

[REDACTED]

From: [REDACTED]
Sent: Wednesday, 5 May 2021 4:55 PM
To: Dion Accoto
Subject: RE: restricted site [DLM=Sensitive:Legal]

Dear Dr Accoto,

I refer to your email of 4 May 2021 at 5:47pm.

Notwithstanding your of email today, the Commission notes your concerns and will consider such an application if one should be made.

Yours faithfully,

[REDACTED]

From: Dion Accoto <info@dionaccoto.com>
Sent: Tuesday, 4 May 2021 5:47 PM
To: [REDACTED] <[REDACTED]@icac.nsw.gov.au>
Subject: restricted site

Dear Mr [REDACTED]

Please see attached application.

Can I also draw to your attention that it is the religious month of Ramadan for Muslims. My client is of the Muslim faith. This means that he is fasting - that is, nil by mouth between sunrise and sunset.

To what extent that causes him issues in giving evidence I do not know.

From my part, I know that I cannot go too long speaking without drinking water.

I also note that it is the religious day of Celebration of Eid on Thursday of next week. That is similar to my Christmas as I understand it. I am not suggesting that ICAC not sit for that reason. Again I simply draw that to your attention. It would be like a Christian giving evidence on Christmas day. If the ICAC has already considered this aspect, then I apologise. I am only bringing it to your attention in the event it was overlooked.

Regards,

PLEASE NOTE:
As of 1 July I am moving offices to:
Suite 109, Level 1, 377 New South Road
Double Bay NSW 2028

Dr. DION ACCOTO

Lawyer
13th Floor, 111 Elizabeth Street

Sydney NSW 2000

Professor of Business Leadership

Faculty of Business & Entrepreneurship
The Australian Graduate School of Leadership
Torrens University Australia

Get in touch

Tel: 02 9233 8888

email: info@dionaccoto.com

web: www.dionaccoto.com

Liability limited by a scheme approved under professional standards legislation. Legal services provided by Acorp Legal Pty Ltd. Torrens University and the Australian Graduate School of Leadership do not provide legal services and are not in partnership with Dr. Dion Accoto or Acorp Legal Pty Ltd.

From: [REDACTED]
To: [Dion Accoto](mailto:info@dionaccoto.com)
Subject: RE: Operation Paragon [DLM=Sensitive:Legal]
Date: Monday, 10 May 2021 5:41:00 PM

Dear Dr Accoto,

I refer to both your emails of 10 May 2021.

The Chief Commissioner has considered your application to adjourn the public inquiry. The Chief Commissioner has determined not to adjourn the public inquiry.

The Commission notes your advice that you have not undertaken preparation for the public inquiry. The recent decision by the Department of Communities & Justice to approve further legal assistance to Mr Dubois by way of an additional solicitor or junior counsel at Legal Representation Office rates should assist your preparation for the public inquiry. In addition, the Commission has re-scheduled the order in which witnesses will be called to give evidence at the public inquiry. Instead of calling Mr Dubois as the first witness, the Commission has decided to first deal with Mr Steyn and the contractors associated with him. It is expected that this segment of the public inquiry will take two weeks and that, therefore, Mr Dubois will not be called to give evidence until the week commencing 24 May 2021.

The Commission considers that, in these circumstances, there are sufficient resources and time for Mr Dubois's legal representatives to prepare for Mr Dubois giving evidence.

I again remind you that Mr Steyn will be made available for cross-examination for all interested parties later in the proceedings.

Yours faithfully,

[REDACTED]
From: Dion Accoto <info@dionaccoto.com>
Sent: Monday, 10 May 2021 12:48 PM
To: [REDACTED]@icac.nsw.gov.au>
Subject: Re: Operation Paragon [DLM=Sensitive:Legal]

Dear Mr [REDACTED]

Thank you for your email.

A decision was taken not to appear in this matter because of the lack of time to prepare and failure to approve a second lawyer.

Whilst I am grateful for to the LRO reconsidering the approval for a second lawyer, I am now in a worse position in terms of preparation time. No preparation has been done.

I can also indicate that I am unavailable tomorrow in any event.

Whilst I appreciate the ICAC would prefer the matter proceed as planned, I ask you to reconsider providing me some time to prepare for the matter. That would require the matter to adjourn for a short period of time, perhaps until Monday week, allowing two weeks to prepare. They are my instructions.

It is of concern to me and Mr Dubois that the interests of Mr Dubois will not be properly served by any lawyer appearing without the benefit of some preparation. Furthermore Mr Dubois may want to ask questions of witnesses. He cannot do that himself. I am instructed he is incapable of doing so and indeed fearful of certain witnesses.

I look forward to hearing from you.

I note your advice that I still have access to the restricted website. Please note that I am not presently instructed to appear.

Regards,

PLEASE NOTE:

As of 1 July I am moving offices to:

Suite 109, Level 1, 377 New South Road

Double Bay NSW 2028

Dr. DION ACCOTO

Lawyer

13th Floor, 111 Elizabeth Street

Sydney NSW 2000

Professor of Business Leadership

Faculty of Business & Entrepreneurship

The Australian Graduate School of Leadership

Torrens University Australia

Get in touch

Tel: 02 9233 8888

email: info@dionaccoto.com

web: www.dionaccoto.com

Prof. Accoto is also the founder of Freedom Mission. www.freedommission.com.au

Advocating the importance of Human Rights

Liability limited by a scheme approved under professional standards legislation. Legal services provided by Acorp Legal Pty Ltd. Torrens University and the Australian Graduate School of Leadership do not provide legal services and are not in partnership with Dr. Dion Accoto or Acorp Legal Pty Ltd.

On Mon, 10 May 2021, 12:22 pm [REDACTED], [REDACTED]@icac.nsw.gov.au> wrote:

Dear Dr Accoto,

I note that Sandra Alexander is next listed witness for tomorrow. Following that is Mr Steyn who listed to give evidence this coming Wednesday, it is anticipated that his evidence will take approximately 3 days. I note cross-examination of Mr Steyn by other interested parties has been reserved until after all the remaining witnesses have been examined.

Please advise me as soon as possible when you have been engaged again. I note you still have access to the ICAC restricted website.

I anticipate to be able to speak to you for 10 mins at approximately 1:20pm.

Yours faithfully,

[REDACTED]

From: Dion Accoto <info@dionaccoto.com>

Sent: Monday, 10 May 2021 11:43 AM

To: [REDACTED]@icac.nsw.gov.au>

Subject: Operation Paragon

Dear Mr [REDACTED]

I understand that the LRO has approved an additional lawyer to assist Mr Dubois in Operation Paragon. For example myself with another/.

Whilst I am not presently instructed to appear at the ICAC in Operation Paragon, it may be that my client will engage me for that purpose. (appreciating that the ICAC has the final say as to the grant of leave).

May I enquire whether the ICAC will sit this week beyond the opening today?

No preparation has been undertaken by me given I was not retained at that juncture.

Regards,

PLEASE NOTE:

As of 1 July I am moving offices to:
Suite 109, Level 1, 377 New South Road
Double Bay NSW 2028

Dr. DION ACCOTO

Lawyer

13th Floor, 111 Elizabeth Street
Sydney NSW 2000

Professor of Business Leadership

Faculty of Business & Entrepreneurship
The Australian Graduate School of Leadership
Torrens University Australia

Get in touch

Tel: 02 9233 8888

email: info@dionaccoto.com

web: www.dionaccoto.com

Prof. Accoto is also the founder of Freedom Mission.

www.freedommission.com.au

Advocating the importance of Human Rights

Liability limited by a scheme approved under professional standards legislation. Legal services provided by Acorp Legal Pty Ltd. Torrens University and the Australian Graduate School of Leadership do not provide legal services and are not in partnership with Dr. Dion Accoto or Acorp Legal Pty Ltd.

IMPORTANT - PRIVACY & CONFIDENTIALITY NOTICE The information contained in this email and any attachments thereto may be of a confidential and/or private nature, and it may also be the subject of legal professional privilege. If you are not the intended recipient, any use, disclosure or copying of this email or its attachments is unauthorised. If you have received this email in error, please notify the Commission immediately by return email and erase all copies of the message and attachments. IMPORTANT DISCLAIMER: No liability is assumed by the NSW Independent Commission Against Corruption for expressions of opinion in this communication which are other than the official opinion of the Commission and a communication of other than official opinion is not to be regarded as a communication from the Commission.

From: [REDACTED]
To: [ADubois](#) [REDACTED]
Subject: Operation Paragon [DLM=Sensitive:Legal]
Date: Tuesday, 11 May 2021 1:40:00 PM

Dear Mr Dubois,

The Commission has received advice from Dr Accoto that he will not be in a position to act for you in the Commission's Operation Paragon public inquiry. In these circumstances, if you wish to be legally represented for the purposes of the public inquiry you will need to arrange for new legal representatives to be appointed and for them to seek authorisation to represent you at the public inquiry.

Following representations from the Commission, the Department of Communities & Justice has approved further legal assistance to you by way of an additional solicitor or junior counsel at Legal Representation Office rates. In addition, the Commission has re-scheduled the order in which witnesses will be called to give evidence at the public inquiry. Instead of calling you as the first witness, the Commission has decided to first deal with Mr Steyn and the contractors associated with him. It is expected that this segment of the public inquiry will take two weeks. The Commission considers that, in these circumstances, there are sufficient resources and time for any legal representatives engaged by you to prepare for you giving evidence.

Given the current scheduling of witnesses, I anticipate you will be required to give evidence in the week commencing 24 May 2021.

Mr Steyn will be made available for cross-examination for all interested parties later in the public inquiry.

Regards,

[REDACTED] | Senior Lawyer

NSW Independent Commission Against Corruption

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

tel: 8281 [REDACTED] | fax: 9264 5364 | web: www.icac.nsw.gov.au

From: [REDACTED]
To: ADubois [REDACTED]
Subject: RE: Operation Paragon [DLM=Sensitive:Legal]
Date: Friday, 14 May 2021 4:38:00 PM
Attachments: [ASN E18-0736-AS-04-026 S35 Alexandre Dubois 20-04-2021.pdf](#)
[Information for witnesses - March2021.pdf](#)

Dear Mr Dubois,

I refer to my previous email dated 11 May 2021 provided below for your review.

I remind you of the following:

1. The Department of Communities & Justice has approved further legal assistance to you by way of an additional solicitor or junior counsel at Legal Representation Office rates; and
2. I anticipate you will be required to attend and give evidence in the week commencing **24 May 2021** in accordance with the summons previously on 21 April 2021.

Please note failure to attend on **24 May 2021** may result in a warrant being issued for your arrest.

Should you require any additional information please refer to the previously served summons and witness information booklet, or alternatively you contact me at [REDACTED] icac.nsw.gov.au .

Yours faithfully,

[REDACTED] | Senior Lawyer

NSW Independent Commission Against Corruption

Level 7, 255 Elizabeth Street Sydney NSW 2000 | GPO Box 500 Sydney NSW 2001
tel: 8281 5 [REDACTED] | fax: 9264 5364 | web: www.icac.nsw.gov.au

From: [REDACTED]
Sent: Tuesday, 11 May 2021 1:41 PM
To: ADubois [REDACTED]
Subject: Operation Paragon [DLM=Sensitive:Legal]

Dear Mr Dubois,

The Commission has received advice from Dr Accoto that he will not be in a position to act for you in the Commission's Operation Paragon public inquiry. In these circumstances, if you wish to be legally represented for the purposes of the public inquiry you will need to arrange for new legal representatives to be appointed and for them to seek authorisation to represent you at the public inquiry.

Following representations from the Commission, the Department of Communities & Justice has approved further legal assistance to you by way of an additional solicitor or junior counsel at Legal Representation Office rates. In addition, the Commission has re-scheduled the order in which witnesses will be called to give evidence at the public inquiry. Instead of calling you as the first witness, the Commission has decided to first deal with Mr Steyn and the contractors associated with him. It is expected that this segment of the public inquiry will take two weeks. The Commission considers that, in these circumstances, there are sufficient resources and time for any legal representatives engaged by you to prepare for you giving evidence.

Given the current scheduling of witnesses, I anticipate you will be required to give evidence in the week commencing 24 May 2021.

Mr Steyn will be made available for cross-examination for all interested parties later in the public inquiry.

Regards,

██████████ | Senior Lawyer

NSW Independent Commission Against Corruption

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

tel: 8281 5██████████ | fax: 9264 5364 | web: www.icac.nsw.gov.au

From: [Lincoln Chee](#)
To: [REDACTED]
Subject: RE: ALEXANDRE DUBOIS [DLM=Sensitive]
Date: Monday, 17 May 2021 2:47:47 PM

Dear Mr [REDACTED]

Thank you for your email.

On 11 May 2021, Dr Accoto advised that he was no longer instructed to appear at the hearing. This office reached out to Mr Dubois noting Dr Accoto's withdrawal and invited Mr Dubois to contact us if he requires legal assistance. To date, we have not heard back from Mr Dubois.

Please do not hesitate to contact me if you wish to discuss.

Lincoln Chee

Director

Inquests, Inquiries & Representation

Legal

Department of Communities and Justice

Level 4, 93 George Street Parramatta NSW 2150

Locked Bag 5111 Parramatta NSW 2124

[REDACTED] [REDACTED]
[REDACTED] [@justice.nsw.gov.au](mailto:[REDACTED]@justice.nsw.gov.au)

From: [REDACTED] <[REDACTED]@icac.nsw.gov.au>
Sent: Monday, 17 May 2021 2:21 PM
To: Lincoln Chee [REDACTED] <[REDACTED]@justice.nsw.gov.au>
Subject: RE: ALEXANDRE DUBOIS [DLM=Sensitive]

Dear Mr Chee,

I refer to your below correspondence.

I would like to thank you for the accommodation that your office has provided in terms of the provision additional legal representation for Mr Alexandre Dubois in relation to the Operation Paragon Public Inquiry.

I would be obliged if you could advise the Commission the following:

1. Has Mr Dubois made any further contact with your office since 10 May 2021?
2. Has your office assigned any new legal representatives for Mr Dubois, if so whom?

I would be grateful for a prompt reply concerning the above queries this.

Yours faithfully,

[REDACTED] | Senior Lawyer

NSW Independent Commission Against Corruption

Level 7, 255 Elizabeth Street Sydney NSW 2000 | GPO Box 500 Sydney NSW 2001
tel: 8281 5[REDACTED] | fax: 9264 5364 | web: www.icac.nsw.gov.au

From: Lyncoln Chee [REDACTED] [@justice.nsw.gov.au](mailto:[REDACTED]@justice.nsw.gov.au)>
Sent: Monday, 10 May 2021 7:20 AM
To: [REDACTED] [icac.nsw.gov.au](mailto:[REDACTED]@icac.nsw.gov.au)>
Cc: [REDACTED] [icac.nsw.gov.au](mailto:[REDACTED]@icac.nsw.gov.au)>
Subject: RE: ALEXANDRE DUBOIS [DLM=Sensitive]
Importance: High

Dear Mr [REDACTED],

Please see letter attached. If you have any questions please let me know.

Lyncoln Chee

Director

Inquests, Inquiries & Representation

Legal

Department of Communities and Justice

Level 4, 93 George Street Parramatta NSW 2150

Locked Bag 5111 Parramatta NSW 2124

[REDACTED] [REDACTED]
lyncoln.chee@justice.nsw.gov.au

From: [REDACTED] [icac.nsw.gov.au](mailto:[REDACTED]@icac.nsw.gov.au)>
Sent: Friday, 7 May 2021 11:56 AM
To: Lyncoln Chee <[\[REDACTED\]@justice.nsw.gov.au](mailto:[REDACTED]@justice.nsw.gov.au)>
Cc: [REDACTED] <[\[REDACTED\]@icac.nsw.gov.au](mailto:[REDACTED]@icac.nsw.gov.au)>
Subject: ALEXANDRE DUBOIS [DLM=Sensitive]

Dear Mr Chee

I refer to our telephone discussion and attach my letter concerning the above-named. I would appreciate a response today so that the Commission can make a decision with respect to the public inquiry which is due to commence on Monday.

Regards

[REDACTED]
[REDACTED]

[REDACTED] [@icac.nsw.gov.au](mailto:[REDACTED]@icac.nsw.gov.au)

IMPORTANT - PRIVACY & CONFIDENTIALITY NOTICE The information contained in this email and any attachments thereto may be of a confidential and/or private nature, and it may also be the subject of legal professional privilege. If you are not the intended recipient, any use, disclosure or copying of this email or its attachments is unauthorised. If you have received this email in error, please notify the Commission immediately by return email and erase all copies of the

message and attachments. IMPORTANT DISCLAIMER: No liability is assumed by the NSW Independent Commission Against Corruption for expressions of opinion in this communication which are other than the official opinion of the Commission and a communication of other than official opinion is not to be regarded as a communication from the Commission.

DISCLAIMER: This email message, including any attachments, is intended for the individual or entity to whom it is addressed and may contain information that is confidential, privileged and/or exempt from disclosure under applicable law. If you have received this email in error you must not disclose or use the information in it. Please delete the email and any copies and notify the sender. Confidentiality or privilege are not waived or lost by reason of the mistaken delivery to you. Views expressed in this message are those of the individual sender, and are not necessarily the views of the Department of Communities and Justice. The Department accepts no liability for any loss or damage arising from the use of this email or attachments and recommends that the recipient check this email and any attached files for the presence of viruses.

IMPORTANT - PRIVACY & CONFIDENTIALITY NOTICE The information contained in this email and any attachments thereto may be of a confidential and/or private nature, and it may also be the subject of legal professional privilege. If you are not the intended recipient, any use, disclosure or copying of this email or its attachments is unauthorised. If you have received this email in error, please notify the Commission immediately by return email and erase all copies of the message and attachments. IMPORTANT DISCLAIMER: No liability is assumed by the NSW Independent Commission Against Corruption for expressions of opinion in this communication which are other than the official opinion of the Commission and a communication of other than official opinion is not to be regarded as a communication from the Commission.

From: [REDACTED]
To: [ADubois](#) [REDACTED]
Cc: [REDACTED]
Subject: Giving evidence at the Operation Paragon Public Inquiry [DLM=Sensitive:Legal]
Date: Thursday, 20 May 2021 2:40:00 PM
Attachments: [Itinerary-15715197.pdf](#)

Dear Mr Dubois,

Please be advised that you will now be required to give evidence on **Wednesday 26 May 2021** in relation to Operation Paragon Public Inquiry.

Accordingly I have attached your itinerary for your use. Should you have queries in relation to this please contact Mr [REDACTED] who has been copied into this communication.

Separately, could you please advise me if you have retained legal representation. If you have retained legal representation I would be obliged if you could provide contact details of your legal practitioner.

Yours faithfully,

[REDACTED] | Senior Lawyer

NSW Independent Commission Against Corruption

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

tel: 8281 5 [REDACTED] | fax: 9264 5364 | web: www.icac.nsw.gov.au

From: [Doreen Lin](#)
To: [REDACTED]
Cc: [Lyncoln Chee](#)
Subject: RE: ALEXANDRE DUBOIS [DLM=Sensitive]
Date: Friday, 21 May 2021 10:39:41 AM

Dear Mr [REDACTED]

I refer to our telephone conversation this morning.

Further to Mr Chee's email to you of 17 May 2021 below, I confirm that as of 10am on 21 May 2021, we have not received any contact from Mr Dubois about his legal representation in Operation Paragon and the additional assistance which was granted to him through the Department.

I note that we have reached out to Mr Dubois on multiple occasions between 5 and 11 May 2021 in an effort to confirm legal representation for him in relation to Operation Paragon. Our last attempt to contact him was on 11 May 2021.

Kind regards

Doreen Lin | A/Inquests, Inquiries and Representation Officer
Inquests, Inquiries and Representation
Legal | Department of Communities and Justice
Phone: (02) [REDACTED] | Email: [REDACTED]@dcj.nsw.gov.au
Level 4 South, 93 George Street, Parramatta NSW 2150
Locked Bag 5111 Parramatta NSW 2124 | DX 1227 SYDNEY

From: Lyncoln Chee
Sent: Monday, 17 May 2021 2:48 PM
To: [REDACTED] <[REDACTED]@icac.nsw.gov.au>
Subject: RE: ALEXANDRE DUBOIS [DLM=Sensitive]

Dear Mr [REDACTED]

Thank you for your email.

On 11 May 2021, Dr Accoto advised that he was no longer instructed to appear at the hearing. This office reached out to Mr Dubois noting Dr Accoto's withdrawal and invited Mr Dubois to contact us if he requires legal assistance. To date, we have not heard back from Mr Dubois.

Please do not hesitate to contact me if you wish to discuss.

Lyncoln Chee

Director

Inquests, Inquiries & Representation
Legal
Department of Communities and Justice
Level 4, 93 George Street Parramatta NSW 2150
Locked Bag 5111 Parramatta NSW 2124

██████████
██████████@justice.nsw.gov.au

From: ██████████ <██████████@icac.nsw.gov.au>
Sent: Monday, 17 May 2021 2:21 PM
To: Lincoln Chee <██████████@justice.nsw.gov.au>
Subject: RE: ALEXANDRE DUBOIS [DLM=Sensitive]

Dear Mr Chee,

I refer to your below correspondence.

I would like to thank you for the accommodation that your office has provided in terms of the provision additional legal representation for Mr Alexandre Dubois in relation to the Operation Paragon Public Inquiry.

I would be obliged if you could advise the Commission the following:

1. Has Mr Dubois made any further contact with your office since 10 May 2021?
2. Has your office assigned any new legal representatives for Mr Dubois, if so whom?

I would be grateful for a prompt reply concerning the above queries this.

Yours faithfully,

██████████ | Senior Lawyer
NSW Independent Commission Against Corruption
Level 7, 255 Elizabeth Street Sydney NSW 2000 | GPO Box 500 Sydney NSW 2001
tel: 8281 5██████████ | fax: 9264 5364 | web: www.icac.nsw.gov.au

From: Lincoln Chee <██████████@justice.nsw.gov.au>
Sent: Monday, 10 May 2021 7:20 AM
To: ██████████@icac.nsw.gov.au
Cc: ██████████ <██████████@icac.nsw.gov.au>
Subject: RE: ALEXANDRE DUBOIS [DLM=Sensitive]
Importance: High

Dear Mr Waldron,

Please see letter attached. If you have any questions please let me know.

Lincoln Chee
Director

Inquests, Inquiries & Representation
Legal

Department of Communities and Justice
Level 4, 93 George Street Parramatta NSW 2150
Locked Bag 5111 Parramatta NSW 2124

[REDACTED]
[REDACTED]@justice.nsw.gov.au

From: [REDACTED] [REDACTED]@icac.nsw.gov.au>
Sent: Friday, 7 May 2021 11:56 AM
To: Lyncoln Chee [REDACTED]@justice.nsw.gov.au>
Cc: [REDACTED] <[REDACTED]@icac.nsw.gov.au>
Subject: ALEXANDRE DUBOIS [DLM=Sensitive]

Dear Mr Chee

I refer to our telephone discussion and attach my letter concerning the above-named. I would appreciate a response today so that the Commission can make a decision with respect to the public inquiry which is due to commence on Monday.

Regards

[REDACTED]
[REDACTED]

[REDACTED]@icac.nsw.gov.au

IMPORTANT - PRIVACY & CONFIDENTIALITY NOTICE The information contained in this email and any attachments thereto may be of a confidential and/or private nature, and it may also be the subject of legal professional privilege. If you are not the intended recipient, any use, disclosure or copying of this email or its attachments is unauthorised. If you have received this email in error, please notify the Commission immediately by return email and erase all copies of the message and attachments. IMPORTANT DISCLAIMER: No liability is assumed by the NSW Independent Commission Against Corruption for expressions of opinion in this communication which are other than the official opinion of the Commission and a communication of other than official opinion is not to be regarded as a communication from the Commission.

DISCLAIMER: This email message, including any attachments, is intended for the individual or entity to whom it is addressed and may contain information that is confidential, privileged and/or exempt from disclosure under applicable law. If you have received this email in error you must not disclose or use the information in it. Please delete the email and any copies and notify the sender. Confidentiality or privilege are not waived or lost by reason of the mistaken delivery to you. Views expressed in this message are those of the individual sender, and are not necessarily the views of the Department of Communities and Justice. The Department accepts no liability for any loss or damage arising from the use of this email or attachments and recommends that the recipient check this email and any attached files for the presence of viruses.

IMPORTANT - PRIVACY & CONFIDENTIALITY NOTICE The information contained in this email and any attachments thereto may be of a confidential and/or private nature, and it may also be the subject of legal professional privilege. If you are not the intended recipient, any use, disclosure or copying of this email or its attachments is unauthorised. If you have received this email in error, please notify the Commission immediately by return email and erase all copies of the message and attachments. IMPORTANT DISCLAIMER: No liability is assumed by the NSW Independent Commission Against Corruption for expressions of opinion in this communication

which are other than the official opinion of the Commission and a communication of other than official opinion is not to be regarded as a communication from the Commission.

DISCLAIMER: This email message, including any attachments, is intended for the individual or entity to whom it is addressed and may contain information that is confidential, privileged and/or exempt from disclosure under applicable law. If you have received this email in error you must not disclose or use the information in it. Please delete the email and any copies and notify the sender. Confidentiality or privilege are not waived or lost by reason of the mistaken delivery to you. Views expressed in this message are those of the individual sender, and are not necessarily the views of the Department of Communities and Justice. The Department accepts no liability for any loss or damage arising from the use of this email or attachments and recommends that the recipient check this email and any attached files for the presence of viruses.

Use of electronic mail is subject to NSW Department of Communities and Justice policy and guidelines.

From: [REDACTED]
To: [ADubois](#) [REDACTED]
Cc: [REDACTED]
Subject: Operation Paragon [DLM=Sensitive:Legal]
Date: Thursday, 27 May 2021 6:04:00 PM
Attachments: [Information for witnesses - March2021.pdf](#)

Dear Mr Dubois,

I refer to our discussion today occurring immediately after the afternoon session of the public inquiry.

During that conversation I informed you of your right to request of the Chief Commissioner to cross-examine any witnesses during the public inquiry proceedings. I note the most relevant witnesses, that being RMS contractors which you were allegedly associated with, will be providing their evidence immediately after you.

Noting you are a now an interstate resident, the Commission will continued to meet your accommodation and reasonable expenses as outlined on page 8 of the attached information for witness booklet should you decide to challenge evidence of those witnesses. I also note that Craig Steyn will be made available for cross-examination at later stage in the proceedings should you or any other interested party request to cross-examine him.

I have also now confirmed that unlike Mr Steyn and yourself where the Commission has allowed for other interested parties to cross-examine at the latter portion of these proceedings, this will not occur with respect to remaining witnesses. The Commission will be *immediately* considering applications made by interested parties to cross-examine those witnesses. This means that, you being an interested party, will need be physically present should you choose to make an application to the Chief Commissioner to cross-examine a witness.

I note that upon them being immediately examined it is likely the Commission will excuse those witnesses from their summonses. So it is important should you choose to cross-examine a witness that you be physically present in the hearing room to make that application to the Chief Commissioner.

Should you have any queries and concerns in relation to the above do not hesitate responding by way of email.

Yours faithfully,

[REDACTED] | Senior Lawyer

NSW Independent Commission Against Corruption

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

tel: 8281 5 [REDACTED] | fax: 9264 5364 | web: www.icac.nsw.gov.au

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Application to cross-examine Alexandre Dubois and Craig Steyn [SEC=UNCLASSIFIED]
Date: Monday, 7 June 2021 6:46:33 AM
Attachments: [Standard ICAC directions for public inquiries.pdf](#)
[Information for witnesses - March2021.pdf](#)

Dear Legal Representatives and self-represented Interested Parties,

I refer to the Chief Commissioner's statements made at the conclusion of counsel-assisting's examinations of Craig Steyn on 17 May 2021 (at 492T) and Alexandre Dubois (at 1404T) (collectively '**the public official witnesses**').

Transcripts of the evidence have been regularly uploaded on at the ICAC public website with respect to Operation Paragon public inquiry. The link for the transcript to date can be found here: [Roads and Maritime Services – allegation concerning two former employees \(Operation Paragon\) - Independent Commission Against Corruption \(nsw.gov.au\)](#)

Given the number of witnesses involved and length of the public inquiry, the Chief Commissioner reserved applications to cross-examine the public official witnesses for the latter stage of proceedings in order to allow for all interested parties to fully appreciate the evidence adduced as it relates to them.

The Chief Commissioner is now receiving applications to cross-examine the public official witnesses. At the first instance applications to cross-examine should be submitted in *reply* to this email. These applications should be made in accordance with the attached ICAC standard directions for public inquiries ('**the standard directions**').

Without limiting the matters the Chief Commissioner can take into consideration in determining whether a person has sufficient interest to cross-examine the public official witnesses, the application should address the grounds outlined in paragraph 13 of the standard directions. The application should also provide an accurate estimate of how much time (in hours) is required to cross-examine each public official witness.

It would be appreciated if the legal representative acting on behalf of an interested party or a self-represented interested party seeking to cross-examine the public official witnesses provide their available dates for 16- 18 June 2021.

Applications should be sent by **5:00pm 11 June 2021**. Once applications have been received and determined by the Chief Commissioner it is anticipated that nominated days will be allocated for each public official witness to attend for the purpose of being cross-examined.

I reiterate self-represented interested parties that you also have a right to make an application to cross-examine the public official witnesses and any other witness you think adversely affects your position, though with respect to other witnesses you will need to be physically present to make an application to cross-examine a non-public official witness once they have concluded being examined by Counsel-Assisting. I once again attach the information for witnesses booklet and refer you to page 1 of the booklet should you wish to obtain free legal advice and legal representation from the Legal Branch at the Department of Communities and Justice. Further

details can be obtained at: <http://www.lro.justice.nsw.gov.au>.

Should you have any queries please do not hesitate to contact via email.

Yours faithfully,

██████████ | Senior Lawyer

NSW Independent Commission Against Corruption

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

tel: 8281 5██████████ | fax: 9264 5364 | web: www.icac.nsw.gov.au