2022 Special Commission of Inquiry

into LGBTIQ hate crimes

Before: The Commissioner,
The Honourable Justice John Sackar

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

On Monday, 15 May 2023 at 10.11am

(Day 51)

Mr Peter Gray SC   (Senior Counsel Assisting)
Ms Claire Palmer   (Counsel Assisting)
Mr Enzo Camporeale   (Director Legal)
Ms Caitlin Healey-Nash   (Senior Solicitor)
Mr Rhys Carvosso   (Solicitor)

Also Present:

Mr Anders Mykkeltvedt and Ms Amber Richards for NSW Police

Mr Murugan Thangaraj SC with Mr Jonathan Milner for
Mr Willing

```
1    THE COMMISSIONER:   Yes?
2
3    MR GRAY:   Commissioner, today is expected to be the final
4    day of evidence for public hearing 2.  Mr Willing will
5    return to the box to answer some further questions.  I'm
6    ready to proceed.
7
8         Your Honour might wish to take appearances.
9
10   THE COMMISSIONER:   Yes, certainly.
11
12   MR THANGARAJ:   I appear for Mr Willing, Commissioner.
13
14   THE COMMISSIONER:   Thank you very much.
15
16   MR MYKKELTVEDT:   Your Honour, I appear for the
17   Commissioner of Police.
18
19   THE COMMISSIONER:   Thank you again.  All right.
20   Mr Willing, would you be kind enough to come forward.
21
22        Just because there has been a bit of a break in
23   proceedings, I will get you to be resworn, and just forgive
24   me, I've just forgotten.  Oath or affirmation?
25
26   MR WILLING:   Oath is fine, Commissioner.
27
28   THE COMMISSIONER:   All right.
29
30   <MICHAEL JOHN WILLING, resworn:              [10.12am]
31
32   MR GRAY:   Commissioner, I should, before I ask Mr Willing
33   some questions, hand up two additional volumes of the
34   tender bundle, volumes 15 and 16, and there are also some
35   agreed short minutes reflecting some orders that are not
36   controversial.
37
38   THE COMMISSIONER:   Thank you.
39
40   MR MYKKELTVEDT:   Commissioner, those short minutes are
41   agreed.
42
43   THE COMMISSIONER:   Thank you, Mr Mykkeltvedt.
44
45        Yes, I have made those orders, thank you very much.
46
47
```

1   **<EXAMINATION BY MR GRAY:**
2
3   MR GRAY: Q.   Mr Willing, when you were last in the
4   witness box here in February, I asked you some questions
5   about Pamela Young's lengthy 445-page statement; you may
6   remember?
7   A.   Yes.
8
9   Q.   And speaking generally for the moment, I suggested to
10   you that her statement made it clear that her opinion was
11   that the most likely explanation for Scott Johnson's death
12   was suicide; do you remember me putting that to you?
13   A.   Yes.
14
15   Q.   And you declined to accept that characterisation,
16   you'll recall?
17   A.   Yes.
18
19   Q.   And you said, and I am paraphrasing, that you thought
20   she simply outlined the evidence relating to each of the
21   three possible hypotheses, but then just left it to the
22   Coroner?
23   A.   Yes.
24
25   Q.   In effect, you were suggesting - again my words not
26   yours - that her statement was, as it were, neutral as to
27   those three possibilities?
28   A.   Yes.
29
30   Q.   Now, first of all, have you thought further, since you
31   were last here, about the question of what impression
32   a reader of her statement would have received on that
33   point?
34   A.   I have.
35
36   Q.   And do you accept that while all three possibilities -
37   that is, suicide, homicide and misadventure - were all
38   covered or dealt with in her statement, it was quite clear
39   that her own view was that suicide was more likely than
40   either of the other two?
41   A.   Yes.
42
43   Q.   And would you agree also that it was quite clear that
44   her own view was, firstly, that suicide was distinctly
45   likely and there was solid evidence supporting that theory?
46   A.   Yes.
47

1   Q.   Secondly, that homicide was distinctly unlikely, and
2   the evidence for that theory was weak to non-existent?
3   A.   Yes.
4
5   Q.   And, thirdly, that misadventure was possible, but that
6   she didn't devote much attention to that possibility?
7   A.   I think that's correct, yes.
8
9   Q.   It may be that I can eliminate the next half a dozen
10   pages of what I was going to ask you, given those answers.
11   Is there a reason why you have come to that somewhat
12   different view since you were last here?
13   A.   Since I was last - or since I gave evidence
14   in February, I should say, I've read and received lots of
15   different documents which has swayed my opinion to what
16   you've just put to me and what I've agreed to.
17
18   Q.   In that case, I will do, I think, a rather more
19   broad-brush approach than I had planned to do.
20   A.   Sure.
21
22   Q.   You may recall - and if you need to have the statement
23   in front of you of course we will put it there - that at
24   the end of her very long statement, the last 15 pages or
25   so --
26   A.   Yes.
27
28   Q.   -- from about 430 to 445 are under the heading
29   "Opinion"?
30   A.   Yes.
31
32   Q.   So we've had 400-plus pages of factual matter --
33   A.   Yes.
34
35   Q.   -- investigative results, and then there's 15 pages
36   under a heading "Opinion"?
37   A.   Yes.
38
39   Q.   And she gives, firstly from paragraph 2878 through to
40   2898, so 20 paragraphs, the suicide hypothesis?
41   A.   Yes, that's correct.
42
43   Q.   Then from 2899 to 2970, the homicide hypothesis?
44   A.   Yes.
45
46   Q.   And then from 2971 to the end, the misadventure
47   hypothesis?

Transcript produced by Epiq

1   A.   Yes.

2

3   Q.   In the broad, taking them in slightly different order,
4 with the homicide - sorry, the misadventure hypothesis, she
5 essentially says that misadventure is not impossible, but
6 there had been some previous cases of misadventure in that
7 area?
8   A.   Yes.

9

10   Q.   And then essentially leaves it there on the topic of
11 misadventure?
12   A.   Yes, without having the statement in front of me,
13 I accept what you're saying, sir.

14

15   Q.   And on the homicide hypothesis - and I can go through
16 this in more detail if you find it necessary - essentially,
17 what she does is two things: she identifies factors that
18 might be put forward as supporting a homicide hypothesis?
19   A.   Yes.

20

21   Q.   And, secondly, she then refutes or debunks each of
22 those, in turn?
23   A.   Yes.

24

25   Q.   So she's plainly saying that the homicide hypothesis
26 is unlikely to be right?
27   A.   Yes.

28

29   Q.   Then as to suicide, overall, what she does,
30 conversely, is, firstly, to identify factors that are put
31 forward against the suicide hypothesis?
32   A.   Yes.

33

34   Q.   And, secondly, she refutes or debunks those factors?
35   A.   Yes.

36

37   Q.   So overall, she's plainly saying that the suicide
38 hypothesis is likely to be right?
39   A.   Is more likely than the others, yes.

40

41 MR GRAY: Now, could Mr Willing have tab 377, which would
42 be in volume 16, I think, [NPL.3000.0003.2864_0001].

43

44   Q.   This may be a little hard to read, it's in rather
45 small print, but --
46   A.   I have it in front of me here, sir.

47

.15/05/2023 (51)   3724   M J WILLING (Mr Gray)
Transcript produced by Epiq

```
 1      Q.    Yes.  The email chain is in May, on 20 May 2015.  So
 2      about five weeks after Coroner Barnes has ordered the third
 3      inquest?
 4      A.    Yes.
 5
 6      Q.    Five weeks after the Lateline interview and about
 7      four weeks after Pamela Young has been removed from the
 8      Scott Johnson investigation?
 9      A.    Yes.
10
11      Q.    What we find here is that Detective Acting
12      Superintendent Laidlaw writes to Coroner Barnes seeking
13      approval for DCI Pamela Young to travel to England to
14      obtain statements from two people about matters concerning
15      suicide in relation to Scott Johnson.
16      A.    That's right, yes.
17
18      Q.    As I mentioned, that's about a month after she has
19      been removed from the Scott Johnson investigation, and she
20      is proposing to fly to England to obtain statements from
21      two people supportive of the suicide theory?
22      A.    Yes, that's right.
23
24      Q.    Did you know that that was proposed a month after
25      she'd been taken off?
26      A.    No.  I was relieving as an Assistant Commissioner in
27      another area, however, Mr Laidlaw who was relieving me,
28      raised it with me, and I thought it was an unlikely
29      proposal that the Coroner would agree to, but told him he
30      should contact the Coroner and raise that with him.
31
32      Q.    Again, to state perhaps the obvious, it suggests
33      a considerable attachment to the suicide theory on the part
34      of --
35      A.    Yes, it does, it does.
36
37      Q.    -- Pamela Young, doesn't it?
38      A.    Yes, it does.
39
40      Q.    Did you also share her view that suicide was the most
41      likely explanation for the death of Scott Johnson?
42      A.    Oh, I think I gave evidence on the last occasion under
43      questioning from Mr Tedeschi.  My view changed at various
44      times.  I thought at some parts of the inquiry, at some
45      points I thought that suicide was much more likely; other
46      times I thought no, depending on my own analysis of what
47      I was being told at the time.  But I thought overall that
```

```
1    suicide was a likely possibility - likely explanation for
2    what occurred with Scott.
3
4    Q.   Can I just ask you to have a look at tab 382
5    [NPL.0147.0001.0005_0001] in that bundle.
6    A.   Yeah.
7
8    Q.   This is the note of your interview with the solicitor
9    from Ashurst --
10   A.   Yes.
11
12   Q.    -- ten days or so after the Lateline interview.
13   A.   Yes.
14
15   Q.   On page 3, towards the bottom, about two paragraphs
16   from the bottom --
17   A.   Yes.
18
19   Q.    -- maybe start three paragraphs from the bottom, where
20   it has your initials, "MW", the question that you have been
21   asked to respond to and the topic you have been on is in
22   the paragraph or so before, if you just orient yourself --
23   A.   Yes, I'm aware.
24
25   Q.     -- is one aspect of the Johnson family's belief that
26   this was a homicide and that there were gangs operating,
27   and so on?
28   A.   Yes.
29
30   Q.   You can see that that's the subject matter?
31   A.   Yes, it is, yes.
32
33   Q.   And you're recorded as saying the Johnsons embellished
34   the facts --
35   A.   Yes.
36
37   Q.    -- and said it was the same area as Scott's death when
38   it was actually a distance away?
39   A.   Yes.
40
41   Q.   Then you're recorded as saying:
42
43        I think he has probably gone up there to
44        engage in casual sex and either fallen
45        asleep and fallen over or committed
46        suicide.
47
```

```
 1      A.    That's right.
 2

 3      Q.    So misadventure or suicide?
 4      A.    Yes.
 5

 6      Q.    This is April 2015?
 7      A.    That's correct, yes.
 8

 9      Q.    Pausing there, did that view remain the same
10      thereafter or is that a view that, as you have described,
11      chopped and changed a bit?
12      A.    It did chop and change a bit.  You'll see in the next
13      line I mention Alan Turing, as a mathematician, similar
14      sort of circumstances, a homosexual man who was concerned
15      over the style of mathematics that Turing engaged in, and
16      I thought that that was a likely scenario at the time, but
17      it did change.  There was another - you know, it was before
18      the Coroner for a considerable period of time after that
19      and I thought ultimately that you couldn't determine one
20      way or the other.
21

22      Q.    So when you're recorded here as saying in April
23      2015 --
24      A.    Yes.
25

26      Q.    -- "My theory is", and you refer to Alan Turing --
27      A.    Yes.
28

29      Q.    -- that theory underwent some changes thereafter?
30      A.    Yeah.  Yeah, it changed.
31

32      Q.    Now, you certainly shared Ms Young's view, I gather,
33      that it was not a homicide?
34      A.    I thought that there was no evidence to indicate it
35      was a homicide.  I couldn't rule that out, of course, but
36      I thought it was more likely the other two scenarios.
37

38      Q.    Did you share her view that the Johnson family were
39      wrong in continuing to push the homicide theory?
40      A.    I didn't think they were wrong in continuing to push
41      it.  In the absence of the other two theories, I thought
42      that was narrow, and that the other two hypotheses should
43      be considered as well.
44

45      Q.    Did you agree with the view that she seems to have had
46      that the Johnson family were the police's opponents in
47      connection with the Scott Johnson inquest?
```

Transcript produced by Epiq

1   A.   No, I didn't. Not opponents.

2

3   Q.   She saw them that way, it appears, from what we've
4   been provided with in documentary form?
5   A.   Yes, that's very clear.

6

7   Q.   Do you agree with that?
8   A.   I do.

9

10   Q.   She seemed to have the view - and I'll take you to
11   a document or two --
12   A.   Sure.

13

14   Q.   -- that one objective of the police in the third
15   inquest would be to defeat the Johnson family by convincing
16   the Coroner that it was not homicide?
17   A.   Yes, I think that's - that's true. I have read those
18   sentiments.

19

20   Q.   And did you understand that to be her objective at the
21   time she was doing her work on the Johnson case?
22   A.   I understood that she reached a conclusion and then
23   pushed that conclusion.

24

25   Q.   Now, do you say that you didn't regard it as an
26   objective of the police to defeat the Johnson family in
27   that way?
28   A.   Not defeat. I mean, you know, it was certainly an
29   adversarial relationship that had evolved over time.
30   I didn't consider defeating them to be an objective.

31

32   Q.   Can we just have a look at 382A
33   [NPL.201.00001.0029] --
34   A.   Yeah.

35

36   Q.   -- which is some bullet points that you prepared at
37   about the time you were going to be interviewed by the
38   Ashurst solicitor?
39   A.   Yes.

40

41   Q.   Now, on page 4 of those notes just below halfway down
42   the page - now, just to orient you, this is 14 April. It's
43   the day after the Lateline interview. Do you see the
44   paragraph beginning "At 5.04pm"?
45   A.   Yes, I do, yeah.

46

47   Q.   Now, you refer there to a text message from DCI Young

1   on 14 April, where she says that the Johnson family
2   criticise and humiliate her "and all our efforts"; do you
3   see that?
4   A.   Yes, I do.
5
6   Q.   And your response --
7   A.   Yes.
8
9   Q.   -- and you're evidently quoting from a text message
10   that you sent her, is:
11
12   *I know Pam. I have felt this crap too and*
13   *you know that I support you. I want all*
14   *the hard work you have done to come out in*
15   *court for what it is and show the Johnsons*
16   *for what they are. We need to let that*
17   *happen and can't jeopardise that now by*
18   *letting them win.*
19
20   A.   Yes.
21
22   Q.
23   *This is for Penny and well and all of the*
24   *other people who have helped.*
25
26   Now, doesn't that suggest that you were keen, just as she
27   was, not to let the Johnsons win?
28   A.   I say that, and I'm attempting to appease her, because
29   she was very upset at the time.
30
31   Q.   Do you mean to say that you used that kind of language
32   although you didn't actually believe it?
33   A.   I didn't see it as an "us" - you know, as a game to be
34   played where there was a winner or not, but it was - I was
35   appeasing her because that was very much her view.
36
37   Q.   Well, she responds:
38
39   *Mick - I will not let them win - that is*
40   *not in my DNA.*
41
42   A.   Yes.
43
44   Q.   Once again making it very clear that she saw it as her
45   against the Johnsons?
46   A.   That's right.
47

```
 1    Q.   And she wanted to defeat them, obviously?
 2    A.   Yes.
 3
 4    Q.   And a defeat was no finding of homicide?
 5    A.   That could be, yes, that's right, yes.
 6
 7    Q.   It's pretty obvious, isn't it?
 8    A.   Yes.
 9
10    Q.   And you respond:
11
12         Ok.  I understand.  We will work it through
13         and we will come out on top.
14
15    A.   Yes.
16
17    Q.   Again, that is you saying to her, "I agree, we will
18    defeat the Johnsons, we will win"?
19    A.   Yes, that is.
20
21    Q.   But you say that wasn't actually your attitude, in
22    fact?
23    A.    I was attempting - as I said, I was attempting to
24    appease her.  She was extremely upset.  I didn't see it as
25    a - as a game with a winner or loser, but it was in the
26    context of all of the criticism that Pam had received up
27    until that point.
28
29    Q.   You may recall last time you were in the witness box
30    I asked you a couple of questions about an email, which
31    I can dig up if need be --
32    A.    Sure.
33
34    Q.    -- from two and a half years later - that is, on the
35    day that the Coroner actually made the finding in November
36    2017 that it had been a homicide.
37    A.    Yes.
38
39    Q.    And there were some emails that I showed you which
40    indicated that those that had worked on the case for the
41    police - namely, Penny Brown in particular - were very
42    upset; do you remember that?
43    A.    Yes.  Yes, I do.
44
45    Q.    And the obvious inference is, isn't it, that those
46    working on the case right up to November 2017, including
47    Penny Brown, were upset because they were dead against
```

```
 1        a finding of homicide?
 2        A.   Yes.
 3
 4        Q.   Well, what do you say about the open-mindedness of
 5        those who were conducting that investigative work?
 6        A.    I believe that they were open-minded but - during the
 7        course of the investigation, up until the time it went to
 8        the Coroner.  From then on it was in the hands of the
 9        Coroner, but they reached a conclusion, without a doubt.
10
11        Q.   Well, they started with a view, it seems, well and
12        truly by April 2015, that it was not homicide and was very
13        likely to be suicide?
14        A.   Very likely, yes, that's right.
15
16        Q.   And they evidently still held that view right up
17        to November 2017 and conducted the inquiry, albeit under
18        the direction of the Coroner, from that perspective?
19        A.   Yes.
20
21        Q.   That doesn't sound very open-minded?
22        A.   By that point it was in the hands of the Coroner,
23        but --
24
25        Q.   I'm asking you about the --
26        A.   But I agree with what you're saying.
27
28        Q.    -- approach of those doing the work, the police
29        officers?
30        A.   Yes.
31
32        Q.   And you are agreeing with me?
33        A.   Yes, I am.
34
35        Q.   Now, I will turn to the Lateline topic.
36        A.   Sure.
37
38        Q.   You may as well just keep that folder there, if you
39        wouldn't  mind.
40        A.   Sure.
41
42        Q.   Because most of the documents that I want to show you
43        are in that folder.
44        A.   Yes.
45
46        Q.   Now, on the last occasion back in February, the
47        Commissioner asked you a few questions and I asked you one
```

1   or two - the Commissioner asked you a few at page 1711 of
2   the transcript. And Mr Willing should have that, either on
3   the screen or in front of him, if we can. Now, if we
4   scroll down towards the bottom, yes, at the bottom of
5   1711 --
6   A.   Yes.

7

8   Q.   -- there's a question from me at line 41:

9

10   Q.   Now, you knew that Pamela Young was
11   going to be interviewed for Lateline,
12   didn't you?

13

14   And your answer starts with the word "No"; do you see that?
15   A.   Yes.

16

17   Q.   And you go on to say a bit more, which you can read to
18   yourself, it's on the screen, and you refer to knowing
19   something about background - and I will come to this in
20   some detail --
21   A.   Sure.

22

23   Q.   -- but you then say:

24

25   A.   ... I was unaware that ... she would
26   actually give a live interview or an
27   interview, I should say, that would be
28   televised.

29

30   Now, is that answer correct?
31   A.   Yes. It's a reference to the in-studio interview that
32   she gave on 13 April.

33

34   Q.   Your answer included that you were unaware that she
35   would give an interview that would be televised.
36   A.   Yes.

37

38   Q.   That's not right, is it?
39   A.   No, it doesn't take into account the door-stop
40   interview that she did during the day on the 13th.

41

42   Q.   The Commissioner then asked you:

43

44   Q.   ... do I understand it to say --

45

46   this is at 1712 --

47

Transcript produced by Epiq

1   *that she didn't tell you that she was going*
2   *on air that night?*
3
4   And you said, "No, no"?
5   A.   I'm referring - that's correct, I did say that.
6
7   Q.   You said that on the transcript, but that answer is
8   not true, is it?
9   A.   It doesn't take into account the fact that she had
10   recorded an interview at the Glebe Coroners Court with the
11   ABC that may have gone on television that night.
12
13   Q.   Do you still say that she didn't tell you that she was
14   going to be on Lateline that night, having been interviewed
15   for Lateline?
16   A.   Yes, for - sorry, in the - in an in-studio capacity
17   like she did. But she was interviewed at the court, as
18   I said.
19
20   Q.   So the Commissioner asks you at about line 14:
21
22   *Q.   It must have come as a complete shock*
23   *and a surprise when you saw her face on the*
24   *television, then, did it?*
25
26   And your answer was:
27
28   *A.   Yes --*
29
30   A.   Yes.
31
32   Q.   --
33
34   *I received a telephone call saying that,*
35   *"Pam is on Lateline". I turned it on and*
36   *saw her there.*
37
38   A.   Yes.
39
40   Q.   Now, is the answer "Yes", truthful - that is, it came
41   as a shock and surprise when you saw her face on the
42   television?
43   A.   In that capacity, in an in-studio-style interview,
44   yes.
45
46   Q.   Well, the Commissioner took that very point up with
47   you in the next few questions.

```
1      A.   Yes.
2
3      Q.   Line 19:
4
5           Q.   ... did it come as a shock and
6           a surprise --
7
8      Answer:
9
10          A.   Yes, it did.
11          Q.   -- to see her on the television?
12          A.   Yes, it did.
13
14     A.   Yes.
15
16     Q.   The Commissioner asked:
17
18          Q.   ... she never asked your permission?
19          A.   To go on television like that, no.
20
21     The Commissioner says:
22
23          Q.   Yes, correct.
24
25     And then he asks you:
26
27          Q.   ... (b) therefore you had no knowledge
28          that she was going on television?
29          A.   Not like that, no.
30
31     A.   Yes, that's correct, yes.
32
33     Q.   The Commissioner then asked you:
34
35          Q.   When you say, "not like that", I'm so
36          sorry, not at all?
37
38     And your answer was:
39
40          A.   No, not on - not on television at all.
41
42     Now, that's not true, is it?
43     A.   Yeah, that's - what you are saying is right and I was
44     wrong.  I didn't take into account --
45
46     Q.   You were wrong?
47     A.   Yes.  I didn't take into account the fact that she had
```

.15/05/2023 (51)   3734   M J WILLING (Mr Gray)
Transcript produced by Epiq

1 been interviewed by ABC at court and that it may be on
2 television later on that night.
3
4 Q.   So do you still say, now, this morning, that you
5 didn't know until you saw the Lateline program that night
6 that she was going to be on it having been interviewed for
7 it?
8 A.   I still say I didn't know that she was going to do an
9 in-studio interview like she did. I --
10
11 Q.   Well, what do you say that you did know?
12 A.   I did know that she had been interviewed by ABC
13 Lateline at court, and that was likely, or could be on as
14 part of a series or an exclusive story by Lateline that
15 night.
16
17 Q.   I'll come back to that. Then on page 1713, at about
18 line 29, I asked you:
19
20   *Q.   ... however it came about, you in fact*
21   *saw the Lateline broadcast?*
22
23 And you said, "Yes, I did."
24
25 A.   Yes.
26
27 Q.   The Commissioner then asked you:
28
29   *Q.   As a result of a phone call?*
30
31 And you said, "Yes, that's correct". Now, that's not
32 accurate, is it?
33 A.   I don't think so. I've seen material since then where
34 I received an email, I think on my phone, from a Detective
35 Chief Inspector, and I think that was the notification that
36 I received which caused me to turn on the television.
37
38 Q.   Well, I'll come to that, too, but when that email was
39 sent to you and he told you that Pamela Young was on
40 television --
41 A.   Yes.
42
43 Q.   -- your answer was, "Watching, mate", in other words,
44 you were already watching it?
45 A.   Some minutes later, I replied that. I turned on the
46 television after receiving notification.
47

1   Q.   Let's go to a bit of the detail. Now, the Lateline
2   broadcast, as we know, was on the evening of Monday,
3   13 April?
4   A.   Yes.
5
6   Q.   Earlier that day there had been a directions hearing
7   before State Coroner Barnes with respect to the Johnson
8   case?
9   A.   Yes.
10
11   Q.   For some weeks before that there had been discussions
12   and planning about how to handle the media in relation to
13   what was likely to happen at that directions hearing?
14   A.   For about two weeks prior, yes.
15
16   Q.   And some of those discussions involved you?
17   A.   Yes.
18
19   Q.   Two of the main aspects for the directions hearing, as
20   everyone understood, were going to be, firstly, whether the
21   Coroner would actually order a third inquest --
22   A.   Yes.
23
24   Q.   -- correct? And, secondly, whether the Coroner would
25   make a non-publication order over Pamela Young's lengthy
26   statement, or whether it would become public, or largely
27   public?
28   A.   Yes.
29
30   Q.   Now, the police, to that point - up to and including
31   13 April - and DCI Young, were contending that her
32   statement should not be released to the public?
33   A.   Yes.
34
35   Q.   They were contending that there should be
36   a non-publication order over it?
37   A.   Yes.
38
39   Q.   But there was concern within the police, especially on
40   the part of Pamela Young, that the statement had somehow
41   already been provided to the Johnson family?
42   A.   Yes.
43
44   Q.   So, so far you're agreeing with what I'm putting?
45   A.   Yes.
46
47   Q.   All right. Now, could you just turn to 372

1   [NPL.0138.0002.3306] in that bundle, please.
2   A.   Yes.
3
4   Q.   That is an email from Georgina Wells, usually referred
5   to as Georgie Wells --
6   A.   Yes.
7
8   Q.   -- to Strath Gordon, both of those people being in
9   the world of the Media Unit or some such unit in the police
10   hierarchy?
11   A.   Yes.
12
13   Q.   They were media officers. And Georgie Wells is
14   telling Strath Gordon on 14 April, and that is, the day
15   after the Lateline interview, something about the
16   background leading up to it. Do you see that?
17   A.   Yes.
18
19   Q.   She says that on Wednesday, 1 April, there was
20   discussion with you and Pamela Young about how to manage
21   the media around the directions hearing, given that the
22   police knew that the Johnson family had a copy of the
23   statement and were likely to approach the media?
24   A.   Yes.
25
26   Q.   So you agree that that indeed did happen?
27   A.   Yes.
28
29   Q.   And she says, Georgie Wells says:
30
31   *We agreed on backgrounders with The*
32   *Australian [namely] (Dan Box) and ABC*
33   *[namely] Lorna Knowles ...*
34
35   And I just pause there for the moment.
36   A.   Yes.
37
38   Q.   I asked you about what you meant or what you
39   understood "backgrounders" last time?
40   A.   Yes.
41
42   Q.   And as I recall it, you said it meant, in effect,
43   talking to a journalist off the record?
44   A.   Yes.
45
46   Q.   Giving the journalist a bit of an understanding about
47   something that was likely to be a topic on which they might

```
1    want to write?
2    A.   Yes.
3
4    Q.   So you refer to "backgrounders" with Dan Box and
5    Lorna Knowles.  And then, according to Georgie Wells,
6    what also was discussed involving you and Pam Young and
7    Georgie Wells was:
8
9         ... with the possibility of on record
10        interviews if and when the statement was
11        made public by the Coroner.
12
13   A.   Yes.
14
15   Q.   Now, first of all, do you agree that that, although
16   it's only four or five lines long, captures what was
17   discussed?
18   A.   It does, but I didn't have the conversations with
19   Pamela Young about the possibility of going on the record
20   when the statement was made public or if the statement was
21   made public.  They were conversations between Georgie Wells
22   and Pamela.
23
24   Q.   All right.  We'll come to an email where something
25   similar is said, but --
26   A.   Sure.
27
28   Q.    -- you don't recall being party to discussions where
29   there was this kind of rider or qualification about going
30   on the record if the statement was made public?
31   A.   I don't recall specifically.  It was certainly
32   something that Pam thought could happen, should that
33   eventuate.
34
35   Q.   All right.  Now, on this same topic, if you just flick
36   over to 382A [NPL.2017.0001.0029_0001] again, which is your
37   notes?
38   A.   Sure.
39
40   Q.   Just about above halfway on the page there's a bullet
41   point beginning, "A couple of weeks prior to 13 April"; do
42   you see that?
43   A.   Yes.
44
45   Q.   Which would put it at around about 1 April, close?
46   A.   Yes.
47
```

```
 1      Q.    And probably, do you think, referring to the same
 2      discussion that Georgie Wells has just been referring to in
 3      that email?
 4      A.    I think that refers to a discussion between
 5      Pamela Young and I that had - that led to the dialogue with
 6      Georgie Wells.
 7
 8      Q.    So we need to look at these two bullet points
 9      together?
10      A.    Yeah.
11
12      Q.    In the one that I have started with you say that
13      DCI Young spoke to you about a media strategy?
14      A.    Yes.
15
16      Q.    I won't read it all out but you can read it to
17      yourself, and halfway down that bullet point she says her
18      idea was - well, you say:
19
20           Her idea was that we "background" select
21           journalists with the contents of her
22           statement ... so they had the complete
23           story --
24
25      et cetera?
26      A.    Yes.
27
28      Q.    And the third-last line of that bullet point reads as
29      follows, in your note:
30
31           If one was --
32
33      that is, if a non-publication order was issued --
34
35           then the discussions would be null and void
36           (they could not use the information
37           provided as it came from DCI Young's
38           statement).
39
40      A.    Yes.
41
42      Q.    And you agreed with that approach and you organised
43      a meeting with Georgie Wells?
44      A.    Yes.
45
46      Q.    And then that's what the next bullet point tells us
47      about?
```

1   A.   Yes.
2
3   Q.   Now, in that bullet point, you note that Georgie Wells
4   was going to brief the Director of Public Affairs, Strath
5   Gordon?
6   A.   Yes.
7
8   Q.   And you were going to speak to Detective Chief
9   Superintendent John Kerlatec and then in due course to the
10   Deputy Commissioner Nick Kaldas?
11   A.   Yes.
12
13   Q.   About this proposed approach involving background?
14   A.   That's correct.
15
16   Q.   And the next bullet point tells us that Strath Gordon,
17   according to Georgie Wells, approved that or agreed with
18   that approach?
19   A.   Yes.
20
21   Q.   Now, did Pamela Young tell you, around this time,
22   around about 1 April or so, that she herself had already
23   given a copy of the statement to Emma Alberici at the ABC
24   some time previously?
25   A.   No.
26
27   Q.   If she had told you that, what would you have done?
28   A.   It would have stopped the backgrounding strategy; it
29   would have stopped it then and there.
30
31   Q.   And why so?
32   A.   Because we were in a position where we were asking or
33   seeking a non-publication order over the statement and it
34   had been provided to a journalist already.
35
36   Q.   You're aware now, I take it, having seen these
37   materials at least in recent times --
38   A.   Yes.
39
40   Q.   -- that Pamela Young had indeed given her
41   445-page statement to Emma Alberici some eight weeks
42   earlier?
43   A.   Yes.
44
45   Q.   If we go to tab 354 [SCOI.82991_0001] we see Emma
46   Alberici telling someone else in the ABC in an email, first
47   of all, in the first paragraph, that she was going to be

1   having lunch with Steve Johnson and Dan Glick the next day?
2   A.   Yes.
3
4   Q.   But then in the longer paragraph beginning, "I have",
5   Emma Alberici says:
6
7   *I have an exclusive (explosive) interview*
8   *with the Detective Chief Inspector who led*
9   *the reinvestigation of the case.*
10
11   Now, I'll come to this in a slightly different way shortly,
12   but since this is on 11 April, she's evidently referring,
13   apparently referring, to the interview that she had with
14   Pamela Young the day before, on the 10th?
15   A.   Yes.
16
17   Q.   And did you know, either on the 10th or by the 11th,
18   that Pamela Young had been to the ABC and given an
19   interview of some description to Emma Alberici?
20   A.   A backgrounding discussion, yes.
21
22   Q.   You knew or thought you knew that she'd given
23   a backgrounding discussion --
24   A.   Yes.
25
26   Q.   -- to Emma Alberici on the 10th?
27   A.   Yes.
28
29   Q.   In the second line of that paragraph, Emma Alberici
30   says, referring to Pamela Young:
31
32   *She has said (we taped yesterday under*
33   *embargo) --*
34
35   A.   Yes.
36
37   Q.   --
38
39   *that this family has used their wealth and*
40   *position to improperly influence the NSW*
41   *judiciary.*
42
43   Was that something that she ever said to you or made known
44   to you, that she had that view?
45   A.   That they had improperly - that she thought that they
46   had improperly influenced the New South Wales judiciary?
47   No.

```
 1
 2      Q.    By using their wealth and position?
 3      A.    The judiciary?  No.
 4
 5      Q.    Well, did she have a view, that you were aware of,
 6      that they had used their wealth and position to improperly
 7      influence someone else, not being the judiciary?
 8      A.    She had a view that the Homicide Squad or the Police
 9      Force had been influenced to conduct the Strike Force
10      Macnamir investigation.
11
12      Q.    And is that a reference, as you understood it, to the
13      meeting with the Police Minister --
14      A.    Yes.
15
16      Q.    -- at the time of Australian Story, or broader than
17      that?
18      A.    A reference to her views arising from the meeting with
19      the Minister at the time, around the time of the Australian
20      Story.
21
22      Q.    Emma Alberici goes on in this email:
23
24            Pamela Young is frustrated by the multi
25            millions of dollars likely to be spent on
26            a third coronial inquest (which will be
27            announced Monday) when there is
28            unequivocally no new evidence to uncover.
29
30      That seems to be what Pamela Young apparently has said to
31      Emma Alberici?
32      A.    Yes.
33
34      Q.    And is that consistent with what, to your knowledge,
35      she was saying to you and others at the time?
36      A.    Not openly like that.  She certainly felt frustrated
37      that a lot of time and resources had gone into the
38      investigation, but not in those words.
39
40      Q.    Emma Alberici goes on:
41
42            I know this because she --
43
44      that is Pamela Young --
45
46            (extremely confidentially) gave me a copy
47            of her 500 page report 8 weeks ago & I've
```

```
 1              read it all.
 2
 3         A.   Yes.
 4
 5         Q.   Now, "eight weeks ago" would take us back to
 6         approximately mid February -- -
 7         A.   Yes.
 8
 9         Q.   -- you agree?
10         A.   Yes.
11
12         Q.   And when was the first time that you learned that
13         Pamela Young had given Emma Alberici her statement back
14         in February?
15         A.   When I read this material that was provided.
16
17         Q.   Meaning in the last month or so or --
18         A.   Yes.
19
20         Q.   Prior to that, no idea?
21         A.   No.
22
23         Q.   If we go to tab 346 in the same volume
24         [NPL.0138.0001.0072] you'll see there's an email from Penny
25         Brown to Pamela Young on 17 February
26         A.   Yes.
27
28         Q.   And the subject heading is "Documents for Emma"; do
29         you see that?
30         A.   Yes.
31
32         Q.   And Penny says to Pam:
33
34              Hi Pam,
35
36              I have placed a double sided copy of your
37              large statement in a massive blue
38              manila ... envelope on your desk.
39
40         A.   Yes.
41
42         Q.   And the next paragraph:
43
44              I spoke to Emma today and informed her that
45              you would contact her and arrange a time to
46              catch up.
47
```

```
1       Do you see that?
2       A.   Yes.
3
4       Q.   So do you read that as telling us that on 17 February,
5       Penny Brown provided a copy of the 445-page statement to
6       Pamela Young for Pamela Young to give to Emma Alberici?
7       A.   Yes, I do.
8
9       Q.   What do you say about the appropriateness of that
10      conduct by both Pamela Young and Penny Brown?
11      A.   Completely inappropriate and wrong.
12
13      Q.   Now, the backgrounder idea, as I mentioned to you a
14      little while ago --
15      A.   Yes.
16
17      Q.   -- seems to have had, at least in some people's minds,
18      a qualification, namely, the possibility of going on the
19      record if and when the statement was made public?
20      A.   Yes.
21
22      Q.   If we go to 382, your Ashurst interview, and go to the
23      middle of page 2, or just above the middle of page 2 --
24      A.   Yes.
25
26      Q.   -- you see the solicitor asks you, "What does
27      backgrounding mean"?
28      A.   Yes.
29
30      Q.   And you say, "Off the record".  And you go on to say
31      a bit later in that answer:
32
33           There was concern whether there was
34           non-publication order over her statement.
35           If there was no order then the statement
36           was on the public record.  After that
37           Georgie and Pam discussed whether she could
38           go on the record.
39
40      A.   Yes.
41
42      Q.   Now, could you explain what you meant when you gave
43      that answer?  Is that a discussion that you were party to
44      or that you were told about or - please tell us.
45      A.   No, as I said before, the discussions around the
46      possibility of going on the record occurred between Georgie
47      and Pam.  If her statement was - like, there was
```

1   no-publication order over the statement.
2
3   Q.   Yes, but you're telling the Ashurst solicitor on
4   24 April --
5   A.   Yes.
6
7   Q.   -- that Georgie and Pam discussed whether she could go
8   on the record?
9   A.   Yes.
10
11   Q.   So somebody, either Georgie or Pam, must have told you
12   that?
13   A.   Yes.
14
15   Q.   And who was it who told you?
16   A.   Georgie, I believe, but I can't recall exactly.
17
18   Q.   Well, what is it, as you recall, that Georgie said had
19   been discussed with between her and Pamela Young on that
20   point?
21   A.   That if the statement went on the record, there was
22   a possibility of - sorry, if the statement was - had no
23   non-publication order over it, there was a possibility of
24   doing an on-the-record interview, should requests come in,
25   but it would be something that would have to come back for
26   further consideration and approval.
27
28   Q.   This is the account given to you by Georgie Wells?
29   A.   If it was Georgie that told me - I believe it was
30   Georgie.
31
32   Q.   Could we go to 347, please [NPL.0138.0001.0037]. Now,
33   this is an email from Georgie Wells to John Kerlatec and
34   Kenneth Finch and also copied to yourself, Pamela Young and
35   Bradley Monk?
36   A.   Yes.
37
38   Q.   And it is on 7 April?
39   A.   Yes.
40
41   Q.   So six days before the directions hearing. Please
42   just tell us, first of all, who was John Kerlatec - that
43   is, what position did he hold - and Kenneth Finch?
44   A.   So John Kerlatec was my direct boss. He was the
45   Director of Serious Crime Directorate, as it was structured
46   at the time, within the State Crime Command.
47

```
 1        Ken Finch - Kenneth Finch - was his equivalent as the
 2     Director of the Organised Crime Directorate - so there were
 3     two directorates within State Crime Command.  At the time
 4     of this email he was acting as the Commander of the State
 5     Crime Command, so Acting Assistant Commissioner.
 6
 7     Q.   I see.  So two very senior officers?
 8     A.   Yes.
 9
10     Q.   So Georgie Wells tells them within the first
11     paragraph that the directions hearing is coming up on
12     13 April?
13     A.   Yes.
14
15     Q.   And in the second paragraph she tells them that
16     Pamela Young has prepared a statement of 445 pages, and
17     that Pamela Young has sought a non-publication order?
18     A.   Yes.
19
20     Q.   But she also tells them that it's possible that it
21     could be made available to the media for reporting as soon
22     as Monday?
23     A.   Yes.
24
25     Q.   She says there's concern that the media, given that
26     445 pages is a long document, might rely on the Johnson
27     family's view of the world because there wouldn't be time
28     to absorb of the lengthy statement; correct?
29     A.   Yes, yes.
30
31     Q.   And so the strategy proposed is in the next
32     paragraph beginning "As such":
33
34          ... we would like to provide a background
35          briefing to the ABC and The Australian
36          prior to Monday ...
37
38     A.   Yes.
39
40     Q.   So far, that's as you understood was to happen?
41     A.   Yes.
42
43     Q.   That's something that you were conscious of having
44     agreed to?
45     A.   Yes.
46
47     Q.   And the reason was so that they - the ABC and The
```

1   Australian - could have a look at the report and have
2   a chat to police about what's in it, it would be for
3   background information only and off the record?
4   A.   Yes.
5
6   Q.   So far consistent with your understanding?
7   A.   Yes.
8
9   Q.   Then she says that they - the ABC and the Australian -
10   would also be informed that there would be a possibility
11   there may be a non-publication order. I won't worry about
12   the sentence referring to the Sydney Morning Herald, but
13   the next sentence reads:
14
15   *If and when the statement is made public,*
16   *we would be happy to go on the record then,*
17   *plus address any media requests from all*
18   *media (including Rick Feneley).*
19
20   A.   Yes.
21
22   Q.   Now, this comes to you, among others, this email?
23   A.   Yes.
24
25   Q.   What did you understand by that sentence beginning,
26   "If and when the statement is made public"?
27   A.   As I said in my previous answer, if the statement did
28   not have a non-publication order over it there was the
29   possibility of going on the record and conducting formal
30   on-the-record interviews, but those interviews would have
31   to come back - if that took place, I should say, that would
32   require a further discussion and approval involving
33   a number of people.
34
35   Q.   Well, to cut to one part of the chase that I will come
36   to --
37   A.   Yes.
38
39   Q.   -- is it your understanding, rightly or wrongly, that
40   Pamela Young seems to have regarded that sentence as giving
41   her permission on the afternoon of 13 April to give an
42   interview to Lateline?
43   A.   I - I can't answer whether she thought that or not.
44   She may have taken that as meaning that, but I - that's
45   a massive stretch from what was agreed, and she knew that
46   those media requests - she'd been around a long time - had
47   to be discussed and approved before you do it.

1
2   Q.   So your evidence is - correct me if I'm wrong - that
3   that sentence beginning "If and when", that I've just taken
4   you to --
5   A.   Yes.
6
7   Q.   -- meant that if the statement was made public,
8   consideration might be given in due course --
9   A.   Yes.
10
11   Q.   -- to doing something in public; correct?
12   A.   Yes.
13
14   Q.   But that it didn't mean that if the statement was made
15   public, a public interview, not a backgrounder, not off the
16   record, was immediately authorised?
17   A.   That's correct.
18
19   Q.   Because you say, I think, do you, that authorisation
20   for that step would need to come back for consideration,
21   approval, discussion, et cetera?
22   A.   Yes.
23
24   THE COMMISSIONER: Mr Gray, I noticed a few minutes ago
25   that you had a problem with your microphone. It's not
26   projecting quite as efficiently as it might. I don't know
27   whether that's because you've --
28
29   MR GRAY: I will see if I can do better, Commissioner.
30   That may be an improvement.
31
32   THE COMMISSIONER: I think it is, yes. Thank you.
33
34   MR GRAY: Q.   I just, on this same email, wanted to ask
35   you one more thing --
36   A.   Yes.
37
38   Q.   -- about the next paragraph beginning "Additionally";
39   do you see that?
40   A.   Yes.
41
42   Q.
43   *Additionally, Det Supt Mick Willing intends*
44   *to advise the Coroner that we will be*
45   *backgrounding a number of reporters on the*
46   *statement as a courtesy.*
47

1   A.   Yes.
2
3   Q.   Now, that seems to mean that you were going to advise
4   the Coroner that you were going to be backgrounding
5   reporters and you would be advising him prior to doing the
6   backgrounding. "We will be backgrounding", it says; do you
7   see that?
8   A.   Yeah, that's the way it reads but that's not in
9   reality what happened.
10
11   Q.   That's obviously not what happened?
12   A.   No.
13
14   Q.   Is it not what happened because you didn't get around
15   to it or because you changed your mind and decided to do
16   something different?
17   A.   No, it didn't happen - that was the way it was written
18   but it happened after the Coroner ordered the new inquest,
19   because if he hadn't and there was no inquest, it was
20   a null and void proposition.
21
22   Q.   Well, in particular I think you may mean if he had
23   made a non-publication order, this wouldn't have come into
24   play?
25   A.   As well, yes.
26
27   Q.   Back to 367 [NPL.0138.0002.2771], still on this same
28   point, this is Georgie Wells's email of 14 April I have
29   asked you about the first paragraph but just have a look at
30   the second paragraph where she says to Strath Gordon,
31   Kenneth Finch and John Kerlatec:
32
33   *In discussing the backgrounders, we had*
34   *spoken about the ability for Pam to go on*
35   *the record if the Coroner made the*
36   *statement public, but would consider any*
37   *requests on the day.*
38
39   A.   Yes, I think you're referring to a different email
40   from the one you showed me before, but yes, that's right.
41
42   Q.   I am referring to a different email, I'm sorry, but,
43   at any rate, looking at this one now --
44   A.   You're correct.
45
46   Q.   Georgie Wells says:
47

```
1              ... we had spoken about the ability for Pam
2              to go on the record if the Coroner made the
3              statement public ...
4
5        Now, is that correct?
6        A.   Yes.
7
8        Q.
9              ... the ability for Pam to go on the
10             record ...
11
12       A.   The conversation that Georgie and her had had.
13
14       Q.   Well, that you knew about?
15       A.   That I - yes, I think I did know about it, yes.
16
17       Q.   Well, was the ability for Pam to go on the record
18       going to be triggered immediately if the Coroner made the
19       statement public?
20       A.   No.  She would have to come back and seek approval for
21       that.
22
23       Q.   We'll go through a few of these emails.
24       A.   Sure.
25
26       Q.   But that last addendum that you just put in --
27       A.   Yes.
28
29       Q.   -- that she'd have to come back and seek approval
30       doesn't seem to get mentioned in any of these emails?
31       A.   No.
32
33       Q.   That's right isn't it?  Is that because you would
34       regard that as so obvious that it goes without saying?
35       A.   It does.
36
37       Q.   Now, Mr Thangaraj points out - and I did take you to
38       this --
39       A.   Sure.
40
41       Q.   -- that the next few words says:
42
43             ... but would consider any requests on the
44             day.
45
46       A.   Yes.
47
```

```
 1      Q.   That's certainly there?
 2      A.   Yes.
 3
 4      Q.   Did you understand that to mean that - well, do you
 5      understand it to mean, looking at it now, that there was
 6      a possibility that, on the day, Pam might be given the
 7      green light to go on the record?
 8      A.   It was a possibility but again it would have to
 9      require a further discussion and approval involving
10      a number of people.
11
12      Q.   And who would it have had to involve?
13      A.   Myself, John Kerlatec, Ken Finch at the very least,
14      Georgie would be notified, and given the circumstances,
15      Strath Gordon as well.  And given that - sorry, and also
16      I would suggest that the Deputy Commissioner Kaldas would
17      have had some input as well, given the fact that he was
18      involved in approving the backgrounding strategy.
19
20      Q.   In that same email, while I have it open --
21      A.   Sure.
22
23      Q.   -- in the first paragraph, Georgie Wells says:
24
25           *Last Tuesday --*
26
27      which would make it 7 April --
28
29           *Pam Young indicated she would prefer to*
30           *speak with Emma Alberici on background at*
31           *ABC rather than Lorna Knowles ...*
32
33      A.   Yes.
34
35      Q.   Now, did you know that at some point along the line?
36      A.   At around that time, yes.
37
38      Q.   Georgie says that Mick Willing - that is, yourself -
39      and she, Georgie, discussed briefly and agreed to that?
40      A.   Yes.
41
42      Q.   Now, 374 [NPL.0138.0004.5545]  if you would.  This is
43      a note by Strath Gordon --
44      A.   Yes.
45
46      Q.   -- in effect to himself on the week of 21 April,
47      a week or so after the Lateline interview?
```

```
 1      A.   Yes.
 2
 3      Q.   In the third paragraph he says:
 4
 5           The previously agreed media strategy
 6           involved back grounding Dan and an ABC
 7           reporter ...
 8
 9      Agreed?
10      A.   Yes.
11
12      Q.   You agreed that's certainly right, and then Strath
13      Gordon goes on:
14
15           ... and then if we needed to provide
16           comment on the Coroners decision we could
17           do that in the day.
18
19      Maybe he means "on the day"?
20      A.   "On the day".
21
22      Q.   Now, what does that mean, as you understand it?  What
23      was it that "we could do" on the day?
24      A.   That if the - there was a non-publication - there was
25      no non-publication order, I should say, over the statement,
26      that we could provide comment on the Coroner's decision on
27      the day, but it would require further discussion.
28
29      Q.   Can I just take you back, now, to 348,
30      [SCOI.82992-0001] which is the day after - this is 8 April.
31      This is an ABC email, but it's the day after 7 April, which
32      is the date of the email we just looked at, in effect
33      summarising the backgrounding strategy?
34      A.   Yes.
35
36      Q.   So here we are on the day after that, 8 April, and
37      Emma Alberici is telling people at the ABC what has been
38      happening at her end about the upcoming interview with
39      Pamela Young, and in about the fourth line in she says:
40
41           We also have an exclusive interview with
42           the head of Homicide at NSW Police Pamela
43           Young who has had carriage of the case for
44           the past 3 years.
45
46      Now, that term "exclusive interview" doesn't sound like
47      "backgrounder", does it?
```

```
 1        A.   No, not at all.
 2
 3        Q.   So if Emma Alberici, as at 8 April, was under the
 4        impression that Pamela Young was giving her an exclusive
 5        interview, that would be quite contrary to what you
 6        understand was approved?
 7        A.   Yes.
 8
 9        Q.   She goes on, Emma Alberici does, a few lines below
10        that:
11
12             Pamela Young is prepared to say that this
13             family, given its wealth, has had too much
14             influence over the criminal justice system.
15
16        Did you have any indication prior to seeing the Lateline
17        program that Pamela Young was going to say that?
18        A.   No.
19
20        Q.   Emma Alberici goes on:
21
22             I have had a copy of the 500 page police
23             report which I have almost finished
24             reading.  It is not a public document and
25             I'm the only person outside police who's
26             had a chance to read it.
27
28        We've covered that before, that she has had it
29        since February?
30        A.   Yes.
31
32        Q.   And Emma Alberici goes on:
33
34             The document proves that the family has
35             twisted facts and made stuff up to garner
36             public support for a finding of "murder".
37
38        Now, as you understand Pamela Young's statement, does the
39        statement do that?
40        A.   No.
41
42        Q.   Does that indicate to you that if Emma Alberici has
43        that understanding, it's an understanding that has come not
44        from the statement but from what Pamela Young has said to
45        her?
46        A.   That's a possibility, yes - or probability, I should
47        say.
```

1
2   Q.   However, Emma Alberici goes on in the next line:
3
4   *Police are still convinced it was*
5   *suicide ...*
6
7   Do you see that?
8   A.   Mmm-hmm, yes.
9
10   Q.   Now, again, presumably, do you agree, that is
11   something that Emma - sorry, that Pamela Young must have
12   said to her?
13   A.   Yes.
14
15   Q.   And were police generally, not just Pamela Young,
16   convinced it was suicide?
17   A.   No, we - everyone I think individually had their own
18   theories, but by and large, the investigation conducted by
19   Pam and Penny reached a conclusion, and I think she's
20   believed that it was suicide was more than likely. Again,
21   my opinion changed and I thought suicide or misadventure
22   was probably more likely, but others - and others' views
23   I don't know.
24
25   Q.   The word Emma Alberici uses is not "more likely" or
26   language of that sort but "convinced" --
27   A.   Yeah.
28
29   Q.   Was that Pamela Young's view? Was she convinced it
30   was suicide?
31   A.   I think it was.
32
33   Q.   Emma Alberici goes on to say:
34
35   *Police have asked me if it's ok for The*
36   *Australian to be given an interview Monday*
37   *with Pamela Young also.*
38
39   A.   Yes.
40
41   Q.   Now, we know that The Australian was in fact given an
42   interview on the Friday, actually, but with Dan Box?
43   A.   The backgrounding interview, yes.
44
45   Q.   A backgrounding interview, yes. But what I'm
46   interested in is police, according to Emma Alberici, asking
47   her at the ABC whether it was okay for police to give The

```
1    Australian an interview.  Did you understand that that was
2    what was happening?
3    A.   No, I didn't.  There was always the possibility that
4    after the backgrounding of Mr Box and The Australian that
5    he would come back and asked for an interview but I can't
6    recall it being specifically discussed.
7
8    Q.   According to Emma Alberici, she spent an hour in
9    conversation with "them all", seemingly police personnel,
10   and "have had them agree that The Australian can't publish
11   until Tuesday"; do you have any knowledge of that?
12   A.   No, I don't.
13
14   Q.   In the next few lines she talks about what sort of
15   package she would do in advance of the program, and she
16   says then:
17
18        We will then have a studio interview with
19        Pamela Young which will be explosive.
20
21   A.   Yes.
22
23   Q.   This is on the 8th - this is before she's had even the
24   backgrounder, much less the second interview?
25   A.   Yes.
26
27   Q.   That would indicate, would it, that Pamela Young must
28   have already told her enough for Emma Alberici to
29   anticipate that what she would say would be explosive?
30   A.   Yes.
31
32   Q.   And Emma Alberici goes on:
33
34        She will also say --
35
36   that is Pamela Young will also say --
37
38        that $$millions have been wasted by the
39        state of NSW pursuing a case that can never
40        be solved on the available evidence.
41
42   That was in fact her view, I gather?
43   A.   Yes.
44
45   Q.   The next sentence is:
46
47        The last coronial "open" finding should
```

```
 1          stand and, if anything, changed back to
 2          suicide.
 3
 4     A.   Yes.
 5
 6     Q.   And that seems to be Emma Alberici recording
 7     Pamela Young's view?
 8     A.   That's right.
 9
10     Q.   So if there were any doubts from your earlier
11     evidence, it's plain there isn't?
12     A.   That's correct.
13
14     Q.   And Pamela Young's view about the suicide theory is
15     crystal clear?
16     A.   Yes.
17
18     Q.   Now, just bear with me one second.  Just back to 382A,
19     just keeping this chronological or close to it, on the top
20     of page 2, do you see there's a couple of paragraphs
21     dealing with what you were doing on 8 April?  The top of
22     page 2 begins "On 8 April 2015"?
23     A.   Yes.
24
25     Q.   So what you do is that you brief Mr Kerlatec about the
26     proposed strategy, by which I assume you mean the
27     backgrounding strategy?
28     A.   Yes.
29
30     Q.   And he agrees.  Then a bit later in the day the two of
31     you meet with Deputy Commissioner Kaldas, and he agrees as
32     well?
33     A.   Yes.
34
35     Q.   And he asks for a briefing note on Macnamir so that he
36     could brief the Police Minister, Mr Grant?
37     A.   Then - yes.
38
39     Q.   And we know, and we have it in this bundle, that you
40     indeed did a briefing note?
41     A.   Yes.
42
43     Q.   And indeed, Pamela Young made some contributions to
44     it?
45     A.   She did.
46
47     Q.   And that did go up to Deputy Commissioner Kaldas?
```

Transcript produced by Epiq

```
 1      A.   Yes.
 2
 3      Q.   Then on 9 April, which is the next paragraph, next
 4      bullet point on where we are on 382A --
 5      A.   Yes.
 6
 7      Q.   -- you are in the office and DCI Young tells you that
 8      she's going to do the backgrounding with Dan Box the next
 9      day?
10      A.   Yeah, later in the afternoon or evening, yes.
11
12      Q.   And she tells you that she doesn't want the media
13      officer, Siobhan McMahon, present at that backgrounding?
14      A.   Yes.
15
16      Q.   She refers to an earlier Australian Story event and
17      she says - that is, DCI Young says - that she did not want
18      to feel restricted by having the media officer present?
19      A.   Yes.
20
21      Q.   Now, did that cause you any concern when she told you
22      that?
23      A.   It did, because it wasn't usual, but - and I expected
24      that Siobhan would report that up to Strath Gordon, who
25      would contact me, but I trusted that Pam would do the right
26      thing and it was backgrounding only.
27
28      Q.   But presumably you must have realised that she wanted
29      to say things to the journalist that might be controversial
30      or problematic?
31      A.   Yes.  But it was on background, so it wouldn't make
32      a difference because it wasn't public.
33
34      Q.   Well, if it was on background and it wouldn't make
35      a difference, why not have the media officer there?
36      A.   Well, she should have.
37
38      Q.   But you agreed to let her not have her there?
39      A.   That's right, and I discussed it with Strath and we
40      both came to that conclusion, that we trusted Pam would
41      know what to say.
42
43      Q.   Well, she was in effect flagging, in this indirect
44      way, that she was likely to say something a bit
45      controversial.  One possibility was going to be this was
46      a suicide.
47      A.   That's right, it's a possibility.
```

```
1
2      Q.    Sorry?
3      A.    That's a possibility, yes.
4
5      Q.    And another possibility was going to be, would you
6      agree, that she would tell the journalist that the Johnson
7      family had far too much influence over the police and the
8      Police Minister?
9      A.    That's a possibility.
10
11     Q.    And were you untroubled about her saying such things
12     with no media officer present?
13     A.    I was concerned, as I said, and I knew, or thought,
14     that Strath would ring me about it and we would have that
15     discussion, but I trusted her.
16
17     THE COMMISSIONER:    Q.    Having been alerted to the fact
18     that she didn't want someone present, though, I take it it
19     didn't occur to you to speak to Young and remind her that
20     she should not say anything controversial?
21     A.    It didn't, sir, because I trusted that she had the
22     experience and know-how to do that, to not say something
23     controversial.
24
25     Q.    But she was almost, in a sense, giving you a heads-up,
26     wasn't she, that she was going to speak, in effect,
27     controversially, in the sense of off the record, and you
28     thought you trusted her sufficiently to, what, speak
29     discreetly off the record?
30     A.    Yes.
31
32     MR GRAY:    Q.    If we turn to 352 [NPL.0138.0004.7178],
33     this is Siobhan McMahon telling you, in effect, the same
34     thing, that Pamela Young doesn't want to have her present
35     at the backgrounder.  That is tab 352?
36     A.    She's telling Blake Clifton, who was the manager of
37     the media --
38
39     Q.    I'm sorry, not telling you, I beg your pardon, sorry.
40     Telling those that are the recipients of this email --
41     A.    Yes.
42
43     Q.    Thank you for that - that Dan Box was coming and,
44     second paragraph, that Georgie had asked her, Siobhan, to
45     sit in on the meeting between Pamela Young and Dan Box and
46     that that was normal Media Liaison Officer protocol?
47     A.    Yes.
```

1
2   Q.   But then reports that DI Young had requested that she
3   not attend the briefing, which is indeed what she had told
4   you the day before?
5   A.   Yes.
6
7   Q.   And the reason, apparently, that Detective Inspector
8   Young gave to Siobhan McMahon was that she wants to have
9   a free and frank discussion with Mr Box about the
10   investigation, and this would be hindered by the presence
11   of a media liaison officer?
12   A.   Yes.
13
14   Q.   Indeed, the decision, said Pamela Young, was designed
15   to protect Siobhan McMahon or any media officer from
16   possible repercussions?
17   A.   Yes.
18
19   Q.   Now, I appreciate that you didn't get this email, but
20   the topic - namely, Pamela Young in effect demanding that
21   the media officer not attend --
22   A.   Yes.
23
24   Q.   -- because there might be repercussions --
25   A.   Yes.
26
27   Q.   -- was one that came to your notice, wasn't it?
28   A.   Yes, it did.
29
30   Q.   Well, what were the repercussions that were
31   anticipated?
32   A.   I - as in from Pam talking to - what did Pam think the
33   repercussions would be?
34
35   Q.   No, what did you think were the possible repercussions
36   that you were alive to by letting Pam go off without the
37   presence of a media officer?
38   A.   Well, it was off the record, so I wouldn't - I didn't
39   think that there were going to be any repercussions from
40   what she said, because it was off the record.
41
42   Q.   Well, Siobhan McMahon makes the point - to the
43   non-police reader a pretty obvious point - in the next
44   paragraph:
45
46   ... it still puts me in a difficult
47   position. If today's meeting eventually

```
 1          leads to the publication of controversial
 2          comments, questions will be asked about why
 3          I was not present.
 4
 5     That seems like a reasonable point for her to make?
 6     A.   Yes, that's right, yes.
 7
 8     Q.   And while the notion of "backgrounder" might involve
 9     the notion of "off the record", the risk always exists, you
10     would agree, that something that is supposed to be off the
11     record one way or another finds its way on the record?
12     A.   The risk does exist but it's very rare.
13     Backgrounding - I mean, that's a normal part of media
14     relations, is talking to journalists and it not becoming
15     public; but the risk does exist.
16
17     Q.   A risk that Siobhan McMahon obviously recognised?
18     A.   Yes.
19
20     Q.   And I'm sure you also recognised?
21     A.   Yes.
22
23     Q.   But it was a risk you were prepared to take?
24     A.   Yes.
25
26     THE COMMISSIONER:   Mr Gray, I was going to take a break.
27     Is that a convenient point?
28
29     MR GRAY:   Oh, yes, that's convenient.
30
31     THE COMMISSIONER:   All right.  I will take a short break,
32     thank you.
33
34     SHORT ADJOURNMENT
35
36     THE COMMISSIONER:   Yes, Mr Gray?
37
38     MR GRAY:   Q.   Mr Willing, could you turn to 382A again.
39     On the second page, just around about halfway, there's
40     a couple of entries for 10 April, being the Friday?
41     A.   Yes.
42
43     Q.   And I think I have asked you about the first topic,
44     which concerns Siobhan McMahon --
45     A.   Yes.
46
47     Q.   -- being asked not to go to the backgrounder with
```

Transcript produced by Epiq

```
 1    Dan Box.  But I want to ask you about the second-bottom
 2    bullet point on that page, which is "Later that
 3    afternoon" - ie, on the 10th?
 4    A.   Yes.
 5
 6    Q.   You say that DCI Young rang you and explained what she
 7    had been doing, and it then says:
 8
 9         [DCI Young] said that the back-grounder
10         went well --
11
12    ie, that must be the one with Dan Box?
13    A.   Yes.
14
15    Q.   And that she was "on her way to the ABC now"?
16    A.   Yes.
17
18    Q.   So she was obviously going to the ABC, as you
19    understood it, on the afternoon of the 10th to do the
20    backgrounder with the ABC?
21    A.   Yes, the start of it, at the very least, yes.
22
23    Q.   Well, when you say "the start of it", as far as you
24    knew, she was going there to do the backgrounder?
25    A.   Yes, but it was late in the afternoon, I didn't know
26    how long that would take.  But that was the purpose of her
27    going there.
28
29    Q.   And she told you, apparently, that she was going to
30    see Emma Alberici.  Was that the first time you knew --
31    A.   No, I think that she - some days prior to that, she
32    made it clear that she wanted to talk to Emma Alberici
33    after the Lorna Knowles suggestion was mooted.
34
35    Q.   Now, at 382, the tab before, which is your Ashurst
36    interview, if we turn to page 6, do you see just below
37    halfway on that page, there's a passage attributed to you
38    beginning, "My understanding was"?
39    A.   Yes.
40
41    Q.    I won't ask you about it, but you can see the couple
42    of paragraphs above are talking about the Siobhan McMahon
43    topic?
44    A.   Yes.
45
46    Q.   Then you say in that paragraph beginning "My
47    understanding was", talking about the backgrounding, you
```

1   say:
2
3   *I sent her a text --*
4
5   that is Pam Young --
6
7   *saying "let me know how you do". She said*
8   *"all good, I am on the way to the ABC".*
9
10   A.   Yes.
11
12   Q.   This is on the 10th?
13   A.   Correct.
14
15   Q.   And you say:
16
17   *By that time I was aware it was Emma*
18   *Alberici and I said "ok". It was important*
19   *for me to have Pam talk to someone she was*
20   *comfortable with. It wasn't going to work*
21   *if she didn't feel the journalist would be*
22   *true to the agreement. Then that was it.*
23   *I didn't hear anything and I trusted*
24   *everything was fine.*
25
26   A.   Yes.
27
28   Q.   So your understanding on the 10th was that she was
29   going off to the ABC on the 10th to do the backgrounder and
30   that she had done so?
31   A.   That she had at least started it because I didn't hear
32   the outcome of it.
33
34   Q.   Well, you said, "I didn't hear anything and I trusted
35   everything was fine"?
36   A.   Yes. Well, I assumed that --
37
38   Q.   You assumed it was not just one backgrounder on the
39   10th but two - Dan Box --
40   A.   Oh, yes, sorry, yes.
41
42   Q.   -- and Emma Alberici?
43   A.   Yes, correct.
44
45   Q.   If we go to the actual interview that Pamela Young did
46   do with Emma Alberici on that day, we find that at 342
47   [NPL.2017.0004.0549] in this bundle. It goes for quite

1   a number of pages, 30 or more pages, and I only want to ask
2   you a few questions about it. On page 2, do you see at
3   about line 32, Emma Alberici asks her - I should add, on
4   the front page, the cover page of this, it's a recorded
5   interview, and according to the cover page it's in the
6   Lateline studio?
7   A.   Yes.
8
9   Q.   And at line 32 on page numbered 2, Emma Alberici asks
10   her:
11
12   *What's your personal opinion about what*
13   *happened to Scott Johnson?*
14
15   Do you see that?
16   A.   Yes, I do.
17
18   Q.   And the answer comes, it's at line 40, she says
19
20   *... my formal view ... to the coroner is,*
21   *of course, it could sit under .. . any of*
22   *those three categories ... but my personal*
23   *view --*
24
25   and I won't read it all out - is that it's feasible that
26   suicide is what happened?
27   A.   Yes.
28
29   Q.   I'm paraphrasing.
30   A.   Yes.
31
32   Q.   So she distinguishes between the formal view and her
33   personal view?
34   A.   Yes.
35
36   Q.   And she expands on that a little bit at the top of
37   page 3:
38
39   *So I am swayed, personally, that the*
40   *current finding, the open finding, could*
41   *move a bit more towards suicide again?*
42
43   A.   Yes.
44
45   Q.   Now, what Emma Alberici then does, and you can see
46   this at about line 16, is to say, "Well, I'm going to get
47   you to do that again"?

1   A.   Yes.
2
3   Q.   Because Emma Alberici thinks that could be improved
4   upon, apparently.
5   A.   Yes.
6
7   Q.   And so down the bottom of that page, Pamela Young says
8   at 43:
9
10   *... we would sway more towards homicide.*
11
12   And she corrects herself, "suicide". And then at page 4,
13   Pamela Young says at line 8 that if she were to say it's
14   most likely to be suicide, "that is such a controversial
15   statement"; do you see that?
16   A.   Yes, I do.
17
18   Q.   And she says:
19
20   *I want to say I believe, it's my true*
21   *belief, but it's going to be so*
22   *controversial ...*
23
24   A.   Yes.
25
26   Q.   And again, as per my questions to you earlier this
27   morning, it's quite obvious what her personal view actually
28   is?
29   A.   Yes.
30
31   Q.   Now, what Emma Alberici ultimately does on page 7, at
32   about line 14, is to ask the question again, to give Pamela
33   Young another go at asking the same question, namely, "What
34   do you personally think happened to Scott Johnson"?
35   A.   Yes.
36
37   Q.   And she gives another answer at line 17 and following;
38   you can see that?
39   A.   Yes, I do.
40
41   Q.   Also referring to suicide. And then over at page 11,
42   there's a series - if you just read, if you wouldn't mind,
43   to yourself from about line 3 down to line 37 - just read
44   those to yourself.
45   A.   Yes. Yes.
46
47   Q.   Now, Pamela Young refers to her understanding that

.15/05/2023 (51)   3764   M J WILLING (Mr Gray)
                    Transcript produced by Epiq

```
 1   part of this exercise on this day was going to be for what
 2   she calls "a grab", at line 4?
 3   A.   Yes, yes.
 4
 5   Q.   And "to attract attention", she says, at line 8?
 6   A.   Yes.
 7
 8   Q.   And Emma Alberici explains that it's possible to get
 9   something on radio with Mark Colvin, and so on?
10   A.   Yes.
11
12   Q.   And then at line 34, Emma Alberici says:
13
14        ... it's like, you know, "Watch Lateline
15        for more".
16
17   A.   Yes.
18
19   Q.   Now, I appreciate you didn't know on the day that this
20   exchange was occurring --
21   A.   That's right.
22
23   Q.    -- but looking at it now, it rather looks as though
24   Emma Alberici and Pamela Young were planning to use
25   excerpts from this interview, being held on the 10th --
26   A.   Yes.
27
28   Q.    -- as a kind of promotional material for what was
29   going to be broadcast on Lateline the next week?
30   A.   Yes.
31
32   Q.   And if that was what Pamela Young was doing on the
33   10th --
34   A.   Yes.
35
36   Q.    -- was that remotely within what you understood she
37   was supposed to be doing?
38   A.   Not at all.
39
40   Q.   What explanation, if any, can you offer as to why she
41   did that and what she thought she was doing?
42   A.    It seems to me, and on the material that I have read,
43   that this was all pre-planned.
44
45   Q.   With what in mind, as far as you know or can surmise?
46   A.    To do a story after the announcement of the inquest on
47   the Monday.
```

.15/05/2023 (51)   3765   M J WILLING (Mr Gray)

Transcript produced by Epiq

1
2   Q.   And was any such plan or idea ever discussed with you?
3   A.   No.
4
5   Q.   So then at the bottom of that page, 11, Emma Alberici
6   gives Pamela Young a third go at the question. She says:
7
8   *... let's try that again .... what do you*
9   *personally think happened to Scott Johnson?*
10
11 Do you see that?
12 A.   Yes, I do.
13
14 Q.   So then Pamela Young gives another answer talking
15 about suicide in a slightly different way?
16 A.   Yes.
17
18 Q.   And then just finally, I think, on this transcript,
19 if I could just take you to page 20 - this is a different
20 point, but I wanted to ask you about something she says
21 on page 20. Do you see that at line 24 on page 20,
22 Emma Alberici asks her:
23
24   *What's changed since the last coronial*
25   *inquest that would warrant another one?*
26
27 Do you see that?
28 A.   Yes, I do.
29
30 Q.   And Pamela Young gives an answer beginning at line 27,
31 which you may read to yourself, I won't take you to that
32 first paragraph.
33 A.   Yes.
34
35 Q.   But then in the second paragraph of her answer, at
36 line 37 she says:
37
38   *We have put to the test some of the*
39   *findings of Operation Taradale --*
40
41 A.   Mmm-hmm.
42
43 Q.   --
44
45   *which ... did identify or reinvestigate*
46   *some gay-hate crimes in Bondi, and two were*
47   *found to be possible homicides.*

.15/05/2023 (51)   3766   M J WILLING (Mr Gray)
Transcript produced by Epiq

1
2   Do you see that?
3   A.   Yes, I do.
4
5   Q.   Now, what do you understand her to mean by that, "We
6   have put to the test some of the findings of Operation
7   Taradale"?
8   A.   That she had, as part of her investigation into
9   Scott Johnson's death, looked at the circumstances around
10   the three Bondi matters, if I can characterise them as
11   that, and included that as part of her investigation back
12   to the Coroner, or to the Coroner.
13
14   Q.   Well, of course, the second coronial inquest, the one
15   under Carmel Forbes --
16   A.   Yes.
17
18   Q.   -- in 2012 had made the open finding departing from
19   the previous suicide finding?
20   A.   Yes.
21
22   Q.   And one of the reasons Carmel Forbes gave for changing
23   from suicide to open finding was her awareness, as Coroner,
24   of what had been uncovered in the Taradale exercise about
25   Bondi; correct?
26   A.   Yes.
27
28   Q.   So when Pamela Young says, "We have put to the test
29   some of the findings of Operation Taradale", should we
30   understand that as meaning that the police were concerned
31   in the Johnson case to show that the findings of Operation
32   Taradale were not reliable?
33   A.   Did you - sorry, can you repeat that, determined to
34   show or --
35
36   Q.   That the findings of Operation Taradale were not
37   reliable?
38   A.   I don't know whether I'd go as far as they're
39   determined to show, but certainly look at them and analyse
40   them as part and parcel of the investigation.
41
42   Q.   Well, put them to the test, apparently - that seems to
43   suggest a challenging of them, doesn't it?
44   A.   An analysis of them and to see whether or not, you
45   know, with information that was developed during the
46   Macnamir investigation, whether they could add light or
47   change the views of what happened to those men.

.15/05/2023 (51)   3767   M J WILLING (Mr Gray)

Transcript produced by Epiq

```
1
2      Q.    Well, I'll make it clear what I'm putting to you.  If
3      the view of Pamela Young, as we've seen, was very much that
4      Scott Johnson's death was a suicide - if that was her
5      view --
6      A.    Yes.
7
8      Q.    -- and if she was keen to combat and rebut the
9      family's view that it was a homicide - which it seems it
10     was?
11     A.    Yes.
12
13     Q.    It seems she was keen to do that, we've agreed?
14     A.    Yes.
15
16     Q.    Then one pathway towards combating the Johnson family
17     homicide theory would have been to undercut the Taradale
18     findings, wouldn't it?
19     A.    That could be a possible pathway, yes.
20
21     Q.    Well, isn't that what she's pretty squarely saying,
22     when she says, "We put the findings of Taradale to the
23     test"?
24     A.    It does read that way, but I think what she's saying
25     is that she's - they've done an analysis of the findings as
26     part and parcel of the investigation.  I can't take it any
27     higher than that.
28
29     Q.    Back to 382A.  At the bottom of the second page, at
30     the very last bullet point, you refer to 12 April, which is
31     the Sunday, getting a text from DCI Young.  Do you see
32     that?
33     A.    Yes.
34
35     Q.    She says that she's letting you know that the ABC had
36     called her to clarify a number of matters and are sounding
37     very much convinced of the true facts of the matter.
38     A.    Yes.
39
40     Q.    Now, that presumably indicated to you that the ABC
41     were clarifying things that she had said two days before in
42     the backgrounder?
43     A.    Yes.
44
45     Q.    And that Pamela Young's impression was, apparently,
46     that the ABC was on board with her view, when she refers to
47     "the true facts"?
```

```
 1        A.   Yes, yes.
 2
 3        Q.   Now, moving to 13 April itself --
 4        A.   Mmm-hmm.
 5
 6        Q.   -- we know that at around about 12 noon or
 7        thereabouts, the middle of the day, Coroner Barnes
 8        announced the outcome of the directions hearing.  Do you
 9        recall that?
10        A.   Yes, I do.  I thought it was slightly before then, but
11        yes.
12
13        Q.   The first thing was that, yes, there would be a third
14        inquest?
15        A.   Yes.
16
17        Q.   And the second thing was that a slightly redacted
18        version of the Pamela Young statement would indeed be
19        public?
20        A.   Yes.
21
22        Q.   Now, back to those questions this morning about the
23        qualification or rider to the strategy, here we are now,
24        the Coroner has said, "Yes, the statement is public" --
25        A.   Yeah.
26
27        Q.   -- and those strategy documents that I showed you
28        referred in various ways to the possibility of, "If that
29        happened, we could think about going on the record"?
30        A.   Yes, that's right.
31
32        Q.   Now, once this did happen and the Coroner did make
33        that ruling about publication of the statement, what
34        happened, to your knowledge, about that qualification or
35        rider about the possibility of going on the record?
36        A.   Nothing changed.  In terms of going on the record to
37        talk about the content of the investigation, her statement,
38        she would have to come back and have a discussion and pose
39        that, and we would discuss it involving a range of people,
40        before that was approved.
41
42        Q.   Now, in fact, the police issued a press release --
43        A.   That's right.
44
45        Q.   -- shortly afterwards?
46        A.   About 1 o'clock.
47
```

Transcript produced by Epiq

```
 1      Q.    About 1 o'clock, as you say.  And we find that at 356
 2      [NPL.0138.0004.7163_0001]?
 3      A.    Yes.
 4
 5      Q.    A couple of emails about it, but the press release or
 6      the text of the press release is there.  And meaning no
 7      disrespect to it, it's in fairly uncontroversial, fairly
 8      bland terms?
 9      A.    That's right.
10
11      Q.    Now, it seems that Pamela Young was actually
12      interviewed outside the court shortly after the Coroner
13      made these decisions on that day, 13 April?
14      A.    Yes.
15
16      Q.    At tab 343 [NPL.2017.0004.0588_0001], there is
17      a transcript of the short interview with her on the
18      footpath outside the Coroners Court - you've seen that,
19      I presume?
20      A.    I have, yes.
21
22      Q.    And she says at the top, for example:
23
24            Yes.   The NSW Police are very pleased about
25            the decision today.
26
27      Et cetera?
28      A.    Yes.
29
30      Q.    I want to ask you one or two questions about what she
31      says, but first of all, in terms of her giving this
32      interview, what did she tell you about whether she had or
33      hadn't given any kind of interview at the court after the
34      Coroner made his decision?
35      A.    When she rang at 5 o'clock, or around about 5 o'clock
36      when I was on the way home, she said that she'd recorded an
37      interview with Emma Alberici at the court - or recorded an
38      interview at the court.
39
40      Q.    "At the court", did you say?
41      A.    She - sorry, she said she'd recorded an interview with
42      ABC.  I think she said "at the court", but - that's what
43      I took it to mean.
44
45      Q.    But she didn't tell you, or you didn't - you weren't
46      told by someone else, that, in fact, by the time she came
47      out of the court, the media had all gone?
```

1   A.   Yes, that's right. I had that - yes.

2

3   Q.   So how could she have given an interview at the court
4   if the media had all gone?
5   A.   Clearly, that wasn't right.

6

7   Q.   Well, do you mean that she first told you that the
8   media had all gone, but at some later stage in the day she
9   told you she'd given an interview at the court?
10   A.   That's right, at 5 o'clock. So she's told myself and
11   Georgie Wells that the media had gone, because she had been
12   tied up with counsel, and by the time she got out they had
13   gone. Later on, at 5 o'clock, she's told me that she's
14   recorded an interview.

15

16   Q.   And you think - and we'll come to that --
17   A.   Yes.

18

19   Q.   -- you think that she told you at 5 o'clock that she
20   had recorded an interview at court?
21   A.   That's what I thought it was, because I didn't know of
22   a recorded interview on the 10th, on the Friday. So it
23   could only have been that.

24

25   Q.   Well, let's just have a look at some of that. Back to
26   382A on the third page, the first bullet point begins,
27   "About 9am on 13 April"?
28   A.   Yes.

29

30   Q.   And the next seven or eight bullet points are all
31   about 13 April?
32   A.   Yes.

33

34   Q.   And four bullet points down she says, "Not long
35   afterwards" - that is, not long after 12.20:

36

37   *Not long afterwards I telephoned [her] or*
38   *she telephoned me and she said that she had*
39   *been with Senior Counsel and that there*
40   *were no media left outside for her to do*
41   *a door-stop statement with.*

42

43   A.   Yes.

44

45   Q.   Now, that seems to be not true on her part?
46   A.   That seems to be not true.

47

```
 1      Q.    Because she plainly did do a door-stop statement
 2      outside the court?
 3      A.    At some time.  I don't know what time it was.
 4
 5      Q.    And at 382, which is your Ashurst interview, at page 6
 6      towards the bottom, do you see in the paragraph beginning,
 7      "I got on with my day", about three from the bottom --
 8      A.    Yes.
 9
10      Q.      -- you record or you tell Ashurst that Pamela Young
11      said in relation to the door-stop that she had been in
12      there too long, the media were all gone?
13      A.    Yes.
14
15      Q.
16            Unknown to me she did do a door stop but
17            with Emma Alberici.
18
19      A.    Yes.
20
21      Q.    So it was unknown to you that she had done this
22      door-stop with Emma Alberici?
23      A.    When she rang me, yes.
24
25      Q.    Now, if we go back to 343, in terms of what she in
26      fact said at this door-stop, could I take you to the third
27      page, or page 3, the interviewer asks her - it actually
28      starts at the bottom of page 2.  The interviewer says to
29      her:
30
31            ... you have suggested that a new inquest
32            will deliver no different finding to
33            that --
34
35      the one in 2012 by Coroner Forbes.
36
37      A.    Yes.
38
39      Q.    And she asks Pamela Young:
40
41            Can you tell us how you arrived at that
42            conclusion, given we haven't had another
43            inquest yet?
44
45      In Pamela Young's answer, she says, about four lines into
46      it that none of the new evidence - and now I'm quoting from
47      hereon:
```

.15/05/2023 (51)   3772   M J WILLING (Mr Gray)

```
1
2            ... is direct - directly relates to Scott
3            being murdered.  So that is why I have that
4            position of an open finding is potentially
5            the most appropriate finding.  But, of
6            course, that's up to the coroner.  It's not
7            impossible that it be - perhaps go back
8            towards suicide, either, or misadventure.
9
10   A.   Yes.
11
12   Q.
13           Any of those things are possible ...
14
15   Now, we'll come to the news bulletin in a moment, but that
16   passage where Pamela Young says those things appears on the
17   `ABC News.  You're aware of that, I take it?
18   A.   No, I haven't - I have never seen the bulletin at all.
19
20   Q.   All right.  If we can go to 361
21   [NPL.0138.0002.2947_0001], please, here we are at 4.35pm.
22   A.   Yes.
23
24   Q.   Now, I appreciate you are not on the distribution list
25   of this email but it's Georgie Wells's daily media update
26   for that day; correct?
27   A.   Yes.
28
29   Q.   And so she is updating the media personnel about
30   numerous topics, one of which is the Scott Johnson inquest?
31   A.   Yes.
32
33   THE COMMISSIONER:   Can I just interrupt, I'm sorry,
34   Mr Gray.
35
36   Q.   Mr Willing, you've explained who Mr Finch and
37   Mr Kerlatec are.  Who was Mr Anthony Cooke?
38   A.   Mr Cooke - my reading of that, Commissioner, is
39   Mr Anthony Cooke was a fellow Detective Superintendent at
40   that time, at State Crime Command.  He may have been
41   relieving into Kenneth Finch's position as the Director of
42   Organised Crime.
43
44   Q.   I see.  And the names - we see "Cc" and there's
45   a whole series of names?
46   A.   Yes.
47
```

```
 1    Q.    Perhaps without being entirely precise, is that more
 2    or less the whole of the Police Media Unit?
 3    A.    No, it's the Acting Deputy Commissioner, at the time,
 4    his staff officer, some members of the Media Unit and
 5    members of State Crime Command executive.
 6
 7    Q.    All right.  So the "Cc" is a mixture --
 8    A.    Yes.
 9
10    Q.    -- of both police officers and media personnel?
11    A.    Yes.
12
13    Q.    All right.  So, not to put too fine a point on it,
14    this is being distributed quite widely, obviously, through
15    both senior police and media?
16    A.    Yes.
17
18    THE COMMISSIONER:    Thank you.
19
20    MR GRAY:    Q.    And when you mentioned - I think you said
21    "Deputy Commissioner", but you may have said "Assistant
22    Commissioner", is that Carmine Minnelli?
23    A.    That's Frank Minnelli.  Carmine is his first name.  He
24    was, at that point, relieving into the position of Deputy
25    Commissioner that was ordinarily occupied by Nick Kaldas.
26
27    Q.    And one other name just to ask you about is Zdenka -
28    Z-D-E-N-K-A - Vaughan?
29    A.    Yes.
30
31    Q.    She is, as I understand it - correct me if I'm wrong -
32    either the media officer or some such type for the
33    Commissioner of Police himself?
34    A.    Yeah, Commissioner's personal executive media adviser.
35
36    Q.    So this media update goes to, among others, the
37    Commissioner's personal media adviser?
38    A.    Yes.
39
40    Q.    And what Georgie Wells is telling everybody on the
41    list about the Johnson inquest hearing that day is, and we
42    see it on the bottom half of that first page, that the
43    hearing happened, the Johnson family had spoken to the
44    media afterwards, that the police had issued a media
45    release, and then, in the second bullet point:
46
47         *Last week, backgrounders were facilitated*
```

1   *by Det Ch Insp Pam Young with Dan Box [of*
2   *The Australian] and Emma Alberici [of the*
3   *ABC] about the contents of the police*
4   *statement.*
5
6   A.   Yes.
7
8   Q.   So appreciating you didn't get this email,
9   nonetheless, as you understood it, that was correct?
10   A.   That's correct. At that time, yes.
11
12   Q.   Then at 5 o'clock or thereabouts, there's a phone call
13   from Pamela Young to you about her going to the ABC that
14   afternoon to talk to Emma Alberici?
15   A.   Yes.
16
17   Q.   Now, was she on her way to the ABC or was she on
18   her way back from the ABC, having been interviewed by
19   Emma Alberici?
20   A.   I took it, from what she told me, she was on the way
21   to the ABC.
22
23   Q.   Well, when you gave evidence here in February, you
24   said that, that it was - that she rang you on the way to
25   the ABC?
26   A.   Yes.
27
28   Q.   That's at page 1720. But I wanted to take you to your
29   almost contemporaneous account of this. If we start at
30   382A on the third page, now, do you see the first bullet
31   point begins, "About 9am on 13 April"?
32   A.   Sorry, which --
33
34   Q.   This is the third page, of 382A.
35
36   THE COMMISSIONER: It's the first bullet point on that
37   page.
38
39   THE WITNESS: Oh, yes, thank you, Commissioner.
40
41   MR GRAY: Q.   So just to orient you, I've asked you about
42   this bullet point already, so we are on 13 April?
43   A.   Yes.
44
45   Q.   Then four bullet points down, there's one beginning,
46   "Later that afternoon around 5pm"?
47   A.   Yes, yes.

1
2   Q.   And your note says that around 5pm you were driving
3   home when you received a call from DCI Young:
4
5   *She stated that she had recorded an*
6   *interview with ABC ...*
7
8   A.   Yes.
9
10   Q.   Not "was going to", but "had".
11   A.   Yes.
12
13   Q.   Well, as I say, last time you were here, your evidence
14   was that she rang you on the way to the ABC. This note
15   says that she rang you having already recorded the
16   interview with the ABC?   What's --
17   A.   No, recorded an interview at the court is the way
18   I took that.
19
20   Q.   I see. So when you say here in this note, "She stated
21   that she had recorded an interview with ABC", you say that
22   you took that to mean she had recorded an interview outside
23   court?
24   A.   Yes, when she - in line with her approval to do
25   a stand-up.
26
27   Q.   But how could that be so when you had been told by her
28   that there were no media left outside court?
29   A.   She's - either a media - ABC has turned up after she
30   has told me that or she has told me an untruth.
31
32   THE COMMISSIONER: Q.   And when did you put all that
33   together, Mr Willing?
34   A.   Sorry, sir?
35
36   Q.   When did you put that proposition together - your
37   analysis, just a moment ago, either that she's told you an
38   untruth or it's happened later?
39   A.   When I went through these documents that had been
40   provided to me.
41
42   THE COMMISSIONER: All right. Okay.
43
44   MR GRAY: Q.   I'm sorry, I just missed that answer,
45   Mr Willing. I'm sorry I didn't hear it.
46   A.   When did I put these - you know, that scenario - when
47   I went through the documents that had provided - had been

```
 1    provided to me since I gave evidence.
 2
 3    Q.   Oh, I see.  So your answer now that you think your
 4    reference in that bullet point to her recording an
 5    interview with the ABC was a reference to a door-stop --
 6    A.   Yes.
 7
 8    Q.    -- is something that you've put together in the last
 9    month or so?
10    A.   Yes.
11
12    Q.   You see, if she told you, as she evidently did, that
13    she had not done a media interview outside the court
14    because there were no media left, then when she rang you at
15    5pm to say that she had recorded an interview with the ABC,
16    she must have been talking about something else, mustn't
17    she?
18    A.    No.  No, not at all.  Like, so she's - that's the only
19    thing it could have been at that time, because I'd given
20    her approval to do a door-stop.  I didn't know about the
21    interview on the Friday at all, the recording.  I knew
22    she'd done a background.  But I didn't know of a recorded
23    interview until she told me at 5 o'clock.
24
25    Q.   I see.  So you agree, of course, that you knew that
26    she had done a backgrounder on the Friday?
27    A.   Yes.
28
29    Q.   But you're saying that although you knew that, you
30    didn't know that it was in the form of a recorded
31    interview?
32    A.   Correct.
33
34    Q.   And is this your evidence, then, that when she rings
35    you at 5 o'clock and says, "I have recorded an interview
36    with the ABC" --
37    A.   Yes.
38
39    Q.    -- you now think that you must have assumed that that
40    was a reference to the door-stop that she must have done
41    that day?
42    A.   Yes.
43
44    Q.   Even though she had actually told that you there were
45    no media left when she came out of the court?
46    A.    That's right.  And she said the same thing to
47    Georgie Wells as well.
```

1
2   Q.   Yes. Maybe so. But my point is you think - your
3   evidence is that when she told you she'd recorded an
4   interview with the ABC on the Monday, you understood that
5   to mean an interview by way of a door-stop outside the
6   court, even though she had told you there were no media
7   left when she came out of the court?
8   A.   Yes.
9
10   Q.   It's hard to fathom how that could be right,
11   Mr Willing.
12   A.   Not if a journalist has turned up after she's told
13   both myself and Georgie Wells around midday that there were
14   no media present.
15
16   Q.   What would make you think that that must have
17   happened?
18   A.   It was the only logical explanation because I didn't
19   know of the interview that had been recorded on the Friday.
20
21   Q.   Well, looking at your note here on 382A -- -
22   A.   Yes.
23
24   Q.   -- it goes on that she'd told you not only that she
25   had recorded an interview, but that her interview, along
26   with interviews with Steve Johnson and Dan Glick, would
27   feature on that night's Lateline?
28   A.   Yes.
29
30   Q.   So you agree that she told you that?
31   A.   Yes.
32
33   Q.   And this caught you by surprise, you said, in this
34   note?
35   A.   Yes.
36
37   Q.   Why?
38   A.   Because she had said before that there was no
39   door-stop opportunity with the - the media pack had already
40   gone. So when she said that she had, in fact, done that,
41   that caught me by surprise.
42
43   Q.   You see, what you actually wrote in this next
44   sentence, soon after the Lateline interview in April 2015,
45   was:
46
47   *I did not know what form the interview took*

1   *at that point and assumed that it was the*
2   *original back-grounding discussion that was*
3   *going to be used by Lateline.*
4
5   A.   Yes.
6
7   Q.   Now, that's a different explanation, isn't it?
8   A.   No, that's - the way that I've written that is
9   actually referring to two things. I thought that the
10   backgrounding at that point - when she told me that there
11   was going to be a Lateline program, I thought the
12   backgrounding would feed in to that program, and I didn't
13   know what form the interview took down at the court,
14   whether or not she was standing outside the court or
15   whether or not she was sitting down. I didn't know at the
16   time.
17
18   Q.   What you wrote was you did not know what form the
19   interview took at that point but you assumed that it - the
20   interview - was the original backgrounding discussion?
21   A.   I've - I'm referring to two things there.
22
23   Q.   But the original backgrounding discussion is the one
24   on Friday, the 10th, is that --
25   A.   That's right.
26
27   Q.   So what you wrote here in your notes for Ashurst was
28   that you assumed that the interview that she had referred
29   to in using the word "interview" was the Friday
30   backgrounding discussion?
31   A.   No. What I'm referring to is that if anything was
32   going to be used for content or to provide content for
33   a Lateline exclusive interview - sorry, exclusive story, it
34   would come from the backgrounding, and I didn't know what
35   she had done at the court, but assumed it was the - it was
36   a stand-up, because that was the only thing that she was
37   authorised to do. I'm referring to two different things
38   there.
39
40   Q.   Yes. Well, you don't make a reference here in this
41   bullet point note to assuming that the material featuring
42   Pamela Young that would appear on Lateline was the
43   door-stop that day at all, do you? You don't suggest that?
44   A.   No, I don't, but that is exactly what happened.
45
46   Q.   But you now say it, having thought about it in the
47   last month?

1   A.   No. At the time that was the only thing that it could
2   have been - something from the court.
3
4   THE COMMISSIONER: Q.   So it didn't come, or, rather, to
5   put it another way, you weren't concerned that, in fact,
6   she was going to be on Lateline that night in a recorded
7   interview, whatever it was?
8   A.   I didn't think that was a possibility, sir.
9
10   Q.   I beg your pardon?
11   A.   Sorry, I didn't think that she would do an in-studio
12   interview.
13
14   Q.   No, I didn't ask you that. I said: it didn't cause
15   you any concern, I take it, that she was telling you that
16   she had recorded an interview, wherever it was and whatever
17   its content was - didn't concern you that it was going to
18   be shown on Lateline that night, whatever it was she said?
19   A.   No, sir, because I thought it was grabs from the court
20   as to how --
21
22   Q.   I didn't ask you that either. I'm simply asking you
23   now: it did not give you any concern that she was telling
24   you that she had recorded an interview and that it was
25   going to be on Lateline that night? That didn't concern
26   you at all as at 5 o'clock in the afternoon?
27   A.   No.
28
29   Q.   Okay. You assumed that, and trusted her, that
30   whatever it was, it would be discreet and appropriate?
31   A.   Yes, that's right.
32
33   Q.   And was 5 o'clock in the afternoon the first time that
34   you were aware that she had recorded an interview which was
35   actually going to be shown on television that night, not on
36   the news but on a program called Lateline?
37   A.   Yes.
38
39   THE COMMISSIONER: Thank you.
40
41   MR GRAY: Q.   Now, at tab 382, your Ashurst interview, at
42   page 6, on this same point, just about the second-bottom
43   paragraph on page 6, beginning, "Next thing I hear" --
44   A.   Yes.
45
46   Q.   -- you tell Ashurst:
47

.15/05/2023 (51)   3780   M J WILLING (Mr Gray)

Transcript produced by Epiq

> *Next thing I hear I am driving home and*
> *she says she did an interview with*
> *Emma Alberici that will be on TV tonight.*

A.   Yes.

Q.   And your evidence is, I gather, that again, you thought that she meant by that a door-stop that she must have done, even though she told you that she hadn't done one?
A.   That's right.

Q.   And you tell Ashurst:

> *I was driving and thought it meant*
> *backgrounding information being used.*

A.   That's right.

Q.   No reference to the possibility that it must have been some door-stop that you'd been told hadn't happened?
A.   But the next line, I say:

> *At most a stand up type interview.*

Q.   You do say that. And do you now say that, by that, you were referring to an assumed possibility --
A.   Yes.

Q.   -- of something outside the court?
A.   Yes.

Q.   You said, in this interview:

> *I really didn't think much more of it.*
> *I assumed it would be a door stop or just*
> *the material from the background made into*
> *a story.*

What do you mean by "the material from the background made into a story"?
A.   Well, the information that Pam had provided ABC, providing context for a story.

Q.   Context?
A.   Yeah.

1   Q.   So your evidence is that it didn't cross your mind
2   that an actual formal interview, not simply a door-stop on
3   the street but a formal interview, had occurred at all?
4   A.   No.
5
6   THE COMMISSIONER: Q.   Can I ask you this, Mr Willing:
7   as at 13 April, I take it you were familiar, were you, with
8   the program Lateline and its format?
9   A.   Yes, I was.
10
11   Q.   And you appreciated, as at 13 April, that it was, if
12   you like, a features style of program as opposed to a 7pm
13   news broadcast?
14   A.   Yes, it was certainly different to a 7pm --
15
16   Q.   Well, different in the sense that it was, if you want
17   to put it in media terms, more like a features program
18   rather than a daily update of news stories as the 7pm news
19   might be?
20   A.   Yes.
21
22   THE COMMISSIONER: Thank you.
23
24   MR GRAY: Q.   Well, is this right, Mr Willing: at any
25   rate, that by this time, 5 o'clock or so, you knew that
26   something on the record featuring Pamela Young was going to
27   be broadcast on Lateline that night?
28   A.   That was likely to be on, yes, on Lateline.
29
30   Q.   On the record, not off the record?
31   A.   A door-stop style interview could be used, on the
32   record, as part of the Lateline.
33
34   THE COMMISSIONER: Q.   And had you authorised in your own
35   mind expressly by 5pm that she be on Lateline that night in
36   a recorded interview?
37   A.   Expressly? No.
38
39   Q.   And that was contrary, wasn't it, to what you thought
40   was going to happen and contrary to what you thought your
41   understanding was?
42   A.   Yes.
43
44   Q.   Did you not think to take up with her, "Why on earth
45   have you done this"? For example, "I told you not to", or
46   something like that?
47   A.   I had - sir, I had told her that she could do

Transcript produced by Epiq

1   a door-stop interview. That's what I assumed it was -
2   which was recorded, and that those grabs or the interview
3   itself as a door-stop might be used on Lateline.
4
5   THE COMMISSIONER: All right.
6
7   MR GRAY: Q.   So you assumed that whoever door-stopped
8   her at the court or near it told her that the door-stop
9   grab was going to be on Lateline?
10   A.   It was likely to be on Lateline, yes.
11
12   Q.   Did you ask her what she had said on the record?
13   A.   No, I didn't.
14
15   Q.   Did you in any way remonstrate with her or reprimand
16   her as to going off, away from the agreed strategy?
17   A.   No, I didn't. Again, I assumed it was the door-stop
18   which she'd been authorised to do. I didn't know what
19   she'd said and I didn't ask her.
20
21   THE COMMISSIONER: Q.   Well, the other thing, Mr Willing,
22   is, if I may ask you, in your note at 382A on page 3, in
23   that bullet point, "Later that afternoon" --
24   A.   Yes.
25
26   Q.   -- maybe I've missed it, you don't put anything in
27   there about it being "likely to be on Lateline"; rather,
28   she told you it "would feature on that night's Lateline
29   program"?
30   A.   No, I don't.
31
32   Q.   You don't what?
33   A.   Include anything in that bullet point.
34
35   Q.   No, and what I'm getting at is you've used, in a
36   couple of answers you've given, that your understanding was
37   that the interview was only likely. She didn't use
38   "likely" in her conversation with you, apparently; she was
39   telling you, seemingly, given the language you used, that
40   it was a certainly that not only she, but that Mr Johnson
41   and Mr Glick would also be on?
42   A.   I can't recall what she told me, sir.
43
44   Q.   But your note here says "would feature on that night's
45   Lateline program"; you don't use the term "would likely
46   feature on that night's Lateline program", do you?
47   A.   No, I don't.

1
2   MR GRAY: Q.   And in the same vein at 382 when you give
3   an interview to Ashurst on this point, at the bottom of
4   page 6, the paragraph beginning, "Next thing I hear", you
5   say that Pamela Young told you - "she did an interview with
6   Emma Alberici that will be on TV tonight"?
7   A.   Yes.
8
9   Q.   Not "likely", but "will be"?
10   A.   Yes.
11
12   Q.   So that was your actual knowledge, wasn't it, at
13   5 o'clock, that it was something on the record from
14   Pamela Young was going to be on television that night?
15   A.   That's correct, yes.
16
17   Q.   Now, you then, I gather, having been told that, ring
18   Georgie Wells?
19   A.   Yes.
20
21   Q.   Look at 382A, the same paragraph we've been looking at
22   on page 3, two or three lines from the bottom?
23   A.   Yes.
24
25   Q.
26
27   *I then rang Georgie Wells and advised her*
28   *of my conversation with DCI Young.*
29
30   A.   Yes.
31
32   Q.   You say something to the same effect in the Ashurst
33   interview?
34   A.   Yes, I do.
35
36   Q.   And she says, Georgie Wells does, "I'd better let
37   Strath know and put on the media report."
38   And then we find the update to the media report at 362
39   [NPL.0138.0002.3238]. Do you see that?
40   A.   Yes.
41
42   Q.   This is Emma Alberici. If you flick over a page, you
43   can see that what she's doing is updating the one that we
44   looked at a little while ago from 4.35pm --
45   A.   Yes.
46
47   Q.   -- with what you've just told her, in effect?

1   A.   Yes.

2

3   Q.   So she tells the people that this goes to:

4

5   *In addition to the media update re: ...*
6   *Macnamir, [DCI] Pam Young spoke to Emma*
7   *Alberici from ABC Lateline on camera today.*
8   *The reporter also spoke with Steve Johnson.*
9   *Both are to appear on tonight's Lateline.*

10

11   A.   Yes.

12

13   Q.   That doesn't read as though Georgie Wells thinks that
14   all that has happened is some door-stop, does it, "Both are
15   to appear"?
16   A.   To me it does, because both were at the court, both
17   recorded interviews at the court, and I think that's
18   exactly what she's referring to - that those interviews
19   would be used as part of a Lateline story.

20

21   Q.   Well, I hear what you say but at this point, half
22   past 6 on the Monday afternoon, you didn't know whether
23   Emma Alberici had spoken to Steve Johnson at all, outside
24   the court or otherwise?
25   A.   I'm not sure whether I did or not. I can't recall.
26   It would be most likely, because each time that Mr Johnson
27   was in town, he would record an interview like that out in
28   front of the court.

29

30   Q.   Now, at 7 o'clock, the ABC news bulletin is broadcast?
31   A.   Yes.

32

33   Q.   We have the transcript at 362B [SCOI.47473_0001],
34   which I presume you've read?
35   A.   I have read it, yes.

36

37   Q.   Have you looked at the video clip of the news?
38   A.   No.

39

40   MR GRAY: I will just play it now, if I may, Commissioner.

41

42   THE COMMISSIONER: Certainly.

43

44   MR GRAY: Q.   It is tab 362A [SCOI.47474_0001].   It's the
45   ABC nightly television news bulletin for that night and
46   I think one can tell - I think what is visible on the
47   screen is that this story comes on about 3 minutes 20

```
1    seconds in to the 30-minute news bulletin.
2    A.   Okay.
3
4    MR GRAY:   At any rate, here it is.
5
6         (Video played)
7
8    MR GRAY:   Q.   Now, a couple of things about that,
9    Mr Willing.
10   A.   Yes.
11
12   Q.   The material featuring Pamela Young that is shown in
13   that news report outside the court --
14   A.   Yes.
15
16   Q.   -- is the passage that I showed you from the
17   transcript of her interview on that day?
18   A.   Yes.
19
20   Q.   We went to it a little while ago.  At the end of that
21   item on the ABC News, the news reader, Juanita Phillips
22   says, as you just heard:
23
24        And you can see an exclusive interview with
25        the lead detective in that case on Lateline
26        tonight at about 10.30 here on ABC TV.
27
28   A.   Yes.
29
30   Q.   Now, it's pretty clear, isn't it, that the exclusive
31   interview referred to was something other than the grab
32   outside the court?
33   A.   No, I don't agree with that.
34
35   THE COMMISSIONER:   Q.   So you thought, did you, that what
36   we've just seen on the screen was the full extent of what
37   would later be seen on Lateline, namely, just a door-stop
38   interview of the sort that was just observed?
39   A.   That was part of what would be on.
40
41   Q.   So you thought it would be more extensive, did you?
42   A.   Yes.
43
44   THE COMMISSIONER:   I see.  All right.  Thank you.
45
46   MR GRAY:   Q.   Do you mean a more extensive part of the
47   same door-stop?
```

```
 1        A.   Yes.
 2
 3        Q.   And that would be something that would come within the
 4        description of "exclusive interview", would it?
 5        A.   Yes.
 6
 7        Q.   Did you watch the ABC News that night?
 8        A.   No.
 9
10        THE COMMISSIONER:   Q.   Did anyone tell you that the
11        announcement had been made shortly after 7 that there would
12        be an exclusive interview with Pamela Young that evening?
13        A.   Not after the news, no, sir.
14
15        Q.   Well, did you find out at some point that there would
16        be an exclusive interview, long before it was broadcast?
17        It was said to be on at 10.30 at night.  When do you say
18        you first heard that there was an exclusive interview with
19        Pamela Young?
20        A.   I'm not sure when it was, sir, but I --
21
22        Q.   Well, 7 o'clock, 8 o'clock, 9 o'clock?
23        A.   No, I didn't hear anything about the Macnamir matter
24        or the inquest at all until I received a message which
25        caused me to turn on the television, which was the Lateline
26        program.  Nothing between 5 o'clock when I had
27        a conversation with Pam and then spoke to Georgie Wells,
28        until then.
29
30        THE COMMISSIONER:   All right, thank you.
31
32        MR GRAY:   Q.   Well, let's have a look at tab 364
33        [NPL.0138.0001.0042].  Now, this document has a date which
34        is 17 April, and you'll see it's from Pamela Young to
35        Pamela Young?
36        A.   Yes.
37
38        Q.   And the subject heading is "Texts Mick Willing &
39        Georgie Wells"; do you see that?
40        A.   Yes.
41
42        Q.   And I want to ask you some questions about these text
43        messages.  Just read them through to yourself first.
44        A.   I've read them.
45
46        Q.   It's quite obvious, isn't it, that the first one is
47        a text from Pamela Young to you and Georgie Wells shortly
```

```
1    after the ABC news bulletin at 7 o'clock on 13 April?
2    A.   Yes.  Yes.
3
4    Q.   That is, on that evening of 13 April, maybe while the
5    news bulletin was still going or else shortly after 7.30?
6    A.   It could be and I'm mistaken in my previous answer in
7    terms of --
8
9    Q.   And what Pamela Young tells you in very plain English
10   is that:
11
12       ... in case you missed it the ABC news
13       coverage was balanced with a reference to
14       an exclusive tonight on Lateline.
15
16   A.   Yes.
17
18   Q.   You knew that by about 7.30 that night at least,
19   didn't you?
20   A.   I did, and I was mistaken in my answer to the
21   Commissioner before about that.  I still took that to mean
22   that it was the door-stop interview that would --
23
24   Q.   Look at the next sentence Pamela Young says to you:
25
26       I am glad we went with ABC --
27
28   A.   Yes.
29
30   Q.   --
31
32       as they go with the journalism not the
33       ratings.
34
35   A.   Yes.
36
37   Q.   She adds:
38
39       Hair & lippy good too-especially on Penny!
40
41   A.   Yes.
42
43   Q.   But I'm focusing on:
44
45       I am glad we went with ABC as they go with
46       the journalism not the ratings.
47
```

1   That's plainly not a reference to some grab on the
2   doorstep, isn't it?
3   A.   I don't agree with that. She's mentioning Penny
4   there. Penny was not part of any interview at Lateline
5   that night. It could only refer to being at court, because
6   Penny was there with her, as you could see on the footage.
7
8   Q.
9   *I am glad we went with ABC as they go with*
10   *the journalism ...*
11
12   A.   Yes.
13
14   Q.   What's the journalism got to do with the door-stop?
15   A.   I don't know what that means other than her review on
16   the quality of the ABC compared to other media outlets.
17
18   Q.   And I again put to you it's pretty obvious that she is
19   not talking about a door-stop when she says that there's
20   going to be "an exclusive tonight on Lateline"?
21   A.   I don't agree, sir.
22
23   THE COMMISSIONER: Q.   Let me put this to you,
24   Mr Willing: she refers to a balanced coverage --
25   A.   Yeah.
26
27   Q.   -- which might be her reference to the ABC's
28   journalism, but the concept of a balanced coverage in this
29   context, you fully appreciated, was Ms Young on one side
30   and Mr Johnson and Mr Glick on the other. If it was going
31   to be balanced, surely it must have occurred to you -
32   perhaps it didn't - that the competing sides or the
33   protagonists were going to be asked about their respective
34   views, to provide balance?
35   A.   Yes, that's right.
36
37   Q.   Well, that's not a door-stop, is it? If people are
38   giving exclusive interviews, both of whom think they know
39   what happened or believe they know what happened, it's
40   rather more than a door-stop; it's protagonists being given
41   both an opportunity by way of a balanced interview, isn't
42   it?
43   A.   That's correct.
44
45   Q.   You were pretty media savvy, weren't you, or regarded
46   yourself as so at this time, surely?
47   A.   Yes, but it still fits within the realm of

```
1       a door-stop.
2
3       Q.   I know it now fits within the realm of a door-stop,
4       but I'm asking you obviously at the time you either
5       didn't - it didn't occur to you that it was more than that
6       or, alternatively, you did appreciate it was more than that
7       but you were comfortable to trust whatever Pamela Young had
8       said.
9       A.   I didn't think it was more than a door-stop interview.
10
11      Q.   And you were comfortable to trust whatever she had
12      said?
13      A.   Yes.
14
15      THE COMMISSIONER:   Thank you.
16
17      MR GRAY:   Q.   Now, after she texts you that, that the
18      news had had a reference to "an exclusive tonight on
19      Lateline", Georgie Wells texts back saying:
20
21          Thanks Pam, look forward to seeing it.
22
23      A.   Yes.
24
25      Q.   And you text back:
26
27          Ta Pam.  I will have to stay up late....on
28          a school night too!
29
30      A.   Yes.
31
32      Q.   Clearly signifying, do you agree, that having been
33      told at least by now that she was going to be on Lateline
34      that night in an exclusive, you would stay up and watch it?
35      A.   I said that, and I didn't.
36
37      Q.   You said that but you didn't?
38      A.   No - until I got notification and then turned it on.
39
40      Q.   At 11 minutes past 8 that night --
41      A.   Yes.
42
43      Q.   -- this is tab 366 [SCOI.47469_0001], you yourself
44      sent a text to State Coroner Michael Barnes?
45      A.   Yes, I did.
46
47      Q.   And you were telling him about something being on
```

```
 1      Lateline that night?
 2      A.   Yes.
 3
 4      Q.   Let's just go through how you put it to Mr Barnes.
 5      You said:
 6
 7           Good Evening Sir, a courtesy text to let
 8           you know that in light of the media --
 9
10       "in light of the media" --
11
12           being pushed by the Johnson family Pam has
13           been interviewed by the ABC and the
14           Australian concerning [strike force]
15           Macnamir.
16
17      A.   Yes.
18
19      Q.   Then you say:
20
21           She will most likely be on Lateline tonight
22           (as will family interviews etc).
23
24      A.   Yes.
25
26      Q.   First of all, you knew that it wasn't just most
27      likely; you had been told that she would be on Lateline,
28      hadn't you - that's what you wrote when you spoke to
29      Ashurst?
30      A.   Yes, I assumed that it would be on Lateline, given the
31      fact that she had given what was an exclusive interview at
32      the court with ABC Lateline.
33
34      Q.   She told you - sorry, go on.
35      A.   With ABC Lateline.
36
37      Q.   According to what you wrote in your notes at 382A and
38      according to what you told Ashurst at 382, what Pam Young
39      told you was that an interview by her with the ABC "will be
40      on Lateline tonight", not "likely", but "will be"; correct?
41      That's what you wrote?
42      A.   That's what I wrote, yes.
43
44      Q.   But it's not what you told Mr Barnes.  You watered it
45      down to "most likely"?
46      A.   That's what I've texted --
47
```

Transcript produced by Epiq

```
1       Q.    Why did you do that?
2       A.    No reason at all.  I thought that there was, again,
3       a recording that occurred outside the court, as with other
4       members of the Johnson family, that would be part of
5       a story that would feature that night.
6
7       THE COMMISSIONER:   Q.   Was the use of the term "most
8       likely" careless on your part?
9       A.    It could be, sir.
10
11      Q.    Well, how else could it be construed?  It was contrary
12      to what you were being told, wasn't it?
13      A.    If it was a door-stop interview, then --
14
15      Q.    Mr Willing, it was contrary to what you were being
16      told, wasn't it?  You weren't told that "it could be", "it
17      may be", "it may not happen", "it could happen but it may
18      not"; you were told by her earlier in the evening that
19      she'd been recorded; was on that evening.  It wasn't "most
20      likely" at all?
21      A.    Yes, sir.
22
23      Q.    And did anyone ever ring you from this media
24      department at the police department and tell you that
25      there'd already been an announcement on the 7 o'clock news
26      about the Lateline interview?
27      A.    No.
28
29      Q.    Does the media organisation within the police normally
30      keep senior police officers abreast of current affairs such
31      as this?
32      A.    They do but not - I wouldn't necessarily get a phone
33      call or anything.
34
35      Q.    No, I appreciate that, but this was a pretty big
36      story, wasn't it?
37      A.    It was one of a number of big stories.
38
39      Q.    Well, it might have been one of a number of big
40      stories but this was a pretty significant historic event in
41      the sense that a third inquest was pretty much almost not
42      heard of, was it --
43      A.    Yes.
44
45      Q.    -- in circumstances like this?
46      A.    Yes.
47
```

1   Q.   And it was probably one of the biggest stories as far
2   as the police was concerned on 13 April?
3   A.   Yes.
4
5   MR GRAY: Q.   In the next sentence you tell Mr Barnes:
6
7   *This --*
8
9   that is, Pamela Young most likely being on Lateline --
10
11   *was something that we discussed up to our*
12   *Deputy Commissioner and head [of] public*
13   *affairs and we all agreed that we needed to*
14   *do it for a number of reasons.*
15
16   A.   Yes.
17
18   Q.   But that's not true, is it?
19   A.   It's referring to the backgrounding strategy.
20
21   Q.   What was discussed up to Deputy Commissioner and Head
22   of the Public Affairs level was backgrounding off the
23   record?
24   A.   Yes.
25
26   Q.   And you all agreed that you needed to do that -
27   backgrounding off the record?
28   A.   Yes.
29
30   Q.   But you're telling Mr Barnes:
31
32   *She will most likely be on Lateline*
33   *tonight ... This was something that we*
34   *discussed ...*
35
36   et cetera. That's just not true, is it?
37   A.   I'm referring to what I believed to be a door-stop
38   interview at Glebe that day.
39
40   THE COMMISSIONER: Q.   And the door-stop had been
41   discussed, had it, up to Deputy Commissioner level?
42   A.   No, no.
43
44   Q.   Well, what had been discussed - merely the
45   backgrounding?
46   A.   Yes, yes. And I'm making reference to her appearance
47   being on Lateline as coming from that door-stop interview

1   at Glebe that day.

2

3   MR GRAY: Q.   Which you knew, because she had told you,

4   was going to be "an exclusive interview"?

5   A.   I can't recall. I've recorded that in my notes, so

6   that must be right.

7

8   Q.   Well, that's what her text says. Her text to you --

9   A.   Yes, sorry, that's right, yes.

10

11   Q.   -- refers to the exclusive interview --

12   A.   It's in the text.

13

14   Q.   -- in the words that Ms Juanita Phillips had used?

15

16   THE COMMISSIONER: Can I ask, and I am sorry to interrupt

17   you, Mr Gray.

18

19   Q.   You agreed, I thought, with Mr Gray a little while ago

20   that the text which came from Ms Young could have come

21   around about 7.30 or a bit after that?

22   A.   Yes.

23

24   Q.   Is there any reason why you didn't tell Commissioner

25   Barnes - sorry, Coroner Barnes until 11 minutes past 8?

26   A.   No reason.

27

28   Q.   Did you speak to anybody in the meantime before you

29   texted him about the Lateline interview with Pamela Young?

30   A.   No.

31

32   Q.   Why not?

33   A.   I didn't feel it necessary.

34

35   MR GRAY: Q.   Were you in regular contact with

36   Coroner Barnes at around this time?

37   A.   Yes.

38

39   Q.   Obviously you had his mobile number?

40   A.   Yes.

41

42   Q.   Were you having discussions with him about the Johnson

43   case?

44   A.   Regular discussions, yes.

45

46   Q.   Did that stop after the third inquest had been

47   announced?

1   A.   No.

2

3   Q.   Once the third inquest was announced, it was

4   thereafter his inquiry as Coroner --

5   A.   Yes.

6

7   Q.   -- correct? I think you have explained that?

8   A.   Yes.

9

10   Q.   And until another week or so, it was Pamela Young's

11   case, as the senior officer from Unsolved Homicide, who was

12   running it up to that point?

13   A.   Yes.

14

15   Q.   Of course, you were Commander Homicide?

16   A.   Yes.

17

18   Q.   So you were superior to her and she reported to you

19   ultimately?

20   A.   Yes.

21

22   Q.   But you were in quite frequent conversation or

23   communication with the Coroner about the Johnson case?

24   A.   Yes. Amongst other matters, but yes.

25

26   Q.   And is that normal or routine?

27   A.   Yes.

28

29   Q.   The actual strategy which we looked at this morning,

30   at least as some of these documents recorded, included the

31   idea that you would, as a courtesy, brief or inform the

32   Coroner that the backgrounding of Dan Box and the ABC was

33   going to occur?

34   A.   Yes.

35

36   Q.   Remember we looked at that?

37   A.   Yeah.

38

39   Q.   And as we've seen, you didn't inform the Coroner

40   that the backgrounding was going to occur but, rather,

41   what you did at 11 minutes past 8 was to inform him that

42   Pamela Young was likely to be on Lateline that night?

43   A.   Yes.

44

45   Q.   Why did you not actually implement the agreed courtesy

46   approach?

47   A.   Because it - if there was no inquest that had been

1 ordered then it was irrelevant. So I was waiting until
2 after the order of the inquest.
3
4 Q.   Right. That was midday or so?
5 A.   Yes.
6
7 Q.   You left it until 11 minutes past 8?
8 A.   That's right.
9
10 Q.   At a point when you knew not just that there'd been
11 backgrounding but that Pamela Young was going to be on
12 Lateline in an exclusive interview --
13 A.   Yes.
14
15 Q.   -- in a matter of an hour or two?
16 A.   Yes.
17
18 Q.   Why leave it so late?
19 A.   I can't - I can't explain other than that was the time
20 that I had and felt it should --
21
22 THE COMMISSIONER: Q.   Sorry, just before you move on,
23 you left an invitation for a chat. Did that take place?
24 A.   Not then, no.
25
26 Q.   When?
27 A.   I have had discussions with Mr Barnes at a number of
28 times after that in the days following, and weeks
29 following.
30
31 Q.   But not on the evening of the 13th?
32 A.   Not from my recollection at all, no.
33
34 Q.   What about the 14th?
35 A.   Yes, I think I did speak to him on the 14th.
36
37 THE COMMISSIONER: Okay, thank you.
38
39 MR GRAY: Q.   Now, you learned, at least by Pamela
40 Young's text, that she's going to be on camera on the
41 Lateline program?
42 A.   Yes.
43
44 Q.   And you tell Mr Barnes, using your words, that she
45 would "most likely" be on Lateline that night?
46 A.   Yes.
47

1   Q.   But then you say you didn't watch it, even though
2   you'd told Pamela Young that you would?
3   A.   I didn't watch it until the - I received a message
4   that she was on it, so I turned it on.
5
6   Q.   Well, you already knew she was going to be on it?
7   A.   That's right, but I - I didn't.
8
9   Q.   So why did getting a message change anything?
10   A.   It didn't, but it caused me to remember that she was
11   on and so I turned it on. The fact that somebody had
12   texted - or, sorry, messaged me and said that she was on
13   caused me to turn it on. I didn't even turn my mind to
14   watching it, to be honest.
15
16   Q.   So at 8.11 you send a text to the Coroner, because you
17   think he needs to know that something is going to be on
18   Lateline, but you then yourself don't even watch it until
19   someone sends you a text while it's on and at that point
20   you decide that you'll turn it on?
21   A.   That's right.
22
23   Q.   Were you not interested?
24   A.   Yes, I was interested, but I had a lot of other things
25   on. I can't recall what was happening at home at the time,
26   either, and I - I don't know and I can't remember why
27   I didn't sit and wait and watch it.
28
29   Q.   Well, the text is at 366A [NPL.0138.0009.0356_E_0001]
30   from Detective Inspector Yeomans?
31   A.   Yeah.
32
33   Q.   You may be able to clarify this for me, perhaps, but
34   his text is recorded as happening at 9.43pm?
35   A.   Yes.
36
37   Q.   And your response is recorded at 9.52pm?
38   A.   Yes.
39
40   Q.   Now, we heard Juanita Phillips say that Lateline would
41   be on at 10.30, but it would appear that it was already on
42   at 9.43, if not earlier, on Channel 24. Can you enlighten
43   us about the timing at all?
44   A.   No, I can't.
45
46   Q.   At any rate, your evidence is, is it, that you were at
47   home but not watching Lateline at all, but you get a text

Transcript produced by Epiq

1   from Peter Yeomans, who says that Channel 24 is doing
2   "a story re North Head murder / suicide with Pam Young", at
3   which point you then turn it on?
4   A.   Yes, although I can't discount getting a phone call or
5   a text message other than that, but something's caused me
6   to turn on the television and watch the Lateline interview.
7   I wasn't watching it before.
8
9   Q.   In your evidence back in February you did mention
10   a telephone call?
11   A.   Yes.
12
13   Q.   And I'm not holding to you this, but you said, "I may
14   have received a telephone call from someone, I can't
15   remember who"?
16   A.   Yes.
17
18   Q.   And is that a recollection that you still partly have?
19   A.   I don't know. I thought this might have been it that
20   caused me to turn it on. It could have been a telephone
21   call or a text. I just don't remember.
22
23   MR GRAY: Commissioner, I don't have very long to go but
24   I see it is 1 o'clock. It might be convenient to take the
25   break.
26
27   THE COMMISSIONER: No, I'll take the break very shortly
28   and we will resume at 2, thank you.
29
30   **LUNCHEON ADJOURNMENT**
31
32   THE COMMISSIONER: Yes, Mr Gray.
33
34   MR GRAY: Q.   Mr Willing, I asked you before lunch about
35   whether you were in regular or fairly frequent contact with
36   the Coroner, Mr Barnes, at around this time and you said
37   essentially that yes, you were.
38   A.   Yes.
39
40   Q.   I wanted to ask you about one particular part of your
41   Ashurst interview on that topic. I'm sorry, it's not your
42   Ashurst interview; it's your own notes. Oh, no, in fact it
43   is your Ashurst interview, if you turn to tab 382. At the
44   very bottom of page 6 there's a reference to you texting
45   the Coroner. That's on the night of the 13th?
46   A.   Yes.
47

```
 1      Q.    Which we've been through?
 2      A.    Yes.
 3
 4      Q.    And then on the top of page 7, you tell Ashurst:
 5
 6            The next day --
 7
 8      that is 14 April --
 9
10            I heard from the Coroner.
11
12      A.    Yes.
13
14      Q.
15            He said he didn't watch it but said he
16            trusted Pam knew what to say.
17
18      A.    Yes.
19
20      Q.    You go on:
21
22            Later that evening --
23
24      still 14 April --
25
26            after talking to Frank Minelli [sic]
27            I raised issues regarding Pam interview
28            with the Coroner.
29
30      Do you remember all this?  Do you remember telling Ashurst
31      these things?
32      A.    Yes.
33
34      Q.    According to this record of interview or this
35      transcript of the Ashurst interview, you told Ashurst as
36      follows:
37
38            The Coroner said "I have watched parts of
39            it, there were some issues regarding
40            credibility of witnesses, but I tend to
41            think it's a tactic by Agius and it's
42            a storm in a tea cup but I need to talk to
43            Counsel.  It serves me no purpose to move
44            Pam from this.  I feel sorry for her and
45            hope she is ok".
46
47      A.    Yes.
```

.15/05/2023 (51)   3799   M J WILLING (Mr Gray)

1
2   Q.   Is that an accurate note of what you told Ashurst?
3   A.   Yes, I think it is.
4
5   Q.   So the Coroner, Mr Barnes, told you that he thought
6   the Pamela Young Lateline interview was a storm in a
7   teacup?
8   A.   At the time, yes. He hadn't watched it all.
9
10   Q.   Did he form a different view, or tell you he had
11   a different view, at some later time?
12   A.   Yes.
13
14   Q.   When was that and what did he say?
15   A.   I can't recall exactly when but he turned his mind to
16   referring Pamela for contempt of court charges.
17
18   Q.   Did he have a conversation with you in which he said
19   "I no longer think it is a storm in a teacup" or anything
20   along those lines?
21   A.   No, he spoke to me about the fact that she had
22   recorded an interview on the 10th and the 13th and then
23   didn't communicate with me any further in relation to that
24   particular issue or the Lateline - sorry, the Lateline
25   issue, I should say. I can't recall when that actual
26   conversation was but it was within days after.
27
28   Q.   The Ashurst solicitor asked you a question about
29   whether the Coroner must have been furious that the letter
30   was leaked. Do you know what that's a reference to? Is
31   that a reference to the statement or is that a reference to
32   something else?
33   A.   No, it's a reference to a letter that Mr Agius wrote
34   to the Coroner asking that Pamela Young be removed from the
35   strike force and then that subsequently appeared in media.
36
37   Q.   I see, thank you. And your answer after that
38   question --
39   A.   Yes.
40
41   Q.   -- after giving the answer to the question, you go on
42   to say that you went down to meet the Coroner regarding
43   another topic, namely, the Lindt Cafe topic, but that in
44   the course of that meeting about the Lindt Cafe matter:
45
46   *The Coroner said something about good*
47   *relationship with Lindt family, 'unlike*

1   *actions of other difficult families' and*
2   *looked at me.*
3
4   A.   Yes.
5
6   Q.   Is this also an accurate record of what you told
7   Ashurst?
8   A.   Yes.
9
10   Q.   So the indication, you took it, was that Mr Barnes was
11   indicating that the Johnson family was a difficult family?
12   A.   That's the way that I interpreted it, yes.
13
14   Q.   Were there other conversations between you and
15   Mr Barnes about the Johnson family or Steve Johnson during
16   the course of this third inquest period?
17   A.   Beforehand, yes, a number of conversations around
18   emails that I'd received, the criticism of Pam Young, and
19   to the point where, early on, State Coroner Barnes
20   interjected and said, "No more correspondence between Steve
21   Johnson and myself and police".
22
23   Q.   And after this time - that is, after 14 April?
24   A.   I - no, it was all through the Crown Solicitor's
25   Office at the time, and Sophie Dawson acting on our behalf.
26
27   Q.   All right. I just want to go to the Lateline
28   interview itself. As broadcast - that is to say what went
29   to air.   It's at tab --
30   A.   What tab is that, sir?
31
32   Q.   That's at tab 318 [SCOI.82483_0001]?
33   A.   318?
34
35   Q.   Oh, yes, apologies. Volume 14, sorry. If you just
36   keep volume 16 with you as well, the whole - the transcript
37   of the entire interview between Pamela Young and Emma
38   Alberici on the 13th is at tab 344
39   [NPL.2017.0004.0592_0001] and of course only part of that
40   goes to air as part of the Lateline program?
41   A.   Okay.
42
43   Q.   I'm sorry to burden you with two folders, but if I
44   could just start at 344, which is in the other folder that
45   you have got there?
46   A.   Yes.
47

Transcript produced by Epiq

1   Q.   So the very first question that Emma Alberici asks
2   Pamela Young is:
3
4   *Do you accept, now, that the initial*
5   *investigation into the death of Scott*
6   *Johnson back in 1988 was flawed?*
7
8   A.   Yes.
9
10   Q.   The answer that Pamela Young gives is as follows:
11
12   *Not at all. It was to the standard of the*
13   *day. It was accepted by the coroner then.*
14   *And there's still evidence and information*
15   *that Scott may have suicided.*
16
17   And then she goes on.
18   A.   Yes.
19
20   Q.   So almost the first thing she says is to draw
21   attention to the suicide theory; you'd agree?
22   A.   Yes.
23
24   Q.   Consistent with what we've accepted this morning was
25   obviously her view?
26   A.   Yes.
27
28   Q.   And similarly at page 5 of this tab 344, at about line
29   30 or so, she refers to the Golden Gate Bridge topic?
30   A.   Yes.
31
32   Q.   And she says:
33
34   *I think it's very important to mention the*
35   *Golden Gate Bridge and compare it to ...*
36   *North Head.*
37
38   Do you see that?
39   A.   Yes.
40
41   Q.   She's obviously emphasising what she sees as
42   a similarity between thinking about jumping from a height
43   at one place and perhaps, in fact, jumping from a height at
44   another place.
45   A.   Yes.
46
47   Q.   And indeed, she uses the expression at line 43, "Lo

```
 1    and behold" - "Golden Gate Bridge" on one occasion, "Lo and
 2    behold" on another occasion?
 3    A.   Yes.
 4
 5    Q.   Again, making it pretty crystal clear to anyone
 6    watching or listening that her view was that this man had
 7    jumped?
 8    A.   Yes.
 9
10    Q.   Now, if we go to 318 now, which is the interview or
11    the part of the interview as broadcast, including the whole
12    Lateline program, the first part of the program has some
13    introductory material from Emma Alberici and then some
14    exchanges between her and Steve Johnson?
15    A.   Yes.
16
17    Q.   Some of which involves Steve Johnson being on site at
18    North Head, if one is watching it?
19    A.   Yes.
20
21    Q.   At the bottom of page 2 of this tab, tab 318,
22    Emma Alberici says:
23
24         26 years after Scott Johnson's death,
25         police remain of the view that suicide is
26         the most likely explanation.
27
28    Do you see that?
29    A.   Yes, I do.
30
31    Q.   Now, what point of this broadcast was it when you
32    started watching, on your account?
33    A.   I cannot recall when it was.
34
35    Q.   Well, did you see anything involving Steve Johnson or
36    only Pamela Young?
37    A.   I think the first time that I started watching I saw
38    a visual of Pamela Young in studio.  So whether that's
39    before or after --
40
41    Q.   There isn't, as far as I can see, anything involving
42    Steve Johnson after Pamela Young's part of the program
43    begins.
44    A.   Right.  Okay.
45
46    Q.   Someone will correct me if I've missed something, but
47    I don't believe there is.  So your recollection is that you
```

```
 1    only saw the program as it involved Pamela Young?
 2    A.    That's when I recall, and I can't be certain, but the
 3    first time I turned it on was - I saw her in an in-studio
 4    situation.  But I can't be a hundred per cent certain on
 5    that.
 6
 7    Q.    Now, this is in tab 318, the broadcast --
 8    A.    Yeah.
 9
10    Q.    -- at the bottom of page 3, we have that first
11    question that I just took you to?
12    A.    Yes.
13
14    Q.    That's included with her answer about "There's still
15    evidence and information that Scott may have suicided"; do
16    you think you saw that?
17    A.    I don't know.
18
19    Q.    On the next page, page 4, she talks about victimology,
20    she talks about Mr Noone, she talks about some submissions
21    that Mr Agius had made?
22    A.    Yes.
23
24    Q.    Do you recall whether you saw any of that?
25    A.    I don't.
26
27    Q.    Then on page 5, just above halfway on the page, she's
28    talking about only eight out of 30 cases being possibly gay
29    hate, and so on?
30    A.    Yes.
31
32    Q.    Do you remember whether you saw that part?
33    A.    I don't.
34
35    Q.    At the bottom of that page, there's the Golden Gate
36    Bridge --
37    A.    Yes, again, yes.
38
39    Q.    -- part?
40    A.    Sorry, yep.
41
42    Q.    Do you recall - did you see that?
43    A.    I can't recall what I saw, but --
44
45    Q.    At about 10 lines down on page 6, she says.
46
47          .... [Mr Johnson] used influence, including
```

.15/05/2023 (51)   3804   M J WILLING (Mr Gray)

Transcript produced by Epiq

1   *I consider influence on the Government, to*
2   *make the death of Scott a priority in my*
3   *office over other jobs that we had.*
4
5   Did you see that?
6   A.   I have a vague recollection of seeing that but I can't
7   be sure. I also see a part there about the New South Wales
8   Crime Commission. I think I saw that.
9
10   Q.   Right. That's a reference to the fact that, at one
11   point, the Crime Commission was invited to --
12   A.   Yes.
13
14   Q.   -- check over her investigation and how she'd gone
15   about it?
16   A.   Correct, yes.
17
18   Q.   Then on page 7, which is getting towards the end of
19   the broadcast, Emma Alberici says:
20
21   *And before I let you go, I must pick up on*
22   *what you said just a moment ago when you*
23   *talked about the influence Steve Johnson*
24   *has had over the Government and others.*
25   *Where do you think that comes from?*
26
27   And then Pamela Young launches into the answer that
28   involves accusing the then Police Minister of kowtowing to
29   Steve Johnson?
30   A.   Yes.
31
32   Q.   So you saw that part?
33   A.   I think I did.
34
35   Q.   And down the bottom of that page, on the same theme,
36   at the very bottom, she says:
37
38   *... the minister ... rang my commander --*
39
40   A.   Yes.
41
42   Q.   Is that you?
43   A.   That's me, but it didn't occur.
44
45   Q.   Sorry, say that again?
46   A.   That's me, but the Minister didn't call me, it was his
47   Chief of Staff.

```
1
2       Q.    Right.  Accepting that, the minister - you correct
3       that to the minister's Chief of Staff - rang you and:
4
5            ... also rang the Johnson family and
6            arranged a meeting and gave them their
7            strike force, their priority over everyone
8            else's death.
9
10      And she goes on to say - Pamela Young does - that was
11      absolutely improper.  Wrong on every level, very wrong.
12      So you saw that?
13      A.    Yes.
14
15      Q.    Now, those criticisms by her of Steve Johnson and the
16      Johnson family improperly using influence over the
17      government were nowhere to be found in her statement, were
18      they - the 445-page statement?
19      A.    That's correct.
20
21      Q.    And similarly, the accusations of kowtowing and so
22      forth against the minister are nowhere to be found in the
23      statement?
24      A.    No, that's right.
25
26      Q.    And I ask that because, as you know, it has been
27      suggested on behalf of Pamela Young in the documents that
28      you have that everything she said on Lateline had only been
29      things that she'd said in her statement?
30      A.    That's clearly not true.
31
32      Q.    That's obviously not correct, is it?
33      A.    That's - what you're saying is correct.
34
35      Q.    Now, you saw at least as much of the Lateline program
36      as you've now just indicated?
37      A.    Yes.
38
39      Q.    You knew that she was going to be on Lateline on
40      camera in some form or other?
41      A.    In some form or other, yes.
42
43      Q.    What did you think she was going to say?
44      A.    I thought that she would - it was in line with her
45      approval to welcome the inquest.  Pretty, you know, benign,
46      along the terms of what went out in the media - the written
47      media release that went out.
```

```
1
2    Q.    You still thought that even after she'd told you that
3    what was going to be on Lateline was an exclusive with her?
4    A.    Yes, because she was the only - Lateline was the only
5    outlet that she spoke to.
6
7    Q.    Well, when you saw that she, in fact, emphasised
8    suicide, that she, in fact, attacked the Johnson family for
9    using their influence in an unfair or inappropriate or
10   wrong way and she, in fact, attacked the former Police
11   Minister in extremely strong language --
12   A.    Yeah.
13
14   Q.    -- were you surprised?
15   A.    Absolutely.
16
17   Q.    Were you amazed?
18   A.    Yes.
19
20   Q.    Shocked?
21   A.    Yes.
22
23   Q.    Angry?
24   A.    Yes, angry.
25
26   Q.    Yet you didn't ring her or text her?
27   A.    No.
28
29   Q.    Why not?
30   A.    Not at that time.  Oh, because I knew that it would be
31   dealt in - first thing in the morning.
32
33   Q.    Well, did you not ring her or text her because you
34   were not actually surprised by what she'd said?
35   A.    No, that's not right at all.  I knew that it would
36   cause all sorts of problems in the morning and I recall
37   saying to my wife, "Tomorrow's going to be a long day."
38
39   Q.    So you'd say that the reason for not ringing her or
40   not texting her was not because you agreed with what she'd
41   said?
42   A.    No.
43
44   THE COMMISSIONER:   Q.   Did you send a text to any other
45   police officer about your impressions of what you'd seen?
46   A.    Not that night.
47
```

Transcript produced by Epiq

```
 1      Q.   Why not?
 2      A.   Because it was late at night.
 3
 4      Q.   Oh, all right, everyone's sleeping, I understand.  But
 5      this is a very serious matter concerning the police and it
 6      didn't occur to you to communicate further with Coroner
 7      Barnes, Mr Yeomans or, for that matter, anybody else in the
 8      Police Force?
 9      A.   No.
10
11      MR GRAY:   Q.   Now, other senior police were shocked and
12      surprised, it would appear from material we've seen; would
13      you agree?
14      A.   Yes.
15
16      Q.   And one of those was Mr Finch, Ken Finch?
17      A.   Yes.
18
19      Q.   And if we go to 367, which is an email chain -
20      somebody could perhaps take the second folder away so that
21      Mr Willing doesn't have to navigate two.  Yes, thank you.
22
23           So you have 367?
24      A.   Yes.
25
26      Q.   You've got tab 367?
27      A.   Yes, I do.
28
29      Q.   So at the bottom of the first page you can see there's
30      an email from Kenneth Finch at 24 minutes past 10pm --
31      A.   Yes.
32
33      Q.   -- on the night of the 13th?
34      A.   Yes.
35
36      Q.   He sends it to Strath Gordon from Public Affairs, and
37      Mr Kerlatec, whose position you described earlier -
38      a senior police officer?
39      A.   Yes, I reported to him, yep.
40
41      Q.   Sorry?
42      A.   I reported to him.
43
44      Q.   Yes, quite.  And so Ken Finch asks:
45
46           So - the question is who organised - and
47           approved Pam Young's interview with Emma
```

1   *Alberici? What was the purpose of it?*

2

3   So you've seen that at least in recent times, that email?
4   A.   Yes.

5

6   Q.   And it seems that nobody answers that question that
7   night - that is, Strath Gordon doesn't and John Kerlatec
8   doesn't. But the next day, this is now on the front
9   page of this chain, halfway down the page, Strath Gordon
10   responds:

11

12   *My understanding is that there were*
13   *background briefings ...*

14

15   Et cetera?
16   A.   Yes.

17

18   Q.   And then at the top of the page, Strath Gordon, having
19   sent his response on, both to Ken Finch and John Kerlatec
20   and Georgie Wells, Georgie Wells then responds at 7.57am on
21   the 14th, and I've been through that email with you before?
22   A.   Yes, you have, yeah.

23

24   Q.   Now, obviously Ken Finch has been taken very much by
25   surprise --
26   A.   Yes.

27

28   Q.   -- one infers from the content of his question. And
29   you would say that you also were, but you just didn't send
30   anybody a text or an email?
31   A.   No, and I knew that it would be something that would
32   be discussed first thing in the morning.

33

34   THE COMMISSIONER: Q.   But leave aside whether you
35   thought something was bound to happen. As the head of
36   Homicide, why didn't you take an initiative if you thought
37   what had happened was so out of the ordinary?
38   A.   I can't answer that, sir, I don't know.

39

40   Q.   Well, you say you can't answer it, but would you like
41   to assist me in some way or other? You're the head of
42   Homicide. You say that you see something on the television
43   that you're not expecting. It's outside what you thought
44   was reasonable, and yet you don't initiate anything either
45   on the evening or even first thing the next morning?
46   A.   No, that's --

47

```
 1      Q.   Were you just waiting for something to happen, were
 2      you?  If nothing happened it would be okay?  What were you
 3      thinking?
 4      A.   I knew that first thing in the morning, that it would
 5      be an issue that would be discussed and --
 6
 7      Q.   No, but why didn't you take it up?  If you were the
 8      head of Homicide, Mr Willing, and you thought it was
 9      inappropriate, why did you wait for someone else?  If you
10      really thought it was inappropriate and out of the bounds
11      of reasonableness, why on earth did you sit back to wait?
12      Were you waiting to see whether there was an adverse or
13      a positive reaction, testing the water?  What were you
14      doing?
15      A.   I don't recall, sir.  There was a 24 --
16
17      THE COMMISSIONER:   Okay, that's fine.  If you don't
18      recall, you don't recall, thank you.
19
20      MR GRAY:   Q.   I just need to take you back to the
21      transcript that I started with this morning, if Mr Willing
22      could have that transcript again, and/or on the screen,
23      it's page 1711.
24
25          Down the bottom of 1711, just revisiting this from
26      this morning, the question at line 41:
27
28          Q.  ... you knew that Pamela Young was
29          going to be interviewed for Lateline,
30          didn't you?
31
32      Answer, "No" - that answer is not true, is it?
33      A.   I knew that she - by that point I knew that she had
34      recorded something that was going to be on Lateline or
35      likely to be on Lateline.
36
37      Q.   And then at the top of page 1712, the Commissioner
38      asked:
39
40          Q.   So do I understand it to say that she
41          didn't tell you that she was going on air
42          that night?
43
44      Answer, "No, no".
45      A.   Yeah, no.
46
47      Q.   That's not true either?
```

1   A.   That's not right, at the time.
2
3   Q.   And a couple of lines down:
4
5   *Q.   It must have come as a complete shock*
6   *and a surprise when you saw her face on the*
7   *television, then, did it?*
8
9   Answer, "Yes" - that can't be true either?
10   A.   In that form, in an in-studio interview that we refer
11   to as - colloquially as an "A Current Affair style
12   interview", it absolutely surprised me.
13
14   Q.   Well, the Commissioner pursued this with you at 1712,
15   at lines 14 and following. He asked you:
16
17   *Q.   It must have come as a complete shock*
18   *and a surprise when you saw her face on the*
19   *television, then, did it?*
20
21   Answer, "Yes", and you received a phone call.
22   A. Yes.
23
24   Q.   The Commissioner asked:
25
26   *Q.   ... to answer my question did it come*
27   *as a shock and a surprise ... to see her on*
28   *the television?*
29   *A.   Yes, it did.*
30
31   That can't be true. You knew she was going to be on the
32   television?
33   A.   That's correct, but I'm referring to an in-studio
34   style of interview.
35
36   Q.   And the Commissioner then asked:
37
38   *Q.   ... she never asked your permission.*
39
40   And you answered:
41
42   *A.   To go on television like that ...*
43
44   making the distinction you're making, "no". But the
45   Commissioner goes on:
46
47   *Q.   ... and (b) therefore you had no*

```
 1         knowledge that she was going on television?
 2         A.   Not like that, no.
 3
 4    Then it's the next question I want to ask you about.  The
 5    Commissioner asks:
 6
 7         Q.   When you say "not like that", I'm so
 8         sorry, not at all?
 9         A.   No ... not on television at all.
10
11    That's not true, is it?
12    A.   No, it's a mistake.
13
14    Q.   When you gave evidence last time, in February, had
15    you, in the course of your preparation for giving evidence,
16    gone back to how it came about that this Pamela Young
17    Lateline interview happened?
18    A.   Amongst other topics, yes.
19
20    Q.   No doubt amongst other topics, granted --
21    A.   Yes.
22
23    Q.   -- but one of the topics was that one, the Lateline
24    interview and Pamela Young and the aftermath of it?
25    A.   Yes, yes, but not to the degree I have now, you know,
26    since that time.
27
28    Q.   So your evidence today would be, would it, that when
29    you gave those answers such as the one at line 35 --
30    A.   Yes.
31
32    Q.   -- that is, you had no knowledge that she was going to
33    on television at all - that is merely a mistake and not
34    a deliberate misstatement?
35    A.   No, it's a mistake; that's correct.  I'm trying to say
36    that not in that form of an in-studio interview, no.
37    I made a mistake.
38
39    Q.   I'm sorry?
40    A.   And I've made a mistake.
41
42    Q.   I have a couple more questions only, and it's just
43    concerning the day or two after 13 April.
44    A.   Sure.
45
46    Q.   If we go back to 382A, at the bottom of the third
47    page - this is your notes, your bullet point notes for
```

```
 1      Ashurst --
 2      A.   Yes.
 3
 4      Q.   -- the second-bottom bullet point on that third page,
 5      you record:
 6
 7           The following morning 14 April ... around
 8           7am I received a text message to call
 9           [Detective Chief Superintendent Kerlatec].
10
11      When you did, he asked whether there was a problem with the
12      interview last night with DCI Young as he had received a
13      terse email from Acting Assistant Commissioner Ken Finch?
14      A.   Yes.
15
16      Q.   Which is obviously the one we just looked at?
17      A.   That's correct, yeah.
18
19      Q.   So you advised him of the content of the interview -
20      that is, advised Mr Kerlatec, I gather?
21      A.   That's correct.  As - what I saw of the interview at
22      the time.
23
24      Q.   And what was his reaction, when you told him, whatever
25      you told him?
26      A.    I think I was driving at the time on the way in to the
27      office.  I can't recall exactly what he said at the time
28      but it would be something along the lines of, "Okay, we
29      need to sort - talk about this when you get in to the
30      office and this will cause issues", or something like that.
31      But I can't recall the exact conversation.
32
33      Q.   Well, as I recall, but correct me if I have this
34      inaccurate, he was one of the ones involved in and
35      approving the strategy back on 7 April?
36      A.   That's right.
37
38      Q.   The backgrounding strategy; correct?
39      A.   That's correct.
40
41      Q.   And presumably, he said to you when you told him what
42      Pamela Young had actually done - did he - "Well, for
43      heaven's sake that wasn't the agreed strategy"?
44      A.   He may well have said that.  I just can't recall it.
45
46      Q.   The next bullet point on this page you say:
47
```

```
 1           Later that morning when I arrived at work
 2           I received a call from the Executive Media
 3           Advisor Zdenka Vaughan.
 4
 5    A.    Mmm-hmm.
 6
 7    Q.    This is the lady who's the personal media adviser to
 8    the Commissioner?
 9    A.    Yes.
10
11    Q.    Who was then Mr Scipione?
12    A.    Yes.
13
14    Q.    You had Detective Inspector Olen and George Wells with
15    you, so Zdenka Vaughan was on speaker, and you all the
16    discussed the fact that DCI Young was not authorised to
17    conduct the interview she did nor say the things she did on
18    Lateline?
19    A.    That's right.
20
21    Q.    Now, Zdenka, it says, was about to brief the
22    Commissioner of Police and would call back?
23    A.    Yes.
24
25    Q.    And then at the top of the next page:
26
27           A short time later Zdenka called back and
28           said that she had spoken with the
29           [Commissioner of Police] and that he agreed
30           that no comment should be made by --
31
32    I suppose that should read "Police", or something like
33    that?
34    A.    Yeah, that's right.
35
36    Q.
37           ... [and he] wanted everyone to know that
38           he supported DCI Young and was aware of the
39           hard work ...
40
41    Et cetera?
42    A.    Yes.
43
44    Q.    So did you get the impression from Zdenka at that
45    point - that is, pretty early in the morning - that the
46    Commissioner of Police was not too troubled?
47    A.    At that point in the morning, yes, that's right.
```

Transcript produced by Epiq

```
1
2      Q.   Did you understand from Zdenka that he had seen it?
3      A.   No, I didn't at all.
4
5      Q.   Don't know or --
6      A.   I don't know.
7
8      Q.   Then --
9
10     THE COMMISSIONER:   Q.   And by this stage - that is, early
11     though it was - you had made - you had taken no initiative
12     to contact Ms Young?
13     A.   That's correct.
14
15     THE COMMISSIONER:   Thank you.
16
17     MR GRAY:   Q.   Now, the next thing that seems to have
18     happened, at least on the documents that we have, is at
19     368, tab 368 [NPL.3000.0009.0669_0001].  Now, this email,
20     which we'll just go through, at the top of it it says,
21     "From:  Michael Willing"?
22     A.   Yeah, that's right.
23
24     Q.   But it begins immediately:
25
26          Hi Zdenka.
27
28          It's Georgie using Mick Willing's computer.
29
30     A.   Yes.
31
32     Q.   I'll come back to that, but at any rate, it's
33     evidently from your computer, at least, from Michael
34     Willing, and it's to Zdenka Vaughan and to a few other
35     people, Strath Gordon, Ken Finch and Georgie Wells and one
36     or two others?
37     A.   Yes.
38
39     Q.   Now, this is at 9.18am on the Tuesday, and it's
40     Georgie Wells apparently sending this from your computer?
41     A.   That's right.
42
43     Q.   So was she with you?  Were you there when she sent it?
44     A.   Yes, myself, and I think Chris Olen was with us in the
45     office as well.
46
47     Q.   Right.  So even though she's sent it, it's a kind of
```

```
1      a joint communication?
2      A.   Yes.
3
4      Q.   And so Georgie, and you, say to Zdenka:
5
6           Some lines:
7
8      and then some sort of bullet points, which I take it are
9      suggested lines that perhaps the police could issue as
10     a kind of response?
11     A.   Yeah, should they get inquiries coming through the
12     door.
13
14     Q.   And did you play a part in drafting those lines?
15     A.   I would have, yes.
16
17     Q.   So the first line says, or the first bullet point:
18
19          DCI Pam Young did express some personal
20          views during last night's interview, but
21          the majority of points she raised are
22          contained within her statement provided to
23          the Coroner.
24
25     A.   Yes.
26
27     Q.   Now, what that rather eloquently doesn't mention is
28     that the really big-ticket problem items were not in the
29     statement provided to the Coroner; correct?
30     A.   Yeah, that's right.
31
32     Q.   Whose idea was it to massage that problem in that way?
33     A.   I - I don't know.  Would be collective decision, three
34     of us having input into it, and again, Zdenka could have
35     used that and done what she wanted with it.  Strath Gordon
36     and others were contained in that as well, they could have
37     all had input into it.
38
39     Q.   Well, even though it may strictly or literally not be
40     wrong, to say that the majority of points she raised are
41     within her statement is somewhat at a distance from the
42     thrust of the problem, isn't it?
43     A.   Yes, that would be right, yes.
44
45     Q.   Why suggest that as part of the collective you and
46     Georgie and Chris Olen who were suggesting it?
47     A.    It would - it was providing some information that
```

1   could be massaged into a response back.
2
3   THE COMMISSIONER: Q.   And is it correct or not at this
4   stage, you can't recall one way or the other whether you
5   saw the whole program or not; is that still the position?
6   A.   That's correct.
7
8   Q.   So you were writing this off to the Commissioner not
9   having, yourself - you tell me - viewed the whole program?
10 A.   The three of us, yes.
11
12 Q.   Well, when you say "the three of us", I know there's
13 often safety in numbers, but you were the senior person in
14 the room, weren't you?
15 A.   That's right, I was.
16
17 Q.   And are you telling me that you were writing to the
18 Commissioner suggesting a considered strategy, not yourself
19 having watched the whole program?
20 A.   That's correct.
21
22 THE COMMISSIONER: Thank you.
23
24 MR GRAY: Q.   At this point, 9.18, when you and the other
25 two send this to Zdenka, was it your understanding that at
26 that stage the Commissioner was relaxed about the Lateline
27 broadcast?
28 A.   Yes.
29
30 Q.   And that's because that's the impression that Zdenka
31 had given you?
32 A.   Yes, yes.
33
34 Q.   And did that belief on your part - namely, that the
35 Commissioner was still fairly relaxed - feed in to the
36 suggested first bullet point?
37 A.   It might have but again, I don't know specifically who
38 thought of it or presented that as an option, as a bullet
39 point, but the three of us were involved in it.
40
41 Q.   Then what seems to have happened is that by a few
42 hours later, the view of the Commissioner and perhaps
43 others had changed?
44 A.   Yes.
45
46 Q.   Is that right? If we turn over one to 369
47 [NPL.3000.0004.0742_0001] we see an email from Rick Feneley

1   of the Sydney Morning Herald at 12.03, ie, midday, or
2   thereabouts --
3   A.   Yes.
4
5   Q.   -- to Zdenka. And I won't read it out but --
6   A.   Yes.
7
8   Q.   -- you've no doubt read it in preparation for today.
9   And Rick Feneley is, in effect, saying, "Is the
10   Commissioner going to stand behind Pamela Young or is he
11   not?"
12   A.   That's correct, yes.
13
14   Q.   So it's apparent from the approach of the Herald
15   journalist, and no doubt from other media responses,
16   that the media didn't regard this Lateline broadcast by
17   Pamela Young as something to be relaxed about; agreed?
18   A.   Certainly not Mr Feneley, not at all.
19
20   Q.   No. And, in fact, it looks like Zdenka was pretty
21   quick to do something about this one, because you send it -
22   or, rather, Rick Feneley sends it to her at 12.03, and two
23   minutes later, she sends it to you and says she's ringing
24   you "now"?
25   A.   Yes.
26
27   Q.   So that tends to indicate that alarm bells were
28   ringing?
29   A.   It does, yes.
30
31   Q.   And - just bear with me.
32
33   THE COMMISSIONER: Q.   Just before you go ahead, I'm
34   sorry to ask this question, would you go back to 368 just
35   for a moment, Mr Willing. Just remind me, yourself,
36   Georgie Wilson [sic], and who else were in the room, did
37   you say?
38   A.   Georgie Wells --
39
40   Q.   Wells, I'm sorry, and --
41   A.   -- and Chris Olen, Detective Chief Inspector Chris
42   Olen.
43
44   Q.   And did you discuss with each other the fact that you
45   hadn't watched it all, you say; had the other two watched
46   it, to your knowledge?
47   A.   I don't know, sir. I can't recall that.

1
2   Q.   You don't know. Would you agree with me, though, that
3   the whole tone of that email is one of total support for
4   Pam Young?
5   A.   Yes.
6
7   THE COMMISSIONER: Thank you.
8
9   MR GRAY: Q.   Now, 382A, which are your bullet points for
10   Ashurst, the fourth page, the second-last page, I've taken
11   you to the first bullet point, which is at a relatively
12   early time in the morning, 7 or 8 o'clock?
13   A.   Yes.
14
15   Q.   But then you say:
16
17   *Shortly before midday I received a called*
18   *from Zdenka who said that the [Commissioner*
19   *of Police] (via herself and Strath Gordon)*
20   *were getting media inquiries demanding to*
21   *know whether he "stood by his officer's*
22   *comments."*
23
24   A.   Yes.
25
26   Q.   And Zdenka said to you - pausing there, one of those
27   was obviously the Feneley email that I just showed to you?
28   A.   Yes.
29
30   Q.   And Zdenka said to you:
31
32   *We have to put something out about the*
33   *matter and ... "you will have to own this,*
34   *Mick."*
35
36   A.   Yes, yes.
37
38   Q.   So those words in quotes are what Zdenka said to you
39   "You will have to own this, Mick"?
40   A.   Yes.
41
42   Q.   And you understood that as the Commissioner saying
43   that to you, "You will have to own this, Mick"?
44   A.   Oh, look, I understood it as Zdenka saying it.
45   Whether the Commissioner had direct input into that,
46   I mean, her role was to manage media. I'm not sure whether
47   the Commissioner had any input into that or not.

```
1
2      THE COMMISSIONER:   Q.   But her role was not to give you
3      directions, was it?
4      A.   She could.
5
6      Q.   She was, what, senior to you in the force?
7      A.   She was in a more senior position, given the role that
8      she had, and most certainly could.
9
10     Q.   So she could give you directions presumably in
11     relation to media strategy and so on?
12     A.   Yes.
13
14     Q.   Obviously not in relation to homicide issues?
15     A.   No, but general media strategy, yes.
16
17     THE COMMISSIONER:   All right.
18
19     MR GRAY:   Q.   Okay.  So the next bullet point:
20
21          ... 15 minutes later I telephoned Zdenka
22          with DI Olen and Georgie Wells present.
23
24     A.   Yes.
25
26     Q.   And I interpolate obviously for the second time?
27     A.   Yes.
28
29     Q.
30          We --
31
32     that is you and Georgie and Mr Olen --
33
34          discussed a set of words that would be
35          appropriate ...
36
37     And you drafted them and circulated them?
38     A.   Which is the "inopportune".
39
40     Q.   Which brings in the word "inopportune", and we find
41     that at tab 370 [NPL.0138.0002.6715_0001]?
42     A.   Mmm-hmm.
43
44     Q.   At the bottom of that page, 370, we see that you
45     indeed send an email at 12.49, so only three-quarters of an
46     hour after the ones that I took you to before.
47     A.   Mmm-hmm.
```

```
1
2      Q.    And you say to Z - that's Zdenka - and Strath:
3
4            Below words for consideration.  I am happy
5            to own the comment subject to the
6            Commissioner's view.
7
8      A.    Yeah.
9
10     Q.    And this time around, rather than saying - that's the
11     last one at tab 368 that said, "The majority of points she
12     raised are contained within her statement", now we have:
13
14           Perhaps some of her comments (on Lateline)
15           were inopportune ...
16
17     Et cetera?
18     A.    Yes.
19
20     Q.    Now, the word "inopportune" was a word that came from
21     you or from Zdenka or --
22     A.    No, it came from Strath Gordon.
23
24     Q.    From Strath Gordon?
25     A.    Yes.
26
27     Q.    And you endorse it or go along with it?
28     A.    Yes.
29
30     Q.    And you send that form of words to Zdenka and a number
31     of others including Strath Gordon.  Strath Gordon says he
32     is fine with it?
33     A.    Yep.
34
35     Q.    Georgie Wells says, subject to one very small minor
36     amendment, that once the Commissioner has approved the
37     wording, that will go out?
38     A.    Yes.
39
40     Q.    And indeed it does go out a bit later?
41     A.    Yes.
42
43     Q.    In that form, with the "inopportune" word in?
44     A.    Yes.
45
46     Q.    And you speak to Pamela Young.  I'm back on 382A now.
47     A.    Yes.
```

Transcript produced by Epiq

```
1
2      Q.    And she's not happy?
3      A.    Not at all.
4
5      Q.    She asked that you try to get it changed to say that
6      the comments were her own views?
7      A.    Yes.
8
9      Q.    You rang Zdenka.  She and Strath Gordon ring you back.
10     You talk about it some more.  You tell DCI Young that - and
11     it reads as follows:
12
13           "we are onto in town and trying to
14           convince."
15
16     What does that mean?
17     A.    We were on to - we were talking to Zdenka and Strath
18     trying to convince them to not use that word "inopportune",
19     because she was very upset about it, Pam.
20
21     Q.    But they say, "No, we want to use that word"?
22     A.    Yes.
23
24     Q.    And so it goes - that's what happens?
25     A.    That's right.
26
27     Q.    And she remains unhappy?
28     A.    Yes.
29
30     Q.    Thereafter?
31     A.    Yes.
32
33     MR GRAY:   I have nothing further, thank you.
34
35     <EXAMINATION BY MR THANGARAJ:
36
37     MR THANGARAJ:   Q.   Just staying with that document,
38     page 4, the last four numbers 0032, of your notes pre the
39     Ashurst interview, you were asked earlier about the suicide
40     theory, at the beginning of the day, and you were taken to
41     about halfway down the bullet point, "At 5.04pm
42     I received", et cetera.
43
44     THE COMMISSIONER:   A bit further down the page, I think.
45
46     THE WITNESS:   Sorry.
47
```

```
 1      MR THANGARAJ:   Yes.
 2
 3      THE COMMISSIONER:   There it is.  Okay.
 4
 5      MR THANGARAJ:    Q.   Page 4 of your notes for the Ashurst
 6      interview?
 7      A.   Oh, yes, sorry.
 8
 9      Q.   Sorry, I thought that's where we were.
10      A.   My fault, yes.
11
12      Q.   At the beginning of the day you were taken to some
13      questions in relation to the suicide theory and from that
14      paragraph of that bullet point, "At 5.04pm onwards", and
15      you ultimately said you wanted to appease Pam Young in
16      relation to this issue.
17      A.   Yes.
18
19      Q.   Now, I wanted to take you to what had preceded that
20      point leading in to that, but we have conveniently done
21      that now in part.  At that time, you've just been taken to
22      a few bullet points by Counsel Assisting, and then you say,
23      that second bullet point above "At 5.04":
24
25           I then telephoned DCI Young and informed
26           her that the words were not going to change
27           and that they would go out under my hand.
28
29      A.   Yes.
30
31      Q.
32           She became very upset and began crying
33           before hanging up the call.
34
35      A.   Yes.
36
37      Q.   So you knew before the 5.04pm text message that you
38      received - you knew what her state of mind was?
39      A.   Yes.
40
41      Q.   Generally with the police?
42      A.   Yes.
43
44      Q.   And also with the fact that it was going out under
45      your hand, the word "inopportune"?
46      A.   Yes.
47
```

Transcript produced by Epiq

1   Q.   And that you had failed to convince head office to
2   change the wording to something that suited her?
3   A.   Yes, that's right.

5   Q.   And as part of your attempts to provide some sort of
6   pastoral care, welfare, the next bullet point:

8   *Over the next hour or so I attempted to*
9   *telephone DCI Young on a number of*
10   *occasions ...*

12   A.   Yes.

14   Q.   If you had got through to her, what were you going to
15   try to achieve?
16   A.   To try and calm her down. I'm not sure whether or not
17   she'd said it beforehand but she said that she was going
18   off sick, at some point, which was of concern to me.

20   Q.   And then the communication you, in fact, had after
21   a number of attempts to call her was the text message she
22   received - you received from her at 5.04?
23   A.   Yes.

25   Q.   And you say that as a result of what had transpired,
26   conveniently noted on that one page, you attempted to
27   appease her in the way that you had attended to on the
28   phone calls that you attempted earlier?
29   A.   Yes.

31   Q.   Now, at any time during this, did Pam Young say to
32   you, "Well, you knew I was going to say this, Mick"?
33   A.   No.

35   Q.   Did she ever say, "You authorised me to go on Lateline
36   and say these things"?
37   A.   No.

39   Q.   Did she say, "I told you at 5pm when I rang you that
40   I was going there for the interview"?
41   A.   No.

43   Q.   Now, I need to take you to some questions in relation
44   to the Lateline topic, but just before we get to that,
45   I just want to ask a couple of things of what was happening
46   in April 2015. Now, the incident at Lindt Cafe was about
47   four months prior?

```
1       A.   Yes, that's right, yep.
2
3       Q.   How important a priority was Lindt Cafe for your role
4       in April 2015?
5       A.    It consumed a considerable amount of my time because
6       it was the biggest investigation being conducted in the
7       country at the time.  I had a detective chief inspector
8       that was running it with a strike force of 30 to 40
9       detectives preparing material that would eventually become
10      part of the coronial inquest.  The Coroner at the time had
11      kicked off an inquest, had started an inquest, and it was
12      an ongoing factor that consumed a lot of my time and
13      attention.
14
15      Q.   And part of that involved scrutiny panels.  What were
16      they?
17      A.    Scrutiny panels were an idea that we came up with to
18      provide support to the inspector that was running that
19      investigation.  It was done with the concurrence of the
20      State Coroner, so it involved myself, John Kerlatec,
21      Mick Fuller, who chaired it, and Deputy Commissioner Kaldas
22      providing advice and guidance to the investigator that was
23      running that inquiry.
24
25      Q.   16 April, so a few days after this, there was
26      a significant announcement that happened in relation to the
27      William Tyrrell investigation?
28      A.   Yes.
29
30      Q.   Now, on 16 April, were you involved in - were you
31      being interviewed --
32      A.   Yes.
33
34      THE COMMISSIONER:   Sorry, can I just interrupt?  I do
35      apologise.  Where does this evidence come from about the
36      William Tyrrell - is it in the papers?
37
38      MR THANGARAJ:   I'm just asking him.
39
40      THE COMMISSIONER:   I know you are, but are you giving
41      evidence about it, are you?  I am not quite sure.  It may
42      be uncontroversial.
43
44      MR THANGARAJ:   I don't think anything is going to be
45      controversial.  I don't expect it to be.
46
47      THE COMMISSIONER:   Well, I just don't know.  But if you're
```

1 going to ask me to find that some announcement was made of
2 some significance, some thought ought to be given to me
3 having, if it's uncontroversial, some material about it,
4 because I personally don't have judicial knowledge or
5 notice of what you're talking about. I have no doubt that
6 Lindt Cafe was on the table, I'm just certainly not aware
7 of William Tyrrell at all, sorry. I know about the case
8 but I don't know about the proximity of the announcement
9 you are talking about now in the light of - and your
10 evidence I accept uncontroversially, but at the moment it's
11 from you only, is all I'm saying.
12
13 MR THANGARAJ: Yes, I understand that. I will take
14 whatever steps are needed.
15
16 THE COMMISSIONER: Thank you.
17
18 MR THANGARAJ: Q.   On 16 April you conducted interviews
19 in relation to a major announcement in relation to the
20 William Tyrrell investigation?
21 A.   Yes, I did.
22
23 Q.   And was that something that was being considered
24 internally for a number of days leading in to that 16 April
25 press conference?
26 A.   Yes, yes, and it was a major press conference followed
27 up with some exclusive interviews.
28
29 Q.   Just very briefly, what was the announcement that was
30 being made on that day in relation to that investigation?
31 A.   That the investigation had identified a paedophile
32 ring that may have had some connection to the case.
33
34 Q.   Now, on 16 and 17 April - I think this is noted in the
35 diary notes that have recently been added to the
36 supplementary bundle - there was a convening of Homicide
37 leaders from around the country?
38 A.   Yes.
39
40 Q.   Heads of Homicide from around the country were here
41 for - was it a two-day conference on the 16th and 17th?
42 A.   Yes, for the first time. That group gathered in
43 Sydney for --
44
45 Q.   And had you initiated that?
46 A.   I had.
47

1   Q.   So there was some involvement leading into the 16th
2   of April for that?
3   A.   Yes.
4
5   Q.   And how many active cases was the Homicide branch
6   looking at, roughly, in April of 2015?
7   A.   At any one time, between 60 and 80 active homicides.
8   April of 2015 would be no different.
9
10   Q.   I want to go specifically now to the 13th, and just in
11   relation to this area, you've been asked a lot of questions
12   of the phone call that took place with Pam Young and also
13   the notes that you made, the recollection, and then the
14   interview - sorry, the meeting you had with Ashurst.
15   A.   Yes.
16
17   Q.   We know that the phone call was at around 5pm. What
18   were you doing on the afternoon of the 13th, so immediately
19   prior to the phone call?
20   A.   I was at a funeral for the first ever Homicide Squad
21   commander, Detective Inspector Harry Tupman.
22
23   Q.   And was that a major event for police?
24   A.   (Witness nods).
25
26   Q.   And why was that?
27   A.   It was a major event for the Homicide Squad and it
28   was - prior to that, Mr Tupman had been invited in for
29   a morning tea with his daughters, and all of the previous
30   Homicide Squad commanders were present with the
31   Commissioner, and it was quite a culturally significant
32   matter for the Homicide Squad, given its history.
33
34   Q.   I just want to take you through a few points generally
35   and specifically in relation to the questions you've been
36   asked. We've heard evidence and we read evidence about the
37   media backgrounding strategy being discussed and approved
38   at very high levels of the police?
39   A.   Yes.
40
41   Q.   And it's clear from that material that the strategy
42   that was being discussed was backgrounding and off the
43   record?
44   A.   Yes.
45
46   Q.   And what was being sought was a balance in the
47   publicity that was being generated by this particular case?

```
1     A.    Yes.
2
3     Q.    And as we've seen, including from a document that you
4     were taken to earlier, there would be a reconsideration of
5     the question of on the record on the 13th if needed?
6     A.    Yes.
7
8     Q.    Was there ever a reconsideration on the 13th --
9     A.    No.
10
11    Q.      -- of that question?  Now, Pam Young had approval to
12    do the door-stop at Glebe on the 13th?
13    A.    Yes, I gave her that approval.
14
15    Q.    To welcome the inquest, et cetera?
16    A.    Yes.
17
18    Q.    It was put to you, with respect, entirely accurately,
19    that the media release was quite bland?
20    A.    Yes.
21
22    Q.    Now, the media release went out because, as far as the
23    police understood it, the media pack had gone?
24    A.    As far as Georgie Wells and I understood it, yes.
25
26    Q.    So the media release that went out was the one that
27    you've been taken to today?
28    A.    Yes.
29
30    Q.    And did she have authority at that door-stop at Glebe
31    to go further than that media release?
32    A.    No.
33
34    Q.    Document ending 2947 - I don't need to take you to it
35    because we've been taken to it but it's the media update
36    that Georgia Wells does.
37    A.    Yes.
38
39    Q.    She did not mention the Glebe interview with
40    Emma Alberici - it's not in that document, is it?
41    A.    That's right.
42
43    Q.    Given that Pam Young had conducted that door-stop at
44    Glebe, was she required to inform police media?
45    A.    Yes.
46
47    Q.    So you take it from that document that she failed to
```

```
1      comply with her obligations and tell police media on the
2      13th of the door-stop?
3      A.    Yes.
4
5      Q.    That media release that went out, would that have gone
6      to Pam Young by email to her phone?
7      A.    Yes.
8
9      Q.    And that would have been before her call to you at
10     5pm?
11     A.    Yes, around 1 o'clock - before 1 o'clock, yeah.
12
13     Q.    I have just taken you to April 2015 generally and
14     specifically up to and including 13 April, and ignore
15     everything you've read since that time, if that's possible,
16     but as of that time in April 2015 up to the 13th is all I'm
17     asking you about, did you trust Pam Young?
18     A.    Yes.
19
20     Q.    Did you trust her to comply with approvals?
21     A.    Yes.
22
23     Q.    Even if they had not been, to her knowledge - sorry,
24     we know that she knew that there was a background strategy
25     approved at high levels.  Even without that, did you have
26     confidence that she would comply with approvals to whatever
27     extent that they were?
28     A.    Yes.
29
30     Q.    As of 13 April, by the end of that phone call at
31     around 5pm, as far as you were aware, had she complied with
32     her obligations?
33     A.    Yes, she had.
34
35     Q.    As far as you understood it?
36     A.    As far as I was aware, yes.
37
38     Q.    Did you have any reason, by the end of that phone
39     call, to believe that she had gone past her authority?
40     A.    No, although she had done an interview with one
41     journalist at court, was my understanding.
42
43     Q.    But at that stage, did you understand that she had
44     gone outside, further than the media pack, the media
45     release?
46     A.    No.
47
```

```
1    Q.   Now, you've read the door-stop interview - since that
2    time, in more recent times, you've read the transcript of
3    the door-stop interview in Glebe?
4    A.   Yes.
5
6    Q.   Did she exceed her authority by saying what she did?
7    A.   Yes, I think she did.
8
9    Q.   Now, the approval that she had was to speak to the
10   media on the 13th at Glebe?
11   A.   Yes.
12
13   Q.   And she did not speak to the media pack and she
14   reported back to the police that they had all gone --
15   A.   That's right.
16
17   Q.   -- by the time she came out?
18   A.   Yes.
19
20   Q.   Now, you don't know whether or not she waited for the
21   media pack to leave, I take it?
22   A.   I don't know.
23
24   Q.   But it just so happened that despite everyone else
25   leaving, Emma Alberici happened to be at Glebe after the
26   rest of the media had left?
27   A.   Yes.
28
29   Q.   And so if that had happened, that she waited,
30   deliberately or otherwise, and Pam Young only spoke to
31   Emma Alberici at Glebe, would you regard that as an
32   exclusive?
33   A.   Yes.
34
35   Q.   You've seen the ABC footage from the news at 7pm which
36   we have just seen today?
37   A.   Yes.
38
39   Q.   And you've read the transcript at Glebe?
40   A.   Yes.
41
42   Q.   Was there more in the transcript than there was on the
43   footage?
44   A.   Yes, considerably more.
45
46   Q.   Who had authority to allow a police officer to give an
47   exclusive interview to media?
```

```
1        A.    Strath Gordon.
2
3        Q.    Did you have that authority?
4        A.    No.
5
6        Q.    And when you understood that this had happened, did
7        you keep it to yourself or did you ring the Media Unit?
8        A.    Oh, I rang Georgie Wells, who in turn said that she'd
9        better notify Strath.
10
11       Q.    So the protocol was for you to ring media and that's
12       what you did?
13       A.    Yes.
14
15       Q.    Media Unit, I'm sorry?
16       A.    Yes.
17
18       Q.    The text message that you received from Pam Young -
19       and you were taken to this by Counsel Assisting - talked
20       about balance and that she was happy the ABC had been
21       involved?
22       A.    Yes.
23
24       Q.    Had there been consideration of excluding a different
25       media organisation in the lead-up to this?
26       A.    Yes, the Herald.
27
28       Q.    And we read the documents, there was a belief that the
29       Herald's reporter had formed a view against the police's
30       position?
31       A.    That's right.
32
33       Q.    And that there was no point speaking to the Herald at
34       that point?
35       A.    Yes.
36
37       Q.    Or that particular journalist?
38       A.    Yes.
39
40       Q.    So part of Pam Young's belief was that they needed to
41       speak to an organisation that would provide balance, that
42       would listen to things fairly, and that the Herald
43       journalist wasn't one of them?
44       A.    That's correct, yes.
45
46       Q.    So when she talks about balance and the ABC, that is
47       in the history of the Herald being problematic from her
```

Transcript produced by Epiq

1   point of view?
2   A.   Yes.
3
4   Q.   She also says in the text message - she also talks
5   about Penny Brown and her appearance, her lipstick,
6   et cetera, in that text message. Now, there's never been
7   a suggestion that Penny Brown would appear on the Lateline
8   studio interview -- -
9   A.   No.
10
11   Q.   -- as far as you've ever understood it?
12   A.   No. No.
13
14   Q.   Her message - sorry, just before that, before you
15   received the message, did you have any reason to think that
16   Pam Young would exceed her authority?
17   A.   No.
18
19   Q.   When you received that text message and she spoke
20   about Penny Brown's appearance, was that consistent or
21   inconsistent with her having conducted a door-stop at
22   Glebe?
23   A.   It was consistent with her having conducted
24   a door-stop at Glebe because Penny Brown was present at the
25   same time.
26
27   Q.   And it's quite usual, isn't it, when there are
28   a couple of officers involved in an investigation or
29   a court case, that one will speak and one or others will
30   stand behind them?
31   A.   Yes.
32
33   Q.   Or will be in the footage of walking along pathways?
34   A.   Yeah, will be in the vicinity with them, yes, that's
35   right.
36
37   Q.   To your knowledge, was anyone in the Media Unit
38   alarmed before the Lateline interview actually went to air?
39   A.   No.
40
41   Q.   To your knowledge, had everyone else assumed, like
42   you, that Pam Young would behave in authority?
43   A.   Yes.
44
45   Q.   And we now have read important material as to the
46   history of the contact between Pam Young, Penny Brown on
47   the one hand, and the ABC on the other hand?

```
1         A.   Yes.
2
3         Q.   On that topic, going back to the document ending A,
4         2733 [sic], Emma Alberici expressed views internally on the
5         8th to others of the ABC.  You have read that, haven't you?
6         A.   I have read it, yes.
7
8         Q.   And obviously those views in relation to Pam Young and
9         what Pam Young would say and the form in which she would
10        say it could only have come from Pam Young?
11        A.   That's right.
12
13        Q.   Is that your understanding?
14        A.   That's correct.
15
16        Q.   Now, as of 8 April, Emma Alberici has an assurance
17        from Pam Young that she would speak on the record?
18        A.   Yes.
19
20        Q.   You have read that?
21        A.   Yes, I have.
22
23        Q.   At the very best, your understanding was there may be
24        consideration to go on the record on 13 April?
25        A.   Yes.
26
27        Q.   So that means well before that possibility had even
28        arisen, Pam Young had assured Emma Alberici that she would
29        go on the record?
30        A.   That's correct.
31
32        Q.   Now, apart from Penny Brown, are you aware of anyone
33        else in police knowing that at that time?
34        A.   I'm not aware of anyone knowing that.
35
36        Q.   Would you regard Pam Young as actively misleading the
37        police in relation to these issues?
38        A.   Yes.
39
40        Q.   Did she have authority to promise Emma Alberici an
41        on-the-record interview on 8 April?
42        A.   No.
43
44        Q.   Let alone an exclusive?
45        A.   No.
46
47        Q.   And we've seen from that material that not only had
```

```
 1    she promised an exclusive interview, but that it would be
 2    explosive, and there was the influence allegation against
 3    the family and politicisation involving the Minister?
 4    A.   Yes.
 5
 6    Q.   Did Pam Young ever have any authority to say that in
 7    the way that she did, or at all, on the record?
 8    A.   No.
 9
10    Q.   Did she tell anyone, to your knowledge, that she had
11    recorded the interview on the 10th, which Emma Alberici
12    had said may be used on the record - for example, the
13    Mark Colvin program?
14    A.   Not to my knowledge.
15
16    Q.   Did she have authority to allow Emma Alberici to use
17    the recording on the 10th for another ABC program?
18    A.   No.
19
20    MR THANGARAJ:   Nothing further.
21
22    THE COMMISSIONER:   I've got a couple of matters I just
23    want to take up with Mr Willing.
24
25    MR MYKKELTVEDT:   Your Honour, I should indicate I will
26    have just one subject to touch upon.
27
28    THE COMMISSIONER:   I beg your pardon?
29
30    MR MYKKELTVEDT:   I should indicate that I will have just
31    one subject to touch upon.
32
33    THE COMMISSIONER:   And what subject will that be, given
34    that Mr Tedeschi has already had his go?
35
36    MR MYKKELTVEDT:   Mr Tedeschi hasn't had his go in relation
37    to the matters that have been considered today.  The
38    subject I wish to touch upon --
39
40    THE COMMISSIONER:   Well, why don't you do it now, before I
41    ask my questions.
42
43    MR MYKKELTVEDT:   Yes, that was all I was exploring.
44
45    THE COMMISSIONER:   All right.  No, that's fair, thank you.
46
47
```

1   **<EXAMINATION BY MR MYKKELTVEDT:**
2
3   MR MYKKELTVEDT: Q.   Mr Willing, you were asked some
4   questions about Pam Young's views as at April 2015 in
5   relation to the likelihood that Mr Johnson died by suicide.
6   Do you recall that --
7   A.   Yes.
8
9   Q.   -- at the very outset of today; and, in addition, her
10   view that the case could never be solved on the available
11   evidence as it then stood?
12   A.   Yes.
13
14   Q.   Now, Pam Young, to your knowledge, was appointed the
15   investigation supervisor on or about 2 April 2013; is that
16   right?
17   A.   Yes, it was.
18
19   Q.   And would you agree that her statement was finalised
20   on 13 July 2014?
21   A.   Yes.
22
23   Q.   And in the meantime, you wrote to the Crime
24   Commission?
25   A.   Yes.
26
27   Q.   And you sought that they provide a view as to whether
28   the relevant lines of inquiry had been covered?
29   A.   Yes.
30
31   Q.   And in turn, whether there was anything in their
32   powers, the specific powers that are ascribed to the Crime
33   Commission, that would allow them to further investigate
34   the matter?
35   A.   Yes.
36
37   Q.   And be of assistance to the NSW Police Force?
38   A.   Yes.
39
40   Q.   And they wrote to you in February 2015, I think - or
41   2014, I should say?
42   A.   Yes.
43
44   Q.   And indicated that they considered that there had been
45   a careful - or I should actually pull up the exact words.
46   Can you be shown, perhaps, tab 350A
47   [NPL.3000.0014.0195_0001] and the middle of the third

```
 1    page of that document?
 2    A.   I think I've got that.  350A.
 3
 4    Q.   Yes.  Do you see in the middle of that page a heading
 5    "Conclusion of major investigations"?
 6    A.   Yes.
 7
 8    Q.   So I took you before to a letter that you had written
 9    on 4 October 2013.
10    A.   Yes.
11
12    Q.   And there is some italicised text in that passage?
13    A.   Yes.
14
15    Q.   Can you indicate for the Commission whether that
16    italicised text is in fact text that was contained in your
17    letter?
18    A.   Yes.
19
20    Q.   And then on 18 February 2014 you received a response?
21    A.   Yes.
22
23    Q.   In which the Commission indicated that the
24    investigations to that point conducted had been
25    comprehensive and thorough --
26    A.   Yes.
27
28    Q.   -- and had not identified any line of inquiry that had
29    not already been undertaken?
30    A.   Yes.
31
32    Q.   And then, as I suggested to you before, the Commission
33    indicated:
34
35         *Similarly, it is considered that there is*
36         *no scope for the Commission to exercise its*
37         *statutory powers in a way which would*
38         *assist the investigation any further.*
39
40    A.   Yes.
41
42    Q.   So as at the date of April 2015, the views that
43    Pam Young had expressed were expressed on the back of quite
44    a lengthy investigation?
45    A.   Yes.
46
47    Q.   That had resulted in a 445-page statement?
```

```
1       A.   Yes.
2
3       Q.   And had had the benefit of the Crime Commission's
4       views as to, among other things, whether there were further
5       lines of inquiry that could be pursued?
6       A.   Yes, that's right.
7
8       Q.   Now, did you yourself at any stage during the course
9       of Pam Young's investigations seek to direct her or
10      influence her to form a conclusion that suicide was the
11      most likely outcome?
12      A.   Not at all.
13
14      MR MYKKELTVEDT:   Those are the questions that I had.
15
16      THE COMMISSIONER:   Thank you.
17
18      Q.   Mr Willing, just a couple of questions.  First,
19      I assume from what's happened and what has been said that
20      you, amongst other telephone numbers, would have had
21      Pamela Young's various contact details in your phone?
22      A.   Yes.
23
24      Q.   And you could, if you had chosen to do so, made
25      contact with her on the evening of the 13th or early the
26      following morning, on the 14th?
27      A.   Yes.
28
29      Q.   Was Ms Young ever disciplined, by reason of her
30      unauthorised activities?
31      A.   Not before - no, she wasn't.
32
33      Q.   And Ms Brown - was she ever spoken to by you or
34      anybody else to find out what part she had played in this
35      unauthorised activity?
36      A.   Not by me.
37
38      Q.   By anyone to your knowledge?
39      A.   I'm not sure whether anyone else did, sir.
40
41      Q.   But you certainly did not initiate any activity to
42      determine to what extent Ms Brown was privy to what had
43      occurred?
44      A.   Sir, a Part 8A complaint had been initiated as part of
45      the process.
46
47      Q.   What does that mean?
```

Transcript produced by Epiq

```
1      A.    So under the Police Act, a complaint investigation had
2      been started but not physically conducted.  So it was
3      recorded that a complaint would be lodged against those
4      officers and investigated down the track, but Pamela Young
5      went off sick and it was never concluded.
6
7      Q.    Well, when you say "never concluded", do you mean, by
8      that, never pursued?
9      A.    Yes.
10
11     THE COMMISSIONER:    Thank you.  They are the matters that
12     I had.  Is there anything arising out of that,
13     Mr Thangaraj?  Thank you.
14
15     MR GRAY:    Commissioner, that concludes the evidence for
16     public hearing 2.
17
18     THE COMMISSIONER:    Thank you.
19
20     MR GRAY:    And under the regime that has been promulgated,
21     the submissions of Counsel Assisting will be due in three
22     weeks' time and the submissions by other authorised
23     parties, three weeks after that.
24
25     THE COMMISSIONER:    Yes, all right.  I think you are all
26     aware of those dates.  Does that still fit in with the -
27     I think we talked about 21 June for you --
28
29     MR THANGARAJ:    Which predates the end of the six weeks
30     from now, unfortunately.  We will leave it as it is and we
31     will see what happens.
32
33     THE COMMISSIONER:    The only difficulty I've got, as is
34     obvious, is the report date, and I want to obviously
35     provide that everybody has such opportunity as they need
36     reasonably to respond.
37
38     MR THANGARAJ:    Yes, that's fine, the timetable is fine.
39
40     THE COMMISSIONER:    We will try to accommodate everybody.
41     Having spent time involved in the matter, both in your
42     interests but more importantly Mr Willing's interests, he
43     would want his preferred counsel.  We will sort something
44     out, I'm sure, even if we have to contact you in Scotland
45     or somewhere.  All right.
46
47           Yes, Mr Gray, were you going to say something?
```

1
2   MR GRAY: I hope this is of assistance. There has been
3   some communication, I believe - I will be corrected if I'm
4   wrong about this - as to possibly amending the dates for
5   the oral submissions in relation to this public hearing
6   to - they were to have been I think 26 and 27 June, or the
7   27th and 28th perhaps, to 30 June, which is a Friday, and
8   3 July, which is a Monday. If that's not convenient, we
9   can work something out, but I understand that may be
10   convenient.
11
12   THE COMMISSIONER: Does that work for you?
13
14   MR THANGARAJ: Sorry, I don't think that involves me.
15
16   MR GRAY: No, that's right.
17
18   THE COMMISSIONER: All right. Well, why don't I leave
19   counsel to try to sort something out if you can, and what
20   is suitable to counsel will suit me, I'm certain. All
21   right. I will now adjourn, thank you. Sorry, Mr Willing,
22   I should excuse you from further attendance, thank you.
23
24   THE WITNESS: Thank you.
25
26   **<THE WITNESS WITHDREW**
27
28   **AT 3.16PM THE SPECIAL COMMISSION OF INQUIRY WAS ADJOURNED**
29   **ACCORDINGLY**
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47

'

'unlike [1] - 3800:47

0

0032 [1] - 3822:38

1

1 [8] - 3737:19, 3738:45, 3740:22, 3769:46, 3770:1, 3798:24, 3829:11
10 [2] - 3760:40, 3804:45
10.11am [1] - 3720:25
10.12am [1] - 3721:30
10.30 [3] - 3786:26, 3787:17, 3797:41
10pm [1] - 3808:30
10th [16] - 3741:14, 3741:17, 3741:26, 3761:3, 3761:19, 3762:12, 3762:28, 3762:29, 3762:39, 3765:25, 3765:33, 3771:22, 3779:24, 3800:22, 3834:11, 3834:17
11 [7] - 3741:12, 3764:41, 3766:5, 3790:40, 3794:25, 3795:41, 3796:7
11th [1] - 3741:17
12 [2] - 3768:30, 3769:6
12.03 [2] - 3818:1, 3818:22
12.20 [1] - 3771:35
12.49 [1] - 3820:45
121 [1] - 3720:20
13 [22] - 3732:32, 3736:3, 3736:31, 3738:41, 3746:12, 3747:41, 3769:3, 3770:13, 3771:27, 3771:31, 3775:31, 3775:42, 3782:7, 3782:11, 3788:1, 3788:4, 3793:2, 3812:43, 3829:14, 3829:30, 3833:24, 3835:20
13th [15] - 3732:40, 3796:31, 3798:45, 3800:22, 3801:38, 3808:33, 3827:10, 3827:18, 3828:5, 3828:8, 3828:12,

3829:2, 3829:16, 3830:10, 3837:25
14 [12] - 3728:42, 3729:1, 3733:20, 3737:14, 3749:28, 3764:32, 3799:8, 3799:24, 3801:23, 3801:35, 3811:15, 3813:7
14th [4] - 3796:34, 3796:35, 3809:21, 3837:26
15 [5] - 3720:25, 3721:34, 3723:24, 3723:35, 3820:21
16 [9] - 3721:34, 3724:42, 3763:46, 3801:36, 3825:25, 3825:30, 3826:18, 3826:24, 3826:34
16th [2] - 3826:41, 3827:1
17 [5] - 3743:25, 3744:4, 3764:37, 3787:34, 3826:34
1711 [4] - 3732:1, 3732:5, 3810:23, 3810:25
1712 [3] - 3732:46, 3810:37, 3811:14
1713 [1] - 3735:17
1720 [1] - 3775:28
17th [1] - 3826:41
18 [1] - 3836:20
19 [1] - 3734:3
1988 [1] - 3802:6

2

2 [13] - 3720:20, 3721:4, 3744:23, 3756:20, 3756:22, 3763:2, 3763:9, 3772:28, 3798:28, 3803:21, 3835:15, 3838:16
20 [6] - 3723:40, 3725:1, 3766:19, 3766:21, 3785:47
2012 [2] - 3767:18, 3772:35
2013 [2] - 3835:15, 3836:9
2014 [3] - 3835:20, 3835:41, 3836:20
2015 [15] - 3725:1, 3727:6, 3727:23, 3731:12, 3756:22, 3778:44, 3824:46, 3825:4, 3827:6,

3827:8, 3829:13, 3829:16, 3835:4, 3835:40, 3836:42
2017 [3] - 3730:36, 3730:46, 3731:17
2022 [1] - 3720:9
2023 [1] - 3720:25
21 [2] - 3751:46, 3838:27
24 [6] - 3745:4, 3766:21, 3797:42, 3798:1, 3808:30, 3810:15
26 [2] - 3803:24, 3839:6
27 [2] - 3766:30, 3839:6
2733 [1] - 3833:4
27th [1] - 3839:7
2878 [1] - 3723:39
2898 [1] - 3723:40
2899 [1] - 3723:43
28th [1] - 3839:7
29 [1] - 3735:18
2947 [1] - 3828:34
2970 [1] - 3723:43
2971 [1] - 3723:46

3

3 [10] - 3726:15, 3752:44, 3763:37, 3764:43, 3772:27, 3783:22, 3784:22, 3785:47, 3804:10, 3839:8
3.16PM [1] - 3839:28
30 [5] - 3763:1, 3802:29, 3804:28, 3825:8, 3839:7
30-minute [1] - 3786:1
318 [5] - 3801:32, 3801:33, 3803:10, 3803:21, 3804:7
32 [2] - 3763:3, 3763:9
34 [1] - 3765:12
342 [1] - 3762:46
343 [2] - 3770:16, 3772:25
344 [3] - 3801:38, 3801:44, 3802:28
346 [1] - 3743:23
347 [1] - 3745:32
348 [1] - 3752:29
35 [1] - 3812:29
350A [2] - 3835:46, 3836:2
352 [2] - 3758:32, 3758:35
354 [1] - 3740:45

356 [1] - 3770:1
361 [1] - 3773:20
362 [1] - 3784:38
362A [1] - 3785:44
362B [1] - 3785:33
364 [1] - 3787:32
366 [1] - 3790:43
366A [1] - 3797:29
367 [4] - 3749:27, 3808:19, 3808:23, 3808:26
368 [4] - 3815:19, 3818:34, 3821:11
369 [1] - 3817:46
37 [2] - 3764:43, 3766:36
370 [2] - 3820:41, 3820:44
372 [1] - 3736:47
374 [1] - 3751:42
377 [1] - 3724:41
382 [8] - 3726:4, 3744:22, 3761:35, 3772:5, 3780:41, 3784:2, 3791:38, 3798:43
382A [16] - 3728:32, 3738:36, 3756:18, 3757:4, 3760:38, 3768:29, 3771:26, 3775:30, 3775:34, 3778:21, 3783:22, 3784:21, 3791:37, 3812:46, 3819:9, 3821:46

4

4 [7] - 3728:41, 3764:12, 3765:2, 3804:19, 3822:38, 3823:5, 3836:9
4.35pm [2] - 3773:21, 3784:44
40 [2] - 3763:18, 3825:8
400-plus [1] - 3723:32
41 [2] - 3732:8, 3810:26
43 [2] - 3764:8, 3802:47
430 [1] - 3723:28
445 [3] - 3723:28, 3746:16, 3746:26
445-page [5] - 3722:5, 3740:41, 3744:5, 3806:18, 3836:47

5

5 [15] - 3770:35, 3771:10, 3771:13, 3771:19, 3775:12, 3777:23, 3777:35, 3780:26, 3780:33, 3782:25, 3784:13, 3787:26, 3802:28, 3804:27
5.04 [2] - 3823:23, 3824:22
5.04pm [4] - 3728:44, 3822:41, 3823:14, 3823:37
500 [2] - 3742:47, 3753:22
51 [1] - 3720:27
5pm [8] - 3775:46, 3776:2, 3777:15, 3782:35, 3824:39, 3827:17, 3829:10, 3829:31

6

6 [8] - 3761:36, 3772:5, 3780:42, 3780:43, 3784:4, 3785:22, 3798:44, 3804:45
60 [1] - 3827:7

7

7 [13] - 3745:38, 3751:27, 3752:31, 3764:31, 3785:30, 3787:11, 3787:22, 3788:1, 3792:25, 3799:4, 3805:18, 3813:35, 3819:12
7.30 [3] - 3788:5, 3788:18, 3794:21
7.57am [1] - 3809:20
7am [1] - 3813:8
7pm [4] - 3782:12, 3782:14, 3782:18, 3830:35

8

8 [16] - 3742:47, 3752:30, 3752:36, 3753:3, 3756:21, 3756:22, 3764:13, 3765:5, 3787:22, 3790:40, 3794:25, 3795:41, 3796:7, 3819:12, 3833:16,

Transcript produced by Epiq

Transcript produced by Epiq

apologise [1] - 3825:35
apparent [1] - 3818:14
appear [8] - 3721:12, 3721:16, 3779:42, 3785:9, 3785:15, 3797:41, 3808:12, 3832:7
appearance [3] - 3793:46, 3832:5, 3832:20
appearances [1] - 3721:8
appeared [1] - 3800:35
appease [4] - 3729:28, 3730:24, 3823:15, 3824:27
appeasing [1] - 3729:35
appointed [1] - 3835:14
appreciate [5] - 3759:19, 3765:19, 3773:24, 3790:6, 3792:35
appreciated [2] - 3782:11, 3789:29
appreciating [1] - 3775:8
approach [8] - 3723:19, 3731:28, 3737:23, 3739:42, 3740:13, 3740:18, 3795:46, 3818:14
appropriate [3] - 3773:5, 3780:30, 3820:35
appropriateness [1] - 3744:9
approval [13] - 3725:13, 3745:26, 3747:32, 3748:21, 3750:20, 3750:29, 3751:9, 3776:24, 3777:20, 3806:45, 3828:11, 3828:13, 3830:9
approvals [2] - 3829:20, 3829:26
approved [8] - 3740:17, 3747:47, 3753:6, 3769:40, 3808:47, 3821:36, 3827:37, 3829:25
approving [2] - 3751:18, 3813:35
April [69] - 3727:6, 3727:22, 3728:42, 3729:1, 3731:12,

3732:32, 3736:3, 3736:31, 3737:14, 3737:19, 3738:41, 3738:45, 3740:22, 3741:12, 3745:4, 3745:38, 3746:12, 3747:41, 3749:28, 3751:27, 3751:46, 3752:30, 3752:31, 3752:36, 3753:3, 3756:21, 3756:22, 3757:3, 3760:40, 3768:30, 3769:3, 3770:13, 3771:27, 3771:31, 3775:31, 3775:42, 3778:44, 3782:7, 3782:11, 3787:34, 3788:1, 3788:4, 3793:2, 3799:8, 3799:24, 3801:23, 3812:43, 3813:7, 3813:35, 3824:46, 3825:4, 3825:25, 3825:30, 3826:18, 3826:24, 3826:34, 3827:2, 3827:6, 3827:8, 3829:13, 3829:14, 3829:16, 3829:30, 3833:16, 3833:24, 3833:41, 3835:4, 3835:15, 3836:42
area [4] - 3724:7, 3725:27, 3726:37, 3827:11
arisen [1] - 3833:28
arising [2] - 3742:18, 3838:12
arrange [1] - 3743:45
arranged [1] - 3806:6
arrived [2] - 3772:41, 3814:1
ascribed [1] - 3835:32
Ashurst [30] - 3726:9, 3728:38, 3744:22, 3745:3, 3761:35, 3772:5, 3772:10, 3779:27, 3780:41, 3780:46, 3781:13, 3784:3, 3784:32, 3791:29, 3791:38, 3798:41, 3798:42, 3798:43, 3799:4, 3799:30, 3799:35, 3800:2, 3800:28, 3801:7, 3813:1, 3819:10, 3822:39, 3823:5, 3827:14
aside [1] - 3809:34
asleep [1] - 3826:45

aspect [1] - 3726:25
aspects [1] - 3736:19
assist [2] - 3809:41, 3836:38
assistance [2] - 3835:37, 3839:2
Assistant [4] - 3725:26, 3746:5, 3774:21, 3813:13
Assisting [5] - 3720:30, 3720:31, 3823:22, 3831:19, 3838:21
assume [2] - 3756:26, 3837:19
assumed [15] - 3762:36, 3762:38, 3777:39, 3779:1, 3779:19, 3779:28, 3779:35, 3780:29, 3781:27, 3781:36, 3783:1, 3783:7, 3783:17, 3791:30, 3832:41
assuming [1] - 3779:41
assurance [1] - 3833:16
assured [1] - 3833:28
AT [1] - 3839:28
attachment [1] - 3725:33
attacked [2] - 3807:8, 3807:10
attempted [3] - 3824:8, 3824:26, 3824:28
attempting [3] - 3729:28, 3730:23
attempts [2] - 3824:5, 3824:21
attend [2] - 3759:3, 3759:21
attendance [1] - 3839:22
attended [1] - 3824:27
attention [4] - 3723:6, 3765:5, 3802:21, 3825:13
attitude [1] - 3730:21
attract [1] - 3765:5
attributed [1] - 3761:37
Australian [14] - 3737:32, 3742:16, 3742:19, 3746:35, 3747:1, 3747:9, 3754:36, 3754:41, 3755:1, 3755:4, 3755:10, 3757:16,

3775:2, 3791:14
authorisation [1] - 3748:19
authorised [7] - 3748:16, 3779:37, 3782:34, 3783:18, 3814:16, 3824:35, 3838:22
authority [10] - 3828:30, 3829:39, 3830:6, 3830:46, 3831:3, 3832:16, 3832:42, 3833:40, 3834:6, 3834:16
available [3] - 3746:21, 3755:40, 3835:10
aware [13] - 3726:23, 3740:36, 3742:5, 3762:17, 3773:17, 3780:34, 3814:38, 3826:6, 3829:31, 3829:36, 3833:32, 3833:34, 3838:26
awareness [1] - 3767:23

___

B

back-grounder [1] - 3761:9
back-grounding [1] - 3779:2
background [14] - 3732:19, 3737:16, 3739:20, 3740:13, 3746:34, 3747:3, 3751:30, 3757:31, 3757:34, 3777:22, 3781:37, 3781:40, 3809:13, 3829:24
backgrounder [13] - 3744:13, 3748:15, 3752:47, 3755:24, 3758:35, 3760:8, 3760:47, 3761:20, 3761:24, 3762:29, 3762:38, 3768:42, 3777:26
backgrounders [5] - 3737:31, 3737:39, 3738:4, 3749:33, 3774:47
backgrounding [36] - 3740:28, 3741:20, 3741:23, 3744:27, 3748:45, 3749:4, 3749:6, 3751:18, 3752:33, 3754:43, 3754:45, 3755:4,

3756:27, 3757:8, 3757:13, 3757:26, 3760:13, 3761:47, 3779:10, 3779:12, 3779:20, 3779:23, 3779:30, 3779:34, 3781:16, 3793:19, 3793:22, 3793:27, 3793:45, 3795:32, 3795:40, 3796:11, 3813:38, 3827:37, 3827:42
balance [5] - 3789:34, 3827:46, 3831:20, 3831:41, 3831:46
balanced [5] - 3788:13, 3789:24, 3789:28, 3789:31, 3789:41
Barnes [20] - 3725:2, 3725:12, 3736:7, 3769:7, 3790:44, 3791:4, 3791:44, 3793:5, 3793:30, 3794:25, 3794:36, 3796:27, 3796:44, 3798:36, 3800:5, 3801:10, 3801:15, 3801:19, 3808:7
bear [2] - 3756:18, 3818:31
became [1] - 3823:32
become [2] - 3736:26, 3825:9
becoming [1] - 3760:14
beforehand [2] - 3801:17, 3824:17
beg [3] - 3758:39, 3780:10, 3834:28
began [1] - 3823:32
beginning [16] - 3728:44, 3738:41, 3741:4, 3746:32, 3747:25, 3748:3, 3748:38, 3761:38, 3761:46, 3766:30, 3772:6, 3775:45, 3780:43, 3784:4, 3822:40, 3823:12
begins [5] - 3756:22, 3771:26, 3775:31, 3803:43, 3815:24
behalf [2] - 3801:25, 3806:27
behave [1] - 3832:42
behind [2] - 3818:10, 3832:30
behold [2] - 3803:1, 3803:2

Transcript produced by Epiq

belief [5] - 3726:25, 3764:21, 3817:34, 3831:28, 3831:40
bells [1] - 3818:27
below [4] - 3728:41, 3753:9, 3761:36, 3821:4
benefit [1] - 3837:3
benign [1] - 3806:45
best [1] - 3833:23
better [3] - 3748:29, 3784:36, 3831:9
between [14] - 3738:21, 3739:4, 3744:46, 3745:19, 3758:45, 3763:32, 3787:26, 3801:14, 3801:20, 3801:37, 3802:42, 3803:14, 3827:7, 3832:46
big [4] - 3792:35, 3792:37, 3792:39, 3816:28
big-ticket [1] - 3816:28
biggest [2] - 3793:1, 3825:6
bit [14] - 3721:22, 3727:11, 3727:12, 3732:17, 3736:1, 3737:46, 3744:31, 3756:30, 3757:44, 3763:36, 3763:41, 3794:21, 3821:40, 3822:44
Blake [1] - 3758:36
bland [2] - 3770:8, 3828:19
blue [1] - 3743:37
board [1] - 3768:46
Bondi [3] - 3766:46, 3767:10, 3767:25
boss [1] - 3745:44
bottom [27] - 3726:15, 3726:16, 3726:19, 3732:4, 3761:1, 3764:7, 3766:5, 3768:29, 3772:6, 3772:7, 3772:28, 3774:42, 3780:42, 3784:3, 3784:22, 3798:44, 3803:21, 3804:10, 3804:35, 3805:35, 3805:36, 3808:29, 3810:25, 3812:46, 3813:4, 3820:44
bound [1] - 3809:35
bounds [1] - 3810:10
Box [11] - 3737:32,

3738:4, 3754:42, 3757:8, 3758:43, 3758:45, 3761:1, 3761:12, 3762:39, 3775:1, 3795:32
box [5] - 3721:5, 3722:4, 3730:29, 3755:4, 3759:9
Bradley [1] - 3745:35
branch [1] - 3827:5
break [5] - 3721:22, 3760:26, 3760:31, 3798:25, 3798:27
Bridge [4] - 3802:29, 3802:35, 3803:1, 3804:36
brief [5] - 3740:4, 3756:25, 3756:36, 3795:31, 3814:21
briefing [4] - 3746:35, 3756:35, 3756:40, 3759:3
briefings [1] - 3809:13
briefly [2] - 3751:39, 3826:29
brings [1] - 3820:40
broad [2] - 3723:19, 3724:3
broad-brush [1] - 3723:19
broadcast [14] - 3735:21, 3736:2, 3765:29, 3782:13, 3782:27, 3785:30, 3787:16, 3801:28, 3803:11, 3803:31, 3804:7, 3805:19, 3817:27, 3818:16
broader [1] - 3742:16
Brown [12] - 3730:41, 3730:47, 3743:25, 3744:5, 3744:10, 3832:5, 3832:7, 3832:24, 3832:46, 3833:32, 3837:33, 3837:42
Brown's [1] - 3832:20
brush [1] - 3723:19
bullet [38] - 3728:36, 3738:40, 3739:8, 3739:17, 3739:28, 3739:46, 3740:3, 3740:16, 3757:4, 3761:2, 3768:30, 3771:26, 3771:30, 3771:34, 3774:45, 3775:30, 3775:36, 3775:42, 3775:45, 3777:4, 3779:41, 3783:23, 3783:33,

3812:47, 3813:4, 3813:46, 3816:8, 3816:17, 3817:36, 3817:38, 3819:9, 3819:11, 3820:19, 3822:41, 3823:14, 3823:22, 3823:23, 3824:6
bulletin [7] - 3773:15, 3773:18, 3785:30, 3785:45, 3786:1, 3788:1, 3788:5
bundle [6] - 3721:34, 3726:5, 3737:1, 3756:39, 3762:47, 3826:36
burden [1] - 3801:43
BY [3] - 3722:1, 3822:35, 3835:1

C

Cafe [5] - 3800:43, 3800:44, 3824:46, 3825:3, 3826:6
Caitlin [1] - 3720:33
calm [1] - 3824:16
camera [3] - 3785:7, 3796:40, 3806:40
Camporeale [1] - 3720:32
cannot [1] - 3803:33
capacity [2] - 3733:16, 3733:43
captures [1] - 3738:16
care [1] - 3824:6
careful [1] - 3835:45
careless [1] - 3792:8
Carmel [2] - 3767:15, 3767:22
Carmine [1] - 3774:22
carmine [1] - 3774:23
carriage [1] - 3752:43
Carvosso [1] - 3720:34
case [19] - 3723:18, 3728:21, 3730:40, 3730:46, 3736:8, 3741:9, 3752:43, 3755:39, 3767:31, 3786:25, 3788:12, 3794:43, 3795:11, 3795:23, 3826:7, 3826:32, 3827:47, 3832:29, 3835:10
cases [3] - 3724:6, 3804:28, 3827:5
casual [1] - 3726:44
catch [1] - 3743:46
categories [1] -

3763:22
caught [2] - 3778:33, 3778:41
caused [6] - 3735:36, 3787:25, 3797:10, 3797:13, 3798:5, 3798:20
Cc [2] - 3773:44, 3774:7
cent [1] - 3804:4
certain [3] - 3804:2, 3804:4, 3839:20
certainly [15] - 3721:10, 3727:32, 3728:28, 3738:31, 3742:36, 3751:1, 3752:12, 3767:39, 3782:14, 3783:40, 3785:42, 3818:18, 3820:8, 3826:6, 3837:41
cetera [10] - 3739:25, 3748:21, 3770:27, 3793:36, 3809:15, 3814:41, 3821:17, 3822:42, 3828:15, 3832:6
Ch [1] - 3775:1
chain [3] - 3725:1, 3808:19, 3809:9
chaired [1] - 3825:21
challenging [1] - 3767:43
chance [1] - 3753:26
change [6] - 3727:12, 3727:17, 3767:47, 3797:9, 3823:26, 3824:2
changed [10] - 3725:43, 3727:11, 3727:30, 3749:15, 3754:21, 3756:1, 3766:24, 3769:36, 3817:43, 3822:5
changes [1] - 3727:29
changing [1] - 3767:22
Channel [2] - 3797:42, 3798:1
characterisation [1] - 3722:15
characterise [1] - 3767:10
charges [1] - 3800:16
chase [1] - 3747:35
chat [2] - 3747:2, 3796:23
check [1] - 3805:14
Chief [7] - 3735:35, 3740:8, 3741:8,

3805:47, 3806:3, 3813:9, 3818:41
chief [1] - 3825:7
chop [1] - 3727:12
chopped [1] - 3727:11
chosen [1] - 3837:24
Chris [4] - 3815:44, 3816:46, 3818:41
chronological [1] - 3756:19
circulated [1] - 3820:37
circumstances [4] - 3727:14, 3751:14, 3767:9, 3792:45
Claire [1] - 3720:31
clarify [2] - 3768:36, 3797:33
clarifying [1] - 3768:41
clear [11] - 3722:10, 3722:38, 3722:43, 3728:5, 3729:44, 3756:15, 3761:32, 3768:2, 3786:30, 3803:5, 3827:41
clearly [3] - 3771:5, 3790:32, 3806:30
Clifton [1] - 3758:36
clip [1] - 3785:37
close [2] - 3738:45, 3756:19
collective [2] - 3816:33, 3816:45
colloquially [1] - 3811:11
Colvin [2] - 3765:9, 3834:13
combat [1] - 3768:8
combating [1] - 3768:16
comfortable [3] - 3762:20, 3790:7, 3790:11
coming [4] - 3746:11, 3758:43, 3793:47, 3816:11
Command [5] - 3745:46, 3746:3, 3746:5, 3773:40, 3774:5
commander [2] - 3805:38, 3827:21
Commander [2] - 3746:4, 3795:15
commanders [1] - 3827:30
comment [4] - 3752:16, 3752:26, 3814:30, 3821:5

Transcript produced by Epiq

Transcript produced by Epiq

3746:28, 3748:2, 3748:11, 3748:17, 3749:44, 3750:5, 3756:12, 3762:13, 3762:43, 3767:25, 3773:26, 3774:31, 3775:9, 3775:10, 3777:32, 3784:15, 3789:43, 3791:40, 3795:7, 3803:46, 3805:16, 3806:2, 3806:19, 3806:32, 3806:33, 3811:33, 3812:35, 3813:17, 3813:21, 3813:33, 3813:38, 3813:39, 3815:13, 3816:29, 3817:3, 3817:6, 3817:20, 3818:12, 3831:44, 3833:14, 3833:30

correct" [1] - 3735:31
corrected [1] - 3839:3
corrects [1] - 3764:12
correspondence [1] - 3801:20
Counsel [6] - 3720:30, 3720:31, 3771:39, 3823:22, 3831:19, 3838:21
counsel [5] - 3771:12, 3799:43, 3838:43, 3839:19, 3839:20
country [3] - 3825:7, 3826:37, 3826:40
couple [14] - 3730:30, 3738:41, 3756:20, 3760:40, 3761:41, 3770:5, 3783:36, 3786:8, 3811:3, 3812:42, 3824:45, 3832:28, 3834:22, 3837:18
course [15] - 3723:23, 3727:35, 3731:7, 3740:9, 3748:8, 3763:21, 3767:14, 3773:6, 3777:25, 3795:15, 3800:44, 3801:16, 3801:39, 3812:15, 3837:8
Court [2] - 3733:10, 3770:18
court [41] - 3729:15, 3733:17, 3735:1, 3735:13, 3770:12, 3770:33, 3770:37, 3770:38, 3770:40, 3770:42, 3770:47, 3771:3, 3771:9,

3771:20, 3772:2, 3776:17, 3776:23, 3776:28, 3777:13, 3777:45, 3778:6, 3778:7, 3779:13, 3779:14, 3779:35, 3780:2, 3780:19, 3781:30, 3783:8, 3785:16, 3785:17, 3785:24, 3785:28, 3786:13, 3786:32, 3789:5, 3791:32, 3792:3, 3800:16, 3829:41, 3832:29
courtesy [4] - 3748:46, 3791:7, 3795:31, 3795:45
cover [2] - 3763:4, 3763:5
coverage [3] - 3788:13, 3789:24, 3789:28
covered [3] - 3722:38, 3753:28, 3835:28
crap [1] - 3729:12
credibility [1] - 3799:40
Crime [13] - 3745:45, 3745:46, 3746:2, 3746:3, 3746:5, 3773:40, 3773:42, 3774:5, 3805:8, 3805:11, 3835:23, 3835:32, 3837:3
crimes [2] - 3720:11, 3766:46
criminal [1] - 3753:14
criticise [1] - 3729:2
criticism [2] - 3730:26, 3801:18
criticisms [1] - 3806:15
cross [1] - 3782:1
Crown [1] - 3801:24
crying [1] - 3823:32
crystal [2] - 3756:15, 3803:5
culturally [1] - 3827:31
cup [1] - 3799:42
current [2] - 3763:40, 3792:30
Current [1] - 3811:11
cut [1] - 3747:35

D

daily [2] - 3773:25, 3782:18
Dan [14] - 3737:32,

3738:4, 3741:1, 3752:6, 3754:42, 3757:8, 3758:43, 3758:45, 3761:1, 3761:12, 3762:39, 3775:1, 3778:26, 3795:32
date [4] - 3752:32, 3787:33, 3836:42, 3838:34
dates [2] - 3838:26, 3839:4
daughters [1] - 3827:29
Dawson [1] - 3801:25
day" [1] - 3752:20
days [8] - 3726:12, 3745:41, 3761:31, 3768:41, 3796:28, 3800:26, 3825:25, 3826:24
DCI [20] - 3725:13, 3728:47, 3736:31, 3739:13, 3739:37, 3757:7, 3757:17, 3761:6, 3761:9, 3768:31, 3776:3, 3784:28, 3785:6, 3813:12, 3814:16, 3814:38, 3816:19, 3822:10, 3823:25, 3824:9
dead [1] - 3730:47
dealing [1] - 3756:21
dealt [2] - 3722:38, 3807:31
death [9] - 3722:11, 3725:41, 3726:37, 3767:9, 3768:4, 3802:5, 3803:24, 3805:2, 3806:8
debunks [2] - 3724:21, 3724:34
decide [1] - 3797:20
decided [1] - 3749:15
decision [6] - 3752:16, 3752:26, 3759:14, 3770:25, 3770:34, 3816:33
decisions [1] - 3770:13
declined [1] - 3722:15
defeat [6] - 3728:15, 3728:26, 3728:28, 3730:1, 3730:4, 3730:18
defeating [1] - 3728:30
degree [1] - 3812:25
deliberate [1] -

3812:34
deliberately [1] - 3830:30
deliver [1] - 3772:32
demanding [2] - 3759:20, 3819:20
departing [1] - 3767:18
department [2] - 3792:24
Deputy [11] - 3740:10, 3751:16, 3756:31, 3756:47, 3774:3, 3774:21, 3774:24, 3793:12, 3793:21, 3793:41, 3825:21
described [2] - 3727:10, 3808:37
description [2] - 3741:19, 3787:4
designed [1] - 3759:14
desk [1] - 3743:38
despite [1] - 3830:24
Det [2] - 3748:43, 3775:1
detail [3] - 3724:16, 3732:20, 3736:1
details [1] - 3837:21
Detective [11] - 3725:11, 3735:34, 3740:8, 3741:8, 3759:7, 3773:39, 3797:30, 3813:9, 3814:14, 3818:41, 3827:21
detective [2] - 3786:25, 3825:7
detectives [1] - 3825:9
determine [2] - 3727:19, 3837:42
determined [2] - 3767:33, 3767:39
developed [1] - 3767:45
devote [1] - 3723:6
DI [2] - 3759:2, 3820:22
dialogue [1] - 3739:5
diary [1] - 3826:35
died [1] - 3835:5
difference [2] - 3757:32, 3757:35
different [18] - 3723:12, 3723:15, 3724:3, 3741:11, 3749:16, 3749:39, 3749:42, 3766:15, 3766:19, 3772:32, 3779:7, 3779:37,

3782:14, 3782:16, 3800:10, 3800:11, 3827:8, 3831:24
difficult [3] - 3759:46, 3801:1, 3801:11
difficulty [1] - 3838:33
dig [1] - 3730:31
direct [4] - 3745:44, 3773:2, 3819:45, 3837:9
direction [1] - 3731:18
directions [9] - 3736:6, 3736:13, 3736:19, 3737:21, 3745:41, 3746:11, 3769:8, 3820:3, 3820:10
directly [1] - 3773:2
Director [5] - 3720:32, 3740:4, 3745:45, 3746:2, 3773:41
Directorate [2] - 3745:45, 3746:2
directorates [1] - 3746:3
disciplined [1] - 3837:29
discount [1] - 3798:4
discreet [1] - 3780:30
discreetly [1] - 3758:29
discuss [2] - 3769:39, 3818:44
discussed [21] - 3738:6, 3738:17, 3744:37, 3745:7, 3745:19, 3747:47, 3751:39, 3755:6, 3757:39, 3766:2, 3793:11, 3793:21, 3793:34, 3793:41, 3793:44, 3809:32, 3810:5, 3814:16, 3820:34, 3827:37, 3827:42
discussing [1] - 3749:33
discussion [17] - 3737:20, 3739:2, 3739:4, 3741:20, 3741:23, 3744:43, 3747:32, 3748:21, 3751:9, 3752:27, 3758:15, 3759:9, 3769:38, 3779:2, 3779:20, 3779:23, 3779:30
discussions [8] - 3736:11, 3736:16, 3738:28, 3739:35,

exchanges [1] - 3803:14

excluding [1] - 3831:24

exclusive [28] - 3735:14, 3741:7, 3752:41, 3752:46, 3753:4, 3779:33, 3786:24, 3786:30, 3787:4, 3787:12, 3787:16, 3787:18, 3788:14, 3789:20, 3789:38, 3790:18, 3790:34, 3791:31, 3794:4, 3794:11, 3796:12, 3807:3, 3826:27, 3830:32, 3830:47, 3833:44, 3834:1

excuse [1] - 3839:22

Executive [1] - 3814:2

executive [2] - 3774:5, 3774:34

exercise [3] - 3765:1, 3767:24, 3836:36

exist [2] - 3760:12, 3760:15

existent [1] - 3723:2

exists [1] - 3760:9

expands [1] - 3763:36

expect [1] - 3825:45

expected [2] - 3721:3, 3757:23

expecting [1] - 3809:43

experience [1] - 3758:22

explain [2] - 3744:42, 3796:19

explained [3] - 3761:6, 3773:36, 3795:7

explains [1] - 3765:8

explanation [7] - 3722:11, 3725:41, 3726:1, 3765:40, 3778:18, 3779:7, 3803:26

exploring [1] - 3834:43

explosive [4] - 3741:7, 3755:19, 3755:29, 3834:2

express [1] - 3816:19

expressed [3] - 3833:4, 3836:43

expression [1] - 3802:47

expressly [2] - 3782:35, 3782:37

extensive [2] - 3786:41, 3786:46

extent [3] - 3786:36, 3829:27, 3837:42

extremely [3] - 3730:24, 3742:46, 3807:11

F

face [4] - 3733:23, 3733:41, 3811:6, 3811:18

facilitated [1] - 3774:47

fact [28] - 3730:22, 3733:9, 3734:47, 3735:20, 3751:17, 3754:41, 3755:42, 3758:17, 3769:42, 3770:46, 3772:26, 3778:40, 3780:5, 3791:31, 3797:11, 3798:42, 3800:21, 3802:43, 3805:10, 3807:7, 3807:8, 3807:10, 3814:16, 3818:20, 3818:44, 3823:44, 3824:20, 3836:16

factor [1] - 3825:12

factors [3] - 3724:17, 3724:30, 3724:34

facts [4] - 3726:34, 3753:35, 3768:37, 3768:47

factual [1] - 3723:32

failed [2] - 3824:1, 3828:47

fair [1] - 3834:45

fairly [5] - 3770:7, 3798:35, 3817:35, 3831:42

fallen [2] - 3726:44, 3726:45

familiar [1] - 3782:7

families' [1] - 3801:1

family [24] - 3727:38, 3727:46, 3728:15, 3728:26, 3729:1, 3736:41, 3737:22, 3741:39, 3753:13, 3753:34, 3758:7, 3768:16, 3774:43, 3791:12, 3791:22, 3792:4, 3800:47, 3801:11, 3801:15, 3806:5, 3806:16, 3807:8, 3834:3

family's [3] - 3726:25,

3746:27, 3768:9

far [15] - 3736:44, 3746:40, 3747:6, 3758:7, 3761:23, 3765:45, 3767:38, 3793:1, 3803:41, 3828:22, 3828:24, 3829:31, 3829:35, 3829:36, 3832:11

fathom [1] - 3778:10

fault [1] - 3823:10

feasible [1] - 3763:25

feature [5] - 3778:27, 3783:28, 3783:44, 3783:46, 3792:5

features [2] - 3782:12, 3782:17

featuring [3] - 3779:41, 3782:26, 3786:12

February [13] - 3722:4, 3723:14, 3731:46, 3743:6, 3743:14, 3743:25, 3744:4, 3753:29, 3775:23, 3798:9, 3812:14, 3835:40, 3836:20

feed [2] - 3779:12, 3817:35

fellow [1] - 3773:39

felt [3] - 3729:12, 3742:36, 3796:20

Feneley [5] - 3817:47, 3818:9, 3818:18, 3818:22, 3819:27

Feneley) [1] - 3747:18

few [14] - 3731:47, 3732:1, 3733:47, 3748:24, 3750:23, 3750:41, 3753:9, 3755:14, 3763:2, 3815:34, 3817:41, 3823:22, 3825:25, 3827:34

final [1] - 3721:3

finalised [1] - 3835:19

finally [1] - 3766:18

Finch [15] - 3745:34, 3745:43, 3746:1, 3749:31, 3751:13, 3773:36, 3808:16, 3808:30, 3808:44, 3809:19, 3809:24, 3813:13, 3815:35

Finch's [1] - 3773:41

findings [8] - 3766:39, 3767:6, 3767:29, 3767:31, 3767:36, 3768:18, 3768:22,

3768:25

fine [8] - 3721:26, 3762:24, 3762:35, 3774:13, 3810:17, 3821:32, 3838:38

finished [1] - 3753:23

first [43] - 3722:30, 3738:15, 3740:46, 3740:47, 3743:12, 3745:42, 3746:10, 3749:29, 3751:23, 3760:43, 3761:30, 3766:32, 3769:13, 3770:31, 3771:7, 3771:26, 3774:23, 3774:42, 3775:30, 3775:36, 3780:33, 3787:18, 3787:43, 3787:46, 3791:26, 3802:1, 3802:20, 3803:12, 3803:37, 3804:3, 3804:10, 3807:31, 3808:29, 3809:32, 3809:45, 3810:4, 3816:17, 3817:36, 3819:11, 3826:42, 3827:20, 3837:18

firstly [4] - 3722:44, 3723:39, 3724:30, 3736:20

fit [1] - 3838:26

fits [2] - 3789:47, 3790:3

five [3] - 3725:2, 3725:6, 3738:16

flagging [1] - 3757:43

flawed [1] - 3802:6

flick [2] - 3738:35, 3784:42

fly [1] - 3725:20

focusing [1] - 3788:43

folder [4] - 3731:38, 3731:43, 3801:44, 3808:20

folders [1] - 3801:43

followed [1] - 3826:26

following [6] - 3764:37, 3796:28, 3796:29, 3811:15, 3813:7, 3837:26

follows [4] - 3739:29, 3799:36, 3802:10, 3822:11

footage [4] - 3789:6, 3830:35, 3830:43, 3832:33

footpath [1] - 3770:18

Forbes [3] - 3767:15, 3767:22, 3772:35

force [5] - 3791:14, 3800:35, 3806:7, 3820:6, 3825:8

Force [4] - 3742:9, 3808:8, 3835:37

forgive [1] - 3721:23

forgotten [1] - 3721:24

form [14] - 3728:4, 3777:30, 3778:47, 3779:13, 3779:18, 3800:10, 3806:40, 3806:41, 3811:10, 3812:36, 3821:30, 3821:43, 3833:9, 3837:10

formal [5] - 3747:29, 3763:20, 3763:32, 3782:2, 3782:3

format [1] - 3782:8

formed [1] - 3831:29

former [1] - 3807:10

forth [1] - 3806:22

forward [4] - 3721:20, 3724:18, 3724:31, 3790:21

four [7] - 3725:7, 3738:16, 3771:34, 3772:45, 3775:45, 3822:38, 3824:47

fourth [2] - 3752:39, 3819:10

frank [1] - 3759:9

Frank [2] - 3774:23, 3799:26

free [1] - 3759:9

frequent [2] - 3795:22, 3798:35

Friday [9] - 3754:42, 3760:40, 3771:22, 3777:21, 3777:26, 3778:19, 3779:24, 3779:29, 3839:7

front [7] - 3723:23, 3724:12, 3724:46, 3732:3, 3763:4, 3785:28, 3809:8

frustrated [2] - 3742:24, 3742:36

full [1] - 3786:36

Fuller [1] - 3825:21

fully [1] - 3789:29

funeral [1] - 3827:20

furious [1] - 3800:29

G

game [2] - 3729:33, 3730:25

gangs [1] - 3726:26

Transcript produced by Epiq

garner [1] - 3753:35
Gate [4] - 3802:29, 3802:35, 3803:1, 3804:35
gather [5] - 3727:32, 3755:42, 3781:7, 3784:17, 3813:20
gathered [1] - 3826:42
gay [2] - 3766:46, 3804:28
gay-hate [1] - 3766:46
general [1] - 3820:15
generally [5] - 3722:9, 3754:15, 3823:41, 3827:34, 3829:13
generated [1] - 3827:47
George [1] - 3814:14
Georgia [1] - 3828:36
Georgie [57] - 3737:5, 3737:13, 3737:29, 3738:5, 3738:7, 3738:21, 3739:2, 3739:6, 3739:43, 3740:3, 3740:17, 3744:37, 3744:46, 3745:7, 3745:11, 3745:16, 3745:18, 3745:28, 3745:29, 3745:30, 3745:33, 3746:10, 3749:28, 3749:46, 3750:12, 3751:14, 3751:23, 3751:38, 3751:39, 3758:44, 3771:11, 3773:25, 3774:40, 3777:47, 3778:13, 3784:18, 3784:27, 3784:36, 3785:13, 3787:27, 3787:39, 3787:47, 3790:19, 3809:20, 3815:28, 3815:35, 3815:40, 3816:4, 3816:46, 3818:36, 3818:38, 3820:22, 3820:32, 3821:35, 3828:24, 3831:8
Georgina [1] - 3737:4
given [33] - 3723:10, 3737:21, 3740:23, 3740:40, 3741:18, 3741:22, 3743:13, 3745:28, 3746:25, 3748:8, 3751:6, 3751:14, 3751:15, 3751:17, 3753:13, 3754:36, 3754:41, 3770:33, 3771:3, 3771:9, 3772:42,

3777:19, 3783:36, 3783:39, 3789:40, 3791:30, 3791:31, 3817:31, 3820:7, 3826:2, 3827:32, 3828:43, 3834:33
glad [3] - 3788:26, 3788:45, 3789:9
Glebe [14] - 3733:10, 3793:38, 3794:1, 3828:12, 3828:30, 3828:39, 3828:44, 3830:3, 3830:10, 3830:25, 3830:31, 3830:39, 3832:22, 3832:24
Glick [4] - 3741:1, 3778:26, 3783:41, 3789:30
Golden [4] - 3802:29, 3802:35, 3803:1, 3804:35
Gordon [22] - 3737:8, 3737:14, 3740:5, 3740:16, 3749:30, 3751:15, 3751:43, 3752:13, 3757:24, 3808:36, 3809:7, 3809:9, 3809:18, 3815:35, 3816:35, 3819:19, 3821:22, 3821:24, 3821:31, 3822:9, 3831:1
government [2] - 3805:24, 3806:17
Government [1] - 3805:1
grab [4] - 3765:2, 3783:9, 3786:31, 3789:1
grabs [2] - 3780:19, 3783:2
Grant [1] - 3756:36
granted [1] - 3812:20
Gray [9] - 3720:30, 3748:24, 3760:26, 3760:36, 3773:34, 3794:17, 3794:19, 3798:32, 3838:47
GRAY [41] - 3721:3, 3721:32, 3722:1, 3722:3, 3724:41, 3748:29, 3748:34, 3758:32, 3760:29, 3760:38, 3774:20, 3775:41, 3776:44, 3780:41, 3782:24, 3783:7, 3784:2, 3785:40, 3785:44, 3786:4, 3786:8,

3786:46, 3787:32, 3790:17, 3793:5, 3794:3, 3794:35, 3796:39, 3798:23, 3798:34, 3808:11, 3810:20, 3815:17, 3817:24, 3819:9, 3820:19, 3822:33, 3838:15, 3838:20, 3839:2, 3839:16
green [1] - 3751:7
grounder [1] - 3761:9
grounding [2] - 3752:6, 3779:2
group [1] - 3826:42
guidance [1] - 3825:22

H

had" [1] - 3776:10
hair [1] - 3788:39
half [4] - 3723:9, 3730:34, 3774:42, 3785:21
halfway [8] - 3728:41, 3738:40, 3739:17, 3760:39, 3761:37, 3804:27, 3809:9, 3822:41
hand [5] - 3721:33, 3823:27, 3823:45, 3832:47
handle [1] - 3736:12
hands [2] - 3731:8, 3731:22
hanging [1] - 3823:33
happy [4] - 3747:16, 3821:4, 3822:2, 3831:20
hard [4] - 3724:44, 3729:14, 3778:10, 3814:39
Harry [1] - 3827:21
hate [3] - 3720:11, 3766:46, 3804:29
Head [4] - 3793:21, 3798:2, 3802:36, 3803:18
head [6] - 3752:42, 3793:12, 3809:35, 3809:41, 3810:8, 3824:1
heading [5] - 3723:28, 3723:36, 3743:28, 3787:38, 3836:4
heads [2] - 3758:25, 3826:40
heads-up [1] - 3758:25

Healey [1] - 3720:33
Healey-Nash [1] - 3720:33
hear [9] - 3762:23, 3762:31, 3762:34, 3776:45, 3780:43, 3781:1, 3784:4, 3785:21, 3787:23
heard [6] - 3786:22, 3787:18, 3792:42, 3797:40, 3799:10, 3827:36
hearing [12] - 3721:4, 3736:6, 3736:13, 3736:19, 3737:21, 3745:41, 3746:11, 3769:8, 3774:41, 3774:43, 3838:16, 3839:5
heaven's [1] - 3813:43
height [2] - 3802:42, 3802:43
held [2] - 3731:16, 3765:25
helped [1] - 3729:24
herald [1] - 3831:33
Herald [6] - 3747:12, 3818:1, 3818:14, 3831:26, 3831:42, 3831:47
herald's [1] - 3831:29
hereon [1] - 3772:47
herself [3] - 3740:22, 3764:12, 3819:19
hi [2] - 3743:34, 3815:26
hierarchy [1] - 3737:10
high [2] - 3827:38, 3829:25
higher [1] - 3768:27
himself [2] - 3751:46, 3774:33
hindered [1] - 3759:10
historic [1] - 3792:40
history [3] - 3827:32, 3831:47, 3832:46
hmm [6] - 3754:8, 3766:41, 3769:4, 3814:5, 3820:42, 3820:47
hold [1] - 3745:43
holding [1] - 3798:13
home [5] - 3770:36, 3776:3, 3781:1, 3797:25, 3797:47
Homicide [13] - 3742:8, 3795:11, 3795:15, 3809:36, 3809:42, 3810:8,

3826:36, 3826:40, 3827:5, 3827:20, 3827:27, 3827:30, 3827:32
homicide [21] - 3722:37, 3723:1, 3723:43, 3724:4, 3724:15, 3724:18, 3724:25, 3726:26, 3727:33, 3727:35, 3727:39, 3728:16, 3730:4, 3730:36, 3731:1, 3731:12, 3752:42, 3764:10, 3768:9, 3768:17, 3820:14
homicides [2] - 3766:47, 3827:7
homosexual [1] - 3727:14
honest [1] - 3797:14
Honour [3] - 3721:8, 3721:16, 3834:25
Honourable [1] - 3720:16
hope [2] - 3799:45, 3839:2
hour [4] - 3755:8, 3796:15, 3820:46, 3824:8
hours [1] - 3817:42
humiliate [1] - 3729:2
hundred [1] - 3804:4
hypotheses [2] - 3722:21, 3727:42
hypothesis [9] - 3723:40, 3723:43, 3723:47, 3724:4, 3724:15, 3724:18, 3724:25, 3724:31, 3724:38

I

idea [8] - 3739:18, 3739:20, 3743:20, 3744:13, 3766:2, 3795:31, 3816:32, 3825:17
identified [2] - 3826:31, 3836:28
identifies [1] - 3724:17
identify [2] - 3724:30, 3766:45
ignore [1] - 3829:14
immediately [4] - 3748:16, 3750:18, 3815:24, 3827:18
implement [1] -

Transcript produced by Epiq

3795:45

important [4] -
3762:18, 3802:34,
3825:3, 3832:45
importantly [1] -
3838:42
impossible [2] -
3724:5, 3773:7
impression [5] -
3722:31, 3753:4,
3768:45, 3814:44,
3817:30
impressions [1] -
3807:45
improper [1] - 3806:11
improperly [5] -
3741:40, 3741:45,
3741:46, 3742:6,
3806:16
improved [1] - 3764:3
improvement [1] -
3748:30
in-studio [8] -
3732:31, 3733:16,
3735:9, 3780:11,
3804:3, 3811:10,
3811:33, 3812:36
in-studio-style [1] -
3733:43
inaccurate [1] -
3813:34
inappropriate [4] -
3744:11, 3807:9,
3810:9, 3810:10
incident [1] - 3824:46
include [1] - 3783:33
included [4] -
3732:34, 3767:11,
3795:30, 3804:14
including [8] -
3730:46, 3736:30,
3747:18, 3803:11,
3804:47, 3821:31,
3828:3, 3829:14
inconsistent [1] -
3832:21
indeed [10] - 3737:26,
3740:40, 3756:40,
3756:43, 3759:3,
3759:14, 3769:18,
3802:47, 3820:45,
3821:40
indicate [7] - 3727:34,
3753:42, 3755:27,
3818:27, 3834:25,
3834:30, 3836:15
indicated [7] -
3730:40, 3751:29,
3768:40, 3806:36,
3835:44, 3836:23,

3836:33
indicating [1] -
3801:11
indication [2] -
3753:16, 3801:10
indirect [1] - 3757:43
individually [1] -
3754:17
inference [1] -
3730:45
infers [1] - 3809:28
influence [11] -
3741:40, 3742:7,
3753:14, 3758:7,
3804:47, 3805:1,
3805:23, 3806:16,
3807:9, 3834:2,
3837:10
influenced [2] -
3741:46, 3742:9
inform [4] - 3795:31,
3795:39, 3795:41,
3828:44
information [8] -
3739:36, 3747:3,
3767:45, 3781:16,
3781:42, 3802:14,
3804:15, 3816:47
informed [3] -
3743:44, 3747:10,
3823:25
initial [1] - 3802:4
initials [1] - 3726:20
initiate [2] - 3809:44,
3837:41
initiated [2] - 3826:45,
3837:44
initiative [2] -
3809:36, 3815:11
inopportune [6] -
3820:40, 3821:15,
3821:20, 3821:43,
3822:18, 3823:45
inopportune" [1] -
3820:38
input [5] - 3751:17,
3816:34, 3816:37,
3819:45, 3819:47
inquest [27] - 3725:3,
3727:47, 3728:15,
3736:21, 3742:26,
3749:18, 3749:19,
3765:46, 3766:25,
3767:14, 3769:14,
3772:31, 3772:43,
3773:30, 3774:41,
3787:24, 3792:41,
3794:46, 3795:3,
3795:47, 3796:2,
3801:16, 3806:45,

3825:10, 3825:11,
3828:15
inquiries [2] -
3816:11, 3819:20
inquiry [7] - 3725:44,
3731:17, 3795:4,
3825:23, 3835:28,
3836:28, 3837:5
Inquiry [1] - 3720:9
INQUIRY [1] - 3839:28
Insp [1] - 3775:1
inspector [2] - 3825:7,
3825:18
Inspector [7] -
3735:35, 3741:8,
3759:7, 3797:30,
3814:14, 3818:41,
3827:21
intends [1] - 3748:43
interested [3] -
3754:46, 3797:23,
3797:24
interests [2] - 3838:42
interjected [1] -
3801:20
internally [2] -
3826:24, 3833:4
interpolate [1] -
3820:26
interpreted [1] -
3801:12
interrupt [3] -
3773:33, 3794:16,
3825:34
interview [155] -
3725:6, 3726:8,
3726:12, 3728:43,
3732:26, 3732:27,
3732:31, 3732:35,
3732:40, 3733:10,
3733:43, 3735:9,
3737:15, 3741:7,
3741:13, 3741:19,
3744:22, 3745:24,
3747:42, 3748:15,
3751:47, 3752:38,
3752:41, 3752:46,
3753:5, 3754:36,
3754:42, 3754:43,
3754:45, 3755:1,
3755:5, 3755:18,
3755:24, 3761:36,
3762:45, 3763:5,
3765:25, 3770:17,
3770:32, 3770:33,
3770:37, 3770:38,
3770:41, 3771:3,
3771:9, 3771:14,
3771:20, 3771:22,
3772:5, 3776:6,

3776:16, 3776:17,
3776:21, 3776:22,
3777:5, 3777:13,
3777:15, 3777:21,
3777:23, 3777:31,
3777:35, 3778:4,
3778:5, 3778:19,
3778:25, 3778:44,
3778:47, 3779:13,
3779:19, 3779:20,
3779:28, 3779:29,
3779:33, 3780:7,
3780:12, 3780:16,
3780:24, 3780:34,
3780:41, 3781:2,
3781:24, 3781:33,
3782:2, 3782:3,
3782:31, 3782:36,
3783:1, 3783:2,
3783:37, 3784:3,
3784:5, 3784:33,
3785:27, 3786:17,
3786:24, 3786:31,
3786:38, 3787:4,
3787:12, 3787:16,
3787:18, 3788:22,
3789:4, 3789:41,
3790:9, 3791:31,
3791:39, 3792:13,
3792:26, 3793:38,
3793:47, 3794:4,
3794:11, 3794:29,
3796:12, 3798:6,
3798:41, 3798:42,
3798:43, 3799:27,
3799:34, 3799:35,
3800:6, 3800:22,
3801:28, 3801:37,
3803:10, 3803:11,
3808:47, 3811:10,
3811:12, 3811:34,
3812:17, 3812:24,
3812:36, 3813:12,
3813:19, 3813:21,
3814:17, 3816:20,
3822:39, 3823:6,
3824:40, 3827:14,
3828:39, 3829:40,
3830:1, 3830:3,
3830:47, 3832:8,
3832:38, 3833:41,
3834:1, 3834:11
interviewed [12] -
3728:37, 3732:11,
3733:14, 3733:17,
3735:1, 3735:6,
3735:12, 3770:12,
3775:18, 3791:13,
3810:29, 3825:31
interviewer [2] -
3772:27, 3772:28

interviews [10] -
3738:10, 3747:30,
3778:26, 3785:17,
3785:18, 3789:38,
3791:22, 3826:18,
3826:27
introductory [1] -
3803:13
investigate [1] -
3835:33
investigated [1] -
3838:4
investigation [26] -
3725:8, 3725:19,
3731:7, 3742:10,
3742:38, 3754:18,
3759:10, 3767:8,
3767:11, 3767:40,
3767:46, 3768:26,
3769:37, 3802:5,
3805:14, 3825:6,
3825:19, 3825:27,
3826:20, 3826:30,
3826:31, 3832:28,
3835:15, 3836:38,
3836:44, 3838:1
investigations [3] -
3836:5, 3836:24,
3837:9
investigative [2] -
3723:35, 3731:5
investigator [1] -
3825:22
invitation [1] -
3796:23
invited [2] - 3805:11,
3827:28
involve [2] - 3751:12,
3760:8
involved [12] -
3736:16, 3751:18,
3752:6, 3804:1,
3813:34, 3817:39,
3825:15, 3825:20,
3825:30, 3831:21,
3832:28, 3838:41
involvement [1] -
3827:1
involves [3] - 3803:17,
3805:28, 3839:14
involving [8] - 3738:6,
3740:13, 3747:32,
3751:9, 3769:39,
3803:35, 3803:41,
3834:3
irrelevant [1] - 3796:1
issue [5] - 3800:24,
3800:25, 3810:5,
3816:9, 3823:16
issued [3] - 3739:33,

Transcript produced by Epiq

3769:42, 3774:44
issues [5] - 3799:27,
3799:39, 3813:30,
3820:14, 3833:37
italicised [2] -
3836:12, 3836:16
item [1] - 3786:21
items [1] - 3816:28
itself [3] - 3769:3,
3783:3, 3801:28

J

jeopardise [1] -
3729:17
jobs [1] - 3805:3
JOHN [1] - 3721:30
John [10] - 3720:16,
3740:9, 3745:33,
3745:42, 3745:44,
3749:31, 3751:13,
3809:7, 3809:19,
3825:20
Johnson [53] - 3725:8,
3725:15, 3725:19,
3725:41, 3726:25,
3727:38, 3727:46,
3727:47, 3728:15,
3728:21, 3728:26,
3729:1, 3736:7,
3736:41, 3737:22,
3741:1, 3746:26,
3758:6, 3763:13,
3764:34, 3766:9,
3767:31, 3768:16,
3773:30, 3774:41,
3774:43, 3778:26,
3783:40, 3785:8,
3785:23, 3785:26,
3789:30, 3791:12,
3792:4, 3794:42,
3795:23, 3801:11,
3801:15, 3801:21,
3802:6, 3803:14,
3803:17, 3803:35,
3803:42, 3804:47,
3805:23, 3805:29,
3806:5, 3806:15,
3806:16, 3807:8,
3835:5
Johnson's [4] -
3722:11, 3767:9,
3768:4, 3803:24
Johnsons [5] -
3726:33, 3729:15,
3729:27, 3729:45,
3730:18
joint [1] - 3816:1
Jonathan [1] -
3720:40

journalism [5] -
3788:32, 3788:46,
3789:10, 3789:14,
3789:28
journalist [11] -
3737:43, 3737:46,
3740:34, 3757:29,
3758:6, 3762:21,
3778:12, 3818:15,
3829:41, 3831:37,
3831:43
journalists [2] -
3739:21, 3760:14
Juanita [3] - 3786:21,
3794:14, 3797:40
judicial [1] - 3826:4
judiciary [4] -
3741:41, 3741:46,
3742:3, 3742:7
July [2] - 3835:20,
3839:8
jumped [1] - 3803:7
jumping [2] - 3802:42,
3802:43
June [3] - 3838:27,
3839:6, 3839:7
Justice [1] - 3720:16
justice [1] - 3753:14

K

Kaldas [6] - 3740:10,
3751:16, 3756:31,
3756:47, 3774:25,
3825:21
keen [3] - 3729:26,
3768:8, 3768:13
keep [4] - 3731:38,
3792:30, 3801:36,
3831:7
keeping [1] - 3756:19
Ken [8] - 3746:1,
3751:13, 3808:16,
3808:44, 3809:19,
3809:24, 3813:13,
3815:35
Kenneth [6] - 3745:34,
3745:43, 3746:1,
3749:31, 3773:41,
3808:30
Kerlatec [13] - 3740:9,
3745:33, 3745:42,
3745:44, 3749:31,
3751:13, 3756:25,
3773:37, 3808:37,
3809:7, 3809:19,
3813:20, 3825:20
Kerlatec] [1] - 3813:9
kicked [1] - 3825:11
kind [7] - 3721:20,

3729:31, 3738:29,
3765:28, 3770:33,
3815:47, 3816:10
know-how [1] -
3758:22
knowing [3] -
3732:18, 3833:33,
3833:34
knowledge [16] -
3734:27, 3742:34,
3755:11, 3769:34,
3784:12, 3812:1,
3812:32, 3818:46,
3826:4, 3829:23,
3832:37, 3832:41,
3834:10, 3834:14,
3835:14, 3837:38
Knowles [4] -
3737:33, 3738:5,
3751:31, 3761:33
known [1] - 3741:43
kowtowing [2] -
3805:28, 3806:21

L

lady [1] - 3814:7
Laidlaw [2] - 3725:12,
3725:27
language [4] -
3729:31, 3754:26,
3783:39, 3807:11
large [2] - 3743:37,
3754:18
largely [1] - 3736:26
last [26] - 3722:3,
3722:31, 3723:12,
3723:13, 3723:24,
3725:42, 3730:29,
3731:46, 3737:39,
3739:28, 3743:17,
3750:26, 3751:25,
3755:47, 3766:24,
3768:30, 3774:47,
3776:13, 3777:8,
3779:47, 3812:14,
3813:12, 3816:20,
3819:10, 3821:11,
3822:38
late [3] - 3761:25,
3796:18, 3808:2
late....on [1] - 3790:27
Lateline [96] - 3725:6,
3726:12, 3728:43,
3731:35, 3732:11,
3733:14, 3733:15,
3735:5, 3735:13,
3735:14, 3735:21,
3736:1, 3737:15,
3747:42, 3751:47,

3753:16, 3763:6,
3765:14, 3765:29,
3778:27, 3778:44,
3779:3, 3779:11,
3779:33, 3779:42,
3780:6, 3780:18,
3780:25, 3780:36,
3782:8, 3782:27,
3782:28, 3782:32,
3782:35, 3783:3,
3783:9, 3783:10,
3783:27, 3783:28,
3783:45, 3783:46,
3785:7, 3785:9,
3785:19, 3786:25,
3786:37, 3787:25,
3788:14, 3789:4,
3789:20, 3790:19,
3790:33, 3791:1,
3791:21, 3791:27,
3791:30, 3791:32,
3791:35, 3791:40,
3792:26, 3793:9,
3793:32, 3793:47,
3794:29, 3795:42,
3796:12, 3796:41,
3796:45, 3797:18,
3797:40, 3797:47,
3798:6, 3800:6,
3800:24, 3801:27,
3801:40, 3803:12,
3806:28, 3806:35,
3806:39, 3807:3,
3807:4, 3810:29,
3810:34, 3810:35,
3812:17, 3812:23,
3814:18, 3817:26,
3818:16, 3821:14,
3824:35, 3824:44,
3832:7, 3832:38
Lateline" [1] - 3733:35
launches [1] -
3805:27
lead [2] - 3786:25,
3831:25
lead-up [1] - 3831:25
leaders [1] - 3826:37
leading [4] - 3737:16,
3823:20, 3826:24,
3827:1
leads [1] - 3760:1
leaked [1] - 3800:30
learned [2] - 3743:12,
3796:39
least [13] - 3740:37,
3744:17, 3751:13,
3761:21, 3762:31,
3788:18, 3790:33,
3795:30, 3796:39,
3806:35, 3809:3,

3815:18, 3815:33
leave [5] - 3796:18,
3809:34, 3830:21,
3838:30, 3839:18
leaves [1] - 3724:10
leaving [1] - 3830:25
led [2] - 3739:5,
3741:8
left [9] - 3722:21,
3771:40, 3776:28,
3777:14, 3777:45,
3778:7, 3796:7,
3796:23, 3830:26
Legal [1] - 3720:32
lengthy [4] - 3722:5,
3736:25, 3746:28,
3836:44
less [2] - 3755:24,
3774:2
letter [4] - 3800:29,
3800:33, 3836:8,
3836:17
letting [3] - 3729:18,
3759:36, 3768:35
Level [1] - 3720:20
level [3] - 3793:22,
3793:41, 3806:11
levels [2] - 3827:38,
3829:25
LGBTIQ [1] - 3720:11
Liaison [1] - 3758:46
liaison [1] - 3759:11
light [5] - 3751:7,
3767:46, 3791:8,
3791:10, 3826:9
likelihood [1] - 3835:5
likely [44] - 3722:11,
3722:39, 3722:45,
3724:38, 3724:39,
3725:41, 3725:45,
3726:1, 3727:16,
3727:36, 3731:13,
3731:14, 3735:13,
3736:13, 3737:23,
3737:47, 3742:25,
3754:20, 3754:22,
3754:25, 3757:44,
3764:14, 3782:28,
3783:10, 3783:27,
3783:37, 3783:38,
3783:45, 3784:9,
3785:26, 3791:21,
3791:27, 3791:40,
3791:45, 3792:8,
3792:20, 3793:9,
3793:32, 3795:42,
3796:45, 3803:26,
3810:35, 3837:11
Lindt [6] - 3800:43,
3800:44, 3800:47,

3824:46, 3825:3,
3826:6
line [34] - 3727:13,
3732:8, 3733:20,
3734:3, 3735:18,
3739:28, 3741:29,
3751:35, 3752:39,
3754:2, 3763:3,
3763:9, 3763:18,
3763:46, 3764:13,
3764:32, 3764:37,
3764:43, 3765:2,
3765:5, 3765:12,
3766:21, 3766:30,
3766:36, 3776:24,
3781:22, 3802:28,
3802:47, 3806:44,
3810:26, 3812:29,
3816:17, 3836:28
lines [15] - 3738:16,
3753:9, 3755:14,
3772:45, 3784:22,
3800:20, 3804:45,
3811:3, 3811:15,
3813:28, 3816:6,
3816:9, 3816:14,
3835:28, 3837:5
lippy [1] - 3788:39
lipstick [1] - 3832:5
list [2] - 3773:24,
3774:41
listen [1] - 3831:42
listening [1] - 3803:6
literally [1] - 3816:39
live [1] - 3732:26
lo [1] - 3802:47
Lo [1] - 3803:1
lodged [1] - 3838:3
logical [1] - 3778:18
look [12] - 3726:4,
3728:32, 3739:8,
3747:1, 3749:29,
3767:39, 3771:25,
3784:21, 3787:32,
3788:24, 3790:21,
3819:44
looked [8] - 3752:32,
3767:9, 3784:44,
3785:37, 3795:29,
3795:36, 3801:2,
3813:16
looking [6] - 3749:43,
3751:5, 3765:23,
3778:21, 3784:21,
3827:6
looks [2] - 3765:23,
3818:20
Lorna [4] - 3737:33,
3738:5, 3751:31,
3761:33

loser [1] - 3730:25
lunch [2] - 3741:1,
3798:34

M

Macnamir [6] -
3742:10, 3756:35,
3767:46, 3785:6,
3787:23, 3791:15
Macquarie [1] -
3720:20
main [1] - 3736:19
major [5] - 3826:19,
3826:26, 3827:23,
3827:27, 3836:5
majority [3] - 3816:21,
3816:40, 3821:11
man [2] - 3727:14,
3803:6
manage [2] - 3737:20,
3819:46
manager [1] - 3758:36
manila [1] - 3743:38
Mark [2] - 3765:9,
3834:13
massage [1] - 3816:32
massaged [1] - 3817:1
massive [2] - 3743:37,
3747:45
mate [1] - 3735:43
material [15] -
3735:33, 3743:15,
3765:28, 3765:42,
3779:41, 3781:37,
3781:40, 3786:12,
3803:13, 3808:12,
3825:9, 3826:3,
3827:41, 3832:45,
3833:47
materials [1] -
3740:37
mathematician [1] -
3727:13
mathematics [1] -
3727:15
matter [12] - 3723:32,
3726:30, 3768:37,
3787:23, 3796:15,
3800:44, 3808:5,
3808:7, 3819:33,
3827:32, 3835:34,
3838:41
matters [7] - 3725:14,
3767:10, 3768:36,
3795:24, 3834:22,
3834:37, 3838:11
McMahon [8] -
3757:13, 3758:33,
3759:8, 3759:15,

3759:42, 3760:17,
3760:44, 3761:42
mean [23] - 3728:28,
3729:31, 3744:27,
3748:14, 3749:3,
3749:22, 3751:4,
3751:5, 3752:22,
3756:26, 3760:13,
3767:5, 3770:43,
3771:7, 3776:22,
3778:5, 3781:40,
3786:46, 3788:21,
3819:46, 3822:16,
3837:47, 3838:7
meaning [4] -
3743:17, 3747:44,
3767:30, 3770:6
means [3] - 3752:19,
3789:15, 3833:27
meant [6] - 3737:38,
3737:42, 3744:42,
3748:7, 3781:8,
3781:15
meantime [2] -
3794:28, 3835:23
media [84] - 3736:12,
3737:13, 3737:21,
3737:23, 3739:13,
3746:21, 3746:25,
3747:17, 3747:18,
3747:46, 3752:5,
3757:12, 3757:18,
3757:35, 3758:12,
3758:37, 3759:11,
3759:15, 3759:21,
3759:37, 3760:13,
3770:47, 3771:4,
3771:8, 3771:11,
3771:40, 3772:12,
3773:25, 3773:29,
3774:10, 3774:15,
3774:32, 3774:34,
3774:36, 3774:37,
3774:44, 3776:28,
3776:29, 3777:13,
3777:14, 3777:45,
3778:6, 3778:14,
3778:39, 3782:17,
3784:37, 3784:38,
3785:5, 3789:16,
3789:45, 3791:8,
3791:10, 3792:23,
3792:29, 3800:35,
3806:46, 3806:47,
3814:7, 3818:15,
3818:16, 3819:20,
3819:46, 3820:11,
3820:15, 3827:37,
3828:19, 3828:22,
3828:23, 3828:26,

3828:31, 3828:35,
3828:44, 3829:1,
3829:5, 3829:44,
3830:10, 3830:13,
3830:21, 3830:26,
3830:47, 3831:11,
3831:25
Media [8] - 3737:9,
3758:46, 3774:2,
3774:4, 3814:2,
3831:7, 3831:15,
3832:37
meet [2] - 3756:31,
3800:42
meeting [8] - 3739:43,
3742:13, 3742:18,
3758:45, 3759:47,
3800:44, 3806:6,
3827:14
members [3] - 3774:4,
3774:5, 3792:4
men [1] - 3767:47
mention [5] - 3727:13,
3798:9, 3802:34,
3816:27, 3828:39
mentioned [4] -
3725:18, 3744:13,
3750:30, 3774:20
mentioning [1] -
3789:3
merely [2] - 3793:44,
3812:33
message [15] -
3728:47, 3729:9,
3787:24, 3797:3,
3797:9, 3798:5,
3813:8, 3823:37,
3824:21, 3831:18,
3832:4, 3832:6,
3832:14, 3832:15,
3832:19
messaged [1] -
3797:12
messages [1] -
3787:43
MICHAEL [1] -
3721:30
Michael [3] - 3790:44,
3815:21, 3815:33
Mick [10] - 3729:39,
3748:43, 3751:38,
3787:38, 3815:28,
3819:34, 3819:39,
3819:43, 3824:32,
3825:21
microphone [1] -
3748:25
mid [1] - 3743:6
midday [4] - 3778:13,
3796:4, 3818:1,

3819:17
middle [5] - 3744:23,
3769:7, 3835:47,
3836:4
might [17] - 3721:8,
3724:18, 3737:47,
3746:26, 3748:8,
3748:26, 3751:6,
3757:29, 3759:24,
3760:8, 3782:19,
3783:3, 3789:27,
3792:39, 3798:19,
3798:24, 3817:37
millions [2] - 3742:25,
3755:38
Milner [1] - 3720:40
mind [9] - 3731:39,
3749:15, 3764:42,
3765:45, 3782:1,
3782:35, 3797:13,
3800:15, 3823:38
minded [2] - 3731:6,
3731:21
mindedness [1] -
3731:4
minds [1] - 3744:17
Minelli [1] - 3799:26
Minister [8] - 3742:13,
3742:19, 3756:36,
3758:8, 3805:28,
3805:46, 3807:11,
3834:3
minister [3] - 3805:38,
3806:2, 3806:22
minister's [1] - 3806:3
Minnelli [2] - 3774:22,
3774:23
minor [1] - 3821:35
minutes [12] -
3721:35, 3721:40,
3735:45, 3748:24,
3785:47, 3790:40,
3794:25, 3795:41,
3796:7, 3808:30,
3818:23, 3820:21
misadventure [10] -
3722:37, 3723:5,
3723:46, 3724:4,
3724:5, 3724:6,
3724:11, 3727:3,
3754:21, 3773:8
misleading [1] -
3833:36
missed [4] - 3776:44,
3783:26, 3788:12,
3803:46
misstatement [1] -
3812:34
mistake [5] - 3812:12,
3812:33, 3812:35,

3812:37, 3812:40

mistaken [2] - 3788:6, 3788:20

mixture [1] - 3774:7

mmm-hmm [6] - 3754:8, 3766:41, 3769:4, 3814:5, 3820:42, 3820:47

mobile [1] - 3794:39

moment [7] - 3722:9, 3737:35, 3773:15, 3776:37, 3805:22, 3818:35, 3826:10

Monday [10] - 3720:25, 3736:2, 3742:27, 3746:22, 3746:36, 3754:36, 3765:47, 3778:4, 3785:22, 3839:8

Monk [1] - 3745:35

month [5] - 3725:18, 3725:24, 3743:17, 3777:9, 3779:47

months [1] - 3824:47

mooted [1] - 3761:33

more" [1] - 3765:15

Morning [2] - 3747:12, 3818:1

morning [19] - 3735:4, 3764:27, 3769:22, 3795:29, 3802:24, 3807:31, 3807:36, 3809:32, 3809:45, 3810:4, 3810:21, 3810:26, 3813:7, 3814:1, 3814:45, 3814:47, 3819:12, 3827:29, 3837:26

most [18] - 3722:11, 3725:40, 3731:42, 3764:14, 3773:5, 3781:24, 3785:26, 3791:21, 3791:26, 3791:45, 3792:7, 3792:19, 3793:9, 3793:32, 3796:45, 3803:26, 3820:8, 3837:11

move [3] - 3763:41, 3796:22, 3799:43

moving [1] - 3769:3

multi [1] - 3742:24

murder [1] - 3798:2

murder" [1] - 3753:36

murdered [1] - 3773:3

Murugan [1] - 3720:40

must [18] - 3733:22, 3745:11, 3754:11, 3755:27, 3757:28, 3761:12, 3777:16,

3777:39, 3777:40, 3778:16, 3781:8, 3781:20, 3789:31, 3794:6, 3800:29, 3805:21, 3811:5, 3811:17

mustn't [1] - 3777:16

MW [1] - 3726:20

Mykkeltvedt [2] - 3720:38, 3721:43

MYKKELTVEDT [9] - 3721:16, 3721:40, 3834:25, 3834:30, 3834:36, 3834:43, 3835:1, 3835:3, 3837:14

N

name [2] - 3774:23, 3774:27

namely [9] - 3730:41, 3737:32, 3737:33, 3744:18, 3759:20, 3764:33, 3786:37, 3800:43, 3817:34

names [2] - 3773:44, 3773:45

narrow [1] - 3727:42

Nash [1] - 3720:33

navigate [1] - 3808:21

near [1] - 3783:8

necessarily [1] - 3792:32

necessary [2] - 3724:16, 3794:33

need [11] - 3723:22, 3729:16, 3730:31, 3739:8, 3748:20, 3799:42, 3810:20, 3813:29, 3824:43, 3828:34, 3838:35

needed [6] - 3752:15, 3793:13, 3793:26, 3826:14, 3828:5, 3831:40

needs [1] - 3797:17

neutral [1] - 3722:26

never [9] - 3734:18, 3755:39, 3773:18, 3811:38, 3832:6, 3835:10, 3838:5, 3838:7, 3838:8

New [3] - 3720:21, 3741:46, 3805:7

new [4] - 3742:28, 3749:18, 3772:31, 3772:46

news [18] - 3773:15, 3780:36, 3782:13,

3782:18, 3785:30, 3785:37, 3785:45, 3786:1, 3786:13, 3786:21, 3787:13, 3788:1, 3788:5, 3788:12, 3790:18, 3792:25, 3830:35

News [3] - 3773:17, 3786:21, 3787:7

next [38] - 3723:9, 3727:12, 3733:47, 3739:46, 3740:16, 3741:1, 3743:42, 3746:31, 3747:13, 3748:38, 3750:41, 3754:2, 3755:14, 3755:45, 3757:3, 3757:8, 3759:43, 3765:29, 3771:30, 3778:43, 3780:43, 3781:1, 3781:22, 3784:4, 3788:24, 3793:5, 3799:6, 3804:19, 3809:8, 3809:45, 3812:4, 3813:46, 3814:25, 3815:17, 3820:19, 3824:6, 3824:8

Nick [2] - 3740:10, 3774:25

night [32] - 3733:2, 3733:11, 3733:14, 3735:2, 3735:5, 3735:15, 3780:6, 3780:18, 3780:25, 3780:35, 3782:27, 3782:35, 3784:14, 3785:45, 3787:7, 3787:17, 3788:18, 3789:5, 3790:28, 3790:34, 3790:40, 3791:1, 3792:5, 3795:42, 3796:45, 3798:45, 3807:46, 3808:2, 3808:33, 3809:7, 3810:42, 3813:12

night's [5] - 3778:27, 3783:28, 3783:44, 3783:46, 3816:20

nightly [1] - 3785:45

no" [2] - 3810:44, 3811:44

no-publication [1] - 3745:1

nobody [1] - 3809:6

nods) [1] - 3827:24

non [14] - 3723:2, 3736:25, 3736:36, 3739:33, 3740:33,

3744:34, 3745:23, 3746:17, 3747:11, 3747:28, 3749:23, 3752:24, 3752:25, 3759:43

non-existent [1] - 3723:2

non-police [1] - 3759:43

non-publication [12] - 3736:25, 3736:36, 3739:33, 3740:33, 3744:34, 3745:23, 3746:17, 3747:11, 3747:28, 3749:23, 3752:24, 3752:25

none [1] - 3772:46

nonetheless [1] - 3775:9

noon [1] - 3769:6

Noone [1] - 3804:20

normal [3] - 3758:46, 3760:13, 3795:26

normally [1] - 3792:29

North [3] - 3798:2, 3802:36, 3803:18

note [15] - 3726:8, 3739:29, 3740:3, 3751:43, 3756:35, 3756:40, 3776:2, 3776:14, 3776:20, 3778:21, 3778:34, 3779:41, 3783:22, 3783:44, 3800:2

noted [2] - 3824:26, 3826:34

notes [12] - 3728:41, 3738:37, 3779:27, 3791:37, 3794:5, 3798:42, 3812:47, 3822:38, 3823:5, 3826:35, 3827:13

nothing [5] - 3769:36, 3787:26, 3810:2, 3822:33, 3834:20

notice [2] - 3759:27, 3826:5

noticed [1] - 3748:24

notification [3] - 3735:35, 3735:46, 3790:38

notified [1] - 3751:14

notify [1] - 3831:9

notion [2] - 3760:8, 3760:9

November [3] - 3730:35, 3730:46, 3731:17

nowhere [2] - 3806:17, 3806:22

NPL.0138.0001.0037] [1] - 3745:32

NPL.0138.0001.0042] [1] - 3787:33

NPL.0138.0001.0072 [1] - 3743:24

NPL.0138.0002.2771 [1] - 3749:27

NPL.0138.0002.2947 _0001 [1] - 3773:21

NPL.0138.0002.3238] [1] - 3784:39

NPL.0138.0002.3306 [1] - 3737:1

NPL.0138.0002.6715 _0001 [1] - 3820:41

NPL.0138.0004.5545 [1] - 3751:42

NPL.0138.0004.7163 _0001 [1] - 3770:2

NPL.0138.0004.7178 [1] - 3758:32

NPL.0138.0009.0356 _E_0001 [1] - 3797:29

NPL.0147.0001.0005 _0001 [1] - 3726:5

NPL.201.00001.0029 [1] - 3728:33

NPL.2017.0001.0029 _0001 [1] - 3738:36

NPL.2017.0004.0549 [1] - 3762:47

NPL.2017.0004.0588 _0001 [1] - 3770:16

NPL.2017.0004.0592 _0001 [1] - 3801:39

NPL.3000.0003.2864 _0001] [1] - 3724:42

NPL.3000.0004.0742 _0001 [1] - 3817:47

NPL.3000.0009.0669 _0001] [1] - 3815:19

NPL.3000.0014.0195 _0001 [1] - 3835:47

NSW [6] - 3720:38, 3741:40, 3752:42, 3755:39, 3770:24, 3835:37

null [2] - 3739:35, 3749:20

number [15] - 3747:33, 3748:45, 3751:10, 3763:1, 3768:36, 3792:37, 3792:39, 3793:14, 3794:39, 3796:27, 3801:17, 3821:30, 3824:9, 3824:21, 3826:24

numbered [1] - 3763:9
numbers [3] -
3817:13, 3822:38,
3837:20
numerous [1] -
3773:30

O

o'clock [25] - 3769:46,
3770:1, 3770:35,
3771:10, 3771:13,
3771:19, 3775:12,
3777:23, 3777:35,
3780:26, 3780:33,
3782:25, 3784:13,
3785:30, 3787:22,
3787:26, 3788:1,
3792:25, 3798:24,
3819:12, 3829:11
oath [2] - 3721:24,
3721:26
objective [4] -
3728:14, 3728:20,
3728:26, 3728:30
obligations [2] -
3829:1, 3829:32
observed [1] -
3786:38
obtain [2] - 3725:14,
3725:20
obvious [9] - 3725:32,
3730:7, 3730:45,
3750:34, 3759:43,
3764:27, 3787:46,
3789:18, 3838:34
obviously [17] -
3730:1, 3749:11,
3760:17, 3761:18,
3774:14, 3790:4,
3794:39, 3802:25,
3802:41, 3806:32,
3809:24, 3813:16,
3819:27, 3820:14,
3820:26, 3833:8,
3838:34
occasion [4] -
3725:42, 3731:46,
3803:1, 3803:2
occasions [1] -
3824:10
occupied [1] -
3774:25
occur [6] - 3758:19,
3790:5, 3795:33,
3795:40, 3805:43,
3808:6
occurred [6] - 3726:2,
3744:46, 3782:3,
3789:31, 3792:3,

3837:43
occurring [1] -
3765:20
October [1] - 3836:9
OF [1] - 3839:28
offer [1] - 3765:40
Office [1] - 3801:25
office [6] - 3757:7,
3805:3, 3813:27,
3813:30, 3815:45,
3824:1
Officer [1] - 3758:46
officer [14] - 3757:13,
3757:18, 3757:35,
3758:12, 3759:11,
3759:15, 3759:21,
3759:37, 3774:4,
3774:32, 3795:11,
3807:45, 3808:38,
3830:46
officer's [1] - 3819:21
officers [7] - 3731:29,
3737:13, 3746:7,
3774:10, 3792:30,
3832:28, 3838:4
often [1] - 3817:13
ok" [2] - 3762:18,
3799:45
Olen [7] - 3814:14,
3815:44, 3816:46,
3818:41, 3818:42,
3820:22, 3820:32
on-the-record [3] -
3745:24, 3747:30,
3833:41
once [4] - 3729:44,
3769:32, 3795:3,
3821:36
one [64] - 3726:25,
3727:19, 3728:14,
3731:47, 3739:12,
3739:31, 3747:35,
3748:35, 3749:40,
3749:43, 3756:18,
3757:45, 3759:27,
3760:11, 3761:12,
3762:38, 3766:25,
3767:14, 3767:22,
3768:16, 3770:30,
3772:35, 3773:30,
3774:27, 3775:45,
3779:23, 3781:10,
3784:43, 3785:46,
3787:46, 3789:29,
3792:37, 3792:39,
3793:1, 3798:40,
3802:43, 3803:1,
3803:18, 3805:10,
3808:16, 3809:28,
3812:23, 3812:29,

3813:16, 3813:34,
3815:35, 3817:4,
3817:46, 3818:21,
3819:3, 3819:26,
3821:11, 3821:35,
3824:26, 3827:7,
3828:26, 3829:40,
3831:43, 3832:29,
3832:47, 3834:26,
3834:31
ones [2] - 3813:34,
3820:46
ongoing [1] - 3825:12
onwards [1] - 3823:14
open [9] - 3731:4,
3731:6, 3731:21,
3751:20, 3755:47,
3763:40, 3767:18,
3767:23, 3773:4
open-minded [2] -
3731:6, 3731:21
open-mindedness [1]
- 3731:4
openly [1] - 3742:36
operating [1] -
3726:26
Operation [5] -
3766:39, 3767:6,
3767:29, 3767:31,
3767:36
opinion [6] - 3722:10,
3723:15, 3723:29,
3723:36, 3754:21,
3763:12
opponents [2] -
3727:46, 3728:1
opportunity [3] -
3778:39, 3789:41,
3838:35
opposed [1] - 3782:12
option [1] - 3817:38
oral [1] - 3839:5
order [16] - 3724:3,
3736:21, 3736:25,
3736:36, 3739:33,
3740:33, 3744:34,
3744:35, 3745:1,
3745:23, 3746:17,
3747:11, 3747:28,
3749:23, 3752:25,
3796:2
ordered [3] - 3725:2,
3749:18, 3796:1
orders [2] - 3721:35,
3721:45
ordinarily [1] -
3774:25
ordinary [1] - 3809:37
organisation [3] -
3792:29, 3831:25,

3831:41
organised [2] -
3739:42, 3808:46
Organised [2] -
3746:2, 3773:42
orient [3] - 3726:22,
3728:42, 3775:41
original [3] - 3779:2,
3779:20, 3779:23
others' [1] - 3754:22
otherwise [2] -
3785:24, 3830:30
ought [1] - 3826:2
outcome [3] -
3762:32, 3769:8,
3837:11
outlet [1] - 3807:5
outlets [1] - 3789:16
outlined [1] - 3722:20
outset [1] - 3835:9
outside [17] - 3753:25,
3770:12, 3770:18,
3771:40, 3772:2,
3776:22, 3776:28,
3777:13, 3778:5,
3779:14, 3781:30,
3785:23, 3786:13,
3786:32, 3792:3,
3809:43, 3829:44
overall [3] - 3724:29,
3724:37, 3725:47
own [11] - 3722:39,
3722:44, 3725:46,
3754:17, 3782:34,
3798:42, 3819:33,
3819:39, 3819:43,
3821:5, 3822:6

P

pack [5] - 3778:39,
3828:23, 3829:44,
3830:13, 3830:21
package [1] - 3755:15
paedophile [1] -
3826:31
page [79] - 3726:15,
3728:41, 3728:42,
3732:1, 3735:17,
3738:40, 3742:47,
3744:23, 3753:22,
3756:20, 3756:22,
3760:39, 3761:2,
3761:36, 3761:37,
3763:2, 3763:4,
3763:5, 3763:9,
3763:37, 3764:7,
3764:12, 3764:31,
3764:41, 3766:5,
3766:19, 3766:21,

3768:29, 3771:26,
3772:5, 3772:27,
3772:28, 3774:42,
3775:28, 3775:30,
3775:34, 3775:37,
3780:42, 3780:43,
3783:22, 3784:4,
3784:22, 3784:42,
3798:44, 3799:4,
3802:28, 3803:21,
3804:10, 3804:19,
3804:27, 3804:35,
3804:45, 3805:18,
3805:35, 3808:29,
3809:9, 3809:18,
3810:23, 3810:37,
3812:47, 3813:4,
3813:46, 3814:25,
3819:10, 3820:44,
3822:38, 3822:44,
3823:5, 3824:26,
3836:1, 3836:4
pages [8] - 3723:10,
3723:24, 3723:32,
3723:35, 3746:16,
3746:26, 3763:1
Palmer [1] - 3720:31
Pam [66] - 3729:12,
3730:26, 3733:35,
3738:6, 3738:32,
3743:32, 3743:34,
3744:37, 3744:47,
3745:7, 3745:11,
3749:34, 3750:1,
3750:9, 3750:17,
3751:6, 3751:29,
3754:19, 3757:25,
3757:40, 3759:32,
3759:36, 3762:5,
3762:19, 3775:1,
3781:42, 3785:6,
3787:27, 3790:21,
3790:27, 3791:12,
3791:38, 3798:2,
3799:16, 3799:27,
3799:44, 3801:18,
3808:47, 3816:19,
3819:4, 3822:19,
3823:15, 3824:31,
3827:12, 3828:11,
3828:43, 3829:6,
3829:17, 3830:30,
3831:18, 3831:40,
3832:16, 3832:42,
3832:46, 3833:8,
3833:9, 3833:10,
3833:17, 3833:28,
3833:36, 3834:6,
3835:4, 3835:14,
3836:43, 3837:9
Pamela [113] - 3722:5,

3725:7, 3725:13, 3725:37, 3732:10, 3735:39, 3736:25, 3736:40, 3737:20, 3738:19, 3738:22, 3739:5, 3740:21, 3740:40, 3741:14, 3741:18, 3741:30, 3742:24, 3742:30, 3742:44, 3743:13, 3743:25, 3744:6, 3744:10, 3745:19, 3745:34, 3746:16, 3746:17, 3747:40, 3752:39, 3752:42, 3753:4, 3753:12, 3753:17, 3753:38, 3753:44, 3754:11, 3754:15, 3754:29, 3754:37, 3755:19, 3755:27, 3755:36, 3756:7, 3756:14, 3756:43, 3758:34, 3758:45, 3759:14, 3759:20, 3762:45, 3764:7, 3764:13, 3764:32, 3764:47, 3765:24, 3765:32, 3766:6, 3766:14, 3766:30, 3767:28, 3768:3, 3768:45, 3769:18, 3770:11, 3772:10, 3772:39, 3772:45, 3773:16, 3775:13, 3779:42, 3782:26, 3784:5, 3784:14, 3786:12, 3787:12, 3787:19, 3787:34, 3787:35, 3787:47, 3788:9, 3788:24, 3790:7, 3793:9, 3794:29, 3795:10, 3795:42, 3796:11, 3796:39, 3797:2, 3800:6, 3800:16, 3800:34, 3801:37, 3802:2, 3802:10, 3803:36, 3803:38, 3803:42, 3804:1, 3805:27, 3806:10, 3806:27, 3810:28, 3812:16, 3812:24, 3813:42, 3818:10, 3818:17, 3821:46, 3837:21, 3838:4

panels [2] - 3825:15, 3825:17
papers [1] - 3825:36
paragraph [26] - 3723:39, 3726:22,

3728:44, 3740:47, 3741:4, 3741:29, 3743:42, 3746:11, 3746:15, 3746:32, 3748:38, 3749:29, 3749:30, 3751:23, 3752:3, 3757:3, 3758:44, 3759:44, 3761:46, 3766:32, 3766:35, 3772:6, 3780:43, 3784:4, 3784:21, 3823:14
paragraphs [5] - 3723:40, 3726:15, 3726:19, 3756:20, 3761:42
paraphrasing [2] - 3722:19, 3763:29
parcel [2] - 3767:40, 3768:26
pardon [3] - 3758:39, 3780:10, 3834:28
Part [1] - 3837:44
part [38] - 3725:33, 3735:14, 3736:40, 3747:35, 3760:13, 3765:1, 3767:8, 3767:11, 3767:40, 3768:26, 3771:45, 3782:32, 3785:19, 3786:39, 3786:46, 3789:4, 3792:4, 3792:8, 3798:40, 3801:39, 3801:40, 3803:11, 3803:12, 3803:42, 3804:32, 3804:39, 3805:7, 3805:32, 3816:14, 3816:45, 3817:34, 3823:21, 3824:5, 3825:10, 3825:15, 3831:40, 3837:34, 3837:44
particular [6] - 3730:41, 3749:22, 3798:40, 3800:24, 3827:47, 3831:37
parties [1] - 3838:23
partly [1] - 3798:18
parts [2] - 3725:44, 3799:38
party [2] - 3738:28, 3744:43
passage [4] - 3761:37, 3773:16, 3786:16, 3836:12
past [8] - 3752:44, 3785:22, 3790:40, 3794:25, 3795:41, 3796:7, 3808:30,

3829:39
pastoral [1] - 3824:6
pathway [2] - 3768:16, 3768:19
pathways [1] - 3832:33
pause [1] - 3737:35
pausing [2] - 3727:9, 3819:26
penny [3] - 3789:3, 3789:4, 3789:6
Penny [15] - 3729:23, 3730:41, 3730:47, 3743:24, 3743:32, 3744:5, 3744:10, 3754:19, 3788:39, 3832:5, 3832:7, 3832:20, 3832:24, 3832:46, 3833:32
people [11] - 3725:14, 3725:21, 3729:24, 3737:8, 3747:33, 3751:10, 3752:37, 3769:39, 3785:3, 3789:37, 3815:35
people's [1] - 3744:17
per [2] - 3764:26, 3804:4
perhaps [12] - 3725:32, 3773:7, 3774:1, 3789:32, 3797:33, 3802:43, 3808:20, 3816:9, 3817:42, 3821:14, 3835:46, 3839:7
period [2] - 3727:18, 3801:16
permission [3] - 3734:18, 3747:41, 3811:38
person [2] - 3753:25, 3817:13
personal [8] - 3763:12, 3763:22, 3763:33, 3764:27, 3774:34, 3774:37, 3814:7, 3816:19
personally [4] - 3763:39, 3764:34, 3766:9, 3826:4
personnel [3] - 3755:9, 3773:29, 3774:10
perspective [1] - 3731:18
Peter [2] - 3720:30, 3798:1
Phillips [3] - 3786:21, 3794:14, 3797:40
phone [14] - 3735:29,

3735:34, 3775:12, 3792:32, 3798:4, 3811:21, 3824:28, 3827:12, 3827:17, 3827:19, 3829:6, 3829:30, 3829:38, 3837:21
physically [1] - 3838:2
pick [1] - 3805:21
place [5] - 3747:31, 3796:23, 3802:43, 3802:44, 3827:12
placed [1] - 3743:36
plain [2] - 3756:11, 3788:9
plainly [4] - 3724:25, 3724:37, 3772:1, 3789:1
plan [1] - 3766:2
planned [2] - 3723:19, 3765:43
planning [2] - 3736:12, 3765:24
play [3] - 3749:24, 3785:40, 3816:14
played [3] - 3729:34, 3786:6, 3837:34
pleased [1] - 3770:24
plus [1] - 3747:17
point [70] - 3722:33, 3730:27, 3731:22, 3733:46, 3736:30, 3738:41, 3739:17, 3739:28, 3739:46, 3740:3, 3740:16, 3745:20, 3749:28, 3751:35, 3757:4, 3759:42, 3759:43, 3760:5, 3760:27, 3761:2, 3766:20, 3768:30, 3771:26, 3774:13, 3774:24, 3774:45, 3775:31, 3775:36, 3775:42, 3777:4, 3778:2, 3779:1, 3779:10, 3779:19, 3779:41, 3780:42, 3783:23, 3783:33, 3784:3, 3785:21, 3787:15, 3795:12, 3796:10, 3797:19, 3798:3, 3801:19, 3803:31, 3805:11, 3810:33, 3812:47, 3813:4, 3813:46, 3814:45, 3814:47, 3816:17, 3817:24, 3817:36, 3817:39, 3819:11, 3820:19, 3822:41,

3823:14, 3823:20, 3823:23, 3824:6, 3824:18, 3831:33, 3831:34, 3832:1, 3836:24
points [14] - 3725:45, 3728:36, 3739:8, 3750:37, 3771:30, 3771:34, 3775:45, 3816:8, 3816:21, 3816:40, 3819:9, 3821:11, 3823:22, 3827:34
Police [18] - 3720:38, 3721:17, 3742:8, 3742:13, 3756:36, 3758:8, 3770:24, 3774:2, 3774:33, 3805:28, 3807:10, 3808:8, 3814:22, 3814:29, 3814:46, 3819:19, 3835:37, 3838:1
police [47] - 3728:14, 3728:26, 3730:41, 3731:28, 3736:30, 3736:39, 3737:9, 3737:22, 3747:2, 3752:42, 3753:22, 3753:25, 3754:4, 3754:15, 3754:35, 3754:46, 3754:47, 3755:9, 3758:7, 3759:43, 3767:30, 3769:42, 3774:10, 3774:15, 3774:44, 3775:3, 3792:24, 3792:29, 3792:30, 3793:2, 3803:25, 3807:45, 3808:5, 3808:11, 3808:38, 3814:32, 3816:9, 3823:41, 3827:23, 3827:38, 3828:23, 3828:44, 3829:1, 3830:14, 3830:46, 3833:33, 3833:37
police" [1] - 3801:21
police's [2] - 3727:46, 3831:29
politicisation [1] - 3834:3
pose [1] - 3769:38
position [13] - 3740:32, 3741:40, 3742:2, 3742:6, 3745:43, 3759:47, 3773:4, 3773:41, 3774:24, 3808:37, 3817:5, 3820:7,

Transcript produced by Epiq

3831:30

positive [1] - 3810:13

possibilities [2] - 3722:27, 3722:36

possibility [25] - 3723:6, 3726:1, 3738:9, 3738:19, 3744:18, 3744:46, 3745:22, 3745:23, 3747:10, 3747:29, 3751:6, 3751:8, 3753:46, 3755:3, 3757:45, 3757:47, 3758:3, 3758:5, 3758:9, 3769:28, 3769:35, 3780:8, 3781:20, 3781:27, 3833:27

possible [10] - 3722:21, 3723:5, 3746:20, 3759:16, 3759:35, 3765:8, 3766:47, 3768:19, 3773:13, 3829:15

possibly [2] - 3804:28, 3839:4

potentially [1] - 3773:4

powers [3] - 3835:32, 3836:37

pre [2] - 3765:43, 3822:38

pre-planned [1] - 3765:43

preceded [1] - 3823:19

precise [1] - 3774:1

predates [1] - 3838:29

prefer [1] - 3751:29

preferred [1] - 3838:43

preparation [2] - 3812:15, 3818:8

prepared [4] - 3728:36, 3746:16, 3753:12, 3760:23

preparing [1] - 3825:9

presence [2] - 3759:10, 3759:37

Present [1] - 3720:36

present [10] - 3757:13, 3757:18, 3758:12, 3758:18, 3758:34, 3760:3, 3778:14, 3820:22, 3827:30, 3832:24

presented [1] - 3817:38

press [5] - 3769:42, 3770:5, 3770:6,

3826:25, 3826:26

presumably [5] - 3754:10, 3757:28, 3768:40, 3813:41, 3820:10

presume [2] - 3770:19, 3785:34

pretty [13] - 3730:7, 3759:43, 3768:21, 3786:30, 3789:18, 3789:45, 3792:35, 3792:40, 3792:41, 3803:5, 3806:45, 3814:45, 3818:20

previous [5] - 3724:6, 3747:27, 3767:19, 3788:6, 3827:29

previously [2] - 3740:24, 3752:5

print [1] - 3724:45

priority [3] - 3805:2, 3806:7, 3825:3

privy [1] - 3837:42

probability [1] - 3753:46

problem [5] - 3748:25, 3813:11, 3816:28, 3816:32, 3816:42

problematic [2] - 3757:30, 3831:47

problems [1] - 3807:36

proceed [1] - 3721:6

proceedings [1] - 3721:23

process [1] - 3837:45

program [25] - 3735:5, 3753:17, 3755:15, 3779:11, 3779:12, 3780:36, 3782:8, 3782:12, 3782:17, 3783:29, 3783:45, 3783:46, 3787:26, 3796:41, 3801:40, 3803:12, 3803:42, 3804:1, 3806:35, 3817:5, 3817:9, 3817:19, 3834:13, 3834:17

projecting [1] - 3748:26

promise [1] - 3833:40

promised [1] - 3834:1

promotional [1] - 3765:28

promulgated [1] - 3838:20

proposal [1] - 3725:29

proposed [4] - 3725:24, 3740:13,

3746:31, 3756:26

proposing [1] - 3725:20

proposition [2] - 3749:20, 3776:36

protagonists [2] - 3789:33, 3789:40

protect [1] - 3759:15

protocol [2] - 3758:46, 3831:11

proves [1] - 3753:34

provide [10] - 3746:34, 3752:15, 3752:26, 3779:32, 3789:34, 3824:5, 3825:18, 3831:41, 3835:27, 3838:35

provided [12] - 3728:4, 3736:41, 3739:37, 3740:34, 3743:15, 3744:5, 3776:40, 3776:47, 3777:1, 3781:42, 3816:22, 3816:29

providing [3] - 3781:43, 3816:47, 3825:22

proximity [1] - 3826:8

public [28] - 3721:4, 3736:26, 3736:27, 3736:32, 3738:11, 3738:20, 3738:21, 3738:30, 3744:19, 3744:36, 3747:15, 3747:26, 3748:7, 3748:11, 3748:15, 3749:36, 3750:3, 3750:19, 3753:24, 3753:36, 3757:32, 3760:15, 3769:19, 3769:24, 3793:12, 3838:16, 3839:5

Public [3] - 3740:4, 3793:22, 3808:36

publication [15] - 3736:25, 3736:36, 3739:33, 3740:33, 3744:34, 3745:1, 3745:23, 3746:17, 3747:11, 3747:28, 3749:23, 3752:24, 3752:25, 3760:1, 3769:33

publicity [1] - 3827:47

publish [1] - 3755:10

pull [1] - 3835:45

purpose [3] - 3761:26, 3799:43, 3809:1

pursued [3] - 3811:14, 3837:5, 3838:8

pursuing [1] - 3755:39

push [2] - 3727:39, 3727:40

pushed [2] - 3728:23, 3791:12

put [25] - 3723:16, 3723:23, 3724:18, 3724:30, 3738:45, 3750:26, 3766:38, 3767:6, 3767:28, 3767:42, 3768:22, 3774:13, 3776:32, 3776:36, 3776:46, 3777:8, 3780:5, 3782:17, 3783:26, 3784:37, 3789:18, 3789:23, 3791:4, 3819:32, 3828:18

puts [1] - 3759:46

putting [3] - 3722:12, 3736:44, 3768:2

Q

qualification [4] - 3738:29, 3744:18, 3769:23, 3769:34

quality [1] - 3789:16

quarters [1] - 3820:45

questioning [1] - 3725:43

questions [21] - 3721:5, 3721:33, 3722:4, 3730:30, 3731:47, 3733:47, 3760:2, 3763:2, 3764:26, 3769:22, 3770:30, 3787:42, 3812:42, 3823:13, 3824:43, 3827:11, 3827:35, 3834:41, 3835:4, 3837:14, 3837:18

quick [1] - 3818:21

quite [15] - 3722:38, 3722:43, 3748:26, 3753:5, 3762:47, 3764:27, 3774:14, 3787:46, 3795:22, 3808:44, 3825:41, 3827:31, 3828:19, 3832:27, 3836:43

quotes [1] - 3819:38

quoting [2] - 3729:9, 3772:46

R

radio [1] - 3765:9

raise [1] - 3725:30

raised [5] - 3725:28, 3799:27, 3816:21, 3816:40, 3821:12

rang [14] - 3761:6, 3770:35, 3772:23, 3775:24, 3776:14, 3776:15, 3777:14, 3784:27, 3805:38, 3806:3, 3806:5, 3822:9, 3824:39, 3831:8

range [1] - 3769:39

rare [1] - 3760:12

rate [5] - 3749:43, 3782:25, 3786:4, 3797:46, 3815:32

rather [12] - 3723:18, 3724:44, 3751:31, 3765:23, 3780:4, 3782:18, 3783:27, 3789:40, 3795:40, 3816:27, 3818:22, 3821:10

ratings [2] - 3788:33, 3788:46

re [2] - 3785:5, 3798:2

reached [3] - 3728:22, 3731:9, 3754:19

reaction [2] - 3810:13, 3813:24

read [34] - 3723:14, 3724:44, 3728:17, 3732:17, 3739:16, 3743:1, 3743:15, 3744:4, 3753:26, 3763:25, 3764:42, 3764:43, 3765:42, 3766:31, 3768:24, 3785:13, 3785:34, 3785:35, 3787:43, 3787:44, 3814:32, 3818:5, 3818:8, 3827:36, 3829:15, 3830:1, 3830:2, 3830:39, 3831:28, 3832:45, 3833:5, 3833:6, 3833:20

reader [3] - 3722:32, 3759:43, 3786:21

reading [2] - 3753:24, 3773:38

reads [4] - 3739:28, 3747:13, 3749:8, 3822:11

ready [1] - 3721:6

realised [1] - 3757:28

reality [1] - 3749:9

really [3] - 3781:35, 3810:10, 3816:28

realm [2] - 3789:47,

3790:3
reason [10] - 3723:11,
3746:47, 3759:7,
3792:2, 3794:24,
3794:26, 3807:39,
3829:38, 3832:15,
3837:29
reasonable [2] -
3760:5, 3809:44
reasonableness [1] -
3810:11
reasonably [1] -
3838:36
reasons [2] - 3767:22,
3793:14
rebut [1] - 3768:8
received [24] -
3722:32, 3723:14,
3730:26, 3733:34,
3735:34, 3735:36,
3776:3, 3787:24,
3797:3, 3798:14,
3801:18, 3811:21,
3813:8, 3813:12,
3814:2, 3819:17,
3822:42, 3823:38,
3824:22, 3831:18,
3832:15, 3832:19,
3836:20
receiving [1] -
3735:46
recent [3] - 3740:37,
3809:3, 3830:2
recently [1] - 3826:35
recipients [1] -
3758:40
recognised [2] -
3760:17, 3760:20
recollection [5] -
3796:32, 3798:18,
3803:47, 3805:6,
3827:13
reconsideration [2] -
3828:4, 3828:8
record [52] - 3737:43,
3738:9, 3738:19,
3738:30, 3744:19,
3744:36, 3744:38,
3744:46, 3745:8,
3745:21, 3745:24,
3747:3, 3747:16,
3747:29, 3747:30,
3748:16, 3749:35,
3750:2, 3750:10,
3750:17, 3751:7,
3758:27, 3758:29,
3759:38, 3759:40,
3760:9, 3760:11,
3769:29, 3769:35,
3769:36, 3772:10,

3782:26, 3782:30,
3782:32, 3783:12,
3784:13, 3785:27,
3793:23, 3793:27,
3799:34, 3801:6,
3813:5, 3827:43,
3828:5, 3833:17,
3833:24, 3833:29,
3833:41, 3834:7,
3834:12
record" [1] - 3744:30
recorded [39] -
3726:33, 3726:41,
3727:22, 3733:10,
3763:4, 3770:36,
3770:37, 3770:41,
3771:14, 3771:20,
3771:22, 3776:5,
3776:15, 3776:17,
3776:21, 3776:22,
3777:15, 3777:22,
3777:30, 3777:35,
3778:3, 3778:19,
3778:25, 3780:6,
3780:16, 3780:24,
3780:34, 3782:36,
3783:2, 3785:17,
3792:19, 3794:5,
3795:30, 3797:34,
3797:37, 3800:22,
3810:34, 3834:11,
3838:3
recording [5] -
3756:6, 3777:4,
3777:21, 3792:3,
3834:17
redacted [1] - 3769:17
refer [7] - 3727:26,
3728:47, 3732:18,
3738:4, 3768:30,
3789:5, 3811:10
reference [19] -
3732:31, 3742:12,
3742:18, 3777:4,
3777:5, 3777:40,
3779:40, 3781:20,
3788:13, 3789:1,
3789:27, 3790:18,
3793:46, 3798:44,
3800:30, 3800:31,
3800:33, 3805:10
referred [4] - 3737:4,
3769:28, 3779:28,
3786:31
referring [20] - 3733:5,
3739:1, 3739:2,
3741:12, 3741:13,
3741:30, 3747:12,
3749:39, 3749:42,
3764:41, 3779:9,

3779:21, 3779:31,
3779:37, 3781:27,
3785:18, 3793:19,
3793:37, 3800:16,
3811:33
refers [7] - 3739:4,
3757:16, 3764:47,
3768:46, 3789:24,
3794:11, 3802:29
reflecting [1] -
3721:35
refutes [2] - 3724:21,
3724:34
regard [5] - 3728:25,
3750:34, 3818:16,
3830:31, 3833:36
regarded [2] -
3747:40, 3789:45
regarding [3] -
3799:27, 3799:39,
3800:42
regime [1] - 3838:20
regular [3] - 3794:35,
3794:44, 3798:35
reinvestigate [1] -
3766:45
reinvestigation [1] -
3741:9
relates [1] - 3773:2
relating [1] - 3722:20
relation [20] - 3725:15,
3736:12, 3772:11,
3800:23, 3820:11,
3820:14, 3823:13,
3823:16, 3824:43,
3825:26, 3826:19,
3826:30, 3827:11,
3827:35, 3833:8,
3833:37, 3834:36,
3835:5, 3839:5
relations [1] - 3760:14
relationship [2] -
3728:29, 3800:47
relatively [1] - 3819:11
relaxed [3] - 3817:26,
3817:35, 3818:17
release [11] - 3769:42,
3770:5, 3770:6,
3774:45, 3806:47,
3828:19, 3828:22,
3828:26, 3828:31,
3829:5, 3829:45
released [1] - 3736:32
relevant [1] - 3835:28
reliable [2] - 3767:32,
3767:37
relieving [4] -
3725:26, 3725:27,
3773:41, 3774:24
rely [1] - 3746:26

remain [2] - 3727:9,
3803:25
remains [1] - 3822:27
remember [11] -
3722:6, 3722:12,
3730:42, 3795:36,
3797:10, 3797:26,
3798:15, 3798:21,
3799:30, 3804:32
remind [2] - 3758:19,
3818:35
remonstrate [1] -
3783:15
remotely [1] - 3765:36
removed [3] - 3725:7,
3725:19, 3800:34
repeat [1] - 3767:33
repercussions [6] -
3759:16, 3759:24,
3759:30, 3759:33,
3759:35, 3759:39
replied [1] - 3735:45
report [8] - 3742:47,
3747:1, 3753:23,
3757:24, 3784:37,
3784:38, 3786:13,
3838:34
reported [4] - 3795:18,
3808:39, 3808:42,
3830:14
reporter [3] - 3752:7,
3785:8, 3831:29
reporters [2] -
3748:45, 3749:5
reporting [1] -
3746:21
reports [1] - 3759:2
reprimand [1] -
3783:15
requested [1] - 3759:2
requests [5] -
3745:24, 3747:17,
3747:46, 3749:37,
3750:43
require [3] - 3747:32,
3751:9, 3752:27
required [1] - 3828:44
resources [1] -
3742:37
respect [2] - 3736:7,
3828:18
respective [1] -
3789:33
respond [3] - 3726:21,
3730:10, 3838:36
responds [3] -
3729:37, 3809:10,
3809:20
response [6] - 3729:6,
3797:37, 3809:19,

3816:10, 3817:1,
3836:20
responses [1] -
3818:15
rest [1] - 3830:26
restricted [1] -
3757:18
result [2] - 3735:29,
3824:25
resulted [1] - 3836:47
results [1] - 3723:35
resume [1] - 3798:28
resworn [2] - 3721:23,
3721:30
return [1] - 3721:5
review [1] - 3789:15
revisiting [1] -
3810:25
Rhys [1] - 3720:34
Richards [1] - 3720:38
Rick [4] - 3747:18,
3817:47, 3818:9,
3818:22
rider [3] - 3738:29,
3769:23, 3769:35
rightly [1] - 3747:39
ring [9] - 3758:14,
3784:17, 3792:23,
3807:26, 3807:33,
3822:9, 3826:32,
3831:7, 3831:11
ringing [3] - 3807:39,
3818:23, 3818:28
rings [1] - 3777:34
risk [5] - 3760:9,
3760:12, 3760:15,
3760:17, 3760:23
role [4] - 3819:46,
3820:2, 3820:7,
3825:3
room [2] - 3817:14,
3818:36
roughly [1] - 3827:6
routine [1] - 3795:26
rule [1] - 3727:35
ruling [1] - 3769:33
running [4] - 3795:12,
3825:8, 3825:18,
3825:23

S

Sackar [1] - 3720:16
safety [1] - 3817:13
sake [1] - 3813:43
savvy [1] - 3789:45
saw [23] - 3728:3,
3729:44, 3733:23,
3733:36, 3733:41,
3735:5, 3735:21,

Transcript produced by Epiq

3803:37, 3804:1, 3804:3, 3804:16, 3804:24, 3804:32, 3804:43, 3805:8, 3805:32, 3806:12, 3806:35, 3807:7, 3811:6, 3811:18, 3813:21, 3817:5

SC [2] - 3720:30, 3720:40

scenario [2] - 3727:16, 3776:46

scenarios [1] - 3727:36

school [1] - 3790:28

Scipione [1] - 3814:11

SCOI.47469_0001 [1] - 3790:43

SCOI.47473_0001 [1] - 3785:33

SCOI.47474_0001] [1] - 3785:44

SCOI.82483_0001 [1] - 3801:32

SCOI.82991_0001 [1] - 3740:45

SCOI.82992-0001 [1] - 3752:30

scope [1] - 3836:36

Scotland [1] - 3838:44

Scott [19] - 3722:11, 3725:8, 3725:15, 3725:19, 3725:41, 3726:2, 3727:47, 3763:13, 3764:34, 3766:9, 3767:9, 3768:4, 3773:2, 3773:30, 3802:5, 3802:15, 3803:24, 3804:15, 3805:2

Scott's [1] - 3726:37

screen [5] - 3732:3, 3732:18, 3785:47, 3786:36, 3810:22

scroll [1] - 3732:4

scrutiny [2] - 3825:15, 3825:17

second [19] - 3741:29, 3746:15, 3749:30, 3755:24, 3756:18, 3758:44, 3760:39, 3761:1, 3766:35, 3767:14, 3768:29, 3769:17, 3774:45, 3780:42, 3808:20, 3813:4, 3819:10, 3820:26, 3823:23

second-bottom [3] - 3761:1, 3780:42, 3813:4

second-last [1] - 3819:10

secondly [4] - 3723:1, 3724:21, 3724:34, 3736:24

seconds [1] - 3786:1

see [69] - 3726:30, 3727:12, 3728:43, 3729:3, 3729:33, 3730:24, 3732:14, 3734:11, 3737:16, 3738:42, 3740:45, 3743:24, 3743:29, 3744:1, 3744:26, 3746:7, 3748:29, 3748:39, 3749:7, 3754:7, 3756:20, 3761:30, 3761:36, 3761:41, 3763:2, 3763:15, 3763:45, 3764:15, 3764:38, 3766:11, 3766:21, 3766:27, 3767:2, 3767:44, 3768:31, 3772:6, 3773:44, 3774:42, 3775:30, 3776:20, 3777:3, 3777:12, 3777:25, 3778:43, 3784:39, 3784:43, 3786:24, 3786:44, 3787:34, 3787:39, 3789:6, 3798:24, 3800:37, 3802:38, 3803:28, 3803:35, 3803:41, 3804:42, 3805:5, 3805:7, 3808:29, 3809:42, 3810:12, 3811:27, 3817:47, 3820:44, 3836:4, 3838:31

seeing [3] - 3753:16, 3790:21, 3805:6

seek [3] - 3750:20, 3750:29, 3837:9

seeking [2] - 3725:12, 3740:33

seem [1] - 3750:30

seemingly [2] - 3755:9, 3783:39

sees [1] - 3802:41

select [1] - 3739:20

send [7] - 3797:16, 3807:44, 3809:29, 3817:25, 3818:21, 3820:45, 3821:30

sending [1] - 3815:40

sends [4] - 3797:19, 3808:36, 3818:22, 3818:23

Senior [3] - 3720:30, 3720:33, 3771:39

senior [9] - 3746:7, 3774:15, 3792:30, 3795:11, 3808:11, 3808:38, 3817:13, 3820:6, 3820:7

sense [4] - 3758:25, 3758:27, 3782:16, 3792:41

sent [7] - 3729:10, 3735:39, 3762:3, 3790:44, 3809:19, 3815:43, 3815:47

sentence [9] - 3747:12, 3747:13, 3747:25, 3747:40, 3748:3, 3755:45, 3778:44, 3788:24, 3793:5

sentiments [1] - 3728:18

series [3] - 3735:14, 3764:42, 3773:45

serious [1] - 3808:5

Serious [1] - 3745:45

serves [1] - 3799:43

set [1] - 3820:34

seven [1] - 3771:30

sex [1] - 3726:44

share [2] - 3725:40, 3727:38

shared [1] - 3727:32

shock [6] - 3733:22, 3733:41, 3734:5, 3811:5, 3811:17, 3811:27

shocked [2] - 3807:20, 3808:11

short [5] - 3721:35, 3721:40, 3760:31, 3770:17, 3814:27

shortly [8] - 3741:11, 3769:45, 3770:12, 3787:11, 3787:47, 3788:5, 3798:27, 3819:17

show [5] - 3729:15, 3731:42, 3767:31, 3767:34, 3767:39

showed [5] - 3730:39, 3749:40, 3769:27, 3786:16, 3819:27

shown [4] - 3780:18, 3780:35, 3786:12, 3835:46

sic [3] - 3799:26, 3818:36, 3833:4

sick [2] - 3824:18, 3838:5

side [1] - 3789:29

sided [1] - 3743:36

sides [1] - 3789:32

significance [1] - 3826:2

significant [3] - 3792:40, 3825:26, 3827:31

signifying [1] - 3790:32

similar [2] - 3727:13, 3738:25

similarity [1] - 3802:42

similarly [3] - 3802:28, 3806:21, 3836:35

simply [3] - 3722:20, 3780:22, 3782:2

Siobhan [10] - 3757:13, 3757:24, 3758:33, 3758:44, 3759:8, 3759:15, 3759:42, 3760:17, 3760:44, 3761:42

sit [4] - 3758:45, 3763:21, 3797:27, 3810:11

site [1] - 3803:17

sitting [1] - 3779:15

situation [1] - 3804:4

six [2] - 3745:41, 3838:29

sleeping [1] - 3808:4

slightly [5] - 3724:3, 3741:11, 3766:15, 3769:10, 3769:17

small [2] - 3724:45, 3821:35

solicitor [5] - 3726:8, 3728:38, 3744:26, 3745:3, 3800:28

Solicitor [2] - 3720:33, 3720:34

Solicitor's [1] - 3801:24

solid [1] - 3722:45

solved [2] - 3755:40, 3835:10

someone [9] - 3740:46, 3742:7, 3758:18, 3762:19, 3770:46, 3797:19, 3798:14, 3803:46, 3810:9

something's [1] - 3798:5

somewhat [2] - 3723:11, 3816:41

somewhere [1] - 3838:45

soon [2] - 3746:21, 3778:44

Sophie [1] - 3801:25

sorry [49] - 3724:4, 3733:16, 3734:36, 3745:22, 3749:42, 3751:15, 3754:11, 3758:2, 3758:39, 3762:40, 3767:33, 3770:41, 3773:33, 3775:32, 3776:34, 3776:44, 3776:45, 3779:33, 3780:11, 3791:34, 3794:9, 3794:16, 3794:25, 3796:22, 3797:12, 3798:41, 3799:44, 3800:24, 3801:35, 3801:43, 3804:40, 3805:45, 3808:41, 3812:8, 3812:39, 3818:34, 3818:40, 3822:46, 3823:7, 3823:9, 3825:34, 3826:7, 3827:14, 3829:23, 3831:15, 3832:14, 3839:14, 3839:21

sort [9] - 3727:14, 3754:26, 3755:14, 3786:38, 3813:29, 3816:8, 3824:5, 3838:43, 3839:19

sorts [1] - 3807:36

sought [3] - 3746:17, 3827:46, 3835:27

sound [2] - 3731:21, 3752:46

sounding [1] - 3768:36

South [3] - 3720:21, 3741:46, 3805:7

speaker [1] - 3814:15

speaking [2] - 3722:9, 3831:33

Special [1] - 3720:9

SPECIAL [1] - 3839:28

specific [1] - 3835:32

specifically [6] - 3738:31, 3755:6, 3817:37, 3827:10, 3827:35, 3829:14

spent [3] - 3742:25, 3755:8, 3838:41

spoken [6] - 3749:34, 3750:1, 3774:43, 3785:23, 3814:28, 3837:33

Squad [5] - 3742:8, 3827:20, 3827:27,

Transcript produced by Epiq

Transcript produced by Epiq

3741:32

Young [153] - 3725:7,
3725:13, 3725:37,
3728:47, 3732:10,
3735:39, 3736:31,
3736:40, 3737:20,
3738:6, 3738:19,
3739:5, 3739:13,
3740:21, 3740:40,
3741:14, 3741:18,
3741:30, 3742:24,
3742:30, 3742:44,
3743:13, 3743:25,
3744:6, 3744:10,
3745:19, 3745:34,
3746:16, 3746:17,
3747:40, 3751:29,
3752:39, 3752:43,
3753:4, 3753:12,
3753:17, 3753:44,
3754:11, 3754:15,
3754:37, 3755:19,
3755:27, 3755:36,
3756:43, 3757:7,
3757:17, 3758:19,
3758:34, 3758:45,
3759:2, 3759:8,
3759:14, 3759:20,
3761:6, 3761:9,
3762:5, 3762:45,
3764:7, 3764:13,
3764:33, 3764:47,
3765:24, 3765:32,
3766:6, 3766:14,
3766:30, 3767:28,
3768:3, 3768:31,
3769:18, 3770:11,
3772:10, 3772:39,
3773:16, 3775:1,
3775:13, 3776:3,
3779:42, 3782:26,
3784:5, 3784:14,
3784:28, 3785:6,
3786:12, 3787:12,
3787:19, 3787:34,
3787:35, 3787:47,
3788:9, 3788:24,
3789:29, 3790:7,
3791:38, 3793:9,
3794:20, 3794:29,
3795:42, 3796:11,
3797:2, 3798:2,
3800:6, 3800:34,
3801:18, 3801:37,
3802:2, 3802:10,
3803:36, 3803:38,
3804:1, 3805:27,
3806:10, 3806:27,
3810:28, 3812:16,
3812:24, 3813:12,
3813:42, 3814:16,

3814:38, 3815:12,
3816:19, 3818:10,
3818:17, 3819:4,
3821:46, 3822:10,
3823:15, 3823:25,
3824:9, 3824:31,
3827:12, 3828:11,
3828:43, 3829:6,
3829:17, 3830:30,
3831:18, 3832:16,
3832:42, 3832:46,
3833:8, 3833:9,
3833:10, 3833:17,
3833:28, 3833:36,
3834:6, 3835:14,
3836:43, 3837:29,
3838:4

Young's [18] - 3722:5,
3727:32, 3736:25,
3739:37, 3753:38,
3754:29, 3756:7,
3756:14, 3768:45,
3772:45, 3795:10,
3796:40, 3803:42,
3808:47, 3831:40,
3835:4, 3837:9,
3837:21

yourself [17] -
3726:22, 3732:18,
3739:17, 3745:34,
3751:38, 3764:43,
3764:44, 3766:31,
3787:43, 3789:46,
3790:43, 3797:18,
3817:9, 3817:18,
3818:35, 3831:7,
3837:8

Z

Zdenka [26] - 3774:27,
3814:3, 3814:15,
3814:21, 3814:27,
3814:44, 3815:2,
3815:26, 3815:34,
3816:4, 3816:34,
3817:25, 3817:30,
3818:5, 3818:20,
3819:18, 3819:26,
3819:30, 3819:38,
3819:44, 3820:21,
3821:2, 3821:21,
3821:30, 3822:9,
3822:17

ZDENKA [1] - 3774:28

.15/05/2023 (51)   22
Transcript produced by Epiq