline might be for the request for quotation.  
19          A.    Mmm-hmm.

20  
21          Q.    That same man, Mr Tulsi, then emails you later the  
22          same day, 1 July, at the top of the page, do you see that?  
23          A.    Yes.

24  
25          Q.    And he says to you:  
26  
27                *I have also attached the documents --*

28  
29          this is in the third paragraph --  
30  
31                *and spreadsheet we have worked on [so] far.*

32  
33          Do you see that?  
34          A.    Yes.

35  
36          Q.    If we turn to 267A [SC0I.81752\_0001] in the bundle  
37          that is the attachment?

38          A.    267 --  
39

40          Q.    The next one, the very next one?  
41          A.    Okay, here it is, okay. Sure, yeah.

42  
43          Q.    Now, when we come to your actual tender, which is  
44          a later version of this one, we'll see a couple of  
45          differences, but do you see on the third page there is  
46          a heading "Independence [a key to objectivity ]"?  
47          A.    Mmm-hmm.

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Q. And you there refer to the fact that you were away from New South Wales, namely, in other states? You need to say something. Can you --

A. Sorry, can you put that to me again?

Q. You there refer to the fact that you and your team were away from New South Wales, in other states?

A. Yes.

Q. You refer to the fractious and divisive era in New South Wales and the existence of much folklore and cultural memory?

A. Yes.

Q. And you say that baggage might be associated with some of the key players, among them being some academics?

A. Yes.

Q. And is that again a reference to Stephen Tomsen, among others?

A. Yeah, it's a reference to what did appear to be very fractious, very hostile relations between some people in the gay community, activists, people who - yes.

Q. One of the academics that you were saying had baggage was Stephen Tomsen; is that right?

A. Yes.

Q. There is then a heading "Dedication to ensuring clear lines of communication are maintained"; do you see that?

A. Mmm-hmm, yes.

Q. You say "Clear lines of communication are vital", and then the next sentence says:

*A team that both assists with the production of an initial review report document and subsequently evaluates the quality of a finalised report is in a slightly invidious position.*

Now, pausing there, what's described there is an initial review report and a finalised report, ie, singular. Was it your understanding or expectation, at least at that point, that the result of your work would be a single joint document with the police?

- 1 A. I - from memory, I think that's a fair - fair point.  
2  
3 Q. Right. And a few lines down, you say:  
4  
5 *Clearly documenting and communicating*  
6 *unambiguous feedback with --*  
7  
8 I think it should be "will" --  
9  
10 *will ensure the detectives authoring both*  
11 *the draft and subsequent version of the*  
12 *review report are given ample opportunities*  
13 *to craft a product [report] that will be*  
14 *likely to meet with a more favourable*  
15 *review.*  
16  
17 A. Mmm-hmm.  
18  
19 Q. That's what you have said?  
20 A. Yes.  
21  
22 Q. Again, you seem to have had in mind at least then  
23 a single report?  
24 A. Yes, I - yes, I would - yes, I agree.  
25  
26 Q. And you were of the mind that you would want, and that  
27 the police would want, a favourable review of that report?  
28 A. But what I meant by "favourable" was that it would be  
29 well received by the public.  
30  
31 Q. All right. Now, then, could I ask you to look at --  
32 A. Could I also just comment on something that --  
33  
34 Q. Yes, do.  
35 A. This was my first tender at the university and I was  
36 very much constantly having to go to people of more  
37 experience saying, "What do you write in these things?  
38 What do you do?"  
39  
40 Q. Okay. Just turn over to tab 269 [SC0I.80109\_0001], if  
41 you would?  
42 A. Mmm-hmm.  
43  
44 Q. This is another email chain, and we just need to start  
45 from the bottom of it. It starts, do you see, with one on  
46 Friday, 22 July, saying "Please accept our invitation to  
47 tender"? It's the bottom one of the chain.



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Q. Sorry, which page are we on, sorry?

A. It's the bottom email in the chain.

THE COMMISSIONER: The third page in, in fact.

MR GRAY: Q. 22 July, "Please" --

A. Yes, I've found it finally.

Q. "Please accept our invitation to tender"; do you see that?

A. Yes.

Q.

*Attached are two documents: the Request For Tender and the Supply Agreement.*

Agreed?

A. Yes.

Q. And you respond saying "Many thanks for supplying the tender information", and you ask some questions about references and so on. And on the front page, in an email from you to Dr Tyson, where she says that she's getting a reference in train, she says - or you say, rather:

*EXCELLENT. The cops seem keen for our tender!*

What was your basis for saying that?

A. I don't recall. That they were keen to receive our tender, because I'd chatted to Jacqueline for quite a while, she seemed very friendly and she just seemed to think - I seemed to think that we could work well.

Q. That request for tender was sent to you on 22 July, as we've just seen?

A. Mmm-hmm.

Q. And your tender, if we now need to go to volume 2, please, and turn to tab 25 [SC0I.75775\_0001]. Your tender goes in six days later, on 28 July. Tab 25. Do you have a covering letter at the front of tab 25?

A. Yes, I do, yes.

Q. See it's dated 28 July?

A. Yes.

- 1  
2 Q. So that's only six days after you get the request for  
3 tender, but can we assume, I suppose, that what you did in  
4 those six days was to revise the draft that you had already  
5 prepared a couple - a few weeks earlier when you first were  
6 contacted by her?  
7 A. Sure. I seem to recall, I don't know why, amongst the  
8 things I do and don't recall, that there was some mad rush  
9 to do it, either there was a deadline or - because I  
10 remember constantly having to hassle Narmon and ring him up  
11 and - I was reliant upon Narmon because he was the  
12 university person assigned to help us with tenders. We  
13 were under a lot of pressure at the university at the time  
14 to bring in any money, any tender sort of money to bolster  
15 the coffers of the university, and he - I also recall, you  
16 know, writing lectures, supervising PhD students and things  
17 being busy and manic and that it was put together in a fair  
18 amount of haste.  
19  
20 Q. I'll just take you to tab 23 [SC0I.7696100007\_0001]  
21 which is the request for quotation that you received.  
22 A. Mmm-hmm.  
23  
24 Q. You no doubt recall receiving that?  
25 A. Well, vaguely, obviously form - yes, it was a request  
26 for quotation, yes.  
27  
28 Q. Turn to page 6.  
29 A. Of the request, yes.  
30  
31 Q. Clause 3.4.  
32 A. Mmm-hmm.  
33  
34 Q. Do you see there is a heading "Challenges"?  
35 A. Sure.  
36  
37 Q. And there's a couple of sentences in that including  
38 this one:  
39  
40 *Many researchers in this area are connected*  
41 *to the "gay community" and may not be as*  
42 *independent as desirable.*  
43 *Some researchers have had their own*  
44 *personal history of negative relationships*  
45 *with police.*  
46  
47 Do you see that, yes.

1 A. Do I see it? Yes, I do see it.

2

3 Q. Yes, please. Now, did you have any discussions with  
4 Jackie Braw or anyone else from the police as to what that  
5 was referring to?

6 A. Oh, I'm trying to remember. We did have some  
7 discussions, but did it - certainly not about the gay  
8 community bit. "Personal history of negative [relations]  
9 with police"?

10

11 Because I'm under oath, and I take it seriously, my  
12 only recollection of something negative ever being said  
13 about Stephen Tomsen was that, early on in the process, one  
14 or two officers had said that they had had some sort of  
15 interaction with him earlier in relation to just  
16 interactions.

17

18 I've got to be careful here because, like, what was  
19 the tenor of what they said? That he was a bit aggressive  
20 to deal with or difficult or words to that effect. And  
21 certainly - not "certainly" - did - if you're asking me did  
22 Jackie and I discuss him, or anyone else, I have no  
23 recollection, but she - there may have been some generic  
24 reference to people having negative relations. There may  
25 have been. I really just don't accurately recall or  
26 I would tell you.

27

28 Q. When you said in the first part of that answer that  
29 "some officers" had something to say about Stephen Tomsen,  
30 first of all, when, approximately, in the timeline; and,  
31 secondly, who?

32 A. I don't remember who, but I - the "when" would have  
33 been in one of the big meetings we had to discuss the  
34 cases.

35

36 Q. Do you mean after you had been awarded the tender?

37 A. Yes.

38

39 Q. Right. So at the moment I'm asking you about before  
40 you were awarded the tender, when you were indeed  
41 tendering.

42 A. Mmm-hmm.

43

44 Q. Did anyone, in any conversation with you, indicate to  
45 you what those sentences under the heading "Challenges"  
46 were referring to?

47 A. She may well have read out or referred to that second

1 one, "researchers in the area", because I do recall fairly  
2 quickly marshalling an idea in my head that, okay, we're in  
3 South Australia, we don't share in the long horrible  
4 cultural animosity between the gay community and the  
5 NSW Police, and so that would be a selling point for our  
6 tender.

7  
8 But I - but as to - as to any sort of - I remember -  
9 I do remember having a long - fairly long discussions with  
10 Jackie. But she was very friendly and - and apart from  
11 anything, because this was a new tender for me, I had no  
12 idea, in a way, what was involved so I was trying to get my  
13 head around what the task was.

14  
15 Q. Well, did she tell you or did you know who the other  
16 tenderers were or were going to be?

17 A. No. No, I don't recall that she did.

18  
19 Q. Did she say anything to you to the effect, "We have  
20 some other tenderers, but they are researchers connected to  
21 the gay community"?

22 A. No, I don't - I honestly don't recall whether she -  
23 whether she said that. I think she did say - she might  
24 have said that they were going to approach other people.  
25 I do recall being a bit surprised she'd rung me, just a  
26 little bit surprised, and she said a phrase like "Your  
27 reputation preceded you", whatever that means.

28  
29 THE COMMISSIONER: Q. And what did you think was your  
30 selling point again?

31 A. Well, my - I thought our - my selling point --

32  
33 Q. Well, you mentioned - your terminology, wasn't it,  
34 "selling point"?

35 A. Yes, yeah.

36  
37 Q. Well, what did you think was your selling point?

38 A. This is sort of vulgar language. This is the language  
39 that the university told me to use to try to get a tender.  
40 Selling point number 1, that we were in South Australia so  
41 we were not totally embroiled in the animosity that had  
42 long existed between the NSW Police and the gay community,  
43 which I don't think is any great secret; and secondly,  
44 I saw my expertise pertaining to gay culture, the way  
45 homosexuality has been policed in Australia, et cetera,  
46 particularly - it was clear to me that cases involving  
47 beats were going to be involved, et cetera. I'd written

1 a lot about that area, that that was going to be valuable  
2 and helpful.

3  
4 And I saw, I have to stress - I wasn't going to - this  
5 was just more work to do amongst a very busy schedule as an  
6 academic, but I saw it as work that was potentially  
7 necessary to gain - to try to keep one's job in a very  
8 competitive environment, but I can honestly say, hand on my  
9 heart, I came to the process of doing this with a genuine  
10 desire to help cast a bit of a light on what had happened  
11 and bring a modicum of sort of justice and insight into  
12 that period.

13  
14 And had there have been - you know, I was prepared,  
15 once I opened the folders, to find 88 cases, if indeed  
16 there were 88. And you must take that as a statement of  
17 honesty. That's what I intended to do. I never - but  
18 you've asked me this - sorry, perhaps I haven't answered  
19 your question, so you might want to ask it again.

20  
21 Q. Did you think at the relevant time you were putting  
22 the tender in that there had already been moral crusaders  
23 urging for large numbers of cases or did you discover moral  
24 crusaders in the course of your doing the report?

25 A. That's a very fair question to ask. I don't recall.  
26 I think it became - it certainly became apparent as we were  
27 doing it.

28  
29 MR GRAY: Q. You will see on the next page, there's  
30 a heading "Terms of Reference", then "4.1, Services  
31 Required"?

32 A. Yes.

33  
34 Q. So you understood that page to be the Terms of  
35 Reference for the academic review that was being proposed?

36 A. Yes.

37  
38 Q. And bullet point number 1 was:

39  
40 *A collaborative approach to working with*  
41 *[the police] ...*

42  
43 A. Yes.

44  
45 Q. Was that something that Ms Braw drew to your  
46 attention, the importance of a collaborative approach?

47 A. I honestly don't remember, but certainly it's in the

- 1 document, so there can be no arguing with it.  
2
- 3 Q. Well, when we go to the actual contract, which is at  
4 tab 24 [SCOI.76961.00008\_0001] the next tab, this is - it  
5 doesn't have the signatures on it, but this is the contract  
6 that you ultimately entered into -- -  
7 A. Mmm-hmm, yes.  
8
- 9 Q. -- or the university did. Do you see that it also  
10 contains the same schedule at pages 18 and 19, with the  
11 heading "Challenges" and the heading "Terms of Reference",  
12 in the same terms?  
13 A. I'm just waiting for it to appear. Yes.  
14
- 15 Q. When we come to your tender itself, which is at tab 25  
16 [SCOI.75775\_0001]. It's in tab 25.  
17 A. Oh, sorry, yes.  
18
- 19 Q. You'll need to flip through the first 10 or 12 or maybe  
20 more pages until you get to the actual text of your  
21 application, with the Flinders University logo at the top.  
22 A. Oh, yes.  
23
- 24 Q. Now, do you see it's seven pages long, the  
25 application, or the tender - the tender proposal?  
26 A. Yes.  
27
- 28 Q. And I just want to go through a couple of aspects of  
29 it. Under the first heading, "Excellent Research  
30 Expertise", you have set out the expertise of yourself,  
31 Professor de Lint and Dr Tyson --  
32 A. Mmm-hmm.  
33
- 34 Q. -- relevant to this tender?  
35 A. Sure.  
36
- 37 Q. And for yourself, you say:  
38  
39 *... extensive experience conducting and*  
40 *publishing research in relation to the*  
41 *policing, homosexuality and public space.*  
42
- 43 A. Mmm-hmm.  
44
- 45 Q. What does "the public space" mean?  
46 A. I wrote an article that got published in a fairly  
47 prestigious journal years ago that looked at - it was in

1 relation to the analysis of that Australian version of the  
2 Wolfenden Committee about the way public space was  
3 understood or as a place where homosexual bodies could flow  
4 in and out of this space and get regulated. I'd have - I'd  
5 literally have to find my own article to refresh my memory  
6 about some of my arguments.

7  
8 Q. Do you mean geographical places like toilet blocks and  
9 the like?

10 A. Yes, yes, yes.

11  
12 Q. And then you go on:

13  
14 *His research --*

15  
16 that is, your research --

17  
18 *... has primarily focused on problematic*  
19 *"Beat" spaces ...*

20  
21 A. Mmm-hmm.

22  
23 Q. You say:

24  
25 *...[that] research culminated in the*  
26 *publication of "Policing Sex" ...*

27  
28 A. Yes.

29  
30 Q. You say that your grasp of legal, social and cultural  
31 complexities of "Beat" spaces will be indispensable to this  
32 project, given the manner in which they figure prominently  
33 in the review brief?

34 A. Yes.

35  
36 Q. Then you say that you do not profess to be expert,  
37 per se, in hate crime?

38 A. Mmm-hmm.

39  
40 Q. And that was correct, wasn't it?

41 A. Yes.

42  
43 Q. Did you have any background in hate crime itself?

44 A. I taught hate crime units at third-year level of  
45 university on various occasions over 16 or 17 years. I'd -  
46 the trick is, a criminologist often - you have a series of  
47 interests that are very defined but then you have wider

1 interests, and whilst I hadn't published on hate crime  
2 per se, I had kept abreast of literature, read a lot about  
3 it, enough that the South Australia Police saw fit once to  
4 invite me to their headquarters to give them kind of  
5 a lecture on the current status of hate crime investigation  
6 and knowledge from a world sort of perspective.

7  
8 Q. Right. So is this the position, that you had not  
9 published in the area of hate crime?

10 A. No.

11  
12 Q. Are you agreeing with me?

13 A. Yes, I'm agreeing with you, yes.

14  
15 Q. But you say that you had an excellent grasp of the  
16 literature relating to hate crime?

17 A. Yes.

18  
19 Q. And you had given some lectures, some to third year  
20 students and some to police, that did bear upon hate crime?

21 A. Yes.

22  
23 Q. And is that --

24 A. Could I be allowed to --

25  
26 Q. Certainly?

27 A. I'll go out on a limb here and say there's probably  
28 only two people in Australia that could rightfully  
29 probably, in inverted commas, say they were hate crime  
30 experts, one is Gail Mason, and the other, and I'm being a  
31 little bit generous, is Stephen Tomsen.

32  
33 Q. Why is that being generous?

34 A. Because if you look at a lot of his literature it's  
35 about homicide in general, not necessarily gay hate.  
36 I mean, when you go to the literature about gay hate,  
37 there's a lot of people overseas who come to mind, Eric,  
38 et cetera, that do all the literature reviews, that's not  
39 to disparage Stephen Tomsen, he certainly has - I mean,  
40 you'll see in the Parrabell report, I cited him and said  
41 very generous and kind things about him. I read all of  
42 his - as much of his literature as I could. It was very  
43 important. It would have been remiss not to look at it.

44  
45 Q. In the next paragraph you refer to one lecture that  
46 you gave for an hour in December 2004 --

47 A. Mmm-hmm.



1  
2 Q. -- entitled "Hate Crime and homophobic violence: an  
3 overview" to 22 police officers?

4 A. Yes.

5  
6 Q. And then you refer to a keynote address in 2006  
7 entitled "International perspectives on community building  
8 between police and the GLBTI community"?

9 A. Yes.

10  
11 Q. And thirdly you refer to attending monthly meetings  
12 from 2004 to 2007 of the "GLBTIQ Police Focus Group" in  
13 South Australia?

14 A. Yes.

15  
16 Q. And then in bold at the end of that paragraph you say  
17 this:

18  
19 *These experiences testify to the fact that*  
20 *[you] have extensive experience*  
21 *communicating with police officers and*  
22 *fostering mutual respect, trust and*  
23 *cooperation with a view to securing*  
24 *positive outcomes.*

25  
26 A. Yes.

27  
28 Q. So it is fair to say - it is in bold - you are  
29 stressing your credentials as someone who works with police  
30 in a cooperative way?

31 A. That's fair. I would say that's very fair.

32  
33 Q. And I will just briefly for this afternoon - you then  
34 talk about Professor de Lint's credentials for this  
35 project. You say:

36  
37 *His areas of interest include security and*  
38 *policing, particularly public order*  
39 *policing ....*

40  
41 A. Yes.

42  
43 Q. After referring to his work on editorial boards you  
44 say he has an international reputation in relation to  
45 policing research?

46 A. Mmm-hmm.

47

1 Q. And then you refer to his expertise in policing  
2 culture?

3 A. Yes.

4

5 Q. Do we take it from that that he also had no  
6 background, academically, in the field of gay hate?

7 A. That's a fair assertion.

8

9 Q. And thirdly, Dr Tyson, in her case, you refer to her  
10 experience in:

11

12 *... intimate partner violence, domestic*  
13 *homicide, filicide in the context of*  
14 *separation and divorce, and family violence*  
15 *and family law reform.*

16

17 Is that right?

18 A. Yes.

19

20 Q. Again, worthy topics but unrelated to gay hate?

21 A. Not totally unrelated but - you see, I'd - in terms of  
22 these processes, I'd respectfully like to say, in terms of  
23 the reality for how the world works in Australian  
24 universities, et cetera, the question sort of is, in  
25 Australia, who were these requisite people who could have  
26 done the job better - as well as us or better than us? And  
27 I would suggest that Gail Mason could have done it - I'm  
28 not sure why - who knows whether she put in a tender,  
29 I have no idea. I imagine Stephen would have put in a  
30 tender. I can't speak to why he didn't get it. But once  
31 you leave those two people out of the equation, you're then  
32 left with a whole lot of other people, myself included, and  
33 our team, who have skills and knowledge that cluster around  
34 the area but don't sort of neatly get printed on a sort of  
35 vellum card that you can hold up and go, "I am a hate crime  
36 expert."

37

38 So I'm trying to think, in terms of Australia - you  
39 know, even someone who does similar - has done, in a way,  
40 similar work to me but in a later period, Angela Dwyer, at  
41 the University of Tasmania, looking at gay and lesbian  
42 youth interactions with the police, et cetera - you know,  
43 I don't think she professes to be a hate crime expert at  
44 all.

45

46 So I guess what I'm respectfully trying to say,  
47 amongst all the factors that were at work here, including

1 a university that was banging its fist on the table  
2 screaming at people, "Bring in the money or your job's on  
3 the line", I saw my expertise in terms of all this stuff as  
4 relevant and helpful. Could you even accuse me, in this  
5 document, of kind of embellishing a little to try to get  
6 the tender because this is what you have to do with this  
7 process? I think even you could do that and that would be  
8 justified. We were told to embellish, to sell yourself  
9 like there's no tomorrow to get the money.

10  
11 They were literally salivating when I went into that  
12 office saying, "We might be able to get this tender." They  
13 were sort of just seeing the dollar signs, they took 20  
14 something per cent or 25 per cent off the top of it.

15  
16 I'd like to stress as well, I didn't get any money in  
17 my back pocket here to go shopping at David Jones or  
18 JB Hi-Fi; the money was paid into a research consultancy.  
19 I had intended prior to COVID occurring to travel to Poland  
20 to visit the memorial sites of Treblinka, Belzec and  
21 Sobibor, to do Holocaust research, which is my true  
22 passion, but COVID got in the road there.

23  
24 But I can honestly tell you, it just was - it's been  
25 a poisoned chalice from the second I started it, all this  
26 hatred and animosity. I would send emails to people who -  
27 one person who had stayed in my house and been very kind,  
28 I sent her an email and she didn't even reply. I was  
29 immediately constructed as a police apologist.

30  
31 It's a disgusting thing. I'm not a police apologist.  
32 I've spent years of my life documenting hate against gay  
33 people and to be constructed as such is a despicable  
34 thing - and that's what I feel is happening today with all  
35 this minutiae about all this sort of stuff. You would have  
36 been better to sequester your energies to look at the 25 or  
37 30 odd cases that weren't determined and spent a whole lot  
38 of resources looking at that, not attacking people like me.

39  
40 MR GRAY: Is that a convenient time?

41  
42 THE COMMISSIONER: Yes. Thank you, Dr Dalton. I will  
43 adjourn until tomorrow morning.

44  
45 **AT 4.06PM THE SPECIAL COMMISSION OF INQUIRY WAS ADJOURNED**  
46 **TO WEDNESDAY, 1 MARCH 2023 AT 10AM**  
47

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