



TURNBULL HILL LAWYERS

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13 August 2010

Mr Michael Elliott  
Professional Standards  
Anglican Diocese of Newcastle  
PO Box 494  
NEWCASTLE NSW 2300

Dear Mr Elliott

Reverend Graeme Lawrence – Professional Standards Enquiry

As you know we act for the abovenamed Reverend Graeme Lawrence whose instructions in response to your correspondence of 11 August 2010 are set out below:

*Specific response to allegations*

Our client denies each and every one of the allegations set out in your letter. Specifically:

- i) he denies absolutely the allegation set out in paragraph 1 of your Statement of Allegations;
- ii) he denies the allegations set out in paragraph 2 of your Statement of Allegations;
- iii) he denies the allegations in paragraph 3 of your Statement of Allegations and says that from at least May of 1984 he was not living in the Griffith area;
- iv) he denies that he attended a clergy function in Narrandera and says that by the time the Anglican Synod (which is the clergy function to which you refer) was held, he had left the Griffith area and taken up a position as Dean of Newcastle. He further says that his enquiries of the Riverina Diocese which retains records of the attendees at that function, confirm that he was not there;



- v) it is a nonsense to suggest that in 1984 our client was guilty of failure to comply with the requirements of a Code of Conduct which was not promulgated until the year 2005. If by that allegation you intended to convey that our client is accused of having failed under some general duty of law to bring to notice the alleged misconduct of the people named in the allegation, then that allegation is also denied.

As to the substance of these allegations, we note that they broadly repeat the allegations put to our client by Detective Constable REDACTED at an interview at Newcastle Police Station on 19 February 2010. Your version of the allegations has been amended by changing the dates in an effort to accommodate the alibi which our client provided in relation to the later dates. We also note that these allegations have been dismissed by the Police as unworthy of prosecution because they cannot be sustained. A proper examination of the matter by you ought to have led you to the same conclusion. Unfortunately, it seems that that is not so.

*Response generally*

We note that in your letter under reply you invoke the provisions of Section 34 of the Anglican Diocese of Newcastle Professional Standards Ordinance to require our client to provide his initial response to these allegations by not later than 4.00pm on 19 August 2010. You should regard this letter as a complete response because no further response will be forthcoming.

Having regard to the manner in which the Professional Standards Committee carried out a recent investigation in another matter and the disgraceful aftermath of those proceedings, our client will not be interviewed by Mr Hodgson or anyone else sent on behalf of the Professional Standards Committee which has shown itself to be a completely disreputable body unworthy of the trust which has thus far been reposed in it.

In the context of recent events, there is no basis for any confidence that you have the capacity to undertake an impartial investigation and your suggestion of what would be "highly inappropriate" is frankly offensive. We give you no undertaking whatever that we will not contact Messrs CKH or CKO or anyone else if it becomes necessary for us to do so in the interests of obtaining a just and equitable outcome for our client.

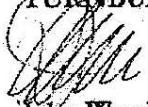
We note that, despite your cynical appeals to confidentiality and labelling of correspondence with the word "Confidential" you have nevertheless allowed notice of this complaint to find its way to the Australian Broadcasting Commission whose news website reported the fact of the complaint and our client's identity under cover

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of an article headed "*High Ranking Anglican in Church Sex Investigation*" on 4 December 2009. As at the time of dictating this letter that article remains on the ABC website. We require that you have it removed. If you do not, we will publish details of the matter sufficient to correct the record.

Finally, we note that, contrary to our previous directions to you and your acknowledgement of 10 November 2009 that, "*...as requested I will ensure all future correspondence relating to this matter is passed through your office...*" you have persisted in corresponding directly with our client. In future, please refrain from doing so. Any further correspondence you wish to direct to our client should be directed to this office.

Yours faithfully  
**TURNBULL HILL LAWYERS**



**John Woodward**  
**Accredited Specialist (Advocacy)**  
**Partner**

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