

AIL

and ORS v STATE OF NEW SOUTH WALESSUBPOENA FOR PRODUCTION

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TO THE DEFENDANT

Copies of all correspondence, notes, memoranda, drafts, files, statements, documents, writing and electronic, audio or visual records in relation to:

1. The Plaintiffs.
2. All policies, guidelines, rules, directives and plans of the New South Wales Government, its departments, agents and representatives (including, but not limited to, the Department of Community Services and the Department of Youth and Community Services) in respect of:
  - (a) The admission and care of children at the Bethcar Children's Home at Brewarrina ("Bethcar") and at Anson Street, Orange ("Anson Street") in the State of New South Wales for the period from 1965 to 1990 (inclusive).
  - (b) The placement of children in foster homes, state or other live-in care for the period 1965 – 1990 (inclusive).
  - (c) The monitoring, inspection, regulation and review of Bethcar, Anson Street and other foster homes or live-in child care facilities in NSW.

- (d) The investigation, review and checks made in respect of people providing care at Bethcar, Anson Street and other live-in foster care facilities in NSW.
3. The selection, recruitment, employment or engagement of personnel at Bethcar or Anson Street for the period prior to 1990 (inclusive) including but not limited to, Bert Gordon, Edith Gordon, AIT [REDACTED] and Colin Gibson.
  4. The assessment of children for admission to Bethcar and Anson Street for the period from 1965 – 1990 (inclusive).
  5. The assessment, review and monitoring of children during their stay and when discharged from Bethcar and Anson Street for the period 1965 – 1990 (inclusive).
  6. The names of all people working, administering care or providing services at Bethcar and Anson Street for the period 1965 – 1990 (inclusive) and details of any payments made or allowances afforded to such people.
  7. Any complaints, enquiries, investigations or action taken or proposed in respect of the assault, mistreatment or concerns as to the well being of any children staying or attending Bethcar or Anson Street during the period 1965 – 1990 (inclusive).
  8. The inspection, review and monitoring of operations at Bethcar and Anson Street during the period from 1965 – 1990 (inclusive).
  9. The background criminal, social and psychological checks made in respect of Bert Gordon, Edith Gordon, AIT [REDACTED] and Colin Gibson.
  10. Any assessment, monitoring and review of Bert Gordon, Edith Gordon, AIT [REDACTED] AIT [REDACTED] and Colin Gibson during the period prior to 1990.

11. The criminal history of Bert Gordon, Edith Gordon, AIT [REDACTED] and Colin Gibson.
12. The Defendant's relationship with Bethcar, Anson Street, Bert Gordon, Edith Gordon, AIT [REDACTED] and Colin Gibson including any lease or contractual relationships.
13. Meetings between the Department of Community Services, Department of Youth and Community Services or any other representative of the Defendant and Bert Gordon, Edith Gordon, AIT [REDACTED] and Colin Gibson including, but not limited to, meetings with Bert Gordon at the home of Mr REDACTED at Billygoat Bend near Brewarrina, which took place in or around mid 1970.
14. All financial records showing or tending to show remuneration, allowances, grants or payments made to or for Bethcar, Anson Street, Bert Gordon, Edith Gordon, AIT [REDACTED] and Colin Gibson during the period from 1965 – 1990 (inclusive).
15. All material provided to the NSW Police, Department of Public Prosecutions or other body in relation to the trial of Colin Gibson, including but not limited to the file known as the "Bethcar File" from the Department of Community Services for the period prior to 1990.