

Papakonstantinou, Helen (AGD)

From: Papakonstantinou, Helen (AGD)
Sent: Tuesday, 2 November 2010 10:25 AM
To: Millman, Dean (SAPOL)
Cc: Campbell, George (SAPOL); SAPOL:State Committal & Disclosure Section
Subject: CDF

Hi Dean,

CDF

AP: 11/W61626
CBMC

First declarations Date 7th of December 2010 at 11:30am

I am the committal solicitor with conduct of this matter.

****Please note this is a State Committal and Disclosure Section matter****

All declarations must be submitted to the **SCDS in Adelaide** in accordance with **their timelines**. All communications regarding declarations in this matter should be forwarded to me **and** George CAMPBELL, and **not** the declarations officers at South Coast LSA CJS.

If you have already submitted decs, thank you.

On my reading of the AP, the following decs are expected in this matter:

- CDI - transcript of interview, dvd from CPS available for proofing and viewing by defence
- CED - transcript of interview, dvd from CPS available for proofing and viewing by defence
- CEH - transcript of interview, dvd from CPS available for proofing and viewing by defence
- REDACTED (first complaint witness)
- Principal of school REDACTED tells him/her
- Police: MILLMAN, DUNLEVEY, TOONE
- Verified transcript of arrest and ROI
- Proof of accused's employment including dates, all children who would be on that bus route to REDACTED Primary School, was the accused given information about their 'special needs' by the employer, was there CCTV on the bus, the route he would take, where he would pick each child up, how long it would take to get from one location to the next
- Pictures of the bus, outside and inside
- Birth Certificates for each complainant
- Medical information for each complainant relating to their particular vulnerability or special need
- The other children on the bus at the same time as these children must be interviewed to see if there are other complainants or possible inconsistencies

It's not clear from the AP whether the alleged offending has happened on the bus whilst it is moving, or whether he stopped somewhere, or something completely different. If it is that he has stopped somewhere, or taken a different route, can we find any proof via witnesses or street cameras that shows he has changed routes?

As I understand it, there might also be other complainants and we will need to address this as the investigation progresses.

All complainant's will need to be proofed given their ages and 'special needs'. Obviously prior to embracing on this, I would like to have as good a picture as I can about how exactly the offending is said to have occurred, which complainant's say they witnessed offending against other children etc so we can see who can give evidence, and whether matters are properly joined.

I instructed police prosecutions to seek a longer than 10 week adjournment given there are likely to be more complainants- given the court endorsement, it seems they listed for the first date in 10 weeks, but have acknowledged that the second date of the 11th of January 2011 might still be for decs rather than an answer charge date.

We will take this file one step at a time.

Dean can you please provide me with up-to-date contact details for the three complainants I have currently, the contact person for them whether it be a parent or FamiliesSA worker etc so that I can WAS refer them asap.

Cheers,

Helen

Helen Papakonstantinou

Solicitor

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