

From: [Patrick Broad](#)
To: "Bridie K. Nolan"
Cc: "phil.lonegan@statechambers.net"
Subject: Operation Skyline [DLM=Sensitive]
Date: Friday, 3 August 2018 2:07:00 PM

Dear Ms Nolan

The purpose of this email is to draw your attention to a folder of documents that has been uploaded to the Skyline restricted website. The folder is described as Volume 53 KNL Materials – Brief and largely contains file notes and other documents produced by Ms Bakis in response to a summons to produce documents issued by the Commission.

I note at T1921.10 you made reference to the fact that the Commission has these file notes.

I wish to draw your attention to T1928.6 when, in the course of examining Mr Green, you mentioned that you may “come back” to the November 2015 costs agreement, but did not. I also wish to draw your attention to Direction 17 of the ICAC’s Standard Directions for Public Inquiries which states the following:

The Commission expects that, where it is to be invited to reject or not accept the evidence of a witness on a material fact or issue, on the grounds the witness deliberately gave false evidence, the evidence is unreliable, or the witness has made a mistake on a significant issue, the material grounds of such contention must be put to the witness to allow the witness an opportunity to offer an explanation.

As you are aware Mr Green will attend the Commission on 6 August 2018 to give evidence. In the light of the matters set out above, including the nature of the documents contained in Volume 53, I invite you to give consideration to seeking leave to further examine Mr Green on 6 August 2018.

Kind regards

Patrick Broad | Principal Lawyer

NSW Independent Commission Against Corruption

Level 7, 255 Elizabeth Street Sydney NSW 2000 | GPO Box 500 Sydney NSW 2001

☎: +61 2 8281 5704 | 📠: +61 2 9264 5364 | ✉: pbroad@icac.nsw.gov.au | 🌐: www.icac.nsw.gov.au