

[REDACTED]

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Lewis Holdway

L A W Y E R S

Our Ref: RCB:TC:16204

2 April 2007

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- 3 APR 2007
COPY
BY:.....

Mr Peter O'Callaghan
Independent Commissioner
Archdiocese of Melbourne
C/- Foley's List
DX 92
MELBOURNE

Dear Sir

Complaint against Father Paul Pavlou

We refer to the above matter and advise that we act on behalf of [BTJ] in her own capacity and as Guardian of [BTK] in regard to their complaints of clergy sexual misconduct against Father Paul Pavlou.

We were contacted by our client on 28 March 2007 and have been instructed that our client has now become aware of a number of rumours circulating in the Healesville parish in relation to further misconduct by Father Paul Pavlou.

We write to draw this to your attention, and to request that you exercise your discretion to ensure that these rumours are investigated immediately and dealt with in a manner which protects the safety and integrity of our client.

We are instructed that in recent weeks, Father Pavlou has been contacting a number of Healesville parishioners directly by phone to discuss his recent departure from the Parish. It is our understanding that in these discussions Father Pavlou has made defamatory and misleading comments about Mrs [BTJ] and her son [BTK].


We are further instructed that Maria Kirkwood of the Catholic Education Office has recently visited the Healesville parish to conduct a meeting to inform parishioners as to the reasons for Father Pavlou's departure but that this meeting was not well attended and no [REDACTED] family members were advised of it.

In addition, we are further instructed that Father Pavlou recently arranged a meeting with three Healesville parishioners; [REDACTED] Tony Snell and Laurie Field, at Lilydale Lake to enlist their support for his position. Father Pavlou allegedly asked each of these parishioners to sign affidavits in support of him, which discredit our client,

[BTJ]

We and our clients are seriously concerned at the content of these rumours, and request that you immediately investigate to establish whether there is any veracity behind the allegations and advise the outcome of your investigations to us and whether Father

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Pavlou is in breach of conditions imposed upon him by the Archbishop upon his removal as Parish Priest.

We note that our client has been asked to remain silent in relation to her complaint against Father Pavlou, and not to discuss Father Pavlou's behaviour toward herself and BTK with any other parishioners in Healesville. To date, our client has abided by this.

Our client is therefore highly concerned to learn that either similar constraints have not been placed on Father Pavlou, who apparently has been free to conduct discussions with Healesville parishioners regarding her family and specifically her son BTK, or he is breaching constraints placed.

We request that if any of these allegations prove to be factual, that you take immediate responsibility to ensure that the behaviour of Father Pavlou is contained. We further suggest that he be monitored and supervised to ensure that our client, her family and the wider parish at Healesville are protected from any further emotional and psychological damage.

In our view Father Pavlou should be prohibited from any discussions with his ex-parishioners in Healesville, and certainly from any further contact with Mrs BTJ and members of her family.

We would appreciate your prompt attention to this matter, and a response to us, so that we can further update our client.

If you have any queries, please contact Paul Holdway or Ruth Baker of our office.

Yours faithfully



LEWIS HOLDWAY LAWYERS
per Ruth Baker

cc Archbishop Denis Hart
cc Les Tomlinson, Vicar-General
cc Maria Kirkwood