

Burrows, Vanessa (AGD)

From: Burrows, Vanessa (AGD)
Sent: Monday, 18 April 2011 10:33 AM
To: Albon, Stephen (SAPOL)
Cc: Duance, Peter (SAPOL); SAPOL:State Committal & Disclosure Section
Subject: CDF

Importance: High

CDF

Charges: Aggravated indecent assault (3): aggravated assault
AP: 11/W61626

Hi Steve

Thank you very much for your assistance at the proofings last week. We will need to get moving on this matter if I am to have answers for the parents in 6 weeks time as I have promised.

The items below in bold are urgent and must be received no later than **10 May 2011**.

****Please note re new Centralised Committal Function (State Committal and Disclosure Section)****

You will need to submit declarations to the **State Committal and Disclosure Section** in accordance with their timelines. All communications regarding declarations in this matter should be forwarded to me **and** the State Committal and Disclosure Section, and **not** the declarations officers at South Coast LSA CJS.

Can I therefore please request the following:

1. **Addendum from you addressing the disclosures made by the children during proofing - Can I please have at least an unsigned copy of this by the end of this week so that I can start looking at charges**
2. Statements from police including:
 - SOLLY
 - JONES
 - BIRT
 - MILLMAN
 - DUNLEVEY
 - TOONE
 - HIGGINS
 - GOOCH
 - **All police officers who searched the Defendant's home and who can corroborate the arrest**
3. **Does the accused have a next door neighbour/associate by the name of [REDACTED]? The children mention him being present on the bus and taking photographs of [CDF] hurting them. This needs to be investigated as a matter of urgency.**
4. **Verified transcription of the record of interview with the accused**
5. Statement from the Dr who saw [CEK] after his parents discovered him putting cotton buds in his bottom
6. Statement from [CEU] ([CET] s mother)
7. Proof of the accused's employment at SERU and the dates for which he was driving the bus to [REDACTED]
8. Do we know the park that the children are describing, where the bus would stop? If so, photographs of that area
9. **If any of the children submitted to a medical examination at CPS, evidence of that**

The following materials have also been requested by defence counsel:

10. All original handwritten notes of SOLLY, TOONE, DUNLEVEY, HIGGINS, GOOCH
Please make sure these are redacted to delete any personal details or irrelevant details
11. Handwritten notes of CEI [REDACTED] and [REDACTED]
12. A copy of all police incident reports, police incident logs, and running sheets
Please make sure these are redacted to delete any personal details or irrelevant details
13. Any medical evidence you intend to rely on

Vanessa Burrows

Solicitor

Office of the Director of Public Prosecutions

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Tracking:

Recipient	Read
Albon, Stephen (SAPOL)	Read: 18/04/2011 9:07 PM
Duance, Peter (SAPOL)	Read: 18/04/2011 10:50 AM
SAPOL:State Committal & Disclosure Section	Read: 19/04/2011 8:33 AM