

**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 Thursday, 13 July 2023 at 2.00pm

(Day 76)

Mr Peter Gray SC	(Senior Counsel Assisting)
Ms Claire Palmer	(Counsel Assisting)
Mr Enzo Camporeale	(Director Legal)
Mr Tom Allchurch	(Senior Solicitor)
Mr Rhys Carvosso	(Solicitor)

Also Present:

**Mr Mark Tedeschi KC with Mr Anders Mykkeltvedt and
Mr Mathew Short for the NSW Police and Ms N Marsic**

1 THE COMMISSIONER: Yes, Mr Gray.
2
3 MR GRAY: Commissioner, this afternoon's sitting has been
4 arranged to hear some evidence from Ms Natalie Marsic, who
5 has sworn an affidavit in compliance with the orders that
6 you made on 22 June in connection with searches for
7 documents and provision of documents both generally and in
8 relation to Strike Force Parrabell. So if it is
9 convenient, I will call Ms Marsic.

10
11 MR TEDESCHI: I represent Ms Marsic, Commissioner.

12
13 THE COMMISSIONER: Yes, thank you.

14
15 MR TEDESCHI: With Mr Mykkeltvedt.

16
17 THE COMMISSIONER: Yes, of course, thank you.

18
19 Ms Marsic, would you come forward, please, thank you.

20
21 <NATALIE MARSIC, sworn: [2.02pm]

22
23 <EXAMINATION BY MR GRAY:

24
25 MR GRAY: Q. Ms Marsic, do you have your affidavit with
26 you?

27 A. I do.

28
29 Q. Now, briefly, to summarise your time with the police,
30 as I understand your affidavit, you graduated in 1994 and
31 then took a Masters in 1996. Did you start with the
32 police, as I understand it, around about 1998?

33 A. 1998 is correct.

34
35 Q. And then in 2008 you went and did other things?

36 A. Yes.

37
38 Q. Then back to the police in 2018?

39 A. That's correct.

40
41 Q. Since December 2018, you have been, firstly, Director,
42 Crime Disruption and Special Inquiries Law, which of course
43 has an acronym, CDSIL?

44 A. That's correct.

45
46 Q. And later, June 2020, commenced as Acting General
47 Counsel and eventually permanently appointed to that role

1 in May 2021?

2 A. Yes.

3

4 Q. Now, among the facts which follow from that, and I'm
5 not suggesting anything other than chronological, you were
6 not with the police during the whole of Strike Force
7 Parrabell?

8 A. That's correct.

9

10 Q. Or, for that matter, Strike Forces Macnamir or
11 Neiwand?

12 A. That's correct.

13

14 Q. In your roles since 2018, I take it it's no part of
15 your role to be in charge of document management systems --

16 A. That's correct.

17

18 Q. -- for the police?

19 A. That's correct.

20

21 Q. And in swearing the affidavit that you've sworn,
22 I take it you are essentially acting on instructions;
23 you're relying on what you're told?

24 A. That's correct.

25

26 Q. I imagine you would also agree, and you probably would
27 tell me more than what I'm about to say, that the document
28 management systems within the Police Force in this State
29 are quite complex?

30 A. That's correct.

31

32 Q. And that's no doubt for lots of reasons, including the
33 size of the organisation?

34 A. Yes.

35

36 Q. That would be one reason, and the period of time over
37 which records are held?

38 A. Yes.

39

40 Q. And changes over time in relation to requirements,
41 best practice, technology, regulatory requirements and so
42 on?

43 A. Yes.

44

45 Q. So, you can assume that we're conscious of all of
46 that, when I am asking you these questions. Now, you're
47 aware, I take it, that last week, in this Commission, there

1 was evidence from a number of police witnesses about
2 various aspects of investigative practices?
3 A. Yes.
4
5 Q. Including - I don't say this is all of the people who
6 gave evidence - Assistant Commissioner Conroy?
7 A. Yes.
8
9 Q. Detective Inspector Warren, Detective Superintendent
10 Doherty and Detective Chief Inspector Laidlaw?
11 A. Yes.
12
13 Q. Are you aware, either generally or more precisely than
14 generally, of the evidence they gave?
15 A. Not of all of them. I'm aware of the evidence given
16 by Detective Inspector Warren and Detective Chief Inspector
17 Laidlaw.
18
19 Q. Do you mean by that not so much Assistant Commissioner
20 Conroy or Detective Superintendent Doherty?
21 A. Correct.
22
23 Q. And in relation to those latter two, are you saying
24 you're not aware at all of what they said or --
25 A. I haven't read the transcript for their evidence.
26
27 Q. But has somebody reported to you as to what the
28 evidence was?
29 A. No.
30
31 Q. No?
32 A. No.
33
34 Q. But in the case of Mr Warren and Mr Laidlaw, was it,
35 you have read the transcript?
36 A. Yes.
37
38 Q. Okay, thank you. Now, as you know, one matter that
39 they were asked about, all four of those, was a memorandum
40 by DCI Lehmann dating back to 5 August 2016. You're aware
41 of that?
42 A. No.
43
44 Q. You're not aware of that? You read the transcript?
45 A. I've read the transcript. I don't recall reading the
46 2016 memorandum.
47

1 Q. I wonder if --

2 A. If you could lead me to that part of the transcript,
3 that might refresh my memory.

4

5 Q. I will show you the document, first of all. It's the
6 document that the Commission had before it last week,
7 Commissioner. It became exhibit 51, tab 6F, and it's
8 a memorandum of 5 August 2016 by Detective Chief Inspector
9 Lehmann [NPL.0100.0018.0002]. I suppose my first question
10 is, Ms Marsic, whether you have seen this before, before
11 today?

12 A. No, I have not.

13

14 THE COMMISSIONER: Q. And do I take it no-one has drawn
15 this to your attention, apart from Mr Gray?

16 A. That's correct.

17

18 THE COMMISSIONER: Thank you.

19

20 MR GRAY: Q. If you will assume for the moment - and
21 I will remind you of some of the transcript, but assume for
22 the moment that the witnesses whose transcripts you have
23 read were asked questions which included questions about
24 this.

25 A. Yes.

26

27 Q. Is that something that just doesn't come to mind now?

28 A. That just doesn't come to mind.

29

30 Q. Well, let's just have a look at it now, if I may, with
31 you.

32 A. Yes.

33

34 Q. You can see from the last page of it that it's dated
35 5 August 2016 - that is, Mr Lehmann's note is?

36 A. Yes.

37

38 Q. And if we go to the front page, you can see that the
39 topic, under the heading "Issue", is "Proposal for
40 a project plan concerning the locating, identification and
41 reconciliation of exhibits relating to unsolved homicide
42 cases"?

43 A. Yes.

44

45 Q. Then there's a paragraph beginning "Background", and
46 then there are five headings after that: "Problem - 1",
47 "Problem - 2", "Problem - 3", "Problem - 4", "Problem - 5"?

1 A. Yes.

2

3 Q. Problems 1, 2 and 3, if you glance at them now, if you
4 would, deal with essentially difficulties in locating
5 exhibits. Do you see that?

6 A. I've read problems 1 to 3.

7

8 Q. Do you agree that, speaking generally, it's dealing
9 with difficulties in locating exhibits?

10 A. Yes.

11

12 Q. And then problem 4 deals with difficulties relating to
13 not only exhibits but briefs of evidence and case file
14 documents. Do you see that?

15 A. Yes.

16

17 Q. One of the things that Mr Lehmann was pointing out in
18 2016 was that not only exhibits but briefs of evidence and
19 case file documents were not archived and stored in the
20 proper manner and that a consequence - and I'm now
21 paraphrasing - is that often problems arose with locating
22 such documentary records?

23 A. Yes.

24

25 Q. Now, problem 5, again, related mainly to exhibits.
26 Then can I take you over to the page numbered 3. There's
27 a heading "Comment". Do you see that?

28 A. Yes.

29

30 Q. And what Mr Lehmann is saying there - I'm looking at
31 the last sentence - is that:

32

33 *It is the legacies of the poor exhibit and*
34 *record management practices of the past,*
35 *compounded by the passage of time that*
36 *causes significant problems for the UHT*
37 *today.*

38

39 A. Yes.

40

41 Q. Now, until you saw this document five minutes ago, was
42 that realisation something that you did not know had been
43 arrived at as long ago as 2016?

44

45 MR TEDESCHI: I object. Commissioner, Ms Marsic has been
46 asked to come to the hearing today to answer questions
47 about the topics that are contained in her affidavit,

1 namely, the location of some exhibits that were found very
2 late in the piece that were properly a response to one of
3 the early subpoenas that were issued by you, Commissioner.
4 She can do no more with this document than to say what's
5 written there in the document.

6
7 THE COMMISSIONER: So be it, Mr Tedeschi. So be it. I'm
8 surprised she hasn't seen it before, and I'm equally
9 surprised nobody drew it to her attention after the
10 evidence last week.

11
12 MR TEDESCHI: Because, Commissioner, it was assumed that
13 she was coming here today to be asked questions about the
14 topics that are raised in her affidavit, not about the
15 evidence that was given --

16
17 THE COMMISSIONER: I'm going to allow it, Mr Tedeschi.
18 Documentation and retrieval of documentation has been
19 a chronic problem for this Commission. Thank you very
20 much. I'm going allow it.

21
22 MR GRAY: Q. The question that I'm asking at the moment,
23 Ms Marsic, is simply this: until the last 10 minutes, when
24 I've shown you this document, were you unaware that the
25 problem identified in that last sentence under the heading
26 "Comment" had been identified as long ago as 2016?

27 A. Yes.

28
29 Q. On the next page, do you see a heading "Reconciliation
30 Plan"?

31 A. Yes.

32
33 Q. By all means, take the time to read it all if you need
34 to, but you'll see that in paragraph numbered 1 under that
35 heading, Mr Lehmann proposes a project to do something
36 about the problem that he has identified in this document.
37 He says phase 1 will be to have exhibits identified and
38 matched to cases. Do you see that in that paragraph?

39 A. I do.

40
41 Q. And then two paragraphs down, he says:

42
43 *The second phase will be to generate files*
44 *to all Regions, Local Area Commands*
45 *and ... Crime Scene Offices requesting*
46 *a search/audit of all historic or long term*
47 *homicide exhibits ...*

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And so on?

A. I see that.

Q. On the last page, if you turn over to the last page, under the heading "Time Frame", he says, "Phase 1 of the project is currently under way", and he goes on to say what he expects or anticipates might then happen. Do you see that?

A. Yes.

Q. Now, are you, as of this afternoon, aware of any such reconciliation plan ever having been implemented or pursued?

A. I do not know.

Q. Has the topic ever been mentioned to you, that such a plan was proposed?

A. No.

Q. Does it come as a surprise to you that these problems had been identified as long ago as 2016, given the evidence that we're about to come to in your affidavit as to matters that you say came to the notice of the Unsolved Homicide Team in the last 12 months?

A. I'm not surprised.

Q. You're not surprised? Why is that?

A. The organisation, NSW Police Force, is a very large organisation and I'm not completely aware of all projects that are done within the organisation on exhibits management or document management.

Q. No doubt. I wouldn't suggest to the contrary. But let me put it this way: in the last 12 months, in the context of this Inquiry, you have, at least at a supervisory level, been aware of the need for records to be searched relevant to a reasonably large number of unsolved homicide cases?

A. Yes.

Q. And you've been aware, at least at that level, supervisory level, of what you were being told was being done to try to meet the summonses?

A. Yes.

Q. And I take it - and I'll come to your affidavit in

1 detail, but you were told, I gather, is this right, at the
2 outset, that is, in May/June, let's say, last year, when
3 the first summonses were issued, that for hard-copy
4 records, one would simply go to the CRRIM resource?

5 A. I was not specifically told that. When the first
6 summonses and when the first letter came to NSW Police
7 Force on 4 May, I believe, from the Commission that
8 information would be required, what I did was I organised
9 appropriate resources with the appropriate expertise to
10 conduct the correct searches to retrieve that
11 documentation.

12
13 Q. Yes, but my question was, were you told or was it your
14 understanding that so far as hard-copy records were
15 concerned, all one needed to do was to go to the CRRIM
16 resource?

17 A. Can you just repeat that question?

18
19 Q. Was it your understanding as at that beginning part of
20 our Inquiry, about May, May/June last year, that so far as
21 hard-copy records were concerned in respect of the various
22 unsolved cases that you were being summoned for, all
23 hard-copy records would be found by going to CRRIM?

24 A. No. I was aware that there could be hard-copy files
25 stored at police stations.

26
27 Q. You were aware of that from the outset, from May last
28 year?

29 A. Yes.

30
31 Q. How were you aware of that?

32 A. Through my experience, through working in the
33 NSW Police Force.

34
35 Q. And in May last year, when the first summons came in,
36 summons 1, were searches made not only of CRRIM but of
37 local area commands for those documents?

38 A. I have been advised that the searches that were
39 originally done did not include going to police stations,
40 that those searches were done through going to Corporate
41 Records or the CRRIM.

42
43 Q. And were you aware of that state of affairs at the
44 time?

45 A. No.

46
47 Q. When did you become aware of that state of affairs?

1 A. I don't know the precise date, but I understand that
2 in October of last year, it was identified that there may
3 be material at police stations that had not been captured
4 through the searches that were done, and at some time
5 thereafter I was made aware of that. I cannot tell you the
6 exact date.

7
8 Q. Sure. But I thought you had said a moment ago - and
9 correct me if I've misunderstood this - that you yourself
10 already knew that, that it was necessary to go to police
11 stations?

12 A. I knew that there could be material at police
13 stations. I did not know that those searches had not been
14 done.

15
16 Q. I see. Let's turn, then, for the moment to your
17 affidavit, if I could, and go to paragraph 12,
18 [SC0I.84212_0001]. You tell us that the CDSIL team - which
19 is lawyers, I take it - is a team of 10?

20 A. Yes.

21
22 Q. And in paragraph 17(b), as I understand it, you say
23 that of those 10, three have been appointed as dedicated
24 resources in connection with the work of this Inquiry?

25 A. Yes.

26
27 Q. When did that happen - that is to say, for how long
28 have there been three appointed, as you call it, dedicated
29 resources in connection with the Inquiry?

30 A. I can't tell you the exact date that there were three.
31 So, initially, when we were informed that work from the
32 Commission would be coming in, the matter was allocated
33 to - we call the team CDSIL, was allocated to CDSIL, and
34 then the solicitors were allocated - the request goes to
35 the director, at the time it was Ms Claudia Pendlebury, and
36 then the director is responsible for allocating resources
37 within the team. So at that time I understand that Patrick
38 Hodgetts was allocated the matter, so at that stage Patrick
39 was working on the matter and had assistance from other
40 solicitors as required, and the director was also then
41 involved in supervising that work.

42
43 Q. But when you say in 17(b) that you have appointed
44 three specifically from CDSIL, are the three Ms Garaty,
45 Mr Hodgetts and someone else?

46 A. Yes, that's correct.

47

- 1 Q. And when did that become the case, that all three were
2 dedicated resources in this regard?
- 3 A. That would - I can't tell you the exact date.
4
- 5 Q. No, but --
- 6 A. It would have been not in the initial stages of the
7 Inquiry; that would have been last year sometime.
8
- 9 Q. Second half of last year sometime?
- 10 A. Yes.
11
- 12 Q. In paragraph 14 you say that it was recognised
13 immediately - that is, immediately on publication of this
14 Inquiry's Terms of Reference - that it would require
15 a substantial involvement from the police, including the
16 provision of records, et cetera. At that point,
17 I understand from what you've just told us, effectively
18 Mr Hodgetts was given the task of being the person from
19 CDSIL to work on the matter?
- 20 A. Yes.
21
- 22 Q. No doubt under the supervision of Ms Garaty, but at
23 that point she wasn't a dedicated resource to it?
- 24 A. At that point in time, it was Ms Pendlebury who was
25 the director of CDSIL until some time in July, and
26 thereafter it was under the supervision of Ms Garaty.
27
- 28 Q. Quite. But at that point, at that original point,
29 neither of those, first Ms Pendlebury, later Ms Garaty, was
30 herself dedicated only to this task?
- 31 A. No.
32
- 33 Q. But later on, is this right, Ms Garaty has been
34 dedicated only to this task?
- 35 A. That's correct. Well, she does do other duties, but
36 the vast majority of her time is spent on the Inquiry.
37
- 38 Q. Thank you. Now, in paragraph 17(d) you talk about the
39 engagement of an external law firm. That's Corrs, I take
40 it?
- 41 A. Corrs, and at one point in time we had another firm
42 involved, which was Makinson d'Apice.
43
- 44 Q. As well?
- 45 A. That's correct. They were instructed in October.
46
- 47 Q. Who were?

1 A. Makinson d'Apice, as well as Corrs.
2
3 Q. Are you saying that they're both currently working on
4 it or --
5 A. No. Makinson d'Apice were engaged to assist with the
6 preparation of some statements. Thereafter, as it became
7 apparent that the resources we needed were going to be more
8 than that firm could handle, we decided to get a larger
9 firm involved to assist with the production of material,
10 hence why Corrs was engaged.
11
12 Q. So they came on board - that is, Corrs - when, about
13 November or so, did they?
14 A. The first instructions were on 31 October, but there
15 was reading in and then obviously a build-up to becoming
16 more involved.
17
18 Q. In paragraph 21(d) you tell us that you meet with the
19 Commissioner of Police every fortnight and that she, the
20 Commissioner, was briefed on the Inquiry in its early
21 stages and that the Inquiry has been on the agenda at every
22 meeting you have had with her since then?
23 A. Yes.
24
25 Q. I can have you shown this letter, if need be, but
26 I imagine you'd remember it. On 2 December last year, you
27 wrote a letter to the Commissioner about, among other
28 things, a relevance objection that was going to be taken as
29 to whether, among other things, Strike Force Parrabell was
30 within the Terms of Reference. Do you remember that?
31 A. I generally remember the letter, but I would like to
32 be shown the letter if I need to recall its contents in
33 detail.
34
35 Q. Okay. I wonder if that letter could be shown to
36 Ms Marsic, please [SCOI.82099_0001].
37 A. Thank you.
38
39 Q. I don't need to take long on this, Ms Marsic, but
40 that's the letter we're talking about. Do you remember it
41 in general terms?
42 A. Yes.
43
44 Q. In paragraph 12 of that letter, where you are talking
45 about resourcing matters, if I could speak generally, you
46 tell the Commissioner in this letter that:
47

1 ... approximately 12 UHT investigations and
2 reviews have had to be placed on hold while
3 the relevant officers assist in the context
4 of this Inquiry.

5

6 Do you see that?

7 A. Yes.

8

9 Q. Was that letter, the entirety of it, something on
10 which the Commissioner was briefed at the time?

11

12 MR TEDESCHI: I object.

13

14 THE COMMISSIONER: Why? You say I should assume it's
15 written on instructions?

16

17 MR TEDESCHI: No, Commissioner. It's one thing for
18 a question that clearly raises privileged issues to be
19 asked about the matters that concern the Terms of the
20 Inquiry, that is, under the Terms of Reference.

21

22 THE COMMISSIONER: Yes.

23

24 MR TEDESCHI: It's quite another thing for a legal officer
25 to be asked about instructions given or received in
26 relation to a procedural matter as to how that party is
27 approaching the Inquiry.

28

29 THE COMMISSIONER: Why?

30

31 MR TEDESCHI: It's completely different to being asked
32 a question about, for instance, one of the matters that the
33 Inquiry is investigating, where --

34

35 THE COMMISSIONER: I think it's a rather important matter,
36 though. It's a matter which, I presume, either I would
37 infer was written on instructions or should have been, and
38 it's an assertion that this Inquiry was having a particular
39 effect on police activities. I can't believe that it would
40 have been written other than on instructions, surely?

41

42 MR TEDESCHI: We would submit that it's not permissible
43 for Counsel Assisting to seek to go behind --

44

45 THE COMMISSIONER: No, well, if you're putting to me that
46 I should proceed upon the basis that this was written on
47 instructions, so be it.

1
2 MR TEDESCHI: No. What I'm submitting, Commissioner, is
3 that Counsel Assisting ought not to ask a question that's
4 clearly privileged.
5
6 THE COMMISSIONER: Well, I will hear from Mr Gray on that,
7 but at the moment I'm disposed to either proceed upon the
8 basis that it would have or should have been written on
9 instructions, or was. Mr Gray, what do you want to say?
10
11 MR GRAY: The question was actually, Commissioner, whether
12 the Commissioner was briefed by Ms Marsic on what was going
13 to be in this letter. That, in my respectful submission,
14 doesn't involve raising any matter of privilege: was the
15 Commissioner told that this letter was going to be sent?
16 That's all.
17
18 THE COMMISSIONER: Are you asking her whether she obtained
19 instructions on the terms of the letter, in effect?
20
21 MR GRAY: No. I may want to ask her that, but at the
22 moment it is simply: was the Commissioner of Police aware
23 that this letter was going to be sent?
24
25 THE COMMISSIONER: I'm not so sure. I think it does
26 travel a little into conversations between her and her
27 client. I would certainly either proceed upon the basis
28 that it should have been written on instructions, and, if
29 it weren't, I would be concerned, but I don't know that
30 I would permit you to ask about conversations between
31 Ms Marsic and her client.
32
33 MR GRAY: I accept the ruling. I will move on.
34
35 Q. Ms Marsic, looking at the terms of that paragraph 12,
36 though, of that letter of 2 December, is that still the
37 position - that is, 12 UHT investigations and reviews are
38 still on hold because of the need to assist this Inquiry?
39 A. I do not know.
40
41 Q. Have you asked?
42 A. No.
43
44 THE COMMISSIONER: Q. But it was the fact, was it, at
45 the date of 2 December?
46 A. Yes. I was advised that.
47

1 Q. By whom?

2 A. I believe it would have been by either Ms Garaty or
3 Mr Hodgetts.

4
5 Q. So it wasn't direct from any police officer?

6 A. No.

7
8 MR GRAY: Q. Last week, Ms Marsic - and you can tell us
9 if you are or are not aware of this - DCI Laidlaw gave
10 evidence that the UHT has stopped all triages so that it
11 can assist the Inquiry. Is this something of which you're
12 aware?

13
14 MR TEDESCHI: Aware of the evidence or aware of the fact?
15 It's unclear.

16
17 THE COMMISSIONER: Mr Gray will make it clear.

18
19 MR GRAY: I will make it more clear.

20
21 Q. First of all, are you aware that - I'll go back
22 a step. Was DCI Laidlaw one of the ones whose transcript
23 you read?

24 A. Yes.

25
26 Q. So are you aware that he gave evidence last week that
27 the UHT has stopped all triages so that it could assist the
28 Inquiry?

29 A. I am aware he gave that evidence.

30
31 Q. And is that something of which you were aware prior to
32 him giving that evidence?

33 A. No.

34
35 Q. What is your reaction to it?

36
37 MR TEDESCHI: I object. Relevance.

38
39 THE COMMISSIONER: I will allow it.

40
41 MR TEDESCHI: Would you hear me, Commissioner? What
42 possible assistance --

43
44 THE COMMISSIONER: Mr Tedeschi, I want to get to the
45 bottom of the documentary issue in this case. If the
46 police are sadly lacking in resources, then something needs
47 to be done about it. If police work is being held up as

1 a result of an act of Executive Government, the public of
2 New South Wales ought to hear about it. I'm going to allow
3 it. Thank you.

4
5 MR GRAY: Q. What is your reaction to that evidence from
6 Mr Laidlaw that that's the position?

7 A. My reaction is that I do not know if it is correct or
8 if it is not correct.

9
10 Q. What would make you think that it might not be
11 correct?

12 A. Because I had not been advised that - the advice that
13 I had received previously was that there was an impact on
14 UHT reviews. I had never been advised that they had
15 stopped altogether.

16
17 Q. Well, if his sworn evidence last week is correct, then
18 that would be of some concern to you, presumably?

19 A. I'm not responsible for the work of UHT. They report
20 to an Assistant Commissioner, so the management of UHT work
21 is not an area that's in my responsibility.

22
23 Q. Is it something that, in your fortnightly briefings of
24 the Commissioner, you would need to tell her?

25 A. If I was aware that all UHT reviews or investigations
26 had ceased, that is something I would have brought to
27 either the Commissioner or Deputy Commissioner David
28 Hudson's attention.

29
30 Q. And no doubt will now do so?

31 A. Mr Hudson - I have had a conversation with Mr Hudson,
32 and he is aware of this - of DCI Laidlaw's evidence.

33
34 Q. He is the Deputy Commissioner, did you say?

35 A. Yep, Deputy Commissioner of Counter Terrorism and
36 Investigations, and the State Crime Command, of which UHT
37 is a part, reports to him.

38
39 Q. And was he aware of the matters of which DCI Laidlaw
40 gave evidence about the triages having stopped?

41 A. No.

42
43 Q. Has the NSW Police sought additional resources to
44 respond to this Inquiry or to try to meet the kind of
45 logistical problems that this evidence from Mr Laidlaw
46 indicates are occurring?

47 A. Do you mean for UHT or for my Office of the General

1 Counsel?

2

3 Q. Either.

4 A. For the Office of the General Counsel, the extra
5 resources that I have secured are in terms of Corrs. So,
6 I recognised that our internal resources were not going to
7 be sufficient to meet the needs of the Inquiry, so we
8 instructed Corrs. The reason Corrs were instructed was so
9 that we had flexibility and could meet the needs of the
10 Inquiry as they surged and went down, so that we could
11 scale up and scale down. That's why Corrs was chosen,
12 because they're a larger firm that had the capacity to be
13 flexible.

14

15 In terms of UHT, back in August 2022 I was made aware
16 I believe by Assistant Commissioner Michael Fitzgerald -
17 I'm not a hundred per cent sure it was him, but I had
18 a conversation with someone from State Crime Command, who
19 advised me that responding to the Inquiry was having an
20 impact on the UHT's ability to conduct reviews.

21

22 After that conversation, I spoke to Deputy
23 Commissioner David Hudson about those concerns. As
24 a result of that conversation, Deputy Commissioner Hudson
25 asked that a report be done to be tabled at the meeting of
26 the Commissioner's executive team. The Commissioner's
27 executive team meets fortnightly and is comprised of the
28 Commissioner and the Deputy Commissioners of the
29 organisation.

30

31 That report was tabled on 12 September in 2022. After
32 that, I understand three additional officers were allocated
33 to UHT to address the concerns.

34

35 Q. Thank you for that. In your affidavit, you tell us at
36 paragraph 17(a) that three officers from the UHT act as
37 dedicated resources to support the Inquiry. 17(a).

38

39

40 Q. And I think you just said that by September, if I've
41 understood you correctly, or some time after that, an extra
42 three were added to the UHT team; is that right?

43

44 A. So, in October/November the extra three were added.
45 The three that I refer to in my affidavit are dedicated
46 resources. I understand - I don't have first knowledge of
47 this, but I have been advised that the UHT uses other
members of the UHT, again on a surge capacity as the needs

1 are required, but the three officers that I refer to in my
2 affidavit are dedicated to the Inquiry. That means that
3 they're not the only officers that work on the Inquiry's
4 work.

5
6 Q. How many police officers are there in the UHT?

7 A. I understand there are 34.

8
9 Q. And if three are dedicated to the Inquiry in the way
10 you've explained, and if others from time to time are also
11 needed to help, why would it be necessary to stop all
12 triages?

13 A. I do not know.

14
15 Q. Now, just moving to a more general topic at the
16 moment, CRRIM is sometimes referred to as Corporate
17 Records?

18 A. That's correct.

19
20 Q. Essentially, as I understand your affidavit, it deals
21 with hard-copy records?

22 A. That's correct.

23
24 Q. Now, in your affidavit, if you look at paragraphs 23
25 and 24, and perhaps also just refresh your memory of what
26 you say in paragraph 29 as well?

27 A. Mmm-hmm. Yes.

28
29 Q. You're explaining there - and I am paraphrasing in
30 a slightly generalised way - the fact that the information
31 management systems in question that you're talking about
32 there require what you call highly specialised knowledge
33 and expertise and years of experience, or at least that's
34 what is brought to it?

35 A. Yes.

36
37 Q. Now, if the information management system is such that
38 it requires highly specialised knowledge and years of
39 practical experience to navigate it, does that indicate to
40 you that it might be in need of some modernisation or
41 simplification?

42 A. That's outside my area of expertise. I don't have any
43 expertise in what's required in record management.

44
45 Q. Whose desk would that topic land on?

46 A. That would be the Director of Corporate Records.

47

1 Q. That's the CRRIM entity?

2 A. Yes, yes.

3

4 Q. In paragraphs 25 to 28 you talk about some of the
5 detail or the logistics of what CRRIM does and can do, and
6 at 28 you say:

7

8 *I believe it is generally known within the*
9 *[Police Force] that when a need to identify*
10 *historical records arises, that a request*
11 *must be made to the CRRIM team.*

12

13 A. Yes.

14

15 Q. You're aware from at least the two whose transcripts
16 you did read from last week, I take it, that they gave
17 evidence about, in reality, what CRRIM did and did not
18 actually hold in its records?

19 A. I might need - to be able to answer that correctly,
20 I'd need to know what other records you mean.

21

22 Q. I'll just remind you of some of the things that were
23 said.

24 A. Yes.

25

26 Q. Now, Ms Conroy, Assistant Commissioner Conroy -
27 I think you said you haven't read her evidence?

28 A. No.

29

30 Q. One of the things, if you can just assume this from
31 me, about which she gave evidence was the plan that
32 DCI Lehmann had recommended be implemented in that document
33 that I took you to?

34 A. Yes.

35

36 Q. Assistant Commissioner Conroy gave evidence that she
37 did not know whether that plan had ever been implemented or
38 not, herself?

39 A. Yes.

40

41 Q. She said it was possible that it had been implemented
42 but that nobody had told her, if so. Just assume that that
43 was a paraphrase of her evidence on that topic. Then
44 Mr Warren, Detective Inspector Warren, gave evidence. He's
45 the one - I think you have read his transcript?

46 A. Yes, I have read his evidence.

47

1 Q. One of the things that he gave evidence about was what
2 it was that Corporate Records held, CRRIM held, and he was
3 asked by the Commissioner whether the records held by
4 Corporate Records were complete, and he accepted that if
5 hard-copy records had not been archived, either at all or
6 inadequately, they would not in fact be within Corporate
7 Records; he accepted that?

8 A. Yes.

9

10 Q. I think you're aware of that. And he accepted that
11 hard-copy documents may in fact exist elsewhere, which have
12 not been archived, and they are therefore not part of the
13 Corporate Records system; he agreed with that?

14 A. Yes.

15

16 Q. Then, still with Mr Warren, he said that for his part,
17 speaking for himself at least, he was not aware of that
18 state of affairs until working on this Inquiry over the
19 last 12 months or so?

20 A. Yes.

21

22 Q. You're aware of that?

23 A. Yes.

24

25 Q. However - now, Mr Doherty was someone whose evidence
26 you read or didn't read?

27 A. No.

28

29 Q. He's the Commander, Homicide --

30 A. That's correct.

31

32 Q. -- at the present time. If you would accept this from
33 me, he gave evidence that when he became Commander, which
34 was in December 2019, he was made aware of issues
35 concerning the location, identification and reconciliation
36 of exhibits to do with Unsolved Homicide; he agreed that he
37 was. And he also agreed that it was well known, at least
38 to him, that there were similar problems in relation to
39 documentary records, such as investigative files and
40 notebooks and the like, and he agreed that that was well
41 known as a problem at least by December 2019?

42 A. (Witness nods).

43

44 Q. You're nodding your head. Thank you. Now, was that
45 well known to you earlier than - well, when did that become
46 known to you?

47 A. I can't put, with any precision, a date or a year that

1 I became aware of that. I was - I am aware that police
2 area commands have not archived all investigative files.
3 I am aware that there's material at police stations. As to
4 when I became aware of that, whether that was in my first
5 stint at police or now in my second stint, I would be
6 misleading the Inquiry if I tried to pinpoint a date, but
7 certainly I am aware of that.

8

9 Q. And I'm not trying to pin you down to a date, either,
10 but you've obviously been aware for quite a while, at least
11 in general terms?

12 A. Yes. I was aware before the Inquiry.

13

14 Q. Just briefly, Mr Laidlaw, Detective Chief Inspector
15 Laidlaw, who is from the Unsolved Homicide Team - that's
16 right? What's his position at the Unsolved Homicide Team?

17 A. I do not know.

18

19 Q. But it's a senior position, I take it? He's one of
20 the leaders of the team?

21 A. I do not know. But as a Detective Chief Inspector,
22 that is a reasonably senior rank.

23

24 Q. So he gave evidence that the reconciliation plan that
25 DCI Lehmann had recommended back in 2016 was under way when
26 he joined the UHT, which was in 2017. He did not know
27 whether it had been completed. And later in his evidence,
28 he agreed that although it was under way, as he understood
29 it, in relation to exhibits, as far as he knew, there was
30 no similar project that had been undertaken in relation to
31 documentary records?

32 A. Yes.

33

34 Q. And that's evidence that you've seen?

35 A. Yes.

36

37 Q. Now, it seems, then, that it's been well known, at
38 least within the UHT, or at least at some levels of the
39 UHT, for some years that not all available hard-copy
40 records will actually be archived and held by CRRIM?

41 A. I can't comment on that.

42

43 Q. Well, that's the evidence that has been given, isn't
44 it?

45 A. The evidence is - the evidence was that - from what
46 you have just told me was that Detective Superintendent
47 Doherty was aware of that.

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Q. And Detective Chief Inspector Laidlaw --

A. That's correct.

Q. -- whose evidence you've read?

A. That's correct, but I can't say whether or not it was known more broadly beyond those two officers.

Q. His evidence was that all of those problems were well-known problems at the time he joined in 2017. You have read that?

A. I can accept that he gave that evidence, but I have no personal knowledge of whether or not that evidence is correct. I have no personal knowledge of the UHT's understanding of those issues more broadly.

Q. All right, but would you agree with this, that if we are to accept his evidence - and there's no reason that I'm aware of why we wouldn't accept his evidence - it was well known within the UHT, at least from 2017, that these problems existed?

MR TEDESCHI: I object. The question is the same as the answer, that my friend is saying, "If you accept the evidence, then that evidence is correct", isn't it, effectively?

THE COMMISSIONER: Yes. That's all right. He gives his evidence.

Q. Have you got any reason to doubt his evidence, though, Ms Marsic?

A. I have no reason to doubt it, but I also have no personal knowledge of whether or not he's correct.

Q. I'm not suggesting you do, and I don't think Mr Gray is, but seemingly Mr Laidlaw is in a position to know, isn't he, whereas you may not be?

A. I can't answer that.

Q. Well, he's in a better position, isn't he, to speak about what was or was not well known within UHT, apparently, than you are, surely?

A. Correct.

MR GRAY: Q. When you were, at least at your supervisory level, organising, if I may use that word, the response of

- 1 the police to the summonses that were coming from the
2 Inquiry --
3 A. Yes.
4
5 Q. -- did you seek out the assistance of the leaders or
6 heads of the Unsolved Homicide Team or only speak to
7 Mr Warren?
8 A. I spoke to, at the time, Claudia Pendlebury, and those
9 discussions were had between Ms Pendlebury and the UHT.
10
11 Q. But who at the UHT?
12 A. I do not know.
13
14 Q. Ms Pendlebury, as you have explained, was the Director
15 of CDSIL?
16 A. That's correct, until some time in July.
17
18 Q. Yes, so not a police officer?
19 A. That's correct.
20
21 Q. No. So you're saying that it was she, Ms Pendlebury,
22 and later Ms Garaty, who dealt with and conversed with
23 whoever it was from the UHT, not yourself?
24 A. That's correct.
25
26 Q. And you don't know who it was from the UHT that they
27 spoke to?
28 A. That's correct.
29
30 Q. Have you inquired, in preparation for today, as to who
31 they spoke to?
32 A. No.
33
34 Q. In paragraph 31 of your affidavit - and you make
35 similar points in later paragraphs as well - you say in the
36 third line, or starting from the first line, in the time
37 since hard-copy records were provided in answer to the
38 initial summonses in June and August last year:
39
40 *... it has been ascertained by the OGC and*
41 *UHT teams ... that some hard copy records*
42 *... may be held in locations other than*
43 *those overseen by the CRRIM.*
44
45 A. Yes.
46
47 Q. The first question, I suppose, is: ascertained when

1 and ascertained by whom?
2 A. October 2022, by Mr Patrick Hodgetts.
3
4 Q. And how did he ascertain it?
5 A. I understand that there was a letter from the Inquiry
6 questioning the fact that there had not been a large amount
7 of material returned in relation to one of the cases and
8 that queries were made about whether or not there was
9 material available elsewhere that had not been found.
10
11 Q. Yes, and what happened?
12 A. I understand that Mr Hodgetts had a conversation with
13 DI Warren, and thereafter it was decided to make inquiries
14 with police area commands.
15
16 Q. Now, as we have seen from the Lehmann 2016 document
17 and from the evidence that other officers gave last week,
18 some within UHT, but evidently not Mr Warren, were aware of
19 this possibility years before October last year, weren't
20 they?
21 A. From the evidence that you have read to me, yes.
22
23 Q. But seemingly - again, not questioning anybody's
24 evidence - seemingly nobody told Mr Warren that?
25 A. I do not know.
26
27 Q. Well, seemingly not, because he says he didn't know?
28 A. I don't know whether or not he was told or not.
29
30 THE COMMISSIONER: Q. But, again, you've got no reason
31 to doubt him when he says he wasn't told, have you?
32 A. No.
33
34 MR GRAY: Q. When did Mr Warren become part of the UHT?
35 A. I believe that is in my affidavit somewhere, but
36 I cannot recall exactly when he became - and I do recall
37 that he mentioned that in his evidence, but I don't have
38 the date at the tip of - I don't recall the date.
39
40 Q. No doubt, the date is available somewhere. It's not
41 a quiz in this sense, Ms Marsic.
42 A. Yes, I don't recall the date.
43
44 Q. But he's the person, as I understand it - again, no
45 criticism of him - who has been allocated as the kind of
46 point man within UHT to be dealing with these summonses?
47 A. That's correct.

1
2 Q. And although others in the UHT knew about this problem
3 about documents being located outside the realm of CRRIM,
4 he didn't, it seems?
5 A. That's the evidence that he gave.
6
7 Q. When you tell us what you do tell us in paragraph 31,
8 did you or anyone else from OGC or the police inform the
9 Inquiry that this realisation had been arrived at in about
10 October last year?
11 A. I do recall reading somewhere, but I cannot specify
12 exactly where, that at some point in time when what we
13 refer to as the "PAC sweep" was undertaken, that the
14 Inquiry was informed that that was taking place. I don't
15 recall where I read that, but I do recall reading that the
16 Inquiry was informed. So it would have been after October.
17
18 Q. Well, do you accept that it - I'm not sure myself
19 whether that's right or not, but putting aside whether it's
20 right or not, you would accept that the Inquiry should have
21 been informed?
22 A. Yes.
23
24 Q. In paragraph 44, if you just read that to yourself,
25 are you there essentially saying the same thing as we just
26 looked at in paragraph 31 - namely, is 44 also telling us
27 that, although it doesn't use a date, until about October
28 '22, you thought CRRIM would have all the hard-copy
29 records, and only after October '22 did you realise, or did
30 somebody realise, that that wasn't right?
31 A. Are you asking about my personal knowledge at that
32 time or the knowledge of the team that --
33
34 Q. I'm asking you whether 44 is saying anything different
35 from 31, and, if it is, could you tell us what it is?
36 A. Prior to October 2022, I believe paragraph 31 and
37 paragraph 44 are saying that the OGC team and UHT teams
38 believed that the inquiries with CRRIM would capture the
39 records.
40
41 Q. Yes. So that, in effect, they're saying the same
42 thing --
43 A. Yes.
44
45 Q. -- in different words?
46 A. Yes.
47

1 Q. That's what I'm asking.
2 A. Yes, yes.
3
4 Q. Does the same also apply to 47? Is that essentially
5 telling us the same thing?
6 A. Yes.
7
8 Q. Now, if it's the case that although Mr Warren only
9 realised that at about that time, others within UHT,
10 including persons senior to him, such as Mr Laidlaw, had
11 been aware of it for years, does that indicate a failure of
12 communication within UHT?
13 A. I can't comment on communication at UHT.
14
15 Q. Can't you?
16 A. No.
17
18 Q. Does it indicate a failure of communication that
19 Mr Warren wasn't told?
20 A. I don't know why Mr Warren was not aware of that fact.
21
22 Q. Well, if others knew and he didn't, someone would need
23 to tell him, wouldn't they?
24 A. I don't know how - what communication is done in UHT
25 in relation to those types of issues.
26
27 Q. I see. Now, more generally, given what you've
28 explained in your affidavit, including - I don't restrict
29 it to this - paragraph 43 and paragraph 62, and by all
30 means take a moment to look at those two if you would, 43
31 and 62.
32 A. Was it 62, the second paragraph?
33
34 Q. Yes.
35 A. Yes.
36
37 Q. Now, my question is simply this: clearly, there is
38 a very large quantity of documentary records in hard-copy
39 form in the possession of the police; that's very plain
40 from your evidence?
41 A. I can't comment on the proportion of hard-copy files
42 to electronic --
43
44 Q. No, that's not my question. Just putting electronic
45 to one side.
46 A. Mmm-hmm.
47

1 Q. There are obviously a lot of hard-copy records,
2 hundreds of thousands of documents, I think, on your --

3 A. Yes.

4

5 Q. Yes. And you say, very fairly - no criticism is being
6 made - in paragraph 62 that notwithstanding that very
7 extensive searches, and so on, have been made, you can't
8 exclude the possibility, although you think the risk is
9 minimal, that there could still be some that haven't been
10 located?

11 A. That's correct.

12

13 Q. Right. Now, my question is this: has consideration
14 been given to, first of all, digitising all the hard-copy
15 records?

16 A. Are you referring to all the hard-copy records that
17 have been provided to the Commission, or generally?

18

19 Q. No, generally. I'm talking about Unsolved Homicide,
20 though. I'm talking about the records at CRRIM and
21 wherever else they may be that are in hard copy?

22 A. I understand that there is a project on foot,
23 I believe that it's led by Corporate Records, to get all
24 the hard-copy documents that are in police area commands
25 into CRRIM so that they're no longer stored at police
26 stations. I'm not aware of whether or not that project
27 involves digitising that material.

28

29 Q. Are you able to express a view as to whether you think
30 it should - that is to say, whether digitising such
31 material would be desirable?

32 A. It would be desirable from the perspective of being
33 able to more readily access that material, but I think
34 there would be a very significant number of factors that
35 would need to be considered about whether or not that could
36 be done, and given I don't have expertise in records
37 management, I'm not really in a position to comment.

38

39 Q. I was going to ask you, but you may have partially
40 answered this in an answer a moment ago, has consideration
41 been given to conducting a comprehensive audit of all
42 possible repositories of documentary records in relation to
43 unsolved homicides?

44 A. As I said, I'm aware that there's - I'm aware at
45 a very high level. I don't have any visibility in detail,
46 but I am aware at a high level that there is a project
47 currently under way to get all the hard-copy records from

1 police stations into Corporate Records.

2

3 Q. And the idea would be, if you were able to tell us,
4 that they would then at least be consolidated all in the
5 one place, as far as it was possible to achieve that; is
6 that --

7 A. In the one place in terms of some of it, I would
8 understand, would be stored - there's different facilities
9 that CRRIM run, so - but it would be all under the control
10 of CRRIM.

11

12 Q. Now, in paragraph 46 you say that your understanding
13 from discussions with the UHT team in preparing this
14 affidavit is that for summons 4, which was August 2022 --

15 A. Mmm-hmm.

16

17 Q. -- and for the summonses issued thereafter, UHT has
18 undertaken searches for the responsive records in the
19 following ways, and then there are eight subparagraphs of
20 different kinds of searches that have been undertaken?

21 A. Yes.

22

23 Q. Now, are you saying that since August 2022, all of
24 these eight different methods have been checked for all
25 summonses from the Special Commission?

26 A. From summons 4.

27

28 Q. Which was August. So are you saying that, from then,
29 all of these eight methods have been done for every
30 summons?

31 A. Yes.

32

33 Q. And did you go back, then, in or after August and redo
34 what had been done hitherto in respect of summonses prior
35 to summons 4?

36 A. So with summonses 1 and 3, the PAC - there was a PAC
37 sweep, which we've referred to in my affidavit.

38

39 Q. A PAC sweep, I gather, means check with all the police
40 stations?

41 A. That's correct. So all the police stations were
42 checked because that had become identified. The other
43 thing that was done was that it was identified that when
44 material had been given to Corporate Records, that the
45 naming conventions were not consistent and were varied, and
46 so further searches were done on different search terms to
47 try and capture - to see if any further records would be

1 picked up by doing broader search terms.

2
3 In terms of summonses 1 and 3, I'd have to seek
4 instructions, for example, in relation to computer systems,
5 as those - I understand those records were historic, and
6 I'm not sure - I don't know whether or not those summonses
7 called for exhibits.

8
9 Q. All right, put exhibits to one side for the moment.
10 But the other - putting exhibits to one side, were these
11 other methods, then, adopted in or after August, back for
12 those that had been previously responded to by means that
13 did not include all of these different checking methods?

14 A. I'm not 100 per cent sure whether or not all of these
15 methods were done. What I have been advised is that all of
16 the searches that were deemed to be appropriate for
17 summonses 1 and 3 - I understand summons 2 was for an
18 appearance, so I exclude summons 2, so talking about
19 summonses 1 and 3, that all the places where it was thought
20 material responsive to the summonses would be located, all
21 of those searches have been done.

22
23 Q. Right. And from an answer you gave earlier, your
24 understanding or recollection is that you think that the
25 Commission was informed in October or some time after
26 October that these further checks and searches were being
27 undertaken?

28 A. I understand the Commission was informed that the PAC
29 sweep was being done, which was going back to the police
30 area commands to do.

31
32 Q. Only that? You think it was just the PAC sweep that
33 the Commission was told about?

34 A. Yes.

35
36 Q. But not all the things that are listed in
37 paragraph 46?

38 A. I do not know whether all of - if the Commission was
39 informed of all of those things.

40
41 Q. All right. In paragraph 49, where you've just been
42 talking in the paragraph before about the PAC sweep, or PAC
43 sweeps - in paragraph 49 you say that Mr Hodgetts and
44 DCI Warren determined that further steps should be taken to
45 ensure that the police had provided a complete set of
46 hard-copy records in response to summonses issued, and then
47 you say that:

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The [police] determined to undertake these steps at its own initiative ...

What do you mean by saying that?

A. That Mr Hodgetts and UHT discovered that there may be material responsive to the summonses 1 and 3 at PACs and therefore they decided to go back through all the schedules, like all the names that are attached to summonses 1 and 3, and go to all the police area commands to ask whether or not there was material - ask them to search whether or not there was material responsive to the summonses there.

Q. Yes, so they were steps they were taking that they realised, by then, were necessary to ensure compliance with the summonses?

A. Correct.

Q. So it's not really right to say that they were doing it at their own initiative, is it? Weren't they doing it in order to comply properly with the summonses?

A. Yes, because - but they identified that that was a step that needed to be taken, and so they did it, because they understood the - they understood their ongoing obligations under the summonses and wanted to provide the Inquiry with all the relevant material.

Q. Okay. And when you say the same thing in paragraph 57, that something was done at the initiative of the police --

A. Yes.

Q. -- you mean that in the same way?

A. Yes. They identified that perhaps there was material responsive to the summonses that could be found by a different method of inquiry, and they realised that that had not been done, so they took those steps because they realised they had an ongoing obligation.

Q. Thank you for that. In paragraph 56 you tell us that Mr Hodgetts became aware of another possible need for further work in April 2023, when Senior Sergeant Coady of FE&TS spoke to him about one particular case, and it was realised that the early summonses, by which I imagine you mean 1 and 3 perhaps --

A. That's correct.

1
2 Q. -- would need to be revisited for that additional or
3 different reason?
4 A. That's correct.
5
6 Q. Now, was the Inquiry told that that realisation had
7 been formed and that this additional work was being done,
8 starting from April?
9 A. I do not know.
10
11 Q. Do you think it should have been told?
12 A. I believe that would have depended on their views on
13 the likelihood of those searches retrieving further
14 information. At a point where it became apparent that
15 those extra searches would retrieve further information,
16 I agree, at that point in time or shortly thereafter, the
17 Inquiry should have been made aware.
18
19 Q. Thank you. Because as I understand it - correct me if
20 I'm wrong - the realisation, and I'm speaking a little
21 broadly, not just about Mr Seymour, was that you get
22 different results depending on what you plug in to the
23 search?
24 A. That's right.
25
26 Q. And that realisation only dawned on people - and I'm
27 not being critical - according to your evidence, in April
28 2023; correct?
29 A. Yes.
30
31 Q. Right, and so that meant, again speaking generally,
32 that the possibility was then live in if not your mind but
33 in the minds of Mr Hodgetts and others that maybe the
34 searches that had been done in any number of cases up to
35 that point may not have been sufficiently comprehensive,
36 because there may be other search terms that really would
37 need to be tried --
38 A. Yes.
39
40 Q. -- to see what else you might turn up; correct?
41 A. Yes.
42
43 Q. And, therefore, the realisation that was being formed
44 was that earlier productions of documents may well not have
45 been complete, because it hadn't, until then, been
46 appreciated that these other possibilities need to be
47 tried?

1 A. Yes.
2
3 Q. So you would agree, wouldn't you, that as at April
4 2023, when at that point the deadline for the Inquiry was
5 30 June, it would have been essential to tell the Inquiry
6 that that possibility existed, wouldn't it?
7 A. I would have thought that that would become essential
8 once they understood that those extra searches were going
9 to retrieve further documents, not necessarily at the point
10 in time that they decided to do the extra searches, because
11 they had - they didn't know whether or not that would
12 return further material.
13
14 Q. They knew that it had had that effect in one case?
15 A. Yes.
16
17 Q. And they, therefore, very reasonably, thought to
18 themselves, well, it might have that effect in other cases.
19 Shouldn't the Inquiry have been told that as at April?
20 A. I believe that they should have told the Inquiry once
21 they formed the view that those extra searches would
22 uncover further information.
23
24 Q. So when it was only a possibility, there was no need
25 to tell the Inquiry?
26 A. I think that's reasonable if they're double-checking
27 things but they have no knowledge that that will in fact
28 produce further material.
29
30 Q. I see. Let me take you to 58 in your affidavit. You
31 refer there to one particular incident where, on 1 June
32 this year, a bit over a month ago, someone at UHT
33 identified some boxes containing hard-copy files in
34 a storage room at the UHT premises --
35 A. Mmm-hmm.
36
37 Q. -- and it turned out that there was material in that,
38 or in those boxes, which needed to be produced?
39 A. Yes.
40
41 Q. Now, you say that DI Warren informed you that he is
42 satisfied that there are no other hard-copy files held by
43 the UHT that have not previously been produced?
44 A. Yes.
45
46 Q. On what basis is he satisfied of that, so far as you
47 know?

- 1 A. I do not know on which basis he has formed that view.
2
- 3 Q. Did you ask him?
4 A. No.
5
- 6 Q. Are we to understand that this particular incident in
7 June, where, at the UHT premises themselves, in a storage
8 room, were boxes containing hard-copy files, that the
9 discovery in that regard just happened by chance?
10 A. I do not know whether that happened by chance or
11 whether they actively looked in that room. I don't know.
12
- 13 Q. And in relation to the PAC sweeps, which refer to the
14 police stations, was the sweep done by sending a letter or
15 email or some communication to police stations saying,
16 "Please check for the following", or did UHT physically go
17 to the police stations and check themselves?
18 A. A communication - I believe it was an email - was sent
19 to the relevant police area commands, to the Commander and
20 I believe it was the staff officer, asking them to search
21 for these documents.
22
- 23 Q. And they were to do, what, just search in any possible
24 cupboard or back room or the like, or what was the nature
25 of the search they were asked to carry out?
26 A. I don't have a copy of the email that was sent to the
27 police area commands, so I can't advise you in particular
28 detail exactly whether it was a general request, "Can you
29 please search your records", or, "Can you please look in X,
30 Y and Z locations."
31
- 32 Q. Thank you. Just a couple of questions about the
33 Parrabell part of your affidavit.
34 A. Yes.
35
- 36 Q. In paragraph 72 you tell us that you were informed by
37 Messrs Grace and Bignell that the Parrabell investigators
38 obtained as much material as possible from sources, and I'm
39 leaving out a few words, but I don't mean you to ignore
40 them - by all means, read the whole thing, but you say
41 "from sources including" those listed in (a) to (e). Do
42 you see that?
43 A. Yes.
44
- 45 Q. Now, are there other sources that, as you understand
46 it, Parrabell sought documents from, or just those five?
47 A. My knowledge is limited to those five.

1
2 Q. Because that's what --
3 A. That's what I've been advised.
4
5 Q. That's what Messrs Grace and Bignell have told you?
6 A. (Witness nods).
7
8 Q. So if they searched - sorry, if Parrabell went further
9 afield than that, you haven't been told that?
10 A. That's right.
11
12 Q. So, earlier in your affidavit, when you talk about the
13 things that are being done now for this Inquiry, at
14 paragraph 46, and you list quite a number of ways of
15 looking for documents, eight in all, some of which have
16 some sub-components --
17 A. Yes.
18
19 Q. -- you don't know - again, this is not said
20 critically - you don't know if Parrabell employed any or
21 all of those?
22 A. No.
23
24 Q. You don't know, for example, whether Parrabell
25 approached police stations or local area commands?
26 A. I do not know.
27
28 Q. Or the DPP?
29 A. I do not know.
30
31 Q. Then I think finally, Ms Marsic, in paragraph 77 -
32 there's a couple of paragraphs I want to take you to, but
33 in paragraph 77 you say that the e@gle.i file for
34 Parrabell, which, as you say, has been provided to the
35 Inquiry - you say it's likely to be a fulsome record of the
36 bulk of the documents, exhibits or other material reviewed
37 by Parrabell that was considered relevant to the Parrabell
38 exercise by investigators?
39 A. Yes.
40
41 Q. Now, when you say it's "likely to be a record of the
42 bulk of the documents", could you help us with what's meant
43 by that?
44 A. What is meant by that is I wasn't part of the
45 Parrabell strike force, and I'm providing advice that
46 I have been given that the officers put the relevant
47 material on e@gle.i.

1
2 Q. You pick up on the word "relevant", which is what
3 I was about to ask you. Do you know what criteria or
4 criterion they used for "relevant"?
5 A. No.
6
7 Q. So it appears - the word "relevant" appears in 77,
8 which I just took you to, in the third-last line, and it
9 also appears, in slightly different form, in paragraph 78,
10 where you say that there is no record of material that was
11 considered but deemed irrelevant?
12 A. That's right.
13
14 Q. And that's, again, what you have been told?
15 A. That's right.
16
17 Q. And then in 84 you say it's impossible to ascertain
18 every single document or other material considered by
19 Parrabell, because no record was kept of material that was
20 not considered relevant?
21 A. That's correct.
22
23 Q. So on the e@gle.i, 22,000-document storage platform,
24 we have, as you understand it, everything that they
25 considered and regarded as relevant?
26 A. Correct.
27
28 Q. But as to what they cast aside as not being relevant,
29 we don't know what that was, and you don't know what that
30 was?
31 A. I do not know what that was.
32
33 Q. And it seems they don't know; is that what we
34 understand from how they've explained it to you?
35 A. I do not know what - I do not know what their
36 knowledge is, but I understand that what is on e@gle.i is
37 what was relevant and that I certainly do not know what was
38 discarded.
39
40 Q. No, but you say in paragraph 84 that no record was
41 kept --
42 A. That's correct.
43
44 Q. -- ie, by them, of what they discarded?
45 A. That's correct.
46
47 MR GRAY: Those are my questions, Commissioner.

1
2 THE COMMISSIONER: Yes, Mr Tedeschi.
3
4 MR TEDESCHI: Commissioner --
5
6 MR GRAY: Sorry, I beg your pardon. I'm sorry. I need to
7 tender Ms Marsic's affidavit, which would be exhibit 58.
8
9 THE COMMISSIONER: Yes, certainly. Thank you.
10
11 **EXHIBIT #58 AFFIDAVIT OF MS MARSIC DATED 26 JUNE 2023**
12 **[SC01.84212_0001]**
13
14 THE COMMISSIONER: Yes.
15
16 MR TEDESCHI: Commissioner, could I have a couple of
17 minutes to consult with Ms Marsic?
18
19 THE COMMISSIONER: Certainly. I will go off the bench for
20 a short time.
21
22 **SHORT ADJOURNMENT**
23
24 MR TEDESCHI: Commissioner, I don't have any questions by
25 way of re-examination of Ms Marsic.
26
27 THE COMMISSIONER: All right.
28
29 MR TEDESCHI: Might I raise another issue, if she could be
30 excused?
31
32 THE COMMISSIONER: Yes, certainly.
33
34 **<THE WITNESS WITHDREW**
35
36 MR TEDESCHI: Commissioner, in the letter from the Inquiry
37 to the police of 29 June 2023, Mr Camporeale raised, at the
38 bottom of the first page, the consideration of an issue
39 noted in relation to the Terms of Reference concerning
40 submissions in relation to questions of procedural fairness
41 of witnesses who haven't been called.
42
43 THE COMMISSIONER: Yes.
44
45 MR TEDESCHI: We're mindful of the fact that we can't do
46 our oral submissions until not only have those submissions
47 been made by both sides but we know what your decision is.

1
2 THE COMMISSIONER: About what?
3
4 MR TEDESCHI: About the question of --
5
6 THE COMMISSIONER: The witnesses?
7
8 MR TEDESCHI: The issue of procedural fairness and whether
9 it is appropriate for the Inquiry to accept suggestions
10 that have been made adverse to people who haven't been
11 called.
12
13 THE COMMISSIONER: Yes.
14
15 MR TEDESCHI: That's an issue on which we wish to be
16 heard --
17
18 THE COMMISSIONER: I understand.
19
20 MR TEDESCHI: -- and we wish to make written submissions,
21 and we need to know your decision before we can do our oral
22 submissions on hearing number 2.
23
24 THE COMMISSIONER: Yes.
25
26 MR TEDESCHI: So I wanted to ask, Commissioner, whether
27 you would like to set a timetable and --
28
29 THE COMMISSIONER: Not at the moment, thank you. I will
30 not proceed with any matter until you are given proper
31 opportunity to be heard on the matter. I have made that
32 clear the other day, but I can reiterate it now. It's
33 under active consideration, for obvious reasons, but all
34 I will tell you is, at the moment, we will let you know
35 promptly and you will be given every opportunity to say
36 whatever it is you want to say about any matter concerning
37 any witness and any finding that might be open to me as
38 a result of submissions that have been already prepared.
39
40 MR TEDESCHI: All right.
41
42 THE COMMISSIONER: And you will be given that opportunity
43 I hope very soon, but there are other matters beyond your
44 client's concern about that that I need to take into
45 account. Be assured, though, it is being given active
46 consideration.
47

1 MR TEDESCHI: All right.

2

3 THE COMMISSIONER: And I'm not going to do anything unless
4 and until you are all given - your side is given
5 a reasonable opportunity to address the question.

6

7 MR TEDESCHI: All right. I would like to be able to make
8 those submissions myself, and I have let my learned friend
9 know that there is a week when I am unavailable, from
10 26 July up to and including 1 August, so I just wanted
11 to --

12

13 THE COMMISSIONER: Well, what I will do is I will take
14 that into account, clearly, and as before and as has been
15 the case to date, I will do everything possible to
16 accommodate your unavailability in that time.

17

18 MR TEDESCHI: Thank you.

19

20 THE COMMISSIONER: There won't be any inconvenience or
21 disadvantage as a result of you being away in that time,
22 but I'm not going to guarantee it, but as has been the case
23 to date, I will take that clearly into account, given the
24 importance of that issue, and I fully appreciate the
25 significance of it.

26

27 MR TEDESCHI: Thank you, Commissioner.

28

29 THE COMMISSIONER: All right. That having been said,
30 I will now adjourn. Thank you.

31

32 **AT 3.33PM THE SPECIAL COMMISSION OF INQUIRY WAS ADJOURNED**
33 **ACCORDINGLY**

34

35

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