

QCPCI 3 (e)

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6 February 2013

Mr Michael Copley SC
BY EMAIL

Dear Michael

RE: APPLICATION FOR ADDITIONAL WITNESSES PERTAINING TO TERM OF REFERENCE 3(e)

On 1 February 2013 you issued an invitation to parties at the Bar Table to provide to you a list of relevant witnesses that we believe should be called and reasons substantiating that request.

Accordingly we submit that the following persons should be called:

Goss Cabinet members:

The Hon Wayne Keith Goss, as former Premier, Minister for Trade and Economics and Minister for the Arts;

The Hon Keith Ernest De Lacy, as former Treasurer;

The Hon Terence Michael Mackenroth, as former Minister for Police and Emergency Services;

The Hon David John Hamill, as former Minister for Transport and Main Roads;

The Hon Robert James Gibbs, as former Minister for Tourism, Sport and Racing;

The Hon Paul Joseph Braddy, as former Minister for Education;

The Hon Dean McMillan Wells, as former Attorney General;

The Hon Neville George Warburton, as former Minister for Employment, Training and Industrial Relations;

The Hon Kenneth Victor McElligott, as former Minister for Health;

The Hon Geoffrey Norman Smith, as former Minister for Business and Industry Regional Development;

The Hon Glen Richard Milliner, as former Minister for Justice, Corrective Services and Consumer Affairs.

The relevant areas to be covered are, we submit, are their state of knowledge concerning:

- a. the content of the Heiner documents at the time of the discussions before cabinet and subsequently;
- b) the contents of the Cabinet Submissions (Exhibits 151, 168 and 181) and cabinet discussions; and
- c) the reasons for the request for further submissions on the topic of the destruction.

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The Hon Kevin Rudd

Mr Rudd, was as we understand the position, the most senior public servant in the Cabinet office at the relevant time in respect of any relevant conversations held pertaining to this issue and his state of and knowledge and actions pertaining to Exhibits 293, 151, 168 and 181 and associated evidence.

Ms Norma Jones (Principal Adviser to the Hon Ann Warner, Minister for Family Services and Aboriginal and Islander Affairs)

In respect of her state of knowledge and actions pertaining to Exhibits 293, 151, 168 and 181 and associated evidence.

Ms Diane Fingleton

In respect of her state of knowledge and actions pertaining to this issue given exhibit 171.

The Hon Craig Sherrin (former Minister for Family Services); and
Mr Frank Jackson, Media Adviser

In respect of their state of knowledge and actions pertaining to Media Release 17 March 1989 regarding the Harding Incident (See Exhibit 251 and associated evidence):

The Commission has heard evidence from a number of witnesses regarding investigations being made in relation to this matter by a former journalist, Bruce Grundy. We understand that the Commission has issued a subpoena upon Mr Grundy for the delivery of any relevant material that he had in his possession relating to Term of reference 3(e).

Mr Grundy is a person who may be able to provide information to the Commission to assist in the Inquiry. We cannot comment on whether there is any direct evidence he can provide or whether any information he has would meet the test of relevance. We respectfully suggest that it may assist if a statement is taken from Mr Grundy by police assisting the Inquiry to determine the above.

In relation to other documentation we are of the understanding that any and all relevant documentation still in the possession of 'Government' has been located and provided to the Commissioner by way of exhibit.

We do request that if Counsel Assisting is in possession of the relevant materials supplied to the Forde Inquiry during the course of that process, and its transcripts, that we be provided copies, or allowed access to same, to establish if there is anything contained in that material that we believe should be tendered before this inquiry.

Similarly, the CJC conducted an examination of this mater and if Counsel Assisting is in possession of the relevant materials accumulated during the course of that process, and any transcripts, that we be provided copies, or allowed access to same, to establish if there is anything contained in that material that we believe should be tendered before this inquiry.

Yours faithfully,



Michael Bosscher

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