ROYAL COMMISSION INQUIRY [LAWYER X, NICOLA GOBBO]

COVER NOTE

To:	Honourable Margaret Anne McMurdo AC				
Title:	Commissioner and Chairperson of the Royal Commission into the				
	'Lawyer X" Inquiry.				
From:	Jan Visser				
At:	Barwon Correctional Centre				
Charges:	Conspiracy to possess a border controlled drug also known as the				
	'tomato tin count'				
Sentence:	11 years with 8 year non-parole period.				
In Custody:	11 August 2012 till 10 August 2020 if parole granted full time				
	expires 10 August 2023.				
Date:	22/02/19				

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- 1. Pre-trial hearing VSC306 p2, 12/12/13 [24-31]
- 2. Victorian Supreme Court Appeal Hearing p83 [3,4] 25/05/15.
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6. 9 Pages of Submissions dated 22/02/2019

7. Questionnaire

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To the Honourable Margaret Anne McMurdo AC.

I wish to make submissions to the Royal Commission into the use of Human Source codenamed 'Lawyer X' Registered informant 3838 also known as *EF* in Court proceedings and true identity Nicola Gobbo [Barrister-at-law]

As Evidence in a Royal Commission is not bound by the strict rules of evidence practices or procedures applicable to Courts. I believe that what I know and what I have personally experienced can both assist the Royal Commission into this Inquiry and myself.

I am an un-represented accused by choice as I have had bad experiences with lawyers both in NSW and Victoria. I have the ability to represent myself in Court which I have proven on numerous occasions in Courts¹ including the Supreme Court in Victoria 2014 and Court of Appeal in Victoria in 2015². Even though I was convicted in VSC and unsuccessful appeal at the VSCA.

This was not due to poor representation of the matters but a corrupt trial.

Factual background

 Early June 2007, Rob Karam was in the middle of a 'Conspiracy to Import' trial in the County Court in Melbourne one of his lawyers assisting him was *Lawyer* X, Nicola Gobbo, Barrister-at-law. Also what Karam believed was that she was

Jan Visser v The Queen [2015] VSCA 168 hearing 25/05/15 Mark Weinberg JA, p83 [3] Crown Desmond Lane p83 [4]

² Jan Visser v The Queen [2015] VSCA 168 judgment 26/06/15

a person he could trust explicit [quantity seized was 1.5 tonne of ecstasy some 5 million pills in 2005]

- 2. Rob Karam was acquitted of that charge on the Indictment in early July 2007.
- 3. Unbeknown to him she [Gobbo] was also a Registered police informant [3838] since 1995 and was passing on all information and incriminating documentation to her Handlers who would pass it on to the Victorian police relevant squads, AFP and Prosecution both state and commonwealth.
- 4. Early June 2007, Rob Karam discussed matters with her inrelation to legal matters and mentioned to her he had a '*Bill of Lading*' to a shipping container 'MEDU 1250218' that was arriving on 28June 2007 in the Port of Melbourne.
- 5. He further discussed Barbaro, Higgs, were involved in taking possession of this container with his help.
- 6. According to the evidence produced at trial the AFP commenced a sting operation from the 13 June 2007 onwards gathering information through surveillance, phone intercepts and further information from Nicola Gobbo
- 7. As Barbaro, Karam and Higgs were exposed as suspects, phone intercepts and surveillance gathered further suspected participants in the matter and placed further phone intercepts on the following people Sam Zirilli, Carmello Falanga, Pat Sergi, Sam Agresta.
- I was living in Melbourne and was contacted on 24th June 2007 to have a meeting with Barbaro and Zirilli on the 27th June 2007 at the Pacific International suite in Melbourne.
- 9. I went to the meeting on 27/06/10, Pasquale Barbaro and Sam Zirilli at the Pacific International Suite in Melbourne on 27/06/07, stated to me [Jan Visser] that they were organizing to pick up a container arriving the following day full of illegal tobacco, worth between \$4 to \$5 million dollars and avoiding 3.5 million dollars in duty fees and requested, if I would be on standby, if required, I said 'Yes'.
- 10. This was the first time that I was seen by AFP surveillance team at the Pacific International suite and became involved what I was told and believed was a container of tobacco [chop/chop].
- **11.** Throughout the whole conspiracy period from 13th June to 3rd October 2007, I was only known as Un-identified Male at an unknown address.
- 12.1 had no surveillance placed on me only when I met Barbaro in Melbourne as

he was under surveillance at all times than when I departed I had no surveillance placed on me.

- 13.28/06/07, shipping container being a 20 foot sea cargo container arrived in Melbourne. This container was then selected for examination by the Australian Customs & Border Protection Service as it was flagged from information given to the AFP from Registered Police Informant Lawyer X, Nicola Gobbo. The examination of the container revealed the presence of MDMA.
- 14.29/7/07, Australian Federal Police (AFP) substituted the drugs in the container, and returned the container to the Melbourne docks for the purpose of a 'controlled delivery' to the intended recipient. This container was not picked up by the recipient.
- **15.**2/7/07 till 5/7/07, I was in a Hotel room which had been fitted with a AFP listening device and as a result recorded incriminating conversations that (8) suspects were organizing to pick up this *container no mention what was in the container by anybody just that a container was at the docks.*

[As can be noted and confirmed at the evidence at trial ³]

16. Prosecutor: 'There is no reference to tobacco, is that so?'

17. Visser: 'Not that I can recall'.

- Prosecutor: 'Or cigarettes, apart from, "I am going to go out and have a smoke"; correct?'
- 19. Visser: 'Correct'.
- **20. Prosecutor:** 'And you know that there is also no specific reference to ecstasy tablets, too, don't you?'
- 21. Visser: 'That's correct'
- **22.** On 4th July 2007 it became known to all involved that the container had been flagged and not to try and obtain the container as it was under 24 hour surveillance by AFP.
- **23.1** left the room the following morning [05/06/07] just after 07:00hrs and went back home, that was my involvement in the matter.
- 24. According to the evidence produced at trial Barbaro and Zirilli stayed in Melbourne until 11/06/07 until it was100% confirmed that the container was flagged ⁴ [Falanga under cross-examination]

³ Falanga & Visser [2014] VSC 306, 19/03/14, TT 1612-3

^{*} Falanga & Visser [2014] VSC 306, 06/03/14, TT1069-70 text message 1120.

25.Barbaro texted Falanga with the message, "You there? I just finished and they tell me that she died yesterday".

Prosecutor: "First of all, what did you understand to mean by "she died yesterday"? **Falanga:** That getting the container was no longer an option.

- 26. Pat Barbaro, Rob Karam, John Higgs, Sam Zirilli, Carmello Falanga, Pat Sergi and Sam Agresta were all arrested on 08/08/08 some 14 months later on *Justice Betty King's* who took control of all the trials in the tomato tin count.
- 27.08/08/08, Lawyer X, Nicola Gobbo was employed by Barbaro and Karam, unbeknown to them she was the Registered Police informant to be legal counsel for them, as Karam had told Barbaro she can be trusted 100% and tell her everything about the whole matter so she can work out the best defence for us.
- **28.** Barbaro and Karam poured their hearts out to Gobbo who asked both men to tell her everything especially stuff that was not in the brief and not known by the AFP, she told them the more information I have the better I can defend you.
- **29.** Little did they both know everything that they told her was given to the AFP and the CDPP.
- **30.** I was arrested on 11/08/12, the evidence relied upon for a conviction against me is the conversations that took place in the room # 609 at the Pacific International Suite in Melbourne between 2-5 July 2007, and some post conspiracy conduct.
- **31.** Drugs were never mentioned **[T1612-3]** The discussions were related to an illegal container of the value of \$4-5 million dollars no mention of the content anywhere in evidence in regards me. ⁵

Visser: 'You know much is involved in it don't you?

Sergi: 'how much do you reckon?'

Visser: 'for that sort of money, I'd ah (clattering sound) ten per cent of that'

Sergi: '(indistinct) don't leave it in here (indistinct)

Visser: 'No, ten percent of that, right, ten per cent of that is that much, okay for that sort of money I fuckin might get half a mill"

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⁵ *Falanga & Visser* [2014] VSC 306, Jury book 1 p283-4, surveillance device transcript, date 02/07/07, room 609 Pacific International Hotel, Melbourne.

Further at trial in 'evidence-in-chief' ⁶ and cross-examined by the trial judge Betty King

Betty King: [26] 'Is there anything you want to say about that?'

Visser: 'Okay. What I'm saying the value of the container, if I was doing what I said on the previous page, if I was involved with that, stealing and taking it to a warehouse and driving the semi, I would want 10% of the value of the content. That's what I'm staying there.'

Betty King: [14] 'No, no, not figures. You are just saying 10% of that, right, 10% of that is what do you mean by that?

Visser: '10% of the value of the container,

Betty King: 'Right, you belief of the value of the container?'

Visser: 'My belief of the value of the container is 4 to 5 million?'

Betty King: [31] 'That's for the driver?' if you were?

Visser: 'No. If I was the driver and if I was taking this – hypothetically speaking if they wanted me to do this I would want 10% Of the value of the container which is, I belief, half a million dollars because the container is worth between 4 to 5 million tops.'

A 20ft sea container full of raw tobacco is 12.5 tonne, the duty [excise] tax is \$3.8million @ \$304.3/kg.[In 2007] i.e. that the container would be worth around \$4-5 million.

There was a detection of [45] illegal tobacco and cigarettes sea containers recorded in 2007 at Australian sea ports.

The contents of 15million ecstasy pills in the container was valued at \$450 million ⁷street price and \$150 million wholesale mean average of \$300 million.

Which is a far cry from the \$5 million figure mentioned in the crown's own evidence from the listening device installed at the Pacific International room #605 between 2nd and 5th July 2007, [speaker Visser and Sergi]

⁶ Falanga & Visser [2014] VSC 306, 18/03/14 TT1505-7

⁷ Falanga & Visser [2014] VSC 306, 26/02/14 TT 800, AFP Erdmann

- **32.** I requested full disclosure but was not given full disclosure of the evidence and how it was obtained especially that Nicola Gobbo was the police informant in the matter and the CDPP was being assisted by Defence counsel Nicola Gobbo.
- 33. That would make the matter a malicious prosecution as the CDPP had knowledge that the evidence was illegally obtained through Police informant Nicola Gobbo.
- **34.** Or at it least that the evidence was illegally obtained through Police informant Nicola Gobbo.
- 2011,Gobbo raised her complaints of her safety at a meeting with Sen/Sgt Buick and Commonwealth Director of Public Prosecutions.(CDPP) ⁸
- 36. Prior to the commencement of the trial in 2014. At Pre-trial hearing 12/12/13 ⁹ Crown: "We would accept a plea of guilty to the charge of aid and abet and attempt to possess. So not the charge of conspiracy and attempt to possess a commercial quantity"<u>If</u> I was prepared to plead guilty to attempt to possess marketable quantity (less than 500grms) I would have been released years ago but I was not prepared to plead guilty to a crime I did not commit.



- **38.** At trial I was unrepresented and cross-examined by the **Justice Betty King** 533 questions!
- **39.1** had a joint trial with Carmelo Falanga in 2014 and we were both found guilty after a two months trial and 7 days jury deliberation.
- 40. VSCA, Appeal hearing 25/05/15 and 26/06/15, application dismissed.
- **41.** In September 2016 some 2½ years after the trial and after VSCA appeal in June 2015, Both Barbaro and Zirilli on advice from their Legal team were than

⁸ Sunday Herald Sun 17Feb 2019 p7 by Patrick Carlyon and Anthony Dowsley.

⁹ Pre-trial hearing 12/12/13 VSC306 p2

prepared to sign an affidavit ¹² and prepared to give evidence in support of the defence in relation to the chop/chop [tobacco] defence. [affidavit(s) supplied] **42.1** was unrepresented by choice at the trial and appeal hearing.

CONCLUSION;

The 'the bill of lading' of container MEDU 1250218' was the crucial beginning of the investigation and the names of Barbaro, Karam and Higgs as suspects given by Lawyer X, police informant Nicola Gobbo approximately 3 weeks before the arrival of the sea container in Melbourne to AFP.

- Commenced an investigation inrelation of container 'MEDU 1250218' around 13th June 2007 till arrest 8th August 2008 of 7 persons for 'the tomato tin count'
- Requested and received a warrant for phone intercepts for 3 named persons that Gobbo supplied which are as follows;
 Robbie Karam; John Higgs; Pat Barbaro; during those phone intercepts Sam Zirilli, Pat Sergi; Sam Agresta and Carmello Falanga were known to have communicated to the others either directly or indirectly and also became subject to the telephone intercepts.
- A warrant for listening devices were also applied for and granted and according to the evidence commenced on the arrival of the container on 28th June 2007 in Melbourne.
- 4. Physical surveillance commenced on 13th June 2007 on all 8 suspects.

Than after arrest:

5. Lawyer X, Nicola Gobbo became Barbaro and Karam's defence lawyer and as stated previous she was trusted and they gave her confidential information about *everything* in connection with the whole matter which was all passed on to the AFP and the (Cth) DPP.

¹² Affidavit(s) from Barbaro and Zirilli dated 19September, 2016.

- The evidence presented at the trial(s) some was illegally obtained or at the least compromised/corrupt and tainted as the prosecution continually was assisted by the defence lawyer, Lawyer X.
- Lawyer X, ¹³2010 Received a compensation payout of \$2.9 million from Victorian Police for giving information as an informant for many years.
- 2010 Victoria Police paid for interstate and Bali trips, paid for her Victorian Racing Club membership and tickets to the 'Pink' concert.
- 9. 2011 received a summons to give evidence against alleged corrupt police officer Paul Dale than wrote a letter to Senior Sergeant Boris Buick stating of her concerns of her safety and lack of confidentiality about her being a Registered Informant. This letter was written weeks before Paul Dale was to face charges of lying to the Australian Crimes Commission as Gobbo was the key witness in the case.
- 10.2011, Three months earlier Gobbo raised her complaints of her safety at a meeting with Sen/Sgt Buick and Commonwealth Director of Public Prosecutions.(CDPP)
- 11. That would make the matter a malicious prosecution as the CDPP had knowledge that the evidence was illegally obtained through Police informant Nicola Gobbo.
- 12. Or at it least that the evidence was illegally obtained through Police informant Nicola Gobbo.
- 13. The Commonwealth Director of Public Prosecutions was handling the 'tomato tin count' and that being the case the trial(s) that followed in 2012 and 2014 were corrupt and it was known by the CDPP that the Police Informant was a defence barrister Lawyer X, and had been involved 3 weeks before the actual container arrived in Melbourne and passing on all information gathered from her clients Barbaro and Karam after arrest.
- 14. And the High Court of Australia ¹⁴ 'Lawyer X's actions in purporting to act as counsel for the Convicted Persons while covertly informing against them were fundamental and appalling breaches of Lawyer X's obligations as counsel to her clients and of Lawyer X's duties to the Court'. Likewise, 'Victoria Police were guilty of reprehensible conduct in knowing encouraging Lawyer X to do

¹³ Sunday Herald Sun 17Feb 2019 p7 by Patrick Carlyon and Anthony Dowsley.

¹⁴ AB v CD and EF v CD HCA 58 [2018]

as she did and were involved in sanctioning atrocious breaches of the sworn duty of every police officer to discharge all duties imposed on them faithfully and according to law without favour or affection, malice or ill-will. As a result the prosecution of each convicted person was corrupted in a manner which debased [violated] fundamental premises of the criminal justice system'.... The propriety of each convicted person's conviction be *re-examined* in light of the information.'

- 15. Here the agency of police informer has been so abused as to corrupt the Criminal Justice System, there arises a greater public interest in disclosure to which the public interest in informer anonymity must yield.
- 16. This police malpractice constitutes a mis-carriage of justice the way the evidence and information was obtained and is un-precedented.
- 17.1

RECOMMENDATIONS SOUGHT

- 1. That the matter should be sent back to the Victorian Supreme Court of Appeal for a re-hearing or be *re-examined* in light of the information.
- And not have to go through Royal Prerogative of Mercy as the waiting time for Royal Prerogative of Mercy on Commonwealth matters is between 2.5 to 3 years on an average.
- 3. This is an exceptional case, where serious error is brought to light which concerns a 'manifest mis-carriage of justice'

Yours truly, Jar Visser 22/02/2019.

This document has been redacted for Public Interest Immunity claims made by Victoria Police. These claims are not yet resolved. 1 one way or the other, Mr Visser, what you do.

> Except, I need to tell you all of these things because you don't have a lawyer, but to get the full benefit of a plea, you need to do it sooner rather than later, because I am going to arrange for a very large jury panel to come in February, because of the estimated duration of this trial and this is about - there are two aspects to a plea of guilty:

9 (1) It can demonstrate remorse or contrition, and 10 the other is the cost saving to the community in terms of 11 time and money, so both of those factors can have an 12 impact and the earlier it is done, the higher the impact. 13 All right, do you follow that.

14 ACCUSED: Yes, Your Honour. The quicker it's done, the bigger 15 the discount.

HER HONOUR: Basically yes. Now I indicated to you that on the ____ 16 17 last occasion that the Commonwealth would probably not 18 negotiate with you in terms of charges. I honestly don't know that, and I thought perhaps it was foolish of me to 19 <u>_</u>0 say dismiss that, and I thought I would ask Mr Young 1 whether it is something that the Commonwealth would be 22 prepared to negotiate about, and ask him in open court, 23 all right. Mr Young, what is the situation. 24 MR YOUNG: Your Honour, the situation with Mr Visser is the 25 same as applied with Mr Sergi - Pasquale Sergi - of 26 Griffith. "The prosecution position is that we say that . 27 the count, as presented, is appropriate, but we would 28 accept a plea of guilty to the charge of aid and abet and 29 attempt to possess. 30 aid and abet and attempt to possess a commercial f 31 quantity ...

.CK:SC 12/12/13 SC2A 2 DISCUSSION Visser

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This document has 1	been redacted for Public Interest Immunity claims made by Victoria Police. These claims are not yet resolved. aware of his rights in a way that was greater than many
2	people would have if they were in his position.
3	WEINBERG JA: He's not a bad advocate, either.
4	MR LANE: And not a bad advocate either, no, your Honour. Let
5	me see if there's anything else I need to say about
6	Ground 4. If the Court would excuse me.
7	I move to Ground 1.
8	WEINBERG JA: You can do grounds 1 and 7 together, I think.
9	MR LANE: Yes. One is the judge and one is the prosecutor. In
10	my submission, none of the passages that Mr Visser has
11	referred to show - establish his ground that he was the
12	victim of an overly zealous prosecutor and an unfair
13	judge who cut him off
14	WEINBERG JA: Her Honour did cut him off on a number of
15	occasions.
16	MR LANE: Or cut him off improperly, I should say. Her Honour
17	was confronted with the problem of Mr Visser referring to
18	- really, appearing to give evidence in the course of his
19	address and
20	WEINBERG JA: The question to us is on a number of occasions
- 31	her Honour was just wrong. He wasn't adding anything to
22	what he'd previously said in evidence or would have been
23	given in evidence but her Honour peremptorily assumed,
24	from a mistake on her part, that this was new material.
. 25	He's taken us to a few examples of that.
26	MR LANE: There were some where, perhaps, it could be said that
27	the evidence did support Mr Visser's submission. But
. 28	reading the whole thing in context, in my submission, you
29	read the way the address proceeded, her Honour was quite
30	fair overall, in my submission, to Mr Visser and did not
31	prevent him from presenting his case in an appropriate
	.DT:CAT 25/05/15 GREEN 83 DISCUSSION Visser

AFFIDAVIT

I, Saverio Zirilli of Barwon Correctional Centre, 1140 Bacchus Marsh Road, Lara, Victoria,

Make oath and say as follows:

- 1. I make this affidavit from my own knowledge unless otherwise stated.
- 2. I am 59 years old.
- 3. In August, 2008, I was arrested and charged with;
- 4. (1) Conspiracy to import commercial quantity of MDMA later changed to Conspiracy to traffick .[known as the tomato tin count] (2) Traffick commercial quantity MDMA, (3) Aid and abet to possess commercial quantity Cocaine
- 5. On 23rd February, 2012, I was sentenced to 26 years with a minimum term of 18 years non-parole period for those offences.
- 6. In August 2012, some 6 months later, I was informed that Jan (John) Visser) was charged with Conspiracy to possess a border controlled drug in commercial quantity.[known as the tomato tin count]
- 7. On 27th June 2007, Pasquale Barbaro and myself were at the Pacific International Suite in Melbourne sometime in the morning Jan (John) Visser around 9am there was a knock on the door and John Visser was there, Pat let him in and there was some general conversation. I had not seen John for about 18 months last time I saw him was at the Sheridan in Sydney.
- 8. There was a conversation about a shipping container arriving the following day full of chop/chop (raw tobacco) worth around 4 to 5 million and John was asked could he be on standby in case we needed some help, he replied Yes.
- 9. John was with us most of the day then he left late that afternoon.
- 10. Then between 2nd July 2007 and 5th July 2007 I was with John and others at the Pacific International Suite in Melbourne and discussions took place about gaining access to that container.
- 11. However by the 4th July 2007 it became clear that the container had been flagged and seized by AFP. The container had been seized by Customs and AFP on 28th June 2007 and the content had been removed and substituted and returned to the docks, the container was never picked up.

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- 12. I can't recall much more detail than that as it was 9 years ago.
- 13. I never stated to Jan (John) Visser that the container content was drugs nor did I hear Pat Barbaro mention that the container content was drugs to John.
- 14. I was asked to give evidence at Jan (John) Visser's trial in early 2014.

- 15. I had spoken to my legal counsel, Peno Acquaro and he advised me to decline to be a defence witness for Jan (John) Visser. (and gave his reasons)
- 16. On 9th April 2014, Jan (John) Visser was found guilty in the Melbourne Supreme Court in relation to that matter.

Affirmed/Sworn by Saverio Zirilli At Lara in the State of Victoria This 19th day of September, 2016

BEFORE ME:

Helen Jongs Executive Officer HM Prisco: Barwon Presented public service officer entent in the Evidence Act 1908

State of Victoria

<u>AFFIDAVIT</u>

I, Pasquale Barbaro of Barwon Correctional Centre, 1140 Bacchus Marsh Road, Lara, Victoria,

Make oath and say as follows:

- 1. I make this affidavit from my own knowledge unless otherwise stated.
- 2. I am 54 years old.
- 3. In August, 2008, I was arrested and charged with;
- 4. (1) Conspiracy to import commercial quantity of MDMA later changed to Conspiracy to traffick (2) Traffick commercial quantity MDMA, (3) Attempt to possess commercial quantity Cocaine
- 5. On 23rd February, 2012, I was sentenced to Life imprisonment with a minimum term of 30 years non-parole period for those offences.
- 6. In August 2012, some 6 months later, I was informed that Jan (John) Visser) was charged with Conspiracy to possess a border controlled drug in commercial quantity.[known as the tomato tin count]
- 7. I wrote a letter to Jan (John) Visser on 20/11/2013 stating "Mate I really don't know why they charged you as you only said some things only to join the conversations and you never knew what was in the box anyway"
- 8. The 'box' meaning container 'MEDU1250218' that arrived on 28th June 2007 in Melbourne.
- 9. Now produced and shown to me and marked Exhibit 'A' is a true copy of the letter I send to Jan (John) Visser on 20/11/2013.
- 10. I never stated to Jan (John) Visser that the container content was drugs.
- 11. The container had been seized by Customs and AFP on 28th June 2007 and the content had been removed and substituted and returned to the docks, the container was never picked up.
- 12. The true content and the amount of the container was not known to me till I went to Italy 21 July 2007 and returned to Australia 16th August 2007.

13. On 4th March, 2014, I had a video link with Jan (John) Visser between Barwon Prison and Metropolitan Remand Centre.

- 14. This was the first time I had spoken to Jan (John) Visser since late 2007 and he asked me to be a defence witness for him at the 2014 trial.
- 15. I had spoken to my legal counsel, Theo Magazis and he advised me to decline to be a defence witness for Jan (John) Visser. (and gave his reasons)
- 16. I told Jan (John) Visser on advice from my legal counsel I decline to give evidence at his trial in 2014.
- 17. However on 9th April 2014, Jan (John) Visser was found guilty in the Melbourne Supreme Court in relation to that matter.

Affirmed/Sworn by Pasquale Barbaro At Lara in the State of Victoria This 9 day of September, 2016

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BEFORE ME:

Holen Jones Enscutive Officer Hill Prison Banyon Prescribed public service officer Prescribed public service Act 1968

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ROYAL COMMISSION INQUIRY [LAWYER X, NICOLA GOBBO]

There are some questions I would like put to Nicola Gobbo which will assist the Royal Commission and myself when the Commission questions Nicola Gobbo.

Questionnaire

- In early June 2007 under what circumstances did Nicola Gobbo receive the Bill of Lading for 'MEDU 1250218' which was the Bill of Lading for the tomato tin count?
- 2. Which police officer did she give the *Bill of Lading* to?
- 3. The information she gathered in relation to the tomato tin count from Barbaro and Karam which police officer did she pass that information to.
- 4. 2011,Nicola Gobbo raised her complaints of her safety at a meeting with Sen/Sgt Buick and Commonwealth Director of Public Prosecutions.(CDPP)⁻¹ What was <u>name</u> of the Commonwealth Director of Public Prosecutions at that meeting?
- 5. Did she also communicate with the Commonwealth Director of Public Prosecutions about the tomato tin count directly.
- 6. What other information had Nicola Gobbo passed onto Commonwealth Director of Public Prosecutions?
- 7. Did Nicola Gobbo ever discuss the tomato tin count matter with Brent Young CDPP directly who was the prosecutor in the two trials for the tomato tin counts?
- 8. Did Nicola Gobbo ever discuss the tomato tin count matter with Brent Young CDPP instructing solicitors?
- 9. Did Nicola Gobbo ever discuss the tomato tin count matter with Trial Judge Betty King?

¹ Sunday Herald Sun 17Feb 2019 p7 by Patrick Carlyon and Anthony Dowsley.