

**THE PARLIAMENTARY INQUIRY INTO THE  
HANDLING OF CHILD ABUSE BY RELIGIOUS  
AND OTHER NON GOVERNMENTAL  
ORGANISATIONS**

**SUBMISSIONS IN REPLY TO THE TRANSCRIPT  
OF HELEN LAST, CLAIRE LEANY  
AND PAM KRSTIC**

**BY PETER O'CALLAGHAN QC**

## INTRODUCTION

The extracts of evidence to which this Submission in Reply responds, is set out in italics, and identified by TS3 etc, followed by my comment.

The evidence of Ms Last, Leany and Kristic is so unsatisfactory and riddled with inaccuracies and misconceptions, that it is not practical for me to respond to every extract. Where I do not do so, this does not indicate that I accept their evidence.

1. ....*both the Melbourne Archdiocese Response and the Towards Healing Response have been very much responsible for causing further layers of harm.*  
(TS3)

## COMMENT:

I repeat what I have said elsewhere. Who are the persons who have suffered 'further layers of harm'? There have only been identified a small number of persons (in the order of 30) to my knowledge who have apparently complained to the Committee about the *Melbourne Response*. I will respond in detail to every complaint which I can identify in the sense of knowing who the complainant is, and who has had contact with me. In dealing with these complaints I will demonstrate that a great deal of these complaints are erroneous and misconceived eg. The submissions and evidence of Mr Ian Lawther and Shirley (pseudonym).

2. *Ms Last: "There are seven pages here that we have collated since 2006 and they have been collated with lawyers who are advocates for the victims. They lay out the mismanagement of complaints, the neglect and mismanagement of investigations, the absence of promised pastoral support, the obvious conflict of interest that exists between Towards Healing and the Melbourne Archdiocese structure and the victims and the scarcity of information. Within each sub-section there are probably about 15, 20 or 30 points. They are explicit examples and we have been collating that because of our absolute concern for these people and what they have been experiencing.*

*They have already been primarily abused and assaulted. They have gone to these systems and then that is an example that misdemeanour section, of explicit details about which they have been put through and how it has come to affect them. You can read in the examples, when you think about it, what terrible impacts this secondary experience would be of going to the systems. This is called 'the second wounding' when a victim goes to some place, some place some person some organisation that they believe will really help them that is set up for them only to find that it is not set up for them; it is set up for another purpose which is an institutionally based purpose.*

*Lots of issues have arisen about them being utterly confused in regard to the Melbourne Response because they are not given a proper briefing and yet the Commissioner is a QC. They do believe that he represents them. They do believe that the Response is there based on the history of their needs, and yet no research has been done into the history of victims needs by the Church, so the mental health issues have become enormous. We are looking at the development of complex post trauma stress disorder which is another level again and it is to do with the breaches of trust, the confusions, the conflicts, the lack of safety that exists between relationships" (TS 4).*

**COMMENT:**

When the list of misdemeanours are published I will provide a detailed response. No doubt other responses can be provided by persons in respect of whom complaints are made. Having been given brief access to view these unpublished documents, I can say that they simply do not bear out the allegations which Ms Last makes in her evidence as above, which can be verified by the Committee by a review of my files. Particularisation is, as always, conspicuously absent.

3. *"Priest sex offenders are known to be carrying weapons – knives and guns – or having weapons in their presbytery that can be accessed and viewed by school children as these children have keys to the presbytery. In another instance, there*

*is a pistol in the glovebox of the priest offender's car. Another Parish Priest sexual offender accesses school children for sexual assaults. Children also know that this priest has a pistol in the Presbytery and carries his gun around the schoolyard with him". (TS4)*

**COMMENT:**

It is impossible to meaningfully answer these assertions without particularisation. As appears from paragraph 13 the priest referred to is Fr Searson (dec'd) and whose deplorable activities in the Parish of Doveton have been publicly detailed. Deplorable as they were, it was not until after my appointment in 1996, that hard evidence came forward, which resulted in that Priest being placed on administrative leave, in March 1997. From that time Fr Searson had no faculties to act as a Priest. Pursuant to my later finding following a contested hearing in June 1997 that Fr Searson had sexually abused two young girls, as was recorded in my report of February 1998, Fr Searson resigned in August 1998. He died in June 2009. When it came to the attention of the Archdiocese that Fr Searson had a gun he was instructed to and did hand his gun to the Doveton Police. So far as I am aware Searson was the only Priest who had a gun. Insofar as it is asserted that there are priests carrying weapons today, there is no evidence to support this. If Ms Last has evidence to the contrary she should identify the priest, or refer the issue to the Police.

4. *"Victims disclose numbers of clergy in ceremonies during the assaults of children. Also a victim reports clerical offenders introducing dogs into the assaulting of children. An adult woman sexually assaulted by a priest with a knife – threatens to rearrange her face if anything is said about this assault". (TS4)*

**COMMENT:**

If the Committee is going to act upon such serious allegations, it is a minimum requirement of fairness and natural justice that these alleged offenders are

identified to the Committee. The Committee can then seek my responses to these matters, which I will readily provide.

5. *“Adult survivors speak of being assaulted in groups of children by male and female Religious as the perpetrators doing the assaults. Also adults tell us that they have been abused in groups of children over a number of locations by groups of clerical offenders. Also as boys being at an altar boy training camp and assaulted for a week by Clergy Seminarians in charge of the camp”. (TS4)*

**COMMENT:**

I repeat my comment to paragraph 4.

6. *“A married woman sexually assaulted by the Catholic Church Chaplain in her bed immediately after being admitted to a Catholic Hospital for Mental Health Care. The Chaplain later instructs the nurse to leave the woman – the patient – in his quarters and he rapes her there and sends her back distressed and traumatised to her ward. The case has been managed by the Melbourne Archdiocese, and no report has ever been made to the hospital authorities”. (TS4)*

**COMMENT:**

This presumably is a reference to a witness, who did give evidence to the Committee which was later ruled irrelevant and inadmissible, because it was not within the Terms of Reference of the Committee.

I say no more than that woman had, before my appointment as Independent Commissioner, taken her complaints to the Police who conducted an exhaustive investigation, and found that there was no case to justify criminal charges. Their very lengthy report was made available to her. When she brought her complaint to me, (initially represented by a Solicitor), I conducted a lengthy separate investigation into her complaint including reference to the Police file, which was produced to me having been obtained under Freedom of Information. I reached the same conclusion as the Police that there was no rape. I did find that there

was a long standing consensual sexual relationship with that priest. This constituted 'sexual abuse' as defined in the terms of my appointment. She applied for and was awarded compensation under the *Melbourne Response*. She also received substantial compensation from the Religious Order, of which the Priest was himself a member.

7. *"Ms Last: We have three examples here of women assaulted in hospitals by different priests, all in the role of Chaplains. These women have had the most shocking time for the last 7 to 10 years trying to get the Melbourne Archdiocese to respond appropriately to these assaults. They go on for approximately 15 points. These are just the worst examples of terrorisation but there are hundreds and hundreds that we can access". (TS4)*

**COMMENT:**

With respect, the Committee must require Ms Last to identify those three women, (if necessary by pseudonym) or at least identify the priests concerned so that a response can be made.

Unless and until Ms Last descends to particularise her vague and exaggerated complaints they should be disregarded. If the three women are whom I think they are their complaints do not fall within the Inquiry's Terms of Reference, and they have each had their complaints of abuse accepted and been compensated. If there are "hundreds and hundreds" of cases of abuse that Ms Last is aware of, she should refer these matters to appropriate authorities.

**THE EVIDENCE OF CLAIRE LEANEY AND PAM KRSTIC**

8. *Ms Leaney: "Perhaps most recently there is Fr Barry Robinson. He admitted to sexually assaulting a teenager in Boston in the United States in 1994. Despite admitting knowledge of this, the Melbourne Archdiocese then accepted him into Ministry in Melbourne. He was placed in Williamstown and East Melbourne and as a hospital Chaplain and relieving Priest at later dates. In 2011 there was an*

*attempt to place him as a Parish Priest of Healesville which has had several other known offenders there. Thankfully, due to the action of In Good Faith and Associates and Pam Krstic at the end there, his appointment did not go ahead".*  
(TS6)

**COMMENT:**

This is quite wrong. I have already referred in detail to the history of Fr Robinson in my Reply to the Submissions and Evidence of Mr Ian Lawther a member of MVC, and a resident of Healesville. (See paras 33-48 of my Reply). There was no attempt to 'place him as a Parish Priest of Healesville'. In the light of these quite erroneous accusations, the veracity of other allegations made which cannot be tested, is to say the least rendered suspect.

9. *Ms Leaney: "Serious consideration should be given to the fact that Church Officials in this instance obstructed justice when facilitating Fr Robinson's sudden departure from the United States whilst under Police investigation".* (TS6)

**COMMENT:**

This is plainly false and to make such an accusation is as irresponsible as is it offensive. Fr Robinson when he left Chicago in 1994 was not under police investigation, and there was no impediment to him leaving the United States, which he did one month after the event complained of. Again I refer to the detailed history of Fr Barry Robinson contained in my Reply to Ian Lawther.

10. *Ms Krstic: "The Independent Commissioner has not made a report to the Police in the whole 16 years he has been operating. Why is the policy still that any allegation of sexual abuse should go to him to decide whether it should be referred to statutory authorities. If matters are of sexual abuse, if there is a suspicion of sexual assault or even if there are patterns of grooming behaviours, the statutory authorities should be informed immediately".* (TS8)

**COMMENT:**

Ms Krstic made similar allegations before the Protection of Vulnerable Children Inquiry, to which I responded part of which response is at paragraph 8 of my Reply to the Police Submission and Ashton. Ms Krstic ignores that response but instead makes these false and irresponsible accusations. Whether a victim wishes to report the complaint to the Police, it is for the victim to decide, not the Independent Commissioner. Typically, victims who have complained to me they have been sexually abused have done so in confidence, and I have undertaken to observe that confidentiality until otherwise instructed by the victim or compelled by law to do so. I have dealt with the issue of reporting to the Police in my Reply to the Police Submission and Ashton.

11. *Ms Krstic: "Can I just add something to that. There is one case with the MVC where it was a group of perpetrators. Sometimes the victims are not willing to talk about it. They have disclosed to their families and they are not willing to talk about it, but the families are willing to talk about it because they can corroborate the time and those sorts of things. We know that when those people go to the Independent Commissioner the answer is that unless the victim is willing to come and make a formal statement they do not even want to know your name or where it took place so there is no information gathering if you like.*

*But we believe now the Police are very keen to gather information. Even if it will never go to Court they are wanting to get the intelligence of these things and where they were operating". (TS13)*

**COMMENT:**

- (a) Ms Krstic from her own knowledge knows that this is quite wrong. She is familiar with a case in which I was advised of the alleged abuse of a victim as referred to in statements made to me by her sisters. I wrote to those sisters and arranged an appointment to meet with them. They did not keep the appointment and, despite being invited sought no other

appointment. Naturally I respect their decision, and did not seek them to do anything which they do not wish to do. But it is wrong to assert that “they do not even want to know your name....etc.”

(b) In that context, if a person advises me that another person has been sexually abused I inform that person of my role and invite them to persuade the victim to come and see me. In some instances that is what happened, but in others the victim for his or her own purposes did not contact me. Naturally I respect the decision of a victim not to pursue his or her complaint with me. I am afraid that there are a significant number of persons who do not want to disclose or discuss the fact of and the details of the abuse they have suffered. This is regrettable, (though understandable) because contrary to what I regard as the misconceived assertions of Ms Last and members of the MVC I believe that victims are better off discussing the matter and taking action, rather than doing nothing, and keeping it within themselves.

12. *Ms Last: “You have got a very interesting way of tracking it down: you just have to collect the files from the Commissioner’s office. A lot of this material is in the ‘Independent’ Commissioner’s office. Many of these victims have already been to him. For example one went 10 years ago, and that material that he received is still sitting there without being actioned in any shape or form.*

*Mr Maguire: Just so you are aware, action has been taken by this Inquiry to address precisely this issue so we will report back at a later date on progress on those”. (TS 13)*

**COMMENT:**

I refer again to the inspection of my files by the Committee’s legal advisers, and I also refer to my request that I be given access to the reports presumably made by the legal advisers to the Committee. If there are adverse comments in those reports, then as a matter of fairness, and natural justice I should have the

opportunity to see them and if appropriate respond. Likewise, if there are favourable comments I should also be apprised of these, because they might be relevant in responding to criticism. I will elsewhere expand these comments and refer inter alia to what I regard as unfortunate, that save for the Foster files, the Committee has not sought production of any actual files, so that the Committee Members can themselves inspect them. If I am to be criticised or praised, my files consisting as they do of contemporaneous documents are surely the primary point of inquiry.

13. *Ms Last questioned by Ms Coote stated: "The pistol incidents happened about the same time – 97, 98. The issue with the priest carrying the gun around the schoolyard, with that particular priest, Peter Searson who is deceased, it took the Church 15 years to do something about him. Claire Leaney has tracked his movements and I apologise that you do not have her Table, you will be shocked when you see it. Peter Searson was moved to 'Claire how many Parishes'. Ms Leaney: Sorry just give me a moment to count.....*

*Fr Peter Searson that I know of that I can find and publicly accessible records was moved 10 times". (TS14)*

**COMMENT:**

The events referred to by Ms Last happened earlier than 1997-8. Searson upon my recommendation had been placed on administrative leave in March 1997. Searson was a deplorable character. However, because of his years in the priesthood the fact that he was moved 10 times is not in itself remarkable. He was not moved after I had found the allegations against him established. (See my comment on para 3 above)

14. *Ms Halfpenny: "The letters that we saw were ones that could be seen as discouraging people from making reports. You have got those.*

*Ms Last: Yes. There is a lawyer here today in the gallery who has got lots of files because he has worked with well over 100 and probably 150 victims cases in regard to Towards Healing and the Melbourne Archdiocese and that is Paul Holdway who I see here. Now his files would contain more of those letters regarding deflecting the Police involvement". (TS15)*

**COMMENT:**

- (a) With respect Ms Halfpenny is mistaken in identifying the letters as discouraging reporting to the Police.
- (b) So far as I am aware Mr Holdway and his firm have acted for 17 victims who have made complaints to the *Melbourne Response* process within the Terms of Reference of this Inquiry. No doubt he has had other involvements, but I deny that any of his files contain letters 'deflecting the Police involvement', because I have not written such letters.

15. *Ms Last: "Just a quick picture for you: The Melbourne Response is not the only door through which victims can go to get settlements and have processes done. There is a door that Mr O'Callaghan himself personally opens and closes. There is the public door of the Melbourne Response that he opens and closes. There are lawyers and barristers who relate to him, who are doing lawyer to lawyer settlements with the Archdiocese. They may go to Corrs Chambers Westgarth who are the lawyers for the Archdiocese and the Archbishop and do them there. They possibly have tried to issue a Civil Writ – it is difficult to do so – but they might have done it as a big stick – but then the settlements are done on the steps of the Court. You have lawyers in Melbourne – Tim Seckel (sic) is one of them. He has done over 300 settlements with the Archdiocese. These are outside the Melbourne Response process". (TS16)*

**COMMENT:**

- (a) This is fantastically absurd, and epitomises the falsity and irresponsibility which permeates the evidence of Ms Last. I have dealt with three complaints of sexual abuse by Fr William Baker who had been moved to another Parish, after it was known he had previously committed child sexual abuse. In two of those cases I advised the victims to seek legal advice from lawyers as to issues of whether common law remedies were available. In the third case I so advised the solicitor for the complainant. This resulted in civil proceedings being issued, or being threatened to be issued by each of these complainants, and the proceedings were settled.
- (b) To say that I personally open and close doors, and there are lawyers and barristers who relate to me is pure fantasy, and false. Settlements outside the Melbourne Response process would not come within my duties as Independent Commissioner. I understand that by letter of 21 December 2012, to Ms Georgie Crozier the Archdiocese advised there had been five settlements outside the Melbourne Response, of which two were those referred to above. The third case referred to above was settled very recently with the solicitors for the complainant Waller Legal. Thus the total settlements outside the Melbourne Response are now six.
- (c) The disparity between Ms Last's assertion and the true facts is highly significant. With respect, it is a further example of when there is the opportunity to respond to Ms Last's assertions, they are demonstrated to be false. It follows in my respectful submission, that the Committee should not accept the broad and unparticularised allegations of Ms Last, and those made by Members and supporters of Melbourne Victims Collective.

16. *Ms Last: "There are also doors that open to the Business Manager of the Melbourne Archdiocese and the Business Manager is involved in doing*

*settlements directly with complainants in regard to offences. There is a door to there as well that people do not know about, but if you know how to open the door, then you can go in there and do your process and get a good settlement that is above what the ceiling is for the public Melbourne Response. You can get more than \$75,000. This is a truly shocking situation for victims". (TS 16)*

**COMMENT:**

I refer to and repeat my comment on paragraph 15

17. *Ms Halfpenny: "In the Catholic Church's Submissions it talks about, from memory, that it has 600 something complaints that have been dealt with through their formal processes which is Towards Healing or Melbourne Response. So you are saying there could be ones well above that.*

*Ms Last: We think it is 2000 people who have been through these different portals – I call them portals. It is all about who you know to get through the portals and whether you have made a complaint to a statutory body about one part of the counselling service for example. This has to be made equal. It has to be looked as to what it is doing to people in its inequity in its dysfunction". (TS 16)*

**COMMENT:**

This incredible statement as has been demonstrated above is false. Ms Last appears to be saying that there have been thousands of victims compensated by the *Melbourne Response* and the Melbourne Archdiocese, but presumably this has been concealed from the public, and indeed from me. There is not a skerrick of evidence to support this statement the making of which should destroy root and branch the credibility of Ms Last.

18. *Ms Last: (In answer to a question from Mr Wakeling): "The former Archbishop of Melbourne, Cardinal Pell, keeps saying that justice has been attended to in a compassionate way and that people are happy and Archbishop Hart does the*

*same. However they have not produced one person who can testify to that. Throughout all this time of you all working with us and everyone to bring it all out, where is the person who can testify to the peace and joy and whatever – the restoration, the recovery, the rehabilitation where are they? Why are they not storming your doors now? Why are they not out in the press? They do not exist”.*  
(TS17)

**COMMENT:**

- (a) I reject this offensive and false statement. There are a number of victims who have expressed in writing their satisfaction with the process. There are many others who have expressly and impliedly conveyed this orally. I am aware that my fellow Independent Commissioner Mr Jeff Gleeson SC has provided the Committee with the names of some of these victims. This is not to say that all people are happy. In the same way that a patient may express his or her gratitude to the doctor for treating the cancer it would be a misnomer to say such patient is happy. Grateful for treatment no doubt, but continually unhappy because of being visited with cancer. Similarly whilst many victims are relieved to have been able to disclose the deplorable abuse they suffered and have received psychological support, compensation and apology the one thing they can never be happy about is that they were subject to sexual abuse, which can never be forgotten and remains a continuing blight on their lives.
- (b) Whilst I would in no way describe it as happiness, I can assure the Committee that I have been told by many victims of the relief they have experienced by being able to recount the facts of their abuse, and to be believed. I regret very much the unremitting hostility flowing from MVC members, and indeed it embarrasses me to have to respond to such criticisms, which I must do so that the Committee has a correct record of

the facts and also to protect my reputation. But the idea of bringing forward to this Committee victims, who have been through the *Melbourne Response*, and have them discuss the process through which they have passed is untenable. This would be destructive of their privacy, and which privacy I can assure the Committee is held dear by the vast majority of victims, with whom I have dealt. They do not want their identities to be revealed because in a great number of cases their problems have only been revealed to a spouse or a very close associate, and notwithstanding having been through the Response such confidentiality has been maintained and it is vital for this to remain so. Consequently I have not asked any person with whom I have dealt to give evidence to the Inquiry describing the process through which they have passed.

19. *Mr Maguire: "...the second thing is even when there has been a finding of guilt, you are saying that clergy often receive a lighter sentence than other known paedophile offenders. I would like you to refer to that and why and that comes in response to the proposition put about Fr Barry Robinson who admitted sexually assaulting a teenager in Boston and then came here. That goes to the fly in question, an issue that has been also raised with us. If you could address these three points".*

*Ms Krstic: "Can I mention Barry Robinson's case because I remember it from when I was doing research at the time. Barry Robinson was being pursued by the District Attorney in Boston. There was a phone call to Melbourne and they decided to whisk him away, so he actually never faced that questioning; he has never actually been found guilty and the District Attorney in Boston decided not to pursue it here in Australia. So the Church says 'he has never been formally found guilty of anything'".*

*Mr Maguire: "So there was an admission of guilt but no finding of guilt*

*Ms Krstic: It was a disclosure of a sexual relationship with a child under 16. He did not say it was abuse; he believed it was a relationship”*

*Ms Last: “He was brought back to the Melbourne Archdiocese by the then Vicar General Les Tomlinson. He got him back from America”.*

*Ms Krstic: “He had been sent to Boston because there had been questions about his relationship with children in South America where he had been working”.*

*Ms Last: “He was sent to Boston for treatment I think”*

*Ms Krstic: “Yes”*

*Ms Last: “And then during that treatment he admitted that he’d had a relationship with an underage boy.” (TS20 –21)*

**COMMENT:**

(a) I have set out the above passages in the transcript at some length because they demonstrate the preparedness of Ms Last and Ms Krstic to make statements apparently based upon actual knowledge, but when they have no such knowledge. They then invite the Committee to accept these statements as the fact. This results in the Committee being misled. I repeat that when it is shown to the Committee that the testimony of a witness, or a Submission is false in not only one but in a number of allegations, the Committee should not accept broad and unparticularised assertions, which thereby preclude a meaningful response.

(b) The full history of Fr Barry Robinson is set out in my Reply to the Submissions and Evidence of Mr Ian Lawther. If the Committee is to make any finding in relation to Fr Robinson and I have difficulty in seeing why it should, the Committee should only do so on the basis of accepting what I have said in my Reply, in preference to the evidence of Ms Last and Ms Krstic. I will restrict myself here to identifying and

correcting the falsities in the evidence of Ms Last and Ms Krstic, without repeating what is contained in my Reply to Ian Lawther.

- (c) I do not know what research Ms Krstic was doing which, she implies, equips her to make definitive statements about Barry Robinson. She says "*Barry Robinson was being pursued by the District Attorney in Boston*". The District Attorney did pursue Barry Robinson in 1994, the year that Barry Robinson admittedly had a sexual relationship with a 16 year old boy (who was not as Ms Krstic falsely states under 16 years) Barry Robinson sought treatment from a therapist who was obliged by the mandatory reporting laws of Massachusetts to report a sexual encounter between an adult and a male under the age of 18 years. In that context it is important to note that the age of consent in Massachusetts, as in Victoria, was 16 years of age. The therapist reported that to the Archdiocese of Boston and also to the authorities in Boston. As I have stated previously this resulted in the Boston Archdiocese removing Robinson's faculties as did the Archdiocese of Melbourne. But the authorities in Boston did not seek to question Barry Robinson albeit he remained in Boston for a month after the reports had been made. The Vicar General in 1994 was Monsignor Gerry Cudmore, as should have been well known to Ms Last as she reported to him when she worked for the Archdiocese, she nonetheless boldly asserts the Vicar General was Monsignor Les Tomlinson. He was not appointed Vicar General until April 2003. A priest from the Archdiocese of Melbourne had in 1994 gone to Boston and recommended that Barry Robinson return to Melbourne for treatment which he did approximately one month after the relevant incident. Barry Robinson had gone to Boston to study at a Boston University, and certainly not for treatment. Prior to this he had been Parish Priest of East Melbourne. There was no question at that time of Robinson's conduct in South America, which had

taken place several years previously, and which concerned his relationship with adults, not children. Ms Last's statement "*and then during that treatment he admitted he had had a relationship with an underage boy*" is simply false. His admission was to his therapist of a relationship with a sixteen year old male.

(d) I note Ms Leaney's statement '*that sentences for paedophile clerical offenders are lighter than for a paedophile who is not a clerical offender*'.

I note she makes a comparison between Fr Vincent Kiss and a Judge who was found guilty. I cannot comment because I am not aware of the latter conviction, and in any event it is notoriously unsafe to compare sentences, because each case must be judged separately and on its own. To say that paedophile clerical offenders are given lighter sentences is not only nonsense, it is an insult to presiding Judges. I say that in the light of my having since 1995 read most and probably all judgements imposing sentences on clerical offenders.

20. *Ms Last: "All reports have to go to Mr O'Callaghan QC, by parents, Parishioners – it is all going back to him to the same person who does not report anything to the Police". (TS 21)*

**COMMENT:**

I am not sure what Ms Last is talking about. I have made it clear on repeated occasions that when a person comes to me complaining of sexual abuse which might constitute criminal conduct, I advise that person of their continuing and unfettered right to report the complaint to the Police and encourage the exercise thereof. I have already referred in my Reply to the Police Submission the true position in relation to my referring victims to the Police when those victims wish to do so.

**CONCLUSION:**

21. For the reasons given above the aforesaid evidence is so coloured by falsities and misconceptions it should not be relied upon.

A handwritten signature in black ink, appearing to read "Peter J. O'Callaghan". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

.....

Peter O'Callaghan QC

Independent Commissioner

16 July 2013