

COMMISSION OF INQUIRY
INTO FORENSIC DNA TESTING IN QUEENSLAND

Brisbane Magistrates Court
Level 1/363 George Street, Brisbane

On Thursday, 20 October 2022 at 9.30am

Before: The Hon Walter Sofronoff KC, Commissioner

Counsel Assisting: Mr Michael Hodge KC
Ms Laura Reece
Mr Joshua Jones
Ms Susan Hedge

1 THE COMMISSIONER: Yes, Mr Hodge?

2
3 MR HODGE: Commissioner, I recall Mr Csoban.

4
5 THE COMMISSIONER: Mr Hodge, so I don't forget it, we will
6 have to adjourn at 3.45 today.

7
8 MR HODGE: Thank you, Commissioner.

9
10 <PAUL CSOBAN, recalled, on former oath: [9.36am]

11
12 <EXAMINATION BY MR HODGE:

13
14 MR HODGE: Q. Mr Csoban, there's no further statement
15 from you. I just want to ask you some questions about some
16 things that you have already helped the Commission with and
17 some additional things that have arisen.

18
19 I want to start with the evidence that you gave last
20 time, and what I will do is I will have the transcript of
21 what you said brought up. Operator, can we bring up
22 [TRA.500.004.0001 at 0092] and could we blow up for
23 Mr Csoban lines 29 through to 37. You'll see, Mr Csoban,
24 last time when I was asking you about the Options Paper and
25 whether there were any concerns that had been raised,
26 whether you were aware of concerns that had been raised by
27 Kylie Rika or Amanda Reeves and what you would have been
28 done if you'd been told, you said:

29
30 *I would have investigated further and*
31 *sought external advice, external expertise,*
32 *to get further details on it and to assess*
33 *fully the objections, as I did in another*
34 *case regarding DNA.*

35
36 Do you see that?

37 A. I can.

38
39 Q. At the end of that answer when you referred to
40 "another case regarding DNA", I had taken it at the time
41 that that was a reference to the concern that had been
42 raised by Amanda Reeves about a year and a half earlier in
43 relation to sperm microscopy; is that right?

44 A. That's correct.

45
46 Q. Perhaps if we start with this: could you explain to
47 the Commissioner, what was your understanding of the

1 concern that had been raised by Amanda Reeves about sperm
2 microscopy?

3 A. From memory, it was around the discrepancy between
4 observation of sperm in microscopy and the DNA profiling
5 that was elicited from doing the testing.
6

7 Q. Could I just check, when you say "from memory", have
8 you, in the last few days, looked back at any of the
9 documents in relation to this issue?

10 A. I have. I had limited time to do so, but - and there
11 was a large number of documents and, yes, I have had
12 a quick look through them.
13

14 Q. I take it your memory as to what the issue was has
15 been refreshed based on being able to look at those
16 documents?

17 A. To an extent, yes.
18

19 Q. The way you described that issue, I just wanted to
20 clarify something about that. Is it the case that you
21 understood back in - or by the end of 2016 that Ms Reeves
22 believed that there may be an issue in relation to the
23 identification of spermatozoa during the evidence recovery
24 phase of examination?

25 A. My recollection is that there was an issue with noting
26 sperm on a microscopic slide and then running the sample
27 through for DNA analysis, and there was a discrepancy
28 between observation of the sperm and the results from the
29 analysis.
30

31 Q. Do you recall whether you understood at the time that
32 the particular concern that Ms Reeves had was that sperm
33 were not being observed on evidence recovery slides when
34 they were doing microscopy and therefore were not being
35 further tested, when in fact it was being found in some
36 cases that there was DNA in the samples, or something to
37 that effect?

38 A. I can't recall that specific - no.
39

40 Q. Is it fair to say you understood that the issue that
41 Ms Reeves was raising at the time was a scientific issue?

42 A. Yes.
43

44 Q. That is, it was an issue about the quality of the work
45 being undertaken by the lab?

46 A. I understood it to be a process issue of the process
47 utilised and obtaining the best results from that.

1
2 Q. Yes, but you understood the process issue to be an
3 issue that went to whether or not the results being
4 produced by the lab were the best results possible or
5 competent results?

6 A. That's correct.

7
8 Q. That is, it was an issue that went to the competence
9 of the lab?

10 A. I'm sorry, could you repeat that?

11
12 Q. Yes. It was an issue that went to the competence of
13 the lab?

14 A. No, I would not agree with that. I don't think it was
15 the competence of the lab. I think it was the operating
16 procedures used by the lab.

17
18 Q. I see. Perhaps if I can put it this way: it was an
19 issue about whether there was a problem with the results
20 being obtained from the operating procedures?

21 A. Yes.

22
23 Q. You understood that the particular kinds of crimes
24 with respect to which these results were concerned were
25 crimes of a sexual nature?

26 A. Yes.

27
28 Q. You understood that the question, as Ms Reeves was
29 framing it, was to suggest that there was a problem with
30 the way the lab had been undertaking testing for
31 investigations in the past in relation to crimes of
32 a sexual nature?

33 A. I can't recall it being a problem in the past.
34 I recall it as being a problem that we were addressing.

35
36 Q. Just take a moment to think about that. What I'm
37 suggesting to you is it wasn't the case that in 2016 you
38 thought some problem had - if there was a problem, it was
39 a problem that had only occurred with respect to very
40 recent samples but, rather, that you understood that the
41 issue that Ms Reeves was raising as a concern dated back
42 some years?

43 A. I would not agree that I understood it was some years,
44 but I do agree that, yes, the issue was not an immediate
45 present problem, but it dated back.

46
47 Q. We will come back to that in a moment. Tell me if

1 this is accurate: you understood at the time - that is, in
2 2016 and 2017 when you were considering the issue - that
3 the issue had arisen because of a concern about the actual
4 results being obtained, not about the words in the SOP?

5 A. You are going to have to - could you repeat that,
6 please?

7
8 Q. Yes. I will put it a different way. You understood
9 that it wasn't the case that Ms Reeves had simply read the
10 SOP and said, "There's a problem with the process that is
11 described in this document, just on the face of the
12 document." You understood that the problem she was raising
13 was that there was a results issue, that the results being
14 obtained, when the process was used, were not what they
15 should have been?

16 A. Yes, I would agree with that.

17
18 Q. You understood, didn't you, by the end of 2016, that
19 Ms Reeves believed that there may be a need for a public
20 interest disclosure in relation to the issue?

21 A. I understood that she did say that, yes.

22
23 Q. You understood that the issue went to the integrity of
24 the scientific tests that had been undertaken in relation
25 to semen samples?

26 A. Yes.

27
28 Q. You say that therefore you sought to investigate the
29 issue; is that right?

30 A. That's correct.

31
32 Q. You told Ms Reeves that you had engaged an external
33 expert to undertake a scientific investigation?

34 A. Yes.

35
36 Q. I will show you a letter you sent. Can we bring up
37 [FSS.0001.0067.0539]. You see this is a letter, and at the
38 moment we've got the first page of the letter, which we can
39 see is addressed to Ms Reeves, and then can we go over to
40 I think the third page. Oh, no, keep going. Yes, the
41 fourth page. Do you see at the bottom of that document,
42 that's you who sent that letter to Ms Reeves on 3 February
43 2017?

44 A. Yes, I signed the letter, but I have to specify that
45 all these letters were drafted by our HR department.

46
47 Q. I see. But presumably you read the letter before you

1 signed it?

2 A. Of course.

3

4 Q. And if you thought it was inaccurate, you would have
5 changed it?

6 A. Yes.

7

8 Q. And so, insofar as it says something, it presumably
9 reflects what you intended to convey to Ms Reeves at the
10 time?

11 A. Yes.

12

13 Q. Can we go to page 3 of the letter. Do you see this is
14 item 3, "Outstanding issues with the scientific process"?

15 A. Yes, I can see it.

16

17 Q. You see in the third paragraph it says:

18

19 *As you are aware, I have engaged an*
20 *external expert, to undertake a further*
21 *scientific investigation and provide*
22 *a report ...*

23

24 A. Yes.

25

26 Q. You can see that that follows two paragraphs where, in
27 the first paragraph, you say:

28

29 *You have previously raised issues with the*
30 *integrity of the scientific tests that are*
31 *undertaken in relation to testing semen*
32 *samples which could [affect] the outcome of*
33 *criminal proceedings relating to sexual*
34 *assault cases.*

35

36 A. Yes.

37

38 Q. And in the second paragraph, you say:

39

40 *I take your concerns seriously,*
41 *particularly given the potential*
42 *implications of such testing being*
43 *unreliable ...*

44

45 A. Yes.

46

47 Q. Those things - we might take them in turn. In the

1 first paragraph, what you say there is true - that is, that
2 is what you understood to be the issue raised by Ms Reeves?

3 A. Yes.

4
5 Q. And the second paragraph is true - that is, you took
6 the concerns seriously, you say?

7 A. Yes.

8
9 Q. And then the third paragraph, where you say:

10
11 *... I have engaged an external expert, to*
12 *undertake a further scientific*
13 *investigation and provide a report ...*

14
15 You say that was true?

16 A. Yes.

17
18 Q. You are referring there in your letter to the ESR
19 engagement; is that right?

20 A. That is correct.

21
22 Q. What I want to suggest to you is that you intended
23 Ms Reeves to understand that you were engaging an expert to
24 consider her concern?

25 A. Yes.

26
27 Q. When you made the statement to Ms Reeves, intending to
28 convey to her that you had engaged an expert to consider
29 her concern, did you believe it was true?

30 A. Yes.

31
32 Q. Do you believe it was true today?

33 A. I'm sorry, believe what is true today - that
34 I believed it was true then or --

35
36 Q. No, no. Do you believe today that it is true that you
37 engaged an expert to review the concern raised by
38 Ms Reeves?

39 A. I would qualify that with not just her concerns, but
40 if someone raises a concern around the integrity of
41 testing, I would want that SOP to be examined in full, and
42 that's what I understood we were doing.

43
44 Q. I think I understand what you're saying, which is you
45 would want a review to go beyond the concern, the specific
46 concern, raised by Ms Reeves?

47 A. Yes.

1
2 Q. But coming back to my question, do you believe it is
3 true today that you engaged ESR to undertake a review of
4 the concern raised by Ms Reeves?

5 A. Yes.
6

7 Q. I see. We'll come then, in a moment, to that. Can we
8 bring up Ms Reeves' reply, which is [FSS.0001.0067.0543].
9 You will see this is a letter that is addressed to you. It
10 is dated 5 February 2017, and if we go to I think the third
11 page of that letter, we can see it is sent by Ms Reeves to
12 you?

13 A. Yes.
14

15 Q. Can we go back to the first page. At the bottom of
16 that first page - could we just blow that up - do you see
17 she says:
18

19 *In relation to point number 3...*
20

21 So this is the issue about the scientific process?

22 A. Yes.
23

24 Q. What she is clarifying - and perhaps if you just read
25 that last paragraph and then when you say you are ready,
26 the operator will bring up the next page - what she is
27 clarifying is this isn't just an issue that she had raised;
28 it was a concern that members of her staff had brought to
29 her and she had then escalated?

30 A. Yes, I've read that part. Yes.
31

32 Q. You will see she goes on to say, again confirming what
33 you had intended her to understand, that she appreciates
34 that you are getting the concerns of staff investigated
35 externally via an expert forensic review and she awaits the
36 outcome of that process?

37 A. Yes.
38

39 Q. By March 2017, I want to suggest to you that you had
40 a very good understanding of what the issue was that
41 Ms Reeves had raised. Do you agree with that?

42 A. I certainly would have had an understanding at the
43 time, yes.
44

45 Q. Well, I will show you a chain of emails. Could we
46 bring up [WIT.0019.0022.0001].
47

1 THE COMMISSIONER: Mr Hodge, are you going to tender
2 Mr Csoban's letter and Ms Reeves' reply?

3
4 MR HODGE: Yes, thank you, Commissioner, if they haven't
5 already been tendered.

6
7 THE COMMISSIONER: It is convenient to link them here if
8 one is looking at the transcript. Mr Csoban's letter to
9 Ms Reeves is exhibit 99.

10
11 **EXHIBIT #99 LETTER FROM PAUL CSOBAN TO AMANDA REEVES, DATED**
12 **3 FEBRUARY 2017, BARCODED [FSS.0001.0067.0539]**

13
14 THE COMMISSIONER: Ms Reeves' reply to Mr Csoban is
15 exhibit 100.

16
17 **EXHIBIT #100 REPLY FROM AMANDA REEVES TO PAUL CSOBAN, DATED**
18 **5 FEBRUARY 2017, BARCODED [FSS.0001.0067.0543]**

19
20 MR HODGE: Q. Mr Csoban, this is a chain of emails, and
21 I will just describe for you or help you to identify that
22 we see three emails on this page. The top email, so the
23 last in time, is an email from Cathie Allen back to you,
24 where she says, "I've tracked my changes below", and we'll
25 see in a moment what she is referring to.

26
27 Then if we go to the second email on the page, you
28 will see it is an email from you to Cathie Allen forwarding
29 something called "Confirmation of instructions", where you
30 say:

31
32 *Can you please [review] and send back any*
33 *amendments to me please.*
34 *I will do the same.*

35
36 Then you see the first email in time is an email from
37 Louise Syme to you, titled "Confirmation of instructions",
38 where she says:

39
40 *Dear Paul,*

41
42 *Thank you for your time yesterday. I have*
43 *provided below a summary of the information*
44 *you provided yesterday and framed a number*
45 *of questions to be answered in our advice.*
46 *Could you please advise whether the summary*
47 *and draft questions accurately reflect your*

1 *concerns?*

2

3 Then if we scroll down on the page, we see there is
4 a document that - well, there's a lot of text, and I will
5 come to it in a moment, but text setting out the background
6 to the issue that had been raised by Amanda Reeves?

7 A. I'm sorry, where are we looking at now?

8

9 Q. Do you see there's --

10 A. Oh, yes, "Background" - the whole document,
11 "Background"?

12

13 Q. Yes. Have you looked at this email recently?

14 A. It'd be probably one of about 80 I've looked at, yes.

15

16 Q. We can scroll to the bottom, I think, to see who
17 Louise Syme is. Do you recall she was a solicitor at
18 Crown Law?

19 A. Yes.

20

21 Q. Do you recall that you had briefed her to provide
22 advice in relation to the issue that had arisen?

23 A. Yes.

24

25 Q. If we go back up, then, to the second page --

26 A. Yes.

27

28 Q. -- do you see there is a detailed description about
29 the standard operating procedures in relation to sexual
30 assault kits?

31 A. Yes.

32

33 Q. Do you see there is a description, first, of what
34 happened prior to 2008, then a new process that arose in
35 mid-2010, and then, Mr Operator, if we scroll down the page
36 and then just stop, you see there is a paragraph which is
37 the second paragraph on the screen, which says:

38

39 *The SOP remained largely unchanged until*
40 *August 2016 when further risk mitigation*
41 *processes -*

42

43 I think that should be "were" --

44

45 *implemented to ensure that all samples were*
46 *processed.*

47

1 A. Yes.

2

3 Q. And you see it says:

4

5 *Whilst the SOP was amended in 2010, the*
6 *manual detailing the SOP was not amended*
7 *until August 2016.*

8

9 A. Yes.

10

11 Q. Then there is some commentary that seems to be
12 commentary from Ms Allen about that highlighted statement?

13

14 A. Yes.

15

16 Q. Is it the case that what is being described by Ms Syme
17 as her understanding is information that came from you?

18

19 A. Yes.

20

21 Q. And so was it the case that by March 2017, you
22 understood that there had been an SOP that had been
23 introduced in mid-2010, and in August 2016 there had been
24 further risk mitigation processes that were introduced?

25

26 A. Yes, if that's documented, yes, that's what I would
27 have read.

28

29 Q. And you see then the next paragraph says:

30

31 *A member of the Reporting Team ... raised*
32 *concerns regarding the new process being*
33 *"bad science" around ...*

34

35 and it looks like you or Ms Syme might have thought it
36 was June 2016, and Ms Allen has corrected it to say it was
37 March 2016, and then the next sentence says:

38

39 *In response to those concerns the FSS*
40 *implemented risk minimisation processes for*
41 *the analysis of sexual assault kits ...*

42

43 A. Yes.

44

45 Q. And so tell me if you agree with this: it seems that
46 you must have understood, by March 2017, that Ms Reeves had
47 raised a concern about the science being used and that that
48 had prompted, some months later, the introduction of what
49 is described as a risk minimisation process?

50

51 A. Can you put that to me again, please, Mr Hodge?

1
2 Q. Yes. It seems that by March 2017, you must have been
3 aware that in March 2016 Ms Reeves had raised a concern
4 about the science and that that had prompted the
5 introduction of risk minimisation processes some months
6 later?

7 A. I cannot recall with any great detail about that
8 particular incident.
9

10 Q. Is it the case that now, looking back at this email,
11 whilst you can see what is written and infer that you must
12 have known these things at the time if you had told Ms Syme
13 about it, you can't actually remember, now, having known
14 these things?

15 A. A lot of the detail that I told or that we told Louise
16 was presented by Cathie Allen as well. She was more expert
17 at this than I was; she had more history of it than I did.
18

19 Q. I understand. But whilst that is undoubtedly the
20 case, that she's more expert than you, you agree with me,
21 don't you, that (a) you were her manager at the time?

22 A. Yes.
23

24 Q. (b) you had responsibility above her in relation to
25 the operation of the lab?

26 A. Yes.
27

28 Q. (c) an issue had been raised that went to the
29 integrity of the work being undertaken by the lab?

30 A. Yes.
31

32 Q. (d) the issue or concern that had been raised was one
33 that you regarded, you've said in correspondence, as
34 serious?

35 A. Yes.
36

37 Q. (e) it was one that you thought, if it received
38 a public airing, might have reputational consequences for
39 the lab?

40 A. Yes.
41

42 Q. (f) therefore, acting responsibly, you would have
43 sought to understand, in as much detail as necessary, what
44 the issue was?

45 A. Yes.
46

47 Q. And (g) sought as much confirmation as possible as to

1 whether the issue was ongoing or had been resolved or had
2 affected past results?

3 A. Yes.

4
5 Q. You had earlier engaged ESR to review the SOP, and
6 I will bring up the document, which is
7 [FSS.0001.0079.3246]. This is a chain of emails, I should
8 say. If we just blow up the bottom half of the page, you
9 will see the earliest email in time is an email from
10 a person named Steve Cordiner to you?

11 A. Yes.

12
13 Q. Then you forward that email to Cathie Allen with just
14 the one word, "Happy?"

15 A. Yes.

16
17 Q. Then if we go, for completeness, to the last email in
18 time, we'll see Ms Allen responds and says, "Yes, happy?"

19 A. Yes.

20
21 Q. Then let's go back down to the bottom of the page,
22 operator. You will see at the very bottom of the email,
23 Mr Cordiner says:

24
25 *I have read the terms of reference you*
26 *provided and also contacted Cathie Allen*
27 *this morning and understand your*
28 *requirements to be ...*
29

30 Then if we go over the page, we can see what they are?

31 A. Yes.

32
33 Q. You will see item number 1 is:

34
35 *An independent review [of] the SOP for*
36 *examination of sex assault cases, taking*
37 *into account the other related technical*
38 *documents provided, to ensure that the labs*
39 *processes are valid, scientifically sound,*
40 *and in line with best practice.*
41

42 A. Yes.

43
44 Q. And then item 2:

45
46 *To make recommendations on any improvements*
47 *to the SOPs ...*

1
2 A. Yes.

3
4 Q. You will see Mr Cordiner is from ESR?

5 A. Yes.

6
7 Q. So it was the case, wasn't it, that you were directly
8 emailing ESR to arrange for this review to be undertaken?

9 A. Yes.

10
11 Q. I will then show you the terms of reference, which are
12 [FSS.0001.0024.1535].

13
14 THE COMMISSIONER: Do you want to tender the chain of
15 emails?

16
17 MR HODGE: I'm sorry, yes, I do. Thank you, Commissioner.

18
19 THE COMMISSIONER: The chain of emails relating to the
20 instructions to ESR is exhibit 101.

21
22 **EXHIBIT #101 CHAIN OF EMAILS RELATING TO THE INSTRUCTIONS**
23 **TO ESR, BARCODED [FSS.0001.0079.3246]**

24
25 MR HODGE: I'm not sure I tendered the chain of emails
26 between Mr Csoban, Ms Allen and Ms Syme.

27
28 THE COMMISSIONER: The chain of emails between Mr Csoban,
29 Ms Allen and Ms Syme, is exhibit 102.

30
31 MR HODGE: Thank you.

32
33 **EXHIBIT #102 CHAIN OF EMAILS BETWEEN PAUL CSOBAN, CATHIE**
34 **ALLEN AND LOUISE SYME, BARCODED [WIT.0019.0022.0001]**

35
36 MR HODGE: Q. You will see this is what is described as
37 the terms of reference and it is dated 31 January 2017?

38 A. Yes.

39
40 Q. If we go over the page, I think over two - have you
41 reviewed this document recently?

42 A. I have read it, but not in detail.

43
44 Q. If we just blow up "Background", at the top, do you
45 see the background says:

46
47 *An issue has been raised specifically*

1 *regarding spermatozoa negative, acid*
2 *phosphatase negative sexual assault*
3 *samples, however a review of the processing*
4 *of SAIKs would be appreciated in the spirit*
5 *of continuing quality improvement.*

6
7 A. Yes.

8
9 Q. Then you see the "Terms of Reference" say:

10
11 *The objective of the scientific review is*
12 *to examine the processing of sexual assault*
13 *investigation kits in the Forensic DNA*
14 *Analysis laboratory to ascertain its*
15 *validity as an acceptable, scientific*
16 *process.*

17
18 A. Yes.

19
20 Q. Then you see it says:

21
22 *Specifically, the review will consider the*
23 *following ...*

24
25 and then there are four bullet points?

26 A. Yes.

27
28 Q. You will see the first is the current SOP?

29 A. Yes.

30
31 Q. The second is the associated SOPs?

32 A. Yes.

33
34 Q. The third is a small report titled "AP Paper - False
35 Positive Investigation"?

36 A. Yes.

37
38 Q. And the fourth is other documents requested by ESR?

39 A. Yes.

40
41 Q. That paper, "AP Paper - False Positive Investigation",
42 do you know what that was about?

43 A. I can't recall now, no.

44
45 Q. I will show it to you. Can we bring up
46 [FSS.0001.0066.9267].

1 MR HODGE: I tender the terms of reference, Commissioner.

2
3 **EXHIBIT #103 TERMS OF REFERENCE, DATED 31 JANUARY 2017,**
4 **BARCODED [FSS.0001.0024.1535]**

5
6 MR HODGE: Q. Now, you see this is that paper, "False
7 Positive Investigation"?

8 A. Yes.

9
10 Q. You see it describes an incident, which is:

11
12 *On 08/11/2016 whilst carrying out*
13 *testing ... the negative control gave*
14 *a false positive AP result ...*

15
16 A. I'm having a bit of trouble reading it, but yes.

17
18 Q. Can we just blow up "Incident" for the benefit of
19 Mr Csoban. Thank you.

20 A. Yes.

21
22 Q. This seems to describe what on its face appears to be
23 a one-off incident when a negative control, which should
24 not have any positive result, gave a false positive result?

25 A. That would be the gist of the paper, yes.

26
27 Q. Then it describes an investigation and the outcome of
28 the investigation, which you can have a look at if that
29 would help you to refresh your memory.

30 A. I honestly cannot recall this document.

31
32 Q. Do you agree with me, this document doesn't describe
33 or address in any way the issue raised by Ms Reeves?

34 A. As I have just said, I can't recall this document, and
35 without going through in great detail and remembering all
36 the facts, I can't comment on that.

37
38 Q. I think you can. Let's just think about it. You
39 know, don't you, that the issue raised by Ms Reeves wasn't
40 about false positives; it was about false negatives?

41 A. Yes, that's my recollection.

42
43 Q. And this is a paper which is about a one-off incident
44 of a false positive?

45
46 THE COMMISSIONER: In December 2016.

1 MR HODGE: November 2016.

2

3 THE COMMISSIONER: November 2016.

4

5 THE WITNESS: That certainly is this paper's gist, yes.

6

7 MR HODGE: Commissioner, I actually think Ms Hedge
8 tendered this document and the preceding document earlier
9 in the week. I don't know --

10

11 THE COMMISSIONER: I'm not sure that's so, but let's mark
12 it exhibit 104.

13

14 **EXHIBIT #104 "AP PAPER - FALSE POSITIVE INVESTIGATION",**
15 **BARCODED [FSS.0001.0066.9267]**

16

17 MR HODGE: She tendered the terms of reference. She may
18 not have tendered this document. I recall her showing it
19 to you.

20

21 Q. Could we go back to the terms of reference, operator,
22 and go to page 2. Do you agree with me, Mr Csoban, that
23 nothing in the terms of reference disclosed to ESR the
24 specific issue raised by Ms Reeves?

25

26 A. No, not the specific issue, no.

27

28 Q. And nothing in the terms of reference disclosed that
29 as a consequence of that issue, a review had been
30 undertaken within the lab of the results?

31

32 A. Can you repeat that, please?

33

34 Q. Yes. Nothing in the terms of reference disclosed that
35 as a consequence of Ms Reeves raising this issue, a review
36 had been undertaken within the lab of the results being
37 obtained from evidence recovery slides?

38

39 A. No, there was no specific mention of Ms Reeves'

40 concerns.

41

42 Q. When you say "there was no specific mention", do you
43 say there's some mention?

44

45 A. My analysis at the time was that reviewing the whole
46 process as per the specifications would elicit any problems
47 that would arise and hence answer Ms Reeves' questions.

48

49 Q. I will need you to explain how you could have thought
50 that was true, and by that I mean this: you knew that the
51 problem being raised by Ms Reeves was not about the text of

1 the SOP on its face; it was about the results being
2 obtained from the application of that SOP. So I need you
3 to explain to the Commissioner how you could have believed
4 that a review of the text of the SOP would deal with or
5 address the issue if you didn't disclose the issue, which
6 was about the results, to ESR?

7 A. An SOP, or standard operating procedure, is designed
8 to produce a certain result, and if there is an error in
9 the process, then the result would not be valid. My
10 understanding was that there is a problem, as Amanda put
11 it, with the result due to the SOP. So reviewing the SOP,
12 which is straightforward, can elicit the problem of where
13 an issue might arise.

14
15 THE COMMISSIONER: I have to say, Mr Csoban, having seen
16 a great deal of material, written material, that was
17 produced at this time from Ms Allen, from you, from
18 Ms Reeves, I haven't seen a single suggestion that
19 Ms Reeves' concern related to the content of the SOP, as
20 opposed to the way the work was actually being done. You
21 might think about that when answering Mr Hodge's questions.

22
23 MR HODGE: Q. Do you have any further explanation you
24 can give, Mr Csoban, as to how you could have thought that
25 merely providing the SOPs would be sufficient to address
26 Ms Reeves' issue?

27 A. As I said, my understanding was that the SOP was the
28 reason that we were getting inappropriate results.
29 Reviewing the SOP to make sure that it was in line with
30 best practice could elicit a response to that.

31
32 Q. If that's true, that that was what you thought, then
33 tell me if you agree that this must follow: after you'd
34 got back the ESR report and saw that there was no issue
35 with the SOP, you must have then thought, "Well, there must
36 be some other reason why there is a problem with the
37 results. I should investigate that"?

38 A. Part of the - part of the concerns were whether there
39 was actually a problem with the results or not. So I'm -
40 so, as I said, the results are the outcome of an SOP. So
41 if the SOP was found to be valid, the results per se must
42 be valid.

43
44 Q. Now, you know that can't be true?

45 A. Unless - well, if I could finish, unless there is an
46 error in the performance of those tests in the lab against
47 the SOP.

1
2 THE COMMISSIONER: Q. You said a moment ago, Mr Csoban,
3 that part of the concern, as you understood it, was whether
4 there was a problem with the result or not; is that right?

5 A. Yes.
6

7 Q. I don't see that as a problem or concern that you
8 invited ESR to comment upon. Is there a reason for that?

9 A. Because my understanding was that the reason there was
10 a problem with the results was that the SOPs were not
11 correct.
12

13 Q. No, you said part of the concern was whether there was
14 a problem with the results, and a study of the SOPs won't
15 tell you whether there was a problem with the results, will
16 it?

17 A. Yes.
18

19 Q. So I don't see that concern referred to in the
20 instructions to ESR. Is there a reason for that?

21 A. At the time, I would have felt that the instructions
22 to ESR would have addressed the problems of the SOP, which
23 was my understanding was the primary concern.
24

25 MR HODGE: Q. It's a bit strange, isn't it, Mr Csoban,
26 because what you did include in the material to ESR was
27 a report about a different, one-off incident that had
28 arisen with respect to a result?

29 A. We gave - we gave, as I remember it, and I'm trying to
30 recall now - we gave all available information around this
31 to ESR to allow them to make an informed decision.
32

33 Q. Now, you know that's not true, because you can see
34 from the document that you didn't disclose any information
35 about either (a) the specific concern raised by Ms Reeves;
36 (b) the specific issue with the result raised by Ms Reeves;
37 (c) the work undertaken by the lab following the raising of
38 that concern to analyse whether it was valid or not; or (d)
39 the fact that after that analysis, a workaround had been
40 introduced in order to mitigate against the risk arising
41 from that issue. None of those things are disclosed.

42 A. No.
43

44 Q. So it's not true that you disclosed to ESR all of the
45 information that would enable them to be able to fully
46 consider this issue?

47 A. I felt that the information we disclosed was relevant

1 to the scope that we required them to comment on.

2
3 THE COMMISSIONER: Q. I want you to understand the
4 intent of this questioning, Mr Csoban. One finding that
5 I may be invited to make is that ESR was deliberately
6 misled by you and Ms Allen into returning a report that did
7 not address Ms Reeves' concern but that could be referred
8 to as having put that concern to rest.

9 A. No, Commissioner, I would totally reject the fact that
10 we deliberately misled ESR. My intention was always to
11 review the SOP to make sure it was best practice and gave
12 the best possible results.

13
14 MR HODGE: Q. But after you got the draft report back,
15 you knew that it didn't address specifically the issue
16 raised by Ms Reeves, didn't you?

17 A. I felt that the draft report indicated that the SOP we
18 were using was best practice, and that was my intent.

19
20 Q. I don't understand how that can have been your intent.
21 Your intent, as you have explained it, was that you were
22 concerned, had a serious concern about the issue raised by
23 Ms Reeves; you understood that issue; you were obtaining
24 a report to address the issues that had been raised by
25 Ms Reeves; you knew that she understood that you were
26 obtaining a report to address the issues that were raised
27 by Ms Reeves; you knew that she was saying to you, "These
28 issues are not just my issues. They are issues that have
29 been raised by more junior staff"; it was not in any sense
30 confined to the idea of reviewing the SOP to decide whether
31 it was in accordance with best practice?

32 A. Again --

33
34 Q. Did you say your purpose was just to review the SOP to
35 decide if it was in accordance with best practice?

36 A. Again, I understood that the issues arising were
37 because of the SOPs.

38
39 THE COMMISSIONER: Q. Who gave you that understanding,
40 Mr Csoban? Because we understand you're not a scientist
41 yourself, at least in this field, so you rely upon others
42 to advise you and inform you. So you gained that
43 understanding that you stated. What was the basis for
44 that, do you remember?

45 A. Not specifically, Commissioner, but I had
46 conversations with Cathie Allen and Justin around this
47 matter, from memory, and that seemed to be my

1 understanding, as I recall it now.

2
3 THE COMMISSIONER: Thank you.

4
5 MR HODGE: Q. I'm going to suggest to you that answer as
6 to what your understanding is doesn't make sense, and I'm
7 going to do it by reference to two documents. First,
8 I want to show you an email chain after the draft report
9 was received. Can we bring up [FSS.0001.0079.3297]. If we
10 go over to the second page, you will see you send an email
11 on 23 March 2017 to some people, which says:

12
13 *Please find attached the report from ESR.*

14
15 A. Yes.

16
17 Q. You obviously read the report before you sent this
18 email?

19 A. I would imagine I did, yes.

20
21 Q. You see you comment, in the second sentence, about the
22 process or the start time for the process that they
23 specify?

24 A. Yes.

25
26 Q. And you see in the third sentence, you advise other
27 people about the state of the first stage of Project #181?

28 A. Yes.

29
30 Q. And so you must have known what Project #181 was?

31 A. At that stage, (indistinct) appropriate, yes.

32
33 Q. But you can't remember now, I take it, what
34 Project #181 was?

35 A. Not specifically, no, I cannot.

36
37 Q. Then if we scroll up and we see the email that comes
38 back from the manager of human resources - so we might,
39 Mr Operator, need to show the - thank you. You see
40 Mr Franklin says:

41
42 *Is it a problem that the report does not*
43 *comment on the fact that Ms Reeves is wrong*
44 *in her thinking?*

45
46 *In terms that "false negative" issue*
47 *Ms Reeves discusses is not an issue at all.*

1
2 A. Yes.

3
4 Q. And so you must have realised, I want to suggest, on
5 reading the report, that it didn't on its face address the
6 issue raised by Ms Reeves?

7 A. I cannot recall that, no.

8
9 Q. You don't recall realising that?

10 A. I don't recall that being specifically an issue.

11
12 Q. Sorry, you don't recall what being specifically an
13 issue?

14 A. I don't recall this email and I don't recall the
15 circumstances around it at this stage.

16
17 MR HODGE: Commissioner, I tender that email.

18
19 THE COMMISSIONER: Exhibit 105.

20
21 **EXHIBIT #105 EMAIL CHAIN AFTER DRAFT ESR REPORT WAS**
22 **RECEIVED, BARCODED [FSS.0001.0079.3297]**

23
24 MR HODGE: Q. I want to go back to that chain of emails
25 we were looking at earlier, where you were instructing or
26 you were having a discussion with Crown Law. So can we
27 bring up [WIT.0019.0022.0001]. Then if we just go over to
28 the second page, can we scroll down. You see that
29 paragraph towards the bottom of the page, which says:

30
31 *A member of the Reporting Team ... raised*
32 *concerns ...*

33
34 A. Yes.

35
36 Q. Just read through that paragraph?

37 A. Yes.

38
39 Q. Again, recalling that this is an exchange of emails
40 dealing with a briefing that you are giving to Crown Law in
41 order to get advice, tell me if you agree with me: you
42 must have known that the concern that had been raised by
43 Ms Reeves was not simply about the SOP or whether the SOP
44 was producing good results; it was about a failure, for an
45 unknown reason, to identify sperm on a slide test or
46 presumptive test which had then previously led to it not
47 being tested?

1 A. I cannot recall the details as you put it.

2
3 Q. Well, before, when you answered the question from the
4 Commissioner and suggested that you had an understanding,
5 based on conversations that you must have had with Cathie
6 Allen or Justin Howes, which caused you to understand that
7 if there was a problem, it related to the text of the SOP -
8 what I'm suggesting to you is you don't have a basis today
9 to say to the Commissioner that that's true?

10 A. No, I disagree. To this day, I still remember that
11 the issue, in my memory and my recollection, is that the
12 SOP was not correct, leading to erroneous results.

13
14 Q. I see. In the documents that you have reviewed -
15 I accept many documents, quickly over the last few days -
16 have you identified a document in which you at the time
17 identified that as being your understanding of the issue?

18 A. I can't recall a document specifically like that, no.

19
20 Q. Can you recall a document in which you were told or in
21 which it is recorded that Ms Allen or Mr Howes had told you
22 that that was the issue?

23 A. No, not specifically.

24
25 Q. Do you agree with me, looking at this email, that if
26 you had that understanding at the time, that understanding
27 was wrong?

28 A. I can't comment on that. I would have to give it some
29 more thought and read more documents around it, but I do -
30 what I would like to do is reiterate that that was my
31 understanding at the time.

32
33 THE COMMISSIONER: Q. Your understanding at the time was
34 that Ms Reeves was raising a problem about results, and the
35 conclusion that you came to when briefing ESR and receiving
36 its report was that that problem was asserted to have been
37 due to a defect in the SOPs, and so the SOPs had to be
38 examined with a view to determining their integrity - their
39 soundness and validity, I should say, and hence the
40 instructions that were sent to ESR concentrated upon that
41 issue and their report concentrated upon that issue; is
42 that a fair summary --

43 A. That is a fair summary.

44
45 Q. -- of your understanding?

46 A. That is a fair summary, Mr Commissioner.

47

1 MR HODGE: Q. And so if that's the case, to come back to
2 a question I asked you earlier, on getting the report from
3 ESR and understanding that there was no issue with the text
4 of the SOP on its face, can you explain why you didn't take
5 any further step to investigate, then, why it was that
6 there was this issue with the results or whether there was
7 in fact an issue with the results?

8 A. Sorry, I'm just trying to think back on the process in
9 the --

10
11 THE COMMISSIONER: Q. Take your time, Mr Csoban. One
12 possibility is that, having a great deal on your plate in
13 your position, you came to understand that the issue was as
14 I put it to you a moment ago and that having received the
15 ESR report, it could be concluded that there was no problem
16 with the processes and that you knew that something had
17 been done in August 2016 to obviate the risk, and
18 therefore, the risk having been obviated, the SOPs being
19 sound, there was no reason to think that there was any
20 issue of concern?

21 A. I certainly agree with your last point, Commissioner,
22 and the reason I was trying to think back on whether there
23 was a question about whether the statements or whether the
24 concerns raised by Amanda were legitimate, and at no stage
25 was I aware that there were others who raised - well, no,
26 let me retract that. At that stage, I was not aware that
27 there were others who shared that concern. So thank you
28 for summarising. I would certainly like to take the
29 cop-out that I had a lot on my plate and therefore didn't
30 pay attention, but --

31
32 Q. No, I don't mean that you were superficial in your
33 examination of it because you were busy; I don't mean that.
34 I meant that this was one out of a number of issues. You
35 rely upon others to give you advice about matters that are
36 outside your expertise so that you can apply your judgment
37 to the issues as you understand them from advice that you
38 are given, and so having believed that Ms Reeves' concern
39 has its foundation in the process described in the SOPs,
40 and those SOPs having been examined and passed as sound,
41 and knowing, as we all know, that a step taken in August
42 had obviated what was seen then to be a risk to the
43 validity of results, it must have appeared to you that the
44 issue had been put to bed.

45
46 Now, what you didn't know, it seems, is that Ms Reeves
47 was passing on concerns about wrong results that had been

1 passed on to her by other scientists, and that continued to
2 be passed on to her after March, and that her concern was
3 not in relation to the SOPs but in relation to the fact
4 that there were wrong results coming forward, which meant
5 that samples were not being tested, which might have led to
6 solving sexual offences, and so her agitation of this issue
7 that you thought had been put to bed must have seemed to
8 you to be unreasonable?

9 A. I would say that that is a very good summation,
10 Commissioner.

11
12 MR HODGE: Q. Now, there is a problem, because, you see,
13 you got the ESR report in March 2017, and you recall you
14 had corresponded with Ms Reeves in February 2017, and she
15 had already told you - we can bring it up. Could we bring
16 up [FSS.0001.0067.0543]. This is the letter, remember we
17 looked at this a moment ago, that Ms Reeves sent back to
18 you?

19 A. Yes.

20
21 Q. If we go to the bottom of the page again - could we
22 just scroll down, Mr Operator, thank you. She had already
23 told you that these were concerns that had been raised with
24 her by staff, so you had been told that already.

25 A. There were a lot of statements made, some of which
26 I found were less than accurate, so I - I can't actually
27 recall this particular letter. There was a lot of
28 correspondence going backwards and forwards.

29
30 Q. Did you provide a copy of the ESR report to Ms Reeves?

31 A. I cannot recall.

32
33 Q. I want to suggest to you that you didn't.

34 A. You want to suggest to me what, sorry?

35
36 Q. You didn't provide a copy of the report to Ms Reeves.

37 A. It's entirely feasible, yes.

38
39 Q. What I want to suggest to you is this, that the way in
40 which you approached this was to deal superficially with
41 the scientific issue and treat this as an issue of
42 personality, because you regarded Ms Reeves as a difficult
43 personality?

44 A. I treated this as an issue, scientific issue, yes.
45 I might also add that as well as sourcing external review,
46 I passed it on to our quality manager to look into the
47 situation as well, who is a scientist as well. So I took

1 this very seriously, not as a superficial investigation.

2
3 Q. But surely when you look at what I've shown you this
4 morning, you couldn't now say to the Commissioner you
5 regarded what you did as an adequate investigation of the
6 issue raised by Ms Reeves?

7 A. At that time, I certainly would have thought that that
8 was an adequate examination.

9
10 Q. Well, do you think it was an adequate investigation
11 now?

12 A. Well, in hindsight, if I had a chance to review all
13 the documents all over again, I might be able to answer
14 that accurately, but on the face of it, it would appear
15 that there were some lacking issues, yes.

16
17 Q. Isn't it the case that you regarded this as an issue
18 where it was Ms Allen on one side and Ms Reeves on the
19 other and an issue of personality?

20 A. No, I did not regard it as such, because, as I said,
21 any issues with scientific content I would take very
22 seriously, and I took every step that I thought reasonable
23 at the time to arrive at a reasonable conclusion.

24
25 Q. So did you interrogate Ms Allen as to what the nature
26 of the problem was?

27 A. Yes, I sought - yes, on occasions; and Justin as well.

28
29 Q. You interrogated them, and you say they led you to
30 believe that if there was an issue, it was just an issue
31 with the text of the SOP?

32 A. That was my understanding at the time.

33
34 Q. I understand, but I asked you if you interrogated
35 Ms Allen about it, because you said you had taken it very
36 seriously, and you said "yes" --

37
38 THE COMMISSIONER: Perhaps "interrogate" is not a word
39 that is apt here, in that --

40
41 MR HODGE: I will put it a different way.

42
43 THE COMMISSIONER: -- Mr Csoban would not have
44 interrogated - could not have been expected to interrogate
45 anybody.

46
47 MR HODGE: I understand what you say, Commissioner.

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Q. You regarded this as a serious issue, you say?

A. I definitely did.

Q. And an issue that you wanted to get to the bottom of, to make sure you understood it?

A. Yes.

Q. And so you say you questioned Ms Allen about the issue?

A. Yes.

Q. And you say you questioned Mr Howes about the issue?

A. From memory, yes.

Q. And you say they gave you the impression that if there was an issue, it was about the terms of the SOP?

A. That is my recollection now, yes.

Q. Therefore, so long as you got the terms of the SOP reviewed, that would in some way confirm whether Ms Reeves was right or wrong about the scientific issue she was raising?

A. That is my recollection, yes.

Q. Why did you understand that a workaround had been implemented?

A. I felt - I understood that was an improvement in the process. So the process was adequate, but processes can always be improved, and they are constantly reviewed and improved.

Q. But you understood, didn't you, that the workaround was implemented because of the issue raised by Ms Reeves?

A. I didn't understand that it was particularly because of the issues raised by Ms Reeves, no.

MR HODGE: I was going to move to another topic, Commissioner, unless you had any more questions about that.

THE COMMISSIONER: No, thank you.

MR HODGE: Q. I want to just ask you about something very brief, and that is in relation to a confidential bin that we have heard about. Is it the case that immediately after Ms Reeves left the DNA unit, Ms Allen came to you to talk about something that had happened in relation to the

1 confidential bin?

2 A. Yes.

3

4 Q. What did she tell you had happened?

5 A. She said that she had been informed by other staff
6 members that all the - no, I shouldn't say "all" - that
7 a great degree of documentation was being placed into the
8 confidential bin for disposal.

9

10 Q. Yes, that was what she told you the issue was?

11 A. Well, the issue was that some of the staff felt that
12 some of the documents should not have been disposed of.

13

14 Q. And so did you and Ms Allen take a key and go and
15 unlock the confidential bin?

16 A. Yes.

17

18 Q. And then, at the same time, you took photos of
19 Ms Reeves' workstation?

20 A. I cannot recall taking photos of her workstation.

21

22 Q. I will come to that in a moment. You took the
23 confidential bin into your office?

24 A. Yes.

25

26 Q. And then you and Ms Allen went through the contents of
27 the confidential bin?

28 A. Yes.

29

30 Q. Were you identifying things that you thought possibly
31 should not have gone into the bin?

32 A. With the aid of Cathie, yes.

33

34 Q. What was the test you were using as to whether
35 something should or shouldn't have gone into the
36 confidential bin?

37 A. I was advised by Cathie about what the document
38 requirements were in terms of keeping them for a certain
39 period of time, what were confidential, what should have
40 been retained.

41

42 Q. Tell me if I am right about this: presumably, what
43 you expected to be in the confidential bin were
44 confidential documents?

45 A. Of course. But what I didn't expect was case notes,
46 signed documents that weren't backed up, to be in that bin,
47 which were - which all - all scientists know that there is

1 a certain period of time that all scientific results are
2 kept either in hard copy or backed up.

3
4 Q. So you were going through and identifying whether
5 there were things that had not been backed up that were in
6 the bin?

7 A. I was reliant on Cathie to advise me of this.

8
9 Q. So she was, as you were going through it, telling you
10 whether something had or hadn't been backed up? How were
11 you doing it?

12 A. Yes.

13
14 Q. In your office, what, on the floor?

15 A. I can't actually remember where it was, but, yes, we
16 were going through it and we were putting it into piles
17 that could be disposed of and piles that shouldn't have
18 been disposed of.

19
20 Q. You couldn't know whether it shouldn't have been
21 disposed of without knowing whether there was some back-up
22 copy held on AUSLAB?

23 A. Well, it wasn't done that night. We actually kept the
24 bin overnight and we did it the next morning - it could
25 have been the next day. I can't remember.

26
27 Q. Was the purpose that you were doing this for to try to
28 preserve things that you thought ought to have been kept?

29 A. Absolutely.

30
31 Q. Was the purpose also because Ms Allen wanted to seek
32 to discipline other staff?

33 A. I don't think that was the purpose, no.

34
35 Q. Did she at some stage express to you the view that she
36 wanted to sack Ms Reeves?

37 A. Not that I can remember.

38
39 Q. Does that mean it's possible that she did?

40 A. It means I can't remember whether she did or not.

41
42 Q. Did she express to you the view that she wanted to
43 discipline staff?

44 A. She expressed the view that this was in direct
45 contravention of policy and the requirements to keep
46 confidential records for a period of time and that there
47 should - it should be brought to the attention of HR to see

1 if any further action should be taken.

2
3 Q. But tell me if you agree with this: before you could
4 know whether there was a contravention of the policy, the
5 first thing you would have to do would be to painstakingly
6 go through each document and check whether it was in or
7 outside of the relevant record-keeping period and whether
8 there was another copy of it kept in electronic form, for
9 example, on AUSLAB?

10 A. Sorry, can you repeat that?

11
12 Q. Yes. Tell me if you agree with this: before you
13 could know whether a document was or was not supposed to be
14 kept, you would first need to identify whether the document
15 was in or outside of any record-keeping period and whether
16 another copy of the document was or was not kept on some
17 electronic database, for example, AUSLAB?

18 A. When you say "you", are you specifically referring to
19 me or the plural "you"?

20
21 Q. The plural "you".

22 A. I would have passed it on to HR, which we duly did,
23 and let them do the investigation and form their opinions
24 about that. I would not have done it myself and gone
25 through every document to check whether it was on - backed
26 up or not.

27
28 THE COMMISSIONER: Q. Mr Hodge means that in principle,
29 before you could come to the view that anything untoward
30 had happened, one would have to know that a document in the
31 bin did not have a back-up electronically, and it was only
32 in that case that any issue would arise as to breaches of
33 policy or guidelines or legislation?

34 A. In principle, I agree with that, yes.

35
36 MR HODGE: Q. Tell me, though, this is what I'm trying
37 to understand: you have said you raised an issue with HR;
38 is that right?

39 A. I don't think I raised it. I suggested that we give
40 it to HR to investigate.

41
42 Q. I see. So you got Ms Allen to raise it?

43 A. That is my recollection, yes.

44
45 Q. Before you suggested to her that an issue be raised
46 with HR, did you first satisfy yourself as to whether there
47 were documents that were in the bin that ought not have

1 been in the bin?

2 A. I certainly satisfied myself of the fact that there
3 were some very confidential, handwritten, original
4 documents there, that if they had not been backed up was in
5 direct contravention of requirements to keep copies of
6 them. So, as far as I could tell, there were definitely
7 documents there that were originals, signed and documented.
8 I relied on Cathie to tell me which ones were required to
9 be kept and which ones would have been put on - put as
10 a back-up.

11
12 Q. I understand. What I'm suggesting to you is, if you
13 were properly discharging your duties, before you would be
14 suggesting that anyone refer anything to HR, you would want
15 to know whether or not there were specific documents that
16 were in the bin that ought not have been in the bin?

17 A. I was informed by Cathie that there were, yes.

18
19 Q. I will show you an email. Can we bring up
20 [WIT.0019.0023.0001]. So you see, this is an email that
21 Ms Allen sends on the Friday, 30 March to Ms Wyman-Clarke
22 and Mr Riddell, and I think they were in Queensland Health
23 HR; is that right?

24 A. Yes.

25
26 Q. She has copied the email to you, so she has described
27 what the two of you had just done over the preceding
28 roughly 24 hours?

29 A. Yes.

30
31 Q. Which is you went to block 3 with a key to the
32 confidential bin, you opened the bin and noted loose diary
33 pages and secured the bin in your office?

34 A. Yes.

35
36 Q. And then she says:

37
38 *We also noted paper from notebooks on the*
39 *floor in the area of Amanda's desk (see*
40 *attached pic ...*

41
42 A. Yes.

43
44 Q. And she has various photos that she seems to have
45 taken of things around Ms Reeves' desk?

46 A. Yes.

47

1 Q. Were you there when the photos were being taken?
2 A. As I said before, I cannot recall photos being taken.

3
4 Q. I will show you in a moment those photos. And then
5 you see she says in the next point:

6
7 *Paul and I tidied the desk area ...*

8
9 A. Yes.

10
11 Q. And:

12
13 *... there was a considerable amount of*
14 *material ... that could be discarded.*

15
16 A. Yes.

17
18 Q. And then says:

19
20 *Diaries were left behind ...*

21
22 but she couldn't locate the 2017 and 2018 diaries?

23 A. Yes.

24
25 Q. Then you will see there is a last dash, which is:

26
27 *All the casefiles were removed from the*
28 *desk area and will be stored appropriately.*

29
30 A. Yes.

31
32 Q. So it wasn't the case, was it, that Ms Reeves had just
33 thrown all of the case files in the confidential bin?

34 A. Well, my recollection is that there were case files in
35 the confidential bin.

36
37 Q. Listen to my question. It wasn't the case that
38 Ms Reeves had simply thrown all of the case files into the
39 confidential bin, because you can see from the email that
40 it says:

41
42 *All the casefiles were removed from the*
43 *desk area and will be stored appropriately.*

44
45 A. Yes.

46
47 Q. Then if we scroll down, you will see that Ms Allen

1 then identifies who the staff member is who had raised an
2 issue of what she apparently described as a "shredding
3 party"?

4 A. Yes.

5
6 Q. Then Ms Allen has apparently gone and checked or
7 looked at what record-keeping training different people
8 should have undertaken?

9 A. Yes.

10
11 Q. And then she asks for advice as to the next steps?

12 A. Yes.

13
14 Q. So when she sent this email, as I understood your
15 evidence earlier, she sent it because you had advised her
16 that she ought to send it - she ought to raise the issue
17 with HR?

18 A. Yes. I felt that was appropriate.

19
20 Q. But tell me if you agree with this: at this stage,
21 all you knew were that there were documents with
22 handwritten notes in the confidential bin; you didn't yet
23 know whether there was anything that was backed up or kept
24 anywhere else?

25 A. I was told by Cathie that they had not been, at that
26 stage.

27
28 Q. Now, I just want you to take your time with this. Do
29 you really say that by 2pm on the Friday afternoon,
30 Ms Allen had already told you that she had checked and
31 there were no back-ups of these documents?

32 A. I was definitely informed that some of these documents
33 were not backed up.

34
35 Q. Tell me if you agree with this: it's strange, then,
36 if that was something that Ms Allen had already determined
37 and told to you, that she doesn't include that information
38 in the email that she sends to HR?

39 A. I can't comment on that. You will have to ask
40 Ms Allen.

41
42 Q. Well, it's the fundamental piece of information that,
43 on your account, is what led you to say to her, "You should
44 raise it with HR"?

45 A. We both had concerns about the fact that if this was
46 the case, it should be addressed. My advice to give it to
47 HR was they could investigate and come to a conclusion on

1 it. I had no preconception or idea of what the results
2 would be, and I felt that they would be in the best
3 position to do the investigation, if appropriate.
4

5 Q. What is it that you thought would be investigated -
6 whether there were back-ups of these documents or whether
7 there was a breach of record-keeping rules?

8 A. Both. I mean, my concern was that there was documents
9 being disposed of that should be kept, for whatever reason,
10 as required by legislation or good record-keeping or
11 because QPS required them.
12

13 Q. So why did you not say to Ms Allen, "Your first
14 priority is to go and go through all of these documents and
15 check whether there are ones that should be kept and secure
16 them, because we also have that obligation"? Why did you
17 send her off to write to HR to complain about these people?

18 A. Let me clarify. We actually did go through the
19 documents and sorted them in the particular piles that we
20 felt should be kept or discarded, so that - well, when
21 I say "we", I assisted, but Cathie was the one who gave
22 most of the instructions on what should be kept. So that
23 actually occurred. We actually went through the documents
24 to determine which documents should be kept and which could
25 be discarded. And then at that stage, when Cathie said
26 that some of these weren't backed up, I said, "Well, that's
27 something we probably should refer to HR."
28

29 THE COMMISSIONER: Q. But it looks from the email that
30 there was no concern on her part at least that there had
31 been case files in the bin to be destroyed, with the risk
32 that they might not have been backed up, because the case
33 files were said to have been found on the desk, where they
34 should be when the employee leaves, and so there's nothing
35 of that nature in the bin.
36

37 What is in the bin are some handwritten notes that are
38 not said in the email to be of a kind that had to be kept
39 or weren't backed up and some handwriting with QPS numbers
40 on it, which of course are confidential and ought to be
41 destroyed or secured, and there was absolutely nothing on
42 the face of the email, as I can see - but you correct me if
43 I'm wrong, because you are more familiar with this - I see
44 nothing on the face of the email to suggest that the
45 documents Ms Reeves - presumably Ms Reeves - put into the
46 bin were documents that ought not have been destroyed
47 confidentially, unless you see something in the email - on

1 the first page of the email, please, Mr Operator, if you
2 could show us that list at the top of the page.

3
4 So it seems that what is in the bin is, on the second
5 dot point, some loose diary notes, the importance of which
6 is that they had staff member details on them, so it
7 doesn't immediately leap out at me that those are things
8 that ought to be preserved under policy or legislation; and
9 some loose notebook pages with QPS case numbers on them,
10 and again there's nothing that leaps out at me that
11 suggests that QPS case numbers on loose notebook pages are
12 something that ought to be preserved.

13
14 So what was the concern? I'm having trouble seeing
15 it, assuming the email is comprehensive and accurate.

16 A. No, my recollection certainly is that it was pointed
17 out to me that there were case notes there in the bin as
18 well. So while there might have been on desks as well, my
19 recollection is that there were certainly some in the bin,
20 confidential stuff that should have been kept. My sole
21 concern in this was to make sure that whatever
22 documentation was in the bin that should have been kept
23 were kept. Secondary to that was if there was a breach of
24 policy or in whatever capacity, that should be addressed by
25 HR.

26
27 Q. And you were given to understand that there were
28 documents in the bin that should be kept?

29 A. Yes.

30
31 MR HODGE: Q. We'll come to that in a moment. I want to
32 just ask you about the attachments. Can we bring up
33 [WIT.0019.0024.0001] - actually, what I might do -
34 Mr Operator, can you bring up each of the documents which
35 are [WIT.0019.0024.0001], [WIT.0019.0025.0001],
36 [WIT.0019.0026.0001] and [WIT.0019.0027.0001].

37
38 THE COMMISSIONER: Did you want to tender that email of
39 Ms Allen's?

40
41 MR HODGE: Yes, I might tender it together with the
42 attachments, Commissioner, if that is convenient.

43
44 THE COMMISSIONER: Yes.

45
46 Q. Mr Csoban, we generally adjourn at around 11 o'clock,
47 but that's for the comfort of the witness, not for the

1 comfort of anyone else, and so I ask you, do you want to
2 adjourn for 15 minutes or 20 minutes now, or soon, or would
3 you prefer to carry on?

4 A. No, Commissioner, I'm happy to carry on.

5
6 THE COMMISSIONER: Thank you.

7
8 MR HODGE: I think the operator is going to bring up the
9 four photos.

10
11 THE OPERATOR: Do you want them all brought up as one?

12
13 MR HODGE: Yes, if you could just bring them all up.

14
15 Q. Mr Csoban, these are the four photos that Ms Allen had
16 taken and attached to the email from HR. You will see one
17 of them, on the top-left corner, is a photo of Ms Reeves'
18 desk and you can see that there was a pamphlet that
19 presumably, well, one would infer Ms Reeves - it might have
20 been somebody else - had left on the keyboard.

21
22 Then the second photo is a close-up of that pamphlet,
23 which is a Queensland Government pamphlet entitled "What
24 can I do if I am assaulted at work?"

25
26 Then the third photo, in the bottom-left corner, seems
27 to be, as I read it, the photo that Ms Allen has described
28 as showing paper from notebooks on the floor in the area of
29 Amanda's desk. I think if you look very closely - maybe if
30 that could be blown up, Mr Operator - I think you can see
31 some tiny scraps of paper.

32
33 And then the last photo, on the bottom right-hand
34 corner, which we will blow up, is seemingly a page from
35 a calendar that had been torn out and left, possibly by
36 Ms Reeves, but in any event, Blu Tacked to her screen, that
37 has a quote saying, "If I'm too strong for some people,
38 that's their problem."

39
40 Now, I appreciate you might not remember now, but can
41 you offer any explanation for why these photographs were
42 being sent to HR?

43 A. No.

44
45 Q. Was there something particularly provocative about
46 a Queensland Government informational brochure titled "What
47 can I do if I am assaulted at work"?

1 A. Not that I'm aware of.

2
3 Q. Was there something particularly provocative about
4 a calendar page with a quote saying, "If I'm too strong for
5 some people, that's their problem"?

6 A. Again, not that I can see.

7
8 Q. Is there something particularly provocative about what
9 seems to be possibly tiny scraps of foolscap paper on the
10 carpet, presumably from pages being torn out of a notebook?

11 A. Again, no.

12
13 Q. But you presumably would have looked at these images
14 when the email was sent?

15 A. Possibly, but I can't recall them. I might add, my
16 sole concern again, let me reiterate, was the resolution of
17 the documents and making sure we kept the appropriate ones.
18 I was not after evidence of any wrongdoing at the time.

19
20 Q. It's hard to understand that answer, and I say this
21 because this is not an email which evidences any focus on
22 trying to ascertain whether documents ought to have been
23 kept and then keeping them. This is an email sent
24 immediately, seemingly, after you and Ms Allen had spent
25 the last 24 hours inspecting the contents of the
26 confidential bin, complaining to HR about staff and with
27 photos of items from Ms Reeves' desk. It just doesn't fit
28 at all with your expression of opinion that what you were
29 focused on was trying to secure documents that needed to be
30 secured. Do you agree with that?

31 A. No. I fail to see how you could come to that
32 conclusion that - I was more concerned about the documents,
33 about - rather than an email sent by Cathie to HR for them
34 to investigate.

35
36 Q. Do you remember whether, when you looked at this email
37 and these photos, you thought the attitude that Ms Allen is
38 demonstrating in relation to this issue is not appropriate?

39 A. Again, I can't remember seeing the photos, and I can't
40 recall thinking that, or one way or the other.

41
42 Q. When you look at these photos now and you read the
43 text of the email --

44
45 THE COMMISSIONER: Can we see the body of the email again,
46 please, Mr Hodge?

1 MR HODGE: Yes.

2

3 THE COMMISSIONER: Thank you.

4

5 MR HODGE: Q. So when you look at the photos and look at
6 the body of the email --

7

8 THE COMMISSIONER: What is the date of that email,
9 Mr Hodge?

10

11 MR HODGE: I believe it is 30 March 2018. Yes.

12

13 Q. Does it reflect the approach that you think is
14 appropriate to this issue?

15 A. I can only say that Cathie always had a very strong
16 sense of right and wrong, and perhaps she thought that this
17 was an issue that needed to be dealt with on a more serious
18 matter. I considered that, as I said, again, we had
19 resolved the issue of the documents, we'd kept what was
20 required to be kept and HR could make a decision about how
21 serious or what actions to be taken on this matter.

22

23 Q. But to come back to my question, when you look at the
24 email now and the photographs attached to the email, does
25 this reflect, in your view, an appropriate attitude to
26 management?

27 A. I would have to consider the context of the entire
28 situation, where we'd just gone through the process, again,
29 of sorting out documents which probably should not have
30 been disposed of.

31

32 THE COMMISSIONER: Q. It doesn't actually say in the
33 email that there was anything in the bin that shouldn't
34 have been disposed of, which is the key point. The only
35 point in this whole exercise is that there were documents
36 in the bin that shouldn't have been disposed of, and if
37 there's anything she doesn't say, it's that.

38 A. Yes.

39

40 Q. And it was copied to you, so you must have understood,
41 in the context that was fresh in your mind at the time,
42 that no such allegation was being made against anybody?

43 A. I'm sorry, was there a question, Mr Commissioner?

44

45 Q. I'm asking you, isn't it odd that at the height of
46 your concern is whether documents that ought to be retained
47 were being put in a bin for destruction, but that's the one

1 thing that is omitted in this email?

2 A. Yes, in retrospect, there probably should have been
3 that in the email. But in my view, my immediate dilemma
4 was solved. We'd gone through the documents. We retained
5 what had to be retained. So that issue was resolved. The
6 next issue was this, sent to HR. And, yes, in retrospect,
7 perhaps it should have been there.

8
9 Q. So what is the purport of this email, on your
10 understanding? It was copied to you. This was the first
11 communication to HR about this affair. What was the
12 substance of what they were being told that would interest
13 them?

14 A. That would interest them? I think Cathie felt that
15 there were breaches of the code of conduct or policy in the
16 actions of Amanda and the others, and she felt that this
17 should be addressed. That's only a summation. You would
18 have to ask Cathie her detailed response to that.

19
20 THE COMMISSIONER: Thank you.

21
22 MR HODGE: Q. I will just show you the last attachment,
23 which is [WIT.0019.0028.0001]. This is a chain of emails
24 that Ms Allen attached to the email in order to confirm
25 that Ms Reeves - you can see this at the bottom of the
26 page - had ordered a diary.

27 A. Yes.

28
29 Q. Again, it may be that you say you just can't take this
30 any further, but Ms Allen has seemingly taken the time to
31 go back - and if we scroll up, we can see - to search and
32 find a chain of emails that she is not on - oh, I'm sorry,
33 she finally gets the last email - and turn it into a PDF
34 and attach it --

35
36 THE COMMISSIONER: No, she gets --

37
38 MR HODGE: She gets the last one.

39
40 THE COMMISSIONER: No, the last one is the contemporaneous
41 one.

42
43 MR HODGE: You are quite right, Commissioner. I'm
44 mistaken.

45
46 Q. She attaches this email that she has searched for to
47 demonstrate that Ms Reeves has ordered a diary but doesn't,

1 in her email, set out what searches she has or hasn't done
2 in order to identify whether documents should or shouldn't
3 have been kept.

4 A. Sorry, Mr Hodge, was there a question there? I must
5 have missed it.

6
7 Q. I'm trying to understand whether, when you look at
8 this, you see this email as appropriate or reflecting
9 sensible management of the issue?

10 A. Can you just - can I just, sorry, look at the entire
11 chain, because I'm not sure what I'm commenting on here.

12
13 Q. Of course.

14
15 THE COMMISSIONER: Q. Let me summarise it for you. In
16 her email to HR, Ms Allen said, among other things, that
17 she couldn't find Ms Reeves' 2018 diary. Do you recall
18 that, that she said, "We couldn't find that", so maybe she
19 improperly took it with her, is the implication, I suppose.
20 So she then took the trouble, at 3 o'clock on the following
21 Monday, to get a copy of Ms Reeves' request to be supplied
22 with such a diary, evidently in an attempt to prove that
23 she had such a diary; she didn't leave it behind; ergo, she
24 might have wrongly retained it.

25
26 MR HODGE: Sorry, Commissioner, that email is 9 October
27 2017. So actually it's been forwarded --

28
29 THE COMMISSIONER: No, what I'm saying is in October 2017,
30 Ms Reeves asked for a diary for 2018.

31
32 MR HODGE: Yes, and the last email in time from
33 a Ms Harmer to Ms Allen is dated 9 October 2017. That was
34 my mistake before. So for some reason, back in October,
35 Ms Allen --

36
37 THE COMMISSIONER: I see. I see. Yes, you're quite
38 right.

39
40 MR HODGE: Ms Allen had been so interested in the
41 diaries --

42
43 THE COMMISSIONER: I withdraw what I said.

44
45 Q. The implication is that Ms Allen was taking the
46 trouble to obtain an email and send it to HR to prove that
47 Ms Reeves had ordered a diary, the one that she couldn't

1 find after Ms Reeves' departure, and what is being put to
2 you is this degree of concentration upon the important
3 issue of the missing diary might be regarded by some as
4 extreme behaviour in relation to something that wasn't so
5 important, and therefore the question to you is, would you
6 not regard the content of the email by Ms Allen to HR as an
7 inappropriate thing to have been done by a manager?

8 A. I'm sorry, Commissioner, I --

9
10 Q. We're spending a lot of time on the diary, you see,
11 when there are bigger fish to fry at FSS. So why is she
12 doing this, is the question, I suppose?

13 A. I can't answer that. Perhaps that's a question best
14 left for Ms Allen to answer.

15
16 MR HODGE: Q. Why did you let her do it?

17 A. I didn't see this email.

18
19 THE COMMISSIONER: Q. No, it was part of the attachment
20 in the email that was sent to HR, which was copied to you.

21 A. Oh. I'm sorry, I have no recollection of this.

22
23 MR HODGE: Q. And then I will show you - there was
24 another email that Ms Allen followed up with and again
25 copied to you. Can we bring up [WIT.0019.0029.0001]. You
26 will see about three weeks later, Ms Allen forwards the
27 email again to Ms Wyman-Clarke and to you, and it has,
28 therefore, the same attachments as the original email.
29 Ms Allen says she is following up on it, but you will see
30 this time she has added some information, she says:

31
32 *A number of items were located in the*
33 *Confidential Bin that should be retained*
34 *indefinitely - examples of this are*
35 *original examination notes from a sexual*
36 *assault case, original signed Intelligence*
37 *Reports and QPS documentation. Attached is*
38 *a list of documents that were retrieved*
39 *from the Confidential Bin and I have ranked*
40 *these in priority (attachment - Work*
41 *related items AJR). Can you please provide*
42 *me with an update on where this is up to?*

43
44 Actually, I should note one other thing. Also, in the last
45 paragraph, you see Ms Allen has studied the QIS records for
46 Ms Reeves to determine that Ms Reeves undertook
47 record-keeping training in 2011. Do you see that in the

1 last sentence?

2 A. Yes.

3

4 Q. Then if we bring up the attachment, the sixth
5 attachment, which is [WIT.0019.0035.0001].

6

7 THE COMMISSIONER: While that is being done, Mr Hodge, the
8 earlier email with the photo attachments - you didn't
9 tender that, did you? Exhibit 106.

10

11 MR HODGE: Thank you, Commissioner.

12

13 **EXHIBIT #106 EMAIL FROM CATHIE ALLEN DATED 30 MARCH 2018 TO**
14 **ANDRIA WYMAN-CLARKE AND ANDREW RIDDELL, BARCODED**
15 **[WIT.0019.0023.0001], TOGETHER WITH PHOTO ATTACHMENTS,**
16 **BARCODED [WIT.0019.0024.0001], [WIT.0019.0025.0001],**
17 **[WIT.0019.0026.0001] AND [WIT.0019.0027.0001]**

18

19 MR HODGE: Q. You will see this is the extract from
20 Ms Reeves' QIS training record?

21 A. Yes.

22

23 Q. And then if we bring up the seventh attachment, which
24 is [WIT.0019.0036.0001], you will see this is a document
25 that Ms Allen has seemingly prepared going through what she
26 found in the confidential bin?

27 A. Yes.

28

29 Q. She has grouped them into different categories?

30 A. Yes.

31

32 Q. Described as "High Risk", "Medium Risk" and "Low
33 Risk", and just blowing up "High Risk", you see the very
34 first item, which is described as "Original examination
35 notes for a Sexual Assault case", it says, "no other copy
36 and not scanned into AUSLAB"?

37 A. Yes.

38

39 Q. Then you see the next one, which is says to be
40 "Original intelligence reports", it says, "unknown if
41 copies of these are held on AUSLAB"?

42 A. Yes.

43

44 Q. Then the next one, which is a QPS submission of
45 articles for three reference samples for a 2017 case, it
46 said, "no copy on AUSLAB".

47 A. Yes.

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Q. Then the next one is "Diary notes regarding performance management of a staff member"?

A. Yes.

Q. Then the next one is "Meeting notes from the QPS Project Recognition meetings - Ms Reeves was the FSS representative on this group and unknown if these notes/minutes are held elsewhere for access by the organisation"?

A. Yes.

Q. Then the next one is "Meeting notes - not known if these are stored electronically"?

A. Yes.

Q. Then if we scroll down to "Medium Risk", you see the first one is "Copies of subpoenas", where it is said, "not known if these have been scanned into AUSLAB or stored within the casefile"?

A. Yes.

Q. Then there is a reference to "Weekly reports with handwritten notes"?

A. Yes.

Q. Then the next two items, it is said "unknown if these are stored"?

A. Yes.

Q. Then the next one says "Handwritten notes regarding cases"?

A. Yes.

Q. And then the last one under "Medium Risk" says "Case notes and kinship calculations - unknown why these discarded (could have been incorrect and therefore correct version stored on the casefile)"?

A. Yes.

Q. Then we can see there is "Low Risk". I don't want us to trouble ourselves with what, frankly, is the absurdity of these, but you see "Low Risk", the first one is "Moot court questions used during training (could be used for other trainees)". Do you see that?

A. Yes.

1 Q. Tell me if you agree with this: it seems like after
2 three weeks, Ms Allen had been able to identify less than
3 a handful of documents where she couldn't find a copy on
4 AUSLAB, and for most of what she described as the "High
5 Risk" and "Medium Risk" documents, she hadn't been able to
6 determine if they were stored elsewhere?

7 A. I think in the first lot, there was a couple that she
8 determined that they weren't stored elsewhere.

9
10 Q. Yes. Do you say, though, that she assured you back
11 three weeks earlier, on 30 March, that she had already
12 determined that some of these documents were not held on
13 AUSLAB?

14 A. She told me that some of these had not been on AUSLAB,
15 yes.

16
17 Q. On 30 March?

18 A. I can't remember the exact date, yes.

19
20 THE COMMISSIONER: Q. On the date that you went through
21 the bin.

22 A. Yes, that's my recollection.

23
24 MR HODGE: Q. AUSLAB is something that you log in to?

25 A. Yes.

26
27 Q. Did she log in to it in your office?

28 A. No.

29
30 Q. So did she leave your office, log in to AUSLAB and
31 come back and tell you that she had checked, and these
32 documents weren't on AUSLAB?

33 A. Not that I can remember, no.

34
35 Q. You don't actually remember whether she told you that
36 any of the documents were not on AUSLAB, do you?

37 A. I'm sorry?

38
39 Q. You don't actually remember whether she told you on
40 30 March 2018 that certain documents were not on AUSLAB?

41 A. My recollection is that she said that, yes.

42
43 Q. When you got this further email on 19 April and saw
44 that Ms Allen had gone to the point of checking the QIS
45 records as to when Ms Reeves had undertaken the
46 record-keeping training in 2011, what did you think she was
47 trying to achieve?

1 A. I cannot recall the details around this.

2

3 Q. Ms Reeves, by then, had left the DNA lab?

4 A. Exactly. That's why I probably wouldn't have paid all
5 that much attention to it in terms of the process being
6 undertaken going forward, which I felt was in the hands of
7 HR.

8

9 Q. But this is an email where Ms Allen is sending it to
10 you and Ms Wyman-Clarke, wanting to follow up on what's
11 happened?

12 A. Ms Wyman-Clarke was head of HR, so I would have left
13 it to her, yes.

14

15 Q. Did you read the email at the time?

16 A. More than likely, but I can't actually specifically
17 recall reading it amongst the thousands of others that
18 I had.

19

20 Q. She was still employed, Ms Reeves, wasn't she, by
21 Queensland Health?

22 A. Yes.

23

24 Q. Did you understand that Ms Allen was seeking to try to
25 have Ms Reeves disciplined or sacked from whatever position
26 she now held in Queensland Health?

27 A. I've already stated that I never heard her refer to
28 Amanda as wanting to be sacked.

29

30 Q. Did you understand that Ms Allen was pursuing
31 Ms Reeves to try to have her disciplined in whatever other
32 area she had gone to in Queensland Health?

33 A. I don't know if I would agree with the word
34 "pursuing". As I said to you before, I know that Ms Allen
35 had a very strong sense of right and wrong, and as
36 a manager she might have thought this was totally
37 inappropriate conduct and should be - someone should be
38 held accountable for it.

39

40 Q. At any point, either then or now, has this contrast
41 struck you, that in relation to the scientific issue as to
42 whether or not there was a problem with the sperm
43 microscopy on ER slides, no-one even bothered to send that
44 out or to spend the time to send that out to an external
45 expert to assess or to check whether it was right, and yet
46 seemingly an incredible amount of effort is being devoted
47 by Ms Allen, of which you are aware and part of, to

1 searching through and documenting the contents of
2 a confidential bin? Does that contrast strike you?

3 A. I'm sorry, not at the time, no.
4

5 Q. Does it strike you now?

6 A. Look, I don't think I can answer that, because, as
7 I said, we discussed at length my recollection of the
8 external advice sought and what I thought was appropriate
9 at the time, and this was - this was a process that was -
10 it was - I felt was in the hands of HR. So, yes, in
11 retrospect, there's certainly effort put into supplying
12 evidence.
13

14 Q. But it wasn't a process at this stage that was in the
15 hands of HR; you were being copied to an email where
16 Ms Allen is following it up to find out what's going on.

17 A. So doesn't that indicate that it was already in the
18 hands of HR?
19

20 Q. Mr Csoban, you understood, didn't you, that Ms Allen
21 was intent on pursuing Ms Reeves?

22 A. No, that was not my understanding.
23

24 Q. And the other staff that had supposedly been near the
25 confidential bin - did you approve Ms Allen pursuing them
26 as well?

27 A. I'm not aware that she was pursuing them.
28

29 Q. Are you aware of Ms Allen requiring three other staff
30 members to come and be interviewed by her in relation to
31 the confidential bin?

32 A. I can't recollect that, no.
33

34 Q. You don't remember whether you were told about it at
35 the time?

36 A. I can't - I can't recall knowing about it or being
37 told about it.
38

39 Q. You agree with me, don't you, that it was your
40 responsibility to manage Ms Allen?

41 A. Yes.
42

43 Q. And it was your responsibility to ensure that the
44 manner in which Ms Allen managed the DNA lab was
45 appropriate?

46 A. Yes.
47

1 Q. And it was your responsibility to ensure that that
2 management by Ms Allen of the DNA lab produced
3 scientifically worthwhile results?

4 A. Yes.

5
6 Q. And it was your responsibility to ensure that there
7 was a focus on science, not on personality?

8 A. Yes.

9
10 Q. Do you think you discharged that responsibility?

11 A. I felt I did it the best at the time, to the best of
12 my abilities, yes.

13
14 MR HODGE: I want to then move to another topic.
15 Commissioner, I'll probably only be 10 minutes on this
16 topic, but I'm just wondering, because other people may
17 have questions for Mr Csoban --

18
19 THE COMMISSIONER: Yes.

20
21 Q. Mr Csoban, Mr Hodge has about 10 minutes to go, so it
22 might be 15 minutes, I guess, and then others might have
23 questions for you. Would you like a break now or would you
24 like to carry on?

25 A. Look, perhaps a five-minute break for me to get
26 another glass of water and do --

27
28 THE COMMISSIONER: All right, let's have a 15-minute
29 break, because it won't make any difference, I think,
30 either way, and then others in the courtroom can go and get
31 a drink. So we will adjourn until 11.45.

32
33 **SHORT ADJOURNMENT**

34
35 THE COMMISSIONER: Yes, Mr Hodge.

36
37 MR HODGE: Thank you, Commissioner.

38
39 Q. Mr Csoban, I wanted to ask you some questions about
40 the Options Paper, which I examined you about last time,
41 but I just need to clarify some things from your evidence.
42 Could we bring up the transcript, bring up
43 [TRA.500.004.0001 at 0085]. Could we blow up for Mr Csoban
44 lines 40 to 47 on that page and lines 1 to 2 on the next
45 page.

46
47 You might recall the last time I examined you, I asked

1 you if were aware in 2017 of a project being undertaken
2 within the lab to examine "this issue", and the issue is
3 the issue that became the Options Paper, that is, whether
4 or not testing of samples between .001 and .0088 ng/ μ L
5 should be processed, and your answer was, yes, and you
6 received oral updates from Ms Allen?

7 A. Yes.

8
9 Q. And that remains your recollection?

10 A. Yes, at this stage.

11
12 Q. And so if you knew in 2017 that there was a project
13 being undertaken within the lab, did you know what the
14 purpose of the project was?

15 A. I can't specifically recall.

16
17 Q. Would you have known what outcome was envisaged by the
18 project?

19 A. Again, I can't specifically recall that.

20
21 Q. Would you have known whether it was envisaged --

22
23 THE COMMISSIONER: Mr Hodge, when you say "would you have
24 known", I'm sorry, I don't understand the basis of the
25 question. Do you mean did Mr Csoban --

26
27 MR HODGE: I'm sorry, yes, I framed it badly.

28
29 Q. Your answer is - if I'm asking you as I should have
30 asked you, "Did you know about what the purpose of the
31 project was?", you are saying you can't remember?

32 A. Correct.

33
34 Q. You don't know whether you knew at the time what
35 outcome was envisaged by the project?

36 A. Again, I can't recall that, no.

37
38 Q. Did you know whether it was envisaged that there would
39 be a recommendation to the QPS?

40 A. No, I can't recall knowing that.

41
42 Q. Did you know why the project was not completed?

43 A. No.

44
45 Q. If you didn't know those things, was that a failure of
46 your oversight?

47 A. Can I clarify - you said I didn't know. I don't

1 recall in detail about knowing about it. It's different --

2
3 THE COMMISSIONER: I'm sorry to interrupt you, Mr Csoban.

4
5 I don't think that's a fair question, Mr Hodge.
6 Mr Csoban would need a lot more hypothetical facts put to
7 him before he could sensibly answer a question like that.
8 I mean, he didn't know about something; "Was that your
9 failure?" - he'd have to know a lot more about it now to be
10 able to comment upon it.

11
12 MR HODGE: I understand, Commissioner. Perhaps if I could
13 add two things, one is I think Mr Csoban is saying he
14 doesn't know whether he didn't know.

15
16 THE COMMISSIONER: That's right, but --

17
18 MR HODGE: And the other part of it is, and I appreciate
19 we have leapt straight into this, but this is the topic
20 that I had previously examined Mr Csoban about, which is
21 the Options Paper and the decision not to test samples
22 between .001 ng/μL and .0088 ng/μL. I will ask Mr Csoban
23 some other things about that, and then I will ask him the
24 hypothetical.

25
26 THE COMMISSIONER: Yes, all right.

27
28 MR HODGE: Q. I want you to assume, Mr Csoban - and
29 I can show you the documents if this would help - that the
30 expected outcome from the project proposal for the project
31 was that a recommendation would be made to the QPS.

32 A. I was not aware of that.

33
34 Q. Sorry, just so I understand, does that mean you are
35 saying today you didn't know that at the time, that that
36 had been the project proposal?

37 A. I'm sorry, perhaps I misunderstood. Was I - I thought
38 the question was, was I aware that there was going to be
39 a specific recommendation made?

40
41 Q. Yes. Did you know that the original project proposal
42 was that there would be a recommendation made?

43 A. I can't recall knowing that, no.

44
45 Q. Is that the type of thing that you would expect to
46 have known - what the outcome of a project was expected to
47 be?

1 A. No, I don't think I'd agree with that. There's many
2 projects go on, and they have - I would not know of the
3 expected outcome of the project. I would have expected -
4 I would be expected to be informed if there was an outcome.
5

6 Q. I see. You gave some evidence - and I will bring this
7 up. Can we go to the page ending in .0110, Mr Operator,
8 and can we blow up lines 2 to 17 for Mr Csoban. You will
9 recall in your witness statement, you had said it was made
10 abundantly clear and fully agreed that there would be no
11 preferred option put forward by FSS?

12 A. Yes.
13

14 Q. Mr Hunter had asked you about that and you had said,
15 "Yes, that was the case", and then I asked you about that
16 and asked you who it was that you had made this abundantly
17 clear to, and you said, "I made it abundantly clear to
18 Cathie Allen and also to QPS."

19 A. Yes.
20

21 Q. I just want to understand that evidence. When is it
22 that you made it abundantly clear to Ms Allen that there
23 would be no preferred option?

24 A. I think, as I said, prior to presenting to QPS, there
25 were discussions around this, and I just wanted to be
26 absolutely clear that there were no options - there were no
27 preferred options, and it was agreed. I can't remember --
28

29 Q. Is that after --

30 A. I can't remember the specific date or time, but it was
31 certainly before presentation of the document.
32

33 Q. But after the Options Paper had been finalised?

34 A. Yes.
35

36 Q. And after it had been sent to QPS?

37 A. I can't - I can't recall that.
38

39 Q. Do you recall whether Ms Allen said to you that was
40 inconsistent with what had been originally envisaged for
41 the project?

42 A. I can pretty much categorically say that that was not
43 the case. I would have had something to question her about
44 at that point, and that never occurred. So I would say,
45 no, she did not say that.
46

47 Q. You had been involved the year before, in 2017, in

1 discussing options with QPS for what would happen with
2 processing P3 samples?

3 A. I had a range of discussions with QPS about a number
4 of things.

5
6 Q. I will show you an email. Can we bring up
7 [FSS.0001.0010.7061], and if we just blow up perhaps first
8 the email at the bottom of the page. You see this is an
9 email between Acting Superintendent McLaren to Ms Brisotto
10 and Mr Howes, copied to you --

11 A. Yes.

12
13 Q. -- on 19 July 2017, and the subject is "Options for
14 Volume crime processing"?

15 A. Yes.

16
17 Q. It says:

18
19 *Paula thank you for the email and for the*
20 *briefing and options paper regarding P+.*
21 *If it's OK I'd like to meet next week to*
22 *discuss the options moving forward ...*

23
24 A. Yes, I can read that, yes.

25
26 Q. Then if we go up the page, you will see the response
27 from Mr Howes is to say:

28
29 *Cathie returns next Tues, and she will*
30 *decide whether Paula or/and I will also*
31 *attend.*

32
33 A. Yes.

34
35 Q. Do you recall that there was a meeting that took place
36 that you attended to discuss what the options were for
37 volume crime scene samples?

38 A. I cannot recall that meeting, Mr Hodge, I'm sorry.

39
40 Q. Do you recall that what was changing was that the kits
41 that were being used to process priority 3 - that is,
42 volume crime samples - were expected to run out some time
43 in early 2018, and Queensland Health needed to make
44 a decision as to what kits it would switch to using for
45 priority 3 cases?

46 A. Yes, I do recall that.

47

1 Q. Do you recall attending a meeting with QPS to discuss
2 that?

3 A. No, I do not, not specifically.

4
5 MR HODGE: Commissioner, I tender that.

6
7 THE COMMISSIONER: Exhibit 107.

8
9 **EXHIBIT #107 EMAILS BETWEEN ACTING SUPERINTENDENT McLAREN,**
10 **PAULA BRISOTTO AND JUSTIN HOWES, COPIED TO THE WITNESS,**
11 **DATED 19 JULY 2017, BARCODED [FSS.0001.0010.7061]**
12

13 MR HODGE: Q. The next email is [FSS.0001.0010.7050].
14 This is a chain of emails you are not copied to, but if we
15 blow up the email at the bottom of the page, sent by
16 Ms Allen to Superintendent Frieberg, you will see Ms Allen
17 writes:

18
19 *Hi Dale.*

20
21 *I'm following up with you regarding the*
22 *discussion held on the options paper*
23 *regarding DNA profiling kits for Volume*
24 *Crime samples. During the meeting, we*
25 *discussed the various options available,*
26 *but all appeared to agree that processing*
27 *Volume Crime samples with*
28 *PowerPlex21 ... was the best option moving*
29 *forward.*
30

31 A. Yes, I can read that, yes.

32
33 Q. Does that assist you to remember a meeting that you
34 attended where there was a discussion about what kits would
35 be used for processing volume crime examples?

36 A. As I said, I can't recall a meeting - attending
37 a meeting of that nature.

38
39 Q. Do you remember, in relation to this issue, whether
40 Queensland Health had a preferred option as to what kits
41 should be used?

42 A. No, I can't - I can't recall having a preferred
43 option.

44
45 Q. In relation to what happened in 2018 and the 2018
46 Options Paper in relation to the testing of priority 2
47 samples in that .001 to .0088 ng/ μ L range, can you explain

1 why it was that you didn't want to put forward a preferred
2 position?

3 A. Yes. It was clear that there was going to be
4 information that the police would not have, however small,
5 and that decision should not and would not have been made
6 by us but would be entirely at the discretion of the
7 police, whether they thought the trade-off was good enough
8 for increased efficiency.

9

10 Q. I understand that, and I take it from your answer, as
11 I think we discussed on the previous occasion, it would
12 follow that nothing should be done without the agreement of
13 QPS?

14 A. Absolutely.

15

16 Q. But I'm interested in understanding why it would be
17 that you thought Queensland Health shouldn't put forward
18 any recommendation?

19 A. I'm sorry, I thought I just explained it, that I was
20 very concerned that there was information that police would
21 not have and it was up to them to decide whether the
22 trade-off in not having that information, however small,
23 would be sufficient to compensate for the increased
24 efficiency in turnaround times and resources.

25

26 Q. I just wanted to check one aspect, then, of that. Am
27 I right in thinking the view that you have just expressed
28 is not one that you ever put in writing at the time?

29 A. No, I don't believe I put that in writing at the time.

30

31 Q. Not internally and not to QPS?

32 A. Not that I can recall, but I do recall the sentiment
33 being expressed to QPS at the meeting.

34

35 Q. I understand, and you say you expressed that
36 sentiment?

37 A. My recollection is that I certainly did.

38

39 Q. Do you recall at the meeting whether anyone expressed
40 the view that - or anyone from QPS expressed a particular
41 view about what ought to be done about the samples?

42 A. I don't think anyone at the time from QPS expressed
43 a view about it, no. Not that I can recall, anyway.

44

45 Q. Then I want to finally just return to where I began
46 today, which is about the ESR report. Can we bring up
47 [FSS.0019.0021.0001 at 0006]. We should perhaps go to the

1 first page, just so you can see what this is. You see this
2 is the advice provided by Clayton Utz to HSQ in relation to
3 dealing with Ms Reeves --

4 A. Yes.

5
6 Q. -- dated 24 March 2017?

7 A. Yes.

8
9 Q. You would have seen it at the time?

10 A. More than likely, yes.

11
12 Q. Then if we go to the page .0006, you see there is
13 a heading "7. ESR Scientific Report"?

14 A. Yes.

15
16 Q. If we just blow that up, you will see Clayton Utz say:

17
18 *We have reviewed the ESR Scientific Report.*
19 *Whilst it appears to support HSQ's current*
20 *testing process, it is not clear whether it*
21 *also [considered] the testing process in*
22 *place prior to August 2016. In our view,*
23 *this needs to be clear if it is to be*
24 *presented to Ms Reeves.*

25
26 A. Yes.

27
28 Q. And then if we take that down, then you see "8. Next
29 steps":

30
31 *In accordance with our recommendation we*
32 *recommend that you meet with Ms Reeves to*
33 *discuss her potential return to work*
34 *including --*

35
36 and then (b) is --

37
38 *the outcome of the ESR Scientific Report -*
39 *noting that the report needs to be clear*
40 *that the report supports both the current*
41 *testing method and the testing method prior*
42 *to August 2016 ...*

43
44 A. Yes.

45
46 Q. After you would have read this letter, you met with
47 Ms Reeves?

1 A. Yes.

2
3 Q. I'm sorry, actually, just before we bring that down,
4 can we just scroll up to the top of the page. Can we just
5 keep going up, just so Mr Csoban can see it. This section
6 is dealing with the option of redeploying her to somewhere
7 else?

8 A. Yes.

9
10 Q. Then if we go down to the top of the page, we see:

11
12 *HSQ needs to have sufficient evidence to*
13 *support the reason for her transfer being*
14 *their concern regarding her competence and*
15 *capability to undertake the role given, for*
16 *example, her ongoing insistent in relation*
17 *to the risk assessment and re-examination*
18 *of the sexual assault cases needed to be*
19 *undertaken in relation to the sexual*
20 *assault cases dating between 2008/10 up to*
21 *8 August 2016 when the process was changed,*
22 *despite the results of the ESR Scientific*
23 *Report supporting the process.*

24
25 A. Just give me a minute to read that again, please?

26
27 Q. Sure.

28 A. Yes.

29
30 Q. It was the case, wasn't it, that you understood by
31 March 2017 that Ms Reeves' position was that there needed
32 to be a re-examination of sexual assault cases in the six-
33 to eight-year period before the workaround was adopted?

34 A. I cannot specifically recall that that was the
35 requirement. She had a number of concerns at various times
36 during the process.

37
38 Q. It was the case, wasn't it, that you must have
39 understood, at least from the Clayton Utz letter, that the
40 ESR scientific report did not, on its face, address the
41 issues raised by Ms Reeves as to the process prior to
42 August 2016?

43 A. No, I did not understand that, I'm sorry.

44
45 Q. And it was the case, I want to suggest to you, that
46 you must have understood that Clayton Utz were saying to
47 you, on the face of it, this report, if you present it to

1 Ms Reeves, won't address her concerns?

2 A. I can't recall that that was my understanding.

3

4 Q. And it was the case, wasn't it, that you understood
5 that you were being advised that the report needed to be
6 clear about the testing method prior to August 2016?

7 A. Again, I can't remember the specifics, but that
8 document is there.

9

10 Q. Then you met with Ms Reeves. Do you remember that?

11 A. I met with Ms Reeves on a number of occasions.

12

13 Q. You met with Ms Reeves and had a discussion with her
14 about the ESR report?

15 A. As I said, I met with Ms Reeves on a number of
16 occasions, and that would have been - at some stage,
17 I would have probably discussed that with her, yes.

18

19 Q. Can we bring up [FSS.0019.0045.0001]. Sorry,
20 actually, just before we bring that up, I should just show
21 you something else. Could we bring up
22 [WIT.0029.0006.0001]. You will see in the bottom half of
23 the page, there is an email - I think there has been
24 a mistake about that. We can take that down, Mr Operator.
25 Can we go back to the document that I wanted to bring up,
26 which is [FSS.0019.0045.0001].

27

28 THE COMMISSIONER: Q. While that is being done,
29 Mr Csoban, do you understand now that the scientists who
30 brought their issues to Ms Reeves, a number of them over
31 a period of months, were concerned that the actual step
32 being taken to examine slides under microscopes was faulty;
33 she was not being told by staff that the standard operating
34 procedures had anything wrong with them but that what
35 somebody in the lab, looking through a microscope - or,
36 rather, preparing slides for a microscope examination was
37 actually doing was resulting in there being no sperm
38 detectable on a slide, when there was actually sperm
39 present in the sample, that was her concern; and therefore,
40 because those samples which showed no sperm would be
41 disposed of and not processed further, there were likely
42 cases where police were being told, "There's nothing here",
43 when in fact there was something there; that was the
44 concern, not the SOP, but that the ESR dealt with the
45 validity of the SOP and did not address at all, because the
46 instructions didn't ask them to, the actual concern being
47 raised by staff members. Are you aware of that now?

1 A. Yes.

2
3 Q. I mean, as you sit there now, are you aware that
4 that's actually what happened?

5 A. It - well, it appears so, yes.

6
7 THE COMMISSIONER: All right, thanks. Go ahead, Mr Hodge.

8
9 MR HODGE: Thank you, Commissioner.

10
11 Q. If we go to page 2 of that document --

12
13 THE COMMISSIONER: I should say, the corollary of that was
14 that it was necessary to do two things, so it seems: one
15 is that the defective examination to determine whether the
16 samples should be further processed had to be rectified,
17 that process had to be rectified immediately so that more
18 samples weren't lost; and the second thing was that there
19 had to be an examination of for how long this defect
20 existed and how many samples might have been lost, some of
21 which might still be able to be retested.

22
23 So there were two things that arose as things that had
24 to be dealt with to address the failure that numerous
25 scientists in the lab had identified as existing and that
26 I should say nobody then or now denied existed - nobody.
27 Nobody has suggested then, nobody suggests now, that what
28 I have said to you is not so.

29
30 And so what Ms Reeves was agitating was, "When are you
31 going to do something about this?", and the response was
32 nothing until August, some eight months after it was first
33 raised, and then a workaround was adopted to obviate the
34 risk, and it did obviate the risk, but it was a workaround,
35 not a proper, validated method that could sustain in the
36 future; and then no work was done to consider how long the
37 defect had existed, and to this date no work has been done
38 to do that; and no work has been done to examine all past
39 cases to see how many might have been missed that should
40 not have been missed. Some work was done on later samples
41 by way of a proxy examination to try to calculate what
42 might have been missed, but those things weren't done.

43
44 In any event, from the time that Ms Reeves raised it
45 until the time she left FSS, those things had not been
46 addressed at all, and that's what she was agitating. The
47 ESR report instructions did not invite ESR to consider any

1 of that. Instead, they were invited to consider the
2 integrity and validity of the SOPs, about which nobody had
3 raised any complaints, and their report, accordingly, dealt
4 with that issue, and the ESR report, which was used as the
5 basis for a conclusion that Ms Reeves was acting
6 irrationally and not accepting the science, as it was put,
7 actually had not addressed her issue at all, and it wasn't
8 shown to her, so she couldn't address it.

9
10 So that's the background, of which you might not be
11 aware, although you might have gathered it from hearing
12 evidence or from other sources or from your examination
13 today, but I wanted you to be clear that that is actually -
14 I haven't formed a final conclusion, of course, but that is
15 how the situation appears, and the parts that I have told
16 you are uncontroversial are uncontroversial.

17
18 So I'm not asking you a question. I'm laying out the
19 background for you, so you understand the import of what
20 Mr Hodge is putting to you.

21
22 THE WITNESS: Yes, Commissioner.

23
24 THE COMMISSIONER: And I'm not suggesting you knew that at
25 the time.

26
27 Yes, Mr Hodge.

28
29 MR HODGE: Thank you.

30
31 Q. Do you recall, Mr Csoban, that you had a meeting with
32 Ms Reeves and others at Clayton Utz's offices?

33 A. Yes.

34
35 Q. And that meeting was on 7 April 2017?

36 A. I can't recall the exact date, but, as I say, I had
37 a number of meetings, yes.

38
39 Q. This is a note, not from you, but that somebody else
40 has taken at the meeting, which, if we just blow up the
41 third-last and second-last bullet points that are on that
42 page which are about that meeting, you will see that the
43 first sentence says:

44
45 *On 7 April 2017, REEVES was presented with*
46 *the findings of two investigations.*
47

1 And do you see in red:
2

3 *Ms Reeves was provided with the findings on*
4 *this date however both reports --*
5

6 that is, Livingstone and ESR --
7

8 *did not support Ms Reeves view and previous*
9 *complaints.*

10
11 A. Yes.
12

13 Q. It was the case, wasn't it, that at that meeting on
14 7 April, you put it to Ms Reeves that the ESR report did
15 not support her concerns?

16 A. Yes.
17

18 Q. And you said to her that you didn't think she was
19 willing to accept the outcome of that report?

20 A. No, I think I asked her on two occasions whether she
21 was satisfied with the outcomes of that report, and on both
22 occasions I got the impression she was not.
23

24 Q. And you didn't show her the report?

25 A. Not at that time, no.
26

27 Q. You never showed her --
28

29 THE COMMISSIONER: Q. How could she be satisfied with
30 a report that she hadn't read?

31
32 MR HODGE: Could we come to that?
33

34 THE COMMISSIONER: All right. I'm sorry, Mr Hodge.
35

36 MR HODGE: Q. When you say, "Not at that time", you
37 never showed it to her?

38 A. I was not the one who showed the report to her, no.
39

40 Q. You just told her that the ESR report didn't support
41 her; is that right?

42 A. That certainly would have been - yes, yes, but I --
43

44 Q. And so --

45 A. But, sorry, Mr Hodge, I'm still not clear on whether
46 she had seen a copy of that report prior to that.
47

1 Q. If we come back to the Commissioner's question, which
2 I rudely stopped him being able to ask: how could she be
3 satisfied that the ESR report did not support her view
4 without having seen it and on the basis of you saying that
5 it didn't support her?

6 A. At that time, Mr Franklin was dealing a lot with her,
7 and I can't answer that question, I'm sorry. I don't know.

8
9 MR HODGE: I tender that document, Commissioner. Can we
10 just go to the top, so we can identify what it is.

11
12 THE COMMISSIONER: The email from CO_Complaints to
13 Mr Mulholland, dated 23 June 2017, is exhibit 108.

14
15 MR HODGE: I should indicate that I understand the red
16 annotation is from Mr Franklin.

17
18 I was going to then go to another document,
19 Commissioner, but did you have a question you wanted to
20 ask?

21
22 THE COMMISSIONER: No, thank you.

23
24 **EXHIBIT #108 EMAIL FROM CO_COMPLAINTS TO SHAUN MULHOLLAND,**
25 **DATED 23 JUNE 2017, BARCODED [FSS.0019.0045.0001]**

26
27 MR HODGE: Q. Can we then bring up [WIT.0029.0005.0001].
28 You will see this is an email that you sent to Gary Uhlmann
29 on the afternoon of 7 April 2017?

30 A. Yes.

31
32 Q. And you will see you must have had a phone
33 conversation with Mr Uhlmann. You refer to that in the
34 first line?

35 A. Yes.

36
37 Q. And you attach to it an advice from Crown Law?

38 A. Yes.

39
40 Q. Do you see in the second paragraph, you say:

41
42 *Jade, Shae and I met with Amanda and her*
43 *lawyer for several hours this afternoon to*
44 *discuss aspects around her acceptance and*
45 *willingness to abide by the outcomes of*
46 *both the Livingstone's Review and ESR*
47 *Scientific Review.*

1
2 A. Yes.

3
4 Q. This was the meeting where you told her that ESR
5 didn't support her, but you didn't show her the report?

6 A. Yes.

7
8 Q. What I want to suggest to you is you knew, because
9 Clayton Utz had pointed it out and it was obvious on the
10 face of the document, that the ESR report did not directly
11 address Ms Reeves' concerns?

12 A. No, that's - I didn't not know that. Reading the
13 report now, it could be inferred, but certainly I felt at
14 the time the report was explicit in stating that the SOPs
15 we used were state of the art and current practice, and
16 I thought that was what the issue was, as I explained
17 before.

18
19 Q. You describe Ms Reeves in your email as:

20
21 *... circumspect and evasive with her*
22 *answers and would not give a firm and*
23 *definitive commitment to returning to work*
24 *in a harmonious and professional capacity*
25 *and accepting all the grievance issues*
26 *outlined previously as settled.*

27
28 A. That's - that was my understanding, yes.

29
30 Q. Can you tell us this: if you genuinely believed that
31 the report on its face addressed the concerns raised by
32 Ms Reeves, why not just show it to her?

33 A. Because, Mr Hodge, I was under the direction of the HR
34 department of HSQ and I followed the directions they gave
35 me in respect of what can be tabled and what cannot, and
36 I would also draw as evidence of that that the previous
37 document from Livingstone, which she required to be tabled,
38 was not tabled because of the HR direction in the matter.

39
40 Q. Do you say someone from HR directed you not to show
41 the ESR report to Ms Reeves?

42 A. No. No, I'm not saying that. I'm saying that they
43 were handling the matter of when to show reports and when
44 not to show reports. They did not direct me not to. I -
45 they were just - they were just organising the meetings and
46 the documents to be presented. And I'm still not clear
47 whether Ms Reeves had not seen the document at this stage.

1
2 Q. But to come back to my question, you're meeting with
3 Ms Reeves apparently to assess her willingness to accept
4 the conclusions of ESR. That's one of the things you were
5 doing - yes?

6 A. Yes.

7
8 Q. So why not show her the document?

9 A. Again, I can't - I don't know for a fact that she
10 hadn't seen the documents.

11
12 THE COMMISSIONER: Q. But you were speaking to her.
13 Surely it must have been plain that you were putting to her
14 that she ought to accept an outcome; it must have been
15 plain whether she had seen the content or not?

16 A. Yes, Commissioner, that's why I'm still wondering
17 whether she had seen the document or not, because she would
18 have raised that as an issue, that, "I haven't seen the
19 document and I'm not going to commit until I've seen it."
20 That wasn't the tenor of the conversation.

21
22 Q. What were her grounds for not accepting the ESR
23 findings as demolishing her scientific complaints? What
24 was her ground for - as you put it in the letter, she was
25 "circumspect and evasive" and you were discussing her
26 willingness to abide by the outcome of the ESR scientific
27 report - you must have pressed her for reasons, "Ms Reeves,
28 why won't you accept the conclusions of ESR, a highly
29 reputable body?" You must have asked her that?

30 A. I believe I asked her similar questions, and I did not
31 get a straight answer one way or the other, hence my
32 comment about her being circumspect. It wasn't that she
33 refused to accept it and it wasn't that she accepted it.

34
35 Q. Well, she couldn't if she hadn't seen it?

36 A. Well, again, that's why I'm not so sure she hadn't
37 seen it. I cannot imagine she wouldn't have said straight
38 away, "I haven't seen the document. I'm not prepared to
39 talk about it until I do." So I'm not sure that she hadn't
40 seen it. I can't comment on that.

41
42 MR HODGE: Q. Then you see in the second-last paragraph,
43 you say:

44
45 *In summary, I am not convinced that Amanda*
46 *has the desire and willingness to return in*
47 *her substantive role and operate in a*

1 professional and committed manner and to
2 observe all Code of Conduct requirements.
3 Her answers, demeanour and behaviour during
4 this and previous discussions demonstrated
5 quite the reverse in my opinion. I believe
6 she could raise similar issues in the
7 future and could potential cause great harm
8 to the DNA unit in which she works and
9 possible to the reputation of FSS.

10
11 A. Yes.

12
13 Q. Your concern, was it, was that she would continue to
14 raise her concern about the scientific issue?

15 A. No, my concern was that if she was asked to give
16 evidence in court, because she is obliged to tell the
17 truth, she would have to say she did not believe in the
18 scientific process being accurate and best practice.
19 I would also add, although generally I don't comment, this
20 was an environment at the time where West Australia was
21 undergoing a very similar problem in regard to forensics,
22 and it resulted, as I understand it, in a large number of
23 challenges to court proceedings.

24
25 THE COMMISSIONER: Q. Yes. Well, if it is the fact that
26 there was a failure to identify some samples containing
27 spermatozoa as samples worthy of processing, and if as
28 a result those samples were not further processed, with the
29 consequence that police weren't being given information -
30 if that was true, are you suggesting that the reputation of
31 FSS, if that evidence was given in court, took precedence
32 over the court knowing the truth about the samples?

33 A. Not at all, Mr Commissioner. My focus is that to the
34 best of my or our knowledge at that stage, ESR had
35 vindicated our operating procedures, by that very nature,
36 our results would be appropriate, and therefore if she
37 wasn't to accept that, I would like to - I wasn't told why
38 at that stage.

39
40 THE COMMISSIONER: Yes, Mr Hodge.

41
42 MR HODGE: Q. Can you offer any explanation for how it
43 could be, given that Crown Law had identified that the ESR
44 report doesn't directly address Ms Reeves' concerns -
45 sorry, Clayton Utz had identified that the ESR report
46 doesn't directly address Ms Reeves' concerns, that
47 nevertheless you believed it did?

1 A. No, my - our collective - collective thoughts were
2 that the matter was actually addressed correctly.

3
4 THE COMMISSIONER: Q. That's not the question. The
5 question was that Mr Franklin and the solicitors from
6 Clayton Utz both pointed out that the ESR report did not
7 deal with the heart of the matter in terms that are quite
8 plain, it seems to me. The question is how you can, in the
9 face of the content of those documents which were sent to
10 you or which you read at the time, maintain that you didn't
11 appreciate that fact?

12 A. I can only reiterate what I said before, that my view
13 was that the matter had been satisfactorily addressed by
14 ESR.

15
16 Q. So what did you make of Mr Franklin's and Clayton
17 Utz's observations that it didn't?

18 A. I can't comment on that at this stage. I cannot
19 recall the exact circumstances.

20
21 MR HODGE: Q. Is one possible explanation, Mr Csoban,
22 that you just didn't care?

23 A. Absolutely not.

24
25 Q. Is there another possible explanation that you can
26 think of?

27 A. The one I've just given.

28
29 Q. No, no, the thing that we're trying to understand is
30 how, in the face of what Mr Franklin said and Clayton Utz
31 said, you could have thought that the report did address
32 Ms Reeves' scientific concerns? So I've suggested one
33 possible explanation is you didn't care that it didn't, on
34 its face, address those concerns, but you say that's not
35 the explanation. So can you offer us any explanation for
36 how, in the face of what Mr Franklin and Clayton Utz said,
37 you still held firm to the view that it did address those
38 things?

39 A. Can we just return to the actual statement which you
40 are referring to, please?

41
42 Q. Which one would you like?

43 A. Whichever one you want to bring up. Mr Franklin's.

44
45 Q. Yes, that is [FSS.0001.0079.3297]. I think what we're
46 looking for is the bottom of the first page and the top of
47 the second page. You see it says:

1
2 *It is a problem that the report does not*
3 *comment on the fact that Ms Reeves is wrong*
4 *in her thinking?*

5
6 *In terms that "false negative" issue*
7 *Ms Reeves discusses is not an issue at all.*

8
9 THE COMMISSIONER: Q. Do you see that the tenor of that
10 email is that Mr Franklin is writing upon the basis that
11 you would know what he is talking about?

12 A. Yes, I clearly didn't pick this up as a major problem
13 to address.

14
15 MR HODGE: Q. And then do you want to see the Clayton
16 Utz advice again?

17 A. Certainly.

18
19 Q. So then if we bring up [FSS.0019.0021.0001 at 0006],
20 and if we blow up 7 and 8, you see the heading "ESR
21 Scientific Report":

22
23 *... it is not clear whether it also*
24 *[considered] the testing process in place*
25 *prior to August 2016. In our view, this*
26 *needs to be clear if it is to be presented*
27 *to Ms Reeves.*

28
29 And then 8(b):

30
31 *... the outcome of the ESR Scientific*
32 *Report - noting that the report needs to be*
33 *clear that the report supports both the*
34 *current testing method and the testing*
35 *method prior to August 2016 ...*

36
37 A. Look, I understood that we had addressed that, and the
38 report addressed that.

39
40 THE COMMISSIONER: Q. Mr Csoban, I will need to consider
41 in due course whether I can accept that evidence, because
42 you are being told by Mr Jade Franklin that the issue of
43 false negatives has not been addressed; you are being told
44 by Clayton Utz, the solicitors who are being paid to advise
45 you, that the issue does not appear to have been addressed;
46 this document is going to be the basis for Ms Reeves'
47 possible sacking, and you are saying to me, "I didn't pick

1 it up as an issue"? You are being given an opportunity now
2 to address the issue, and your answer is that, that you
3 didn't pick it up as a big issue?

4 A. I felt that the standard operating procedures were the
5 result of the false negatives, as was --

6
7 Q. I know that. I know that. You may have thought that
8 when ESR was given instructions, but you are now being
9 warned by Mr Franklin and by Clayton Utz that the issue,
10 "the issue", the only issue being raised by Ms Reeves in
11 this connection, has not been addressed, it appears, and
12 your evidence to me, that you invite me to accept, is that
13 you simply didn't pick that up; is that right?

14 A. Well, that - I can only reiterate that we felt that
15 the ESR report had addressed the issues and this was the
16 outcome of it, the standard operating procedure, not
17 a separate issue. That's - to my recollection five years
18 ago, that's the way it was.

19
20 THE COMMISSIONER: Yes, I understand. Yes, Mr Hodge.

21
22 MR HODGE: Commissioner, I just need to tender some
23 documents.

24
25 THE COMMISSIONER: Yes. What are they?

26
27 MR HODGE: That document that is on the screen has already
28 been tendered. I think the first document that I have not
29 tendered is [WIT.0019.0029.0001].

30
31 THE COMMISSIONER: Yes.

32
33 MR HODGE: I think that's the email from Ms Allen to
34 Ms Wyman-Clarke about "Thursday afternoon".

35
36 THE COMMISSIONER: Yes. Exhibit 109.

37
38 **EXHIBIT #109 EMAIL FROM CATHIE ALLEN TO ANDRIA WYMAN-CLARKE**
39 **ABOUT "THURSDAY AFTERNOON", DATED 19 APRIL 2018, BARCODED**
40 **[WIT.0019.0029.0001]**

41
42 MR HODGE: Then the second document is
43 [FSS.0001.0010.7050].

44
45 THE COMMISSIONER: Yes, what is that?

46
47 MR HODGE: Assuming I have managed to read these things in

1 the correct order, that should be the email from
2 Superintendent Frieberg to Ms Allen.

3
4 THE COMMISSIONER: Yes. That's exhibit 110.

5
6 **EXHIBIT #110 EMAIL FROM SUPERINTENDENT FRIEBERG TO**
7 **CATHIE ALLEN, DATED 6 SEPTEMBER 2017, BARCODED**
8 **[FSS.0001.0010.7050]**
9

10 MR HODGE: Then the last one is [FSS.0019.0021.0001].
11 That's the letter of advice from Clayton Utz that I thought
12 I had already --

13
14 THE COMMISSIONER: Exhibit 111.

15
16 **EXHIBIT #111 LETTER OF ADVICE FROM CLAYTON UTZ, BARCODED**
17 **[FSS.0019.0021.0001]**
18

19 MR HODGE: Could I just deal with one other thing. Could
20 we just bring up Dr Moeller's statement, which is
21 [WIT.0011.0010.0001 at 0012]. Could we blow up for
22 Mr Csoban paragraphs 74 and 75 at the bottom and then the
23 rest of paragraph 75 and paragraph 76.

24
25 Q. This is some evidence that was given by Dr Moeller to
26 the effect that there was a meeting that was convened on
27 23 January 2018 with all staff, and it was chaired by you
28 and Ms Allen. Do you recall that meeting?

29 A. Yes.

30
31 Q. It is the case that Dr Moeller is correct that you and
32 Ms Allen chaired the meeting?

33 A. I chaired the meeting, yes, and Cathie was there as
34 well.

35
36 Q. And is it the case that during the meeting, you or
37 Ms Allen, or both, said things to the effect that managers
38 were not performing their duties and displaying
39 favouritism?

40 A. To be clear, this report was produced by Workplace
41 Edge, who were appointed by HSQ to integrate Amanda back
42 into the workforce. I had clear instructions from my CEO,
43 Gary Uhlmann, to follow their direction completely. This
44 was their report, this was their slide, and I was told to
45 present it, and it was their (indistinct).

46
47 Q. By Mr Uhlmann?

1 A. Mr Uhlmann wasn't there at the meeting, no.

2

3 Q. No, but you were instructed by Mr Uhlmann to present
4 the slides that had been prepared by Workplace Edge?

5 A. Specifically I was told to follow their direction
6 completely into integrating Amanda back into the workforce.
7 I had no leeway in the matter of what I chose to do or not
8 to do in this respect.

9

10 MR HODGE: Q. I will come to that point of leeway in
11 a moment, but I just want to understand whether you agree
12 that you or Ms Allen or both said to people at the meeting
13 that managers were not performing their duties and
14 displaying favouritism?

15 A. That would have been an observation from Workplace
16 Edge.

17

18 THE COMMISSIONER: Q. But the question was whether you
19 articulated that, whether you said that?

20 A. If it was on the slide, I would have articulated that,
21 yes.

22

23 THE COMMISSIONER: Thank you.

24

25 MR HODGE: Q. And did you say to the meeting that staff
26 exhibited contextual bias regarding their cases?

27 A. Sorry, can I - where was that?

28

29 Q. You see the second dash?

30 A. Yes.

31

32 Q.

33 *Staff exhibited "contextual bias" regarding*
34 *their cases ...*

35

36 A. I don't understand what that means.

37

38 Q. You don't remember having said that at the meeting?

39 A. If I don't understand it now, I probably wouldn't have
40 understood it then.

41

42 Q. Do you recall having said that some staff were
43 bullying others?

44 A. That was the finding of Workplace Edge, yes.

45

46 Q. Do you recall having said something to the effect of
47 that the staff's jobs could be outsourced if they didn't

1 perform better?

2 A. Not in those words.

3

4 THE COMMISSIONER: Q. What words do you recall using?

5 A. That was in relation to QPS threatening us with
6 shifting their work to New South Wales, for instance, the
7 blood alcohol levels roadside testing. I had a number of
8 occasions where QPS actually did suggest that they might -
9 they would get a better deal from New South Wales if they
10 sent all their work to them, and I merely pointed out that
11 this was an option that QPS had.

12

13 Q. Yes, I understand.

14 A. I did not say their jobs were at risk. I said, "You
15 must remember that QPS" - from memory, and again, five
16 years ago - "that QPS have approached us and have the
17 option of moving those samples to New South Wales to feed
18 their high-throughput machines", and I do know New South
19 Wales made several approaches to QPS for that exact reason.

20

21 THE COMMISSIONER: Yes.

22

23 MR HODGE: Q. Do you recall that before the meeting, you
24 had sent a copy of the presentation to Theresa Hodges?

25 A. Yes, I do.

26

27 Q. Can we bring up the document which is
28 [FSS.0001.0067.1684].

29

30 THE COMMISSIONER: Ms Hodges was within Queensland
31 Health's human resources department?

32

33 MR HODGE: Q. She was at the time, wasn't she,
34 Mr Csoban, the chief human resources officer for Queensland
35 Health?

36 A. Yes, correct.

37

38 Q. The acting chief?

39 A. I don't remember her title, but she was certainly one
40 I was dealing with at the time.

41

42 Q. Then can we blow up the email that Ms Hodges sent to
43 you?

44 A. Yes.

45

46 Q. You see she sends an email to you saying:

47

1 *Thanks, I have spoken to Allan in some*
2 *detail today and he advises that the slides*
3 *are not for provision to staff and have not*
4 *been provided to any staff to date*
5 *including those managers already briefed.*

6
7 *I went through my concerns around some of*
8 *the wording and the rationale around this.*

9
10 A. Yes.

11
12 Q. She goes on to say:

13
14 *I also reiterated my support for direct and*
15 *frank feedback but the need to balance this*
16 *against directing it at specific positions.*

17
18 A. Yes.

19
20 Q. Then says:

21
22 *I understand that Allan intended to contact*
23 *you to get together early tomorrow to*
24 *review the slides to reframe some of the*
25 *points.*

26
27 A. Yes.

28
29 Q. And she recommended that you engage your HR team and,
30 in particular, Ms Wyman-Clarke to provide additional
31 support?

32 A. Yes.

33
34 Q. We see that email is sent after 9pm on 22 January.
35 The all staff meeting happened the next day, on 23 January?

36 A. Yes.

37
38 Q. Were the slides substantially reframed?

39 A. I do know the slides were reframed at some stage, and
40 I have read this email in the documents you have sent, and,
41 in all honesty, I cannot recall this email arriving before
42 the meeting. I'm - I would love to be absolutely clear on
43 that, but that - I can't - I can't recall reading this
44 email saying, "Don't have the meeting." So I do know that
45 at some stage in the first instance, as we did - I did make
46 changes to the slides with Mr Alan Holz, but I cannot
47 remember this email, the timing of this email, and whether

1 I saw it before the meeting.

2

3 Q. Can we just scroll down, and keep going. You see
4 there is an email sent earlier in the day, at 3.38pm, from
5 Ms Hodges to you?

6 A. Yes.

7

8 Q. You see she gives much more detailed feedback in this
9 earlier email that day as to the slide presentation?

10 A. Yes.

11

12 Q. She makes critiques of the various slides?

13 A. Yes.

14

15 Q. Then can we keep going down. One of the issues that
16 she raises - and you can see this at the end - is:

17

18 *Paul, overall I am concerned that the way*
19 *in which this presentation has been put*
20 *together will be more harmful than helpful.*
21 *I think that you should seek some support*
22 *from your HR team before progressing with*
23 *this presentation, in particular I am aware*
24 *that the new General Manager People,*
25 *Performance and Excellence commenced today.*

26

27 Do you see that?

28 A. Yes, I do.

29

30 Q. It's definitely the case that you received this email
31 and read it --

32 A. Yes.

33

34 Q. -- before the presentation, isn't it?

35 A. I believe so.

36

37 Q. Well, we know that, because if we scroll back up --

38

39 THE COMMISSIONER: Sorry, I just want to read the last
40 paragraph on that page. Yes.

41

42 MR HODGE: Q. If we just scroll back up to the first
43 page, you see you respond to that email?

44 A. Yes.

45

46 Q. So you must have read it, surely?

47 A. Which one, the first email?

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Q. Yes.

A. Yes. I said (indistinct) I did read it, yes.

Q. Do you say you think you didn't read the further email, where Ms Hodges effectively continues to express her concern about what you were doing?

A. I cannot recall seeing that prior to the meeting, but I was strongly advised that Mr Alan Holz was in continuous contact with the department's HR team. He was the one handling the correspondence generally, and changes were made to the slides, I know that, but again, they were his documents, not mine, and I was merely told to present them.

Q. Who - who told you to present them? We've just seen this email from the chief human resources officer saying, "Consult first with your HR department." Who do you say told you to present them?

A. As I previously stated, I was directed to follow the directions of Workplace Edge. I do know Workplace Edge constantly was in contact with HR departments, and they were the ones doing the liaison between them. I would have presumed that this was being done prior to the meeting, and the documents that I presented were the documents that were agreed on. So, yes, that's the situation.

Q. Mr Csoban, do you say that you reviewed the slides beforehand, before they were presented, and checked whether the detailed issues raised by Ms Hodges had been addressed?

A. I can't say that accurately, but I know the slides were changed at some stage.

Q. The changes were insignificant, weren't they?

A. I can't recall the exact changes, but they were certainly changed. There were some I didn't --

Q. Why, if you had the chief human resources officer expressing detailed concerns about the slides, would you have gone ahead and presented it to staff, notwithstanding those concerns and without checking if they had been addressed?

A. There was a disagreement, I remember, between Workplace Edge and the HR department. They were sorting it out. I - I presented the slides as I thought was appropriate.

Q. Why didn't you consult with your HR department, as

1 Ms Hodges suggested, before presenting them?

2 A. Because, as I said, Workplace Edge were consulting
3 with both HR departments.
4

5 Q. She had suggested to you that you use your HR
6 department?

7 A. And yes, and I had been strictly informed by the CEO
8 that I was to follow the advice of Workplace Edge.
9

10 Q. So you say the CEO gave you that instruction. Was
11 that after Ms Hodges' emails?

12 A. No.
13

14 Q. Before then?

15 A. Before then.
16

17 Q. Did you write back to her and say, "I'm sorry, it
18 doesn't matter what you think. I've been told to just go
19 ahead and do it"?

20 A. No, I did not.
21

22 Q. Why not?

23 A. I think I just answered that.
24

25 Q. No, you didn't. Why didn't you do that? If you
26 believed that, notwithstanding what she was saying to you,
27 that you had to go ahead and do it anyway because you had
28 been given this direction, why didn't you write that back
29 to her?

30 A. I can't answer that.
31

32 Q. Is this the case, you saw the presentation as an
33 opportunity for you and Ms Allen to criticise the staff of
34 the lab, and you had no interest in acting appropriately as
35 you had been directed to by the HR department?

36 A. No, it is not the case, definitely not.
37

38 Q. Can you think of any other explanation, then, for why
39 you just went ahead and did it?

40 A. I think I've given you the explanation, Mr Hodge.
41

42 Q. Workplace Edge were engaged to reintegrate Ms Reeves
43 into the workplace?

44 A. Yes.
45

46 Q. And you were directed to follow them as to how to go
47 about reintegrating Ms Reeves into the workplace?

1 A. Yes.

2
3 Q. You don't seriously suggest to the Commissioner, do
4 you, that you believed that the presentation of those
5 slides would assist with the reintegration of Ms Reeves
6 into the workplace?

7 A. I can't recall what I specifically thought at the
8 time, but that was the result of intensive interviews; that
9 was the result of the recommendations by Workplace Edge,
10 appointed by HSQ, and I did not consider that it was very -
11 it was going to be extremely harmful by any stretch of the
12 imagination.

13
14 MR HODGE: Commissioner, I tender that email chain.

15
16 THE COMMISSIONER: Yes. Exhibit 112.

17
18 **EXHIBIT #112 EMAIL CHAIN BETWEEN THERESA HODGES AND**
19 **PAUL CSOBAN, BARCODED [FSS.0001.0167.1684]**

20
21 MR HODGE: Commissioner, I don't have any further
22 questions for Mr Csoban.

23
24 THE COMMISSIONER: Thank you. Mr Hunter?

25
26 MR HUNTER: Commissioner, there is a matter that was
27 raised just a moment ago about which I need to get some
28 instructions, so I'm not in a position to pursue that topic
29 at the moment.

30
31 THE COMMISSIONER: We might see who else - Mr Rice? No?
32 Ms McKenzie?

33
34 MS MCKENZIE: No, thank you, Commissioner.

35
36 THE COMMISSIONER: Anyone else? Mr Hickey?

37
38 MR HICKEY: No, thank you, Commissioner.

39
40 MS FREEMAN: Commissioner, I act for Mr Csoban, I just
41 have a couple of questions.

42
43 THE COMMISSIONER: Just excuse me for a moment,
44 Ms Freeman.

45
46 MS FREEMAN: Yes, of course.

47

1 THE COMMISSIONER: Mr Hunter, how long will your
2 questioning go, do you think?

3
4 MR HUNTER: Probably five minutes, if that.

5
6 THE COMMISSIONER: I see. And are the instructions that
7 you have to take something that you can do quickly now, or
8 should we adjourn?

9
10 MR HUNTER: I have tried to get some prompt instructions
11 but I haven't received them as yet, and it may be that the
12 person I need to speak to has not received my message as
13 yet, so I can't guarantee that I will have instructions in
14 the next few minutes.

15
16 THE COMMISSIONER: All right.

17
18 MR HUNTER: Mr Neville is currently in a meeting, and he
19 is the person that I need to speak to - oh, I'm sorry,
20 Commissioner, I have just received those instructions,
21 I can proceed.

22
23 THE COMMISSIONER: Good. Let's carry on so Mr Csoban can
24 go about his business later, without waiting.

25
26 **<EXAMINATION BY MR HUNTER:**

27
28 MR HUNTER: Q. Mr Csoban, you told Mr Hodge a moment ago
29 that on 23 January 2018, in the context of the Workplace
30 Edge presentation, you told staff words to the effect that
31 the Queensland Police Service had threatened to outsource
32 their DNA testing to New South Wales because they could get
33 a better deal. Do you recall saying that a moment ago?
34 A. I specifically referred to the roadside alcohol
35 testing, which they paid for.

36
37 Q. Didn't you tell us a moment ago that you told staff
38 words to the effect that the police had threatened to
39 outsource their DNA testing to New South Wales because they
40 could get a better deal?

41 A. Yes.

42
43 Q. So you did tell the staff that in January 2018. Do
44 you know where this threat came from?

45 A. Yes. I had a number of discussions earlier with
46 Superintendent Brian - Dale Frieberg's predecessor, I can't
47 quite remember his name. And in fact I actually reduced

1 the price for roadside testing for a period of time to
2 assist him with his budgeting process.

3
4 Q. I'm not asking you about roadside testing; I'm asking
5 you about DNA testing.

6 A. I'm pretty sure I specifically said - specified
7 roadside testing.

8
9 Q. All right. So --

10 A. Sorry, can I just correct, if I did say DNA testing,
11 it was in error. It was roadside blood alcohol testing.

12
13 Q. So it's not correct to say that the Queensland Police
14 Service had ever threatened to outsource DNA testing?

15 A. No, it is not.

16
17 MR HUNTER: All right, thank you. That's all.

18
19 THE COMMISSIONER: Q. But at that meeting, you were
20 addressing the staff from the DNA unit.

21 A. Yes.

22
23 Q. So why raise the question whether alcohol testing
24 might be outsourced?

25 A. That's a very good question. I'm kind of confused now
26 about that, yes.

27
28 Q. I hope all my questions are good questions.

29 A. They are indeed, Mr Commissioner. I can - I can
30 definitely say that that was a submission made by the
31 police about roadside testing, and I cannot now recall why
32 or what I referred to in that (indistinct). I would have
33 to - that may have been an error on my part.

34
35 Q. Because the effect of saying something like that is
36 really capable of being intimidating to the staff, isn't
37 it?

38 A. It is, and I am pretty sure I never said there would
39 be job losses. I think that was a misstatement on whoever
40 wrote - said that part. I think I used that - I think,
41 from memory - and again, five years back - I think, from
42 memory, it was saying that no particular jobs or, sorry,
43 not jobs, no process was beyond change, and there was a lot
44 of discussion in the forensic forum nationally, which
45 I attended, about rationalisation of testing into centres
46 of excellence.

1 THE COMMISSIONER: Yes.

2
3 <EXAMINATION BY MS FREEMAN:

4
5 MS FREEMAN: Q. Just briefly, Mr Csoban, in your role as
6 executive director, the forensic DNA unit wasn't the only
7 unit you were responsible for, was it?

8 A. No, it was not.

9
10 Q. There were about 14 different units under your
11 management; is that right?

12 A. Roughly, yes.

13
14 Q. And they covered a wide range of disciplines, if I
15 could put it that way - for example, forensic toxicology?

16 A. Yes.

17
18 Q. Pathology and virology, for example?

19 A. Yes, forensic pathology, which are the autopsies;
20 virology, yes.

21
22 Q. Your role was even managing a unit that was involved
23 in testing uranium in mines; is that right??

24 A. The radiation, sorry, I misspoke. It was radiation in
25 mines. That was one of the units, yes.

26
27 Q. And you were responsible for some 400 staff at the
28 time you were the executive director, weren't you?

29 A. From memory, yes.

30
31 MS FREEMAN: Thank you. Thank you, Commissioner, that's
32 all I have.

33
34 MR HODGE: There is nothing arising.

35
36 THE COMMISSIONER: Thank you for your assistance,
37 Mr Csoban. You are free to cut the link, if you wish.

38
39 <THE WITNESS WITHDREW

40
41 THE COMMISSIONER: We will adjourn, then, until what time?
42 We need to adjourn at 3.45 today.

43
44 MR HODGE: Perhaps if we adjourn until 2.15. I think
45 realistically Ms Brisotto won't finish today, anyway.

46
47 THE COMMISSIONER: All right. We will adjourn until 2.15.

1 Does that suit everyone? Yes. All right, 2.15 it is.

2
3 **LUNCHEON ADJOURNMENT**

4
5 **<PAULA MICHELLE BRISOTTO, recalled, on former oath:**
6 **[2.19pm]**

7
8 THE COMMISSIONER: Yes, Mr Hodge.

9
10 MR HODGE: Commissioner, the next witness is Ms Brisotto.

11
12 THE COMMISSIONER: Yes. Ms Brisotto, you are still under
13 your former oath or affirmation.

14
15 THE WITNESS: Yes.

16
17 **<EXAMINATION BY MR HODGE:**

18
19 MR HODGE: Q. Ms Brisotto, I think you have given two
20 further statements since the last time you were here?

21 A. That is correct, yes.

22
23 Q. I will just bring each of those up. Could we bring up
24 first the statement dated 17 October 2022. That's
25 [WIT.0014.0152.0001]. This is entitled "Supplementary
26 Statement of Paula Brisotto". You can see that on the
27 screen, Ms Brisotto?

28 A. Yes, I can.

29
30 Q. I should check, are there any corrections you have to
31 that statement?

32 A. No.

33
34 Q. I'm sorry, I'm going to get this wrong, but there is
35 one statement where I think there is a correction you want
36 to make to paragraph 60 or something like that; is that
37 right?

38 A. Yes, I believe so.

39
40 Q. I just don't know if that's --

41
42 MR DIEHM: It is the second of the statements.

43
44 MR HODGE: I tender that statement, Commissioner.

45
46 THE COMMISSIONER: Exhibit 113.

1 **EXHIBIT #113 SUPPLEMENTARY STATEMENT OF PAULA BRISOTTO,**
2 **DATED 17 OCTOBER 2022, BARCODED [WIT.0014.0152.0001]**
3

4 MR HODGE: Q. The second statement is the one dated
5 18 October 2022, and that's [WIT.0014.0150.0001].

6 A. Yes.

7
8 Q. That's your second supplementary statement, also
9 titled "Supplementary Statement of Paula Brisotto". Could
10 we go, operator, to paragraph 60. Perhaps if we just blow
11 that up, it's about an email to Justin Howes. Is the
12 correction to that sentence which says:

13
14 *I may not have specifically included Kylie*
15 *Rika's feedback ...*
16

17 A. Yes, so the correction is that some of the feedback
18 from Kylie was considered in relation to the work
19 processes.

20
21 Q. Does that mean you incorporated that feedback or it
22 had been incorporated by --

23 A. It had been incorporated in the wording used.

24
25 Q. In the wording used?

26 A. In the wording used.

27
28 MR HODGE: I tender that second supplementary statement,
29 Commissioner.

30
31 THE COMMISSIONER: Exhibit 114.

32
33 **EXHIBIT #114 SECOND SUPPLEMENTARY STATEMENT OF PAULA**
34 **BRISOTTO, DATED 18 OCTOBER 2022, BARCODED**
35 **[WIT.0014.0150.0001]**
36

37 MR HODGE: Q. Can we bring back up the first
38 supplementary statement and can we go to page 17 and
39 paragraphs 38 to 39. Now, I can take you to the document,
40 but you see in paragraph 38 you are referring to written
41 feedback that you provided to version 1 of the project
42 report?

43 A. Yes.

44
45 Q. You will remember this, and we went through this last
46 time, but there were two versions of the project report for
47 Project #184 that were created?

1 A. Yes.

2

3 Q. The first one was distributed, I think, in November
4 2017, and the second one was distributed in January 2018?

5 A. Yes.

6

7 Q. I think you've gone back and you've looked again, and
8 you can find written feedback that you provided on
9 version 1, but you can't find any feedback you provided on
10 version 2?

11 A. That is correct.

12

13 Q. In paragraph 38, you are quoting from the email that
14 you sent back to Mr Howes with your feedback on version 1
15 of the project report?

16 A. Yes.

17

18 Q. In paragraph 39, you are reiterating that you were
19 happy with the theory and recommendations that were
20 included in project report version 1?

21 A. Yes.

22

23 Q. I wonder, then, if we might just have a look at that
24 version 1 of the project report, so can we bring up the
25 document which is [FSS.0001.0001.0914]. This is version 1
26 of the report?

27 A. Yes.

28

29 Q. You can see the date of that, which is November 2017,
30 and if we go to page 3 of the document, you can see the
31 version history, version number 1, changed by Justin Howes.
32 The date is 30 November 2017?

33 A. Yes.

34

35 Q. Then if we go to the conclusions and recommendations,
36 which is page 18 of the PDF, page 17 of the document, and
37 you see there the heading is "Conclusion and
38 Recommendations", and then you see about a third of the way
39 down the page:

40

41 *Based on the data analysis, the following*
42 *recommendations are offered: ...*

43

44 A. Yes.

45

46 Q. And you see number 1 is:

47

1 Cease "auto-microcon" processing with the
2 following exceptions:

- 3 a. Priority 1 samples ...
4 b. Coronial/DVI samples ...
5

6 A. Yes.

7
8 Q. If you look further down, in item number 4, you see:

9
10 *Re-analyse Priority 2 samples in the range*
11 *0.0088ng/ μ L to 0.0133ng/ μ L after a six*
12 *month period of processing to evaluate*
13 *whether Recommendation 2 can be extended to*
14 *Priority 2 samples.*
15

16 A. Yes.

17
18 Q. You see that recommendation 2 is to:

19
20 *Cease processing all Priority 3 samples up*
21 *to the quantification value of*
22 *0.0133ng/ μ L ...*
23

24 A. Yes.

25
26 Q. And so tell me if you agree with this: version 1 of
27 the report was recommending first that for priority 2
28 samples, you would no longer - that is, the lab would no
29 longer - process them if they were in the range
30 of 0.001 ng/ μ L to 0.0088 ng/ μ L?

31 A. Yes, that's what it states.
32

33 Q. Then it was also recommending that for priority 3
34 samples, which already were not being processed if they
35 were in that range of 0.001 to 0.0088 ng/ μ L, that
36 non-processing would be extended up to 0.0133 ng/ μ L?

37 A. After an evaluation, yes.
38

39 Q. Sorry, when you say that --

40 A. Sorry, yes, it says that, yes.
41

42 Q. Recommendation 2, for priority 3, it's just "stop it",
43 isn't it?

44 A. Yes, yes.
45

46 Q. And then, in addition, that for priority 2 samples in
47 that range above 0.0088 ng/ μ L up to 0.0133 ng/ μ L, there be

1 a re-analysis after six months in order to evaluate no
2 longer processing them as well?

3 A. Yes.

4
5 Q. As I understand it, based on your feedback, you were
6 happy with all of those recommendations?

7 A. The theory and the recommendations, yes, that's what
8 the email states.

9
10 Q. And you supported them?

11 A. I supported them - I think in the email, it also
12 states once the decision is made on the quant values, but
13 I have to go back to that, I'm sorry.

14
15 Q. I'm sorry, can we bring back up Ms Brisotto's
16 statement that we were looking at a moment ago, so that's
17 [WIT.0014.0152.0001], and we were looking at, on page 17,
18 paragraphs 38 to 39. You're referring to that last
19 paragraph extract there, where you say:

20
21 *Once a decision is reached on the range for*
22 *quant values, we will need to submit*
23 *enhancements to VSTS and create/write*
24 *manual procedures for P3 samples both*
25 *through Analytical and reporting.*
26

27 A. Yes, so I guess, yes, with the first bit, I'm happy
28 with the theory and the recommendations, and at that point
29 we hadn't yet decided on the range for the quant values, is
30 what I'm reading from that email.

31
32 Q. Just think about that for a moment. You didn't
33 understand that the recommendations - you can see them on
34 the right-hand side of the screen - which are stated by
35 reference to particular ranges, you didn't understand them
36 to be in fact still open as to what ranges would be put in
37 there?

38 A. If it was open for feedback.

39
40 Q. Just so I understand it, you supported the
41 recommendations as they were drafted --

42 A. Yes.

43
44 Q. -- but you think that that reference to "once
45 a decision is reached" was a reference to an understanding
46 by you of the possibility that other people might have
47 thought different ranges were appropriate?

1 A. Yes, it is a possibility that other people might have
2 provided something alternative.

3
4 Q. I understand, but it's your email. When you said,
5 "Once a decision is reached on the range for quant values",
6 what were you referring to?

7 A. The final decision, I can imagine. I can't recall
8 specifically.

9
10 Q. Yes, I understand. Is this fair: the reference to
11 "Once a decision is reached on the range for quant values"
12 was just a reference to the fact that a final decision was
13 going to be made based on whatever recommendations were
14 going to be made, which would mean that quant values of
15 a particular range would no longer be processed?

16 A. Yes.

17
18 Q. And you were saying, "Once that decision is made, then
19 we will have to make enhancements to our systems"?

20 A. Yes.

21
22 Q. Okay. So to come back to my question, it must follow,
23 mustn't it, that you, as at December 2017, were happy to
24 make a recommendation to police that there be a cessation
25 of processing of priority 2 samples in the range of
26 0.001 ng/ μ L to 0.0088 ng/ μ L?

27 A. Yes, when I provided that feedback, yes.

28
29 Q. And you understood, at the time you provided the
30 feedback, that the purpose of this report, once it was
31 finalised, was to come up with recommendations that would
32 be made to the QPS for them to consider?

33 A. Yes.

34
35 MR DIEHM: I object, Commissioner. If that is to be put
36 to the witness, then it might be prudent to take her to the
37 part of the document that shows that.

38
39 THE COMMISSIONER: I'm sorry?

40
41 MR DIEHM: If the question that has just been put by
42 Mr Hodge to the witness is to be put, then it should be by
43 reference to the part of the document that contains that as
44 to which she had assented to at the time.

45
46 THE COMMISSIONER: Why? The question is one about the
47 purpose of the project report as a whole.

1
2 MR DIEHM: Yes.

3
4 THE COMMISSIONER: And the witness might say - there's an
5 infinite scope for answers, and I think the witness
6 actually answered the question before you rose.

7
8 MR DIEHM: She did, yes.

9
10 THE COMMISSIONER: But there is no ambiguity in the
11 question or unfairness that I can see, so I will disallow
12 the objection.

13
14 MR DIEHM: Thank you.

15
16 THE COMMISSIONER: Yes, Mr Hodge. You had better put the
17 question again.

18
19 MR HODGE: Yes.

20
21 Q. Ms Brisotto, you understood that the purpose of the
22 report that would ultimately be finalised for Project #184
23 was to come up with recommendations that would be put to
24 the QPS?

25 A. Yes.

26
27 Q. It must follow, therefore, that in December 2017 when
28 you provided your feedback, you were happy for these
29 recommendations to be put to the QPS?

30 A. Yes.

31
32 Q. On the basis of the reasoning that was contained in
33 this report?

34 A. Yes.

35
36 Q. You will recall last time you were here, towards the
37 conclusion of your examination I was asking you some
38 questions which were about your understanding of how
39 samples were ultimately used in relation to priority 2
40 cases as opposed to priority 3 cases; do you remember that?

41 A. Yes.

42
43 Q. The particular issue was, as I think you know, that
44 for priority 3 samples, it might well be the case that
45 uploading to NCIDD is of significance in a number of cases
46 for solving or potentially solving the crime?

47 A. Yes.

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Q. For providing useful intelligence, anyway, to police?

A. Yes.

Q. But in the case of priority 2 samples, which are the serious crimes like murders and sexual assaults, for those kinds of cases, it's much less likely that uploading to NCIDD will be providing information of significance to police?

A. Yes, in some cases, yes.

Q. Well, the thing that, as I understood it, you agreed with was that usually it is the case for those kinds of cases that there is a known suspect and there is a reference sample, and so the useful information that is obtained is by comparing a crime scene sample to a reference sample?

A. Yes.

Q. I think you understand that one of the issues of concern to the Commission has been why a recommendation would be made to discontinue processing of priority 2 samples within a particular range based on successful NCIDD outcomes rather than based on comparison to reference samples?

A. Yes.

Q. Tell me if you agree with this, but no part of version 1 of the paper was taking into account the success in comparing crime scene samples to reference samples for priority 2 cases?

A. I'd have to read the report again.

Q. I see. Have you not reread it recently?

A. Not within the last couple of weeks.

Q. Do you think it's possible that version 1 of the report engages in some analysis of how often reference samples are compared with crime scene samples for priority 2 cases?

A. If the success was defined, I think - I'm not sure if it was in this version - as "suitable for comparison", then, yes, that would be comparison to reference samples or other crime scene samples.

Q. I see. So when you decided that you were happy with the recommendation to cease processing priority 2 samples,

1 could you just explain to the Commission how the utility of
2 priority 2 samples for comparison with reference samples
3 rather than for NCIDD upload factored in to your
4 decision-making?

5 A. I can't recall specifically the reasons why I put that
6 forward at the time. I'd have to again read through the
7 report.

8
9 Q. Well, I don't expect that you will conclude your
10 evidence this afternoon, so you will have the opportunity
11 overnight to read through version 1 of the report. In any
12 event, it was the case that in December 2017, you were
13 happy with a recommendation that was to be put forward to
14 the QPS about this issue?

15 A. Yes.

16
17 Q. And you know, I think, that the Options Paper that was
18 put forward on its face identified options but didn't make
19 a recommendation?

20 A. Yes.

21
22 Q. And you will remember that on the last occasion when
23 I was asking you questions, I asked you some questions
24 about whether it was significant or not that
25 a recommendation was or was not provided to QPS, and
26 I understood your evidence to be that you understood that
27 no recommendation was provided to QPS?

28 A. In the Options Paper, yes.

29
30 Q. What about in the meeting that was held?

31 A. I don't know. I wasn't there. I'm not aware.

32
33 Q. Do you say you just had no idea whether or not
34 a recommendation was made?

35 A. I don't believe there was.

36
37 Q. Why do you say that?

38 A. Because I don't recall that being commented on in
39 relation to the Options Paper or the meeting.

40
41 Q. Now, there was an email exchange I showed you last
42 time, which I want to bring up again. Could we bring up
43 [WIT.0014.0020.0001]. If we just blow up the two emails at
44 the bottom half of the page. So you will see this is -
45 again, you have looked at this before - an email that
46 Ms Allen sends to you and Mr Howes, saying:
47

1 *Regarding the Options Paper, my intention*
2 *was to email management team letting them*
3 *know that the Options Paper was presented*
4 *to the QPS and that they have elected*
5 *Option 2 for us moving forward. And I was*
6 *going to attach the Options Paper. Do you*
7 *see any issues with this?*

8
9 A. Yes.

10
11 Q. And then your response is:

12
13 *No, I don't, as the information in the*
14 *options paper was taken from the report*
15 *they had already read. I also think the*
16 *options paper shows the information that*
17 *was presented to the QPS did not offer*
18 *opinions or recommendations, only options*
19 *for them to consider. The decision is*
20 *therefore theirs (so to speak).*

21
22 If we can put that on one side of the page and then on the
23 other side of the page bring up your 17 October statement,
24 that is, [WIT.0014.0152.0001], and go to page 22 of the
25 document, page 22 of the PDF, and blow up paragraphs 61 and
26 62. Do you see in paragraph 61, you say:

27
28 *I have been asked why I wrote "It is QPS*
29 *decision (so to speak)" in my response to*
30 *an email by Cathie Allen. I don't remember*
31 *what I was thinking when sending that email*
32 *however it was my view then as it still is*
33 *now that while it involved laboratory*
34 *processes it was a decision that needed to*
35 *be made by QPS, which would explain why*
36 *I said that.*

37
38 A. Yes.

39
40 Q. Then you go on to say:

41
42 *I accept that the Options Paper did not*
43 *include the risks and benefits of all*
44 *options, or convey the significant benefit*
45 *of other data, apart from the percentage*
46 *that might be uploaded to NCIDD.*
47

1 Just pausing on that, when you refer to the "significant
2 benefit of other data", what is the other data that,
3 reflecting on it, you think ought to have been included in
4 the Options Paper?

5 A. The, I guess, expansion of what was suitable and how
6 was it suitable for comparison to other samples.

7
8 Q. And is other data that it might have been useful to
9 have what consequence it would be likely to have on
10 turnaround times?

11 A. Yes, and the risks and benefits and also, if there
12 were risks identified, how to mitigate the risks.

13
14 Q. Then you see in next sentence of that paragraph, you
15 say:

16
17 *I did not draft the Options Paper and it*
18 *does not appear that I was a formal*
19 *reviewer of it.*

20
21 A. Yes.

22
23 Q. Then you say in the last sentence:

24
25 *It is hard to say when I cannot remember*
26 *the circumstances in which I looked at the*
27 *document, whenever that was, but in any*
28 *case I may not have noticed that it*
29 *emphasised the limited data about uploads*
30 *to the NCIDD rather than the other data of*
31 *successes.*

32
33 A. Yes.

34
35 Q. Just take a moment to reflect on this. Do you really
36 say that you think it's possible that you just didn't
37 notice that the justification that was given for
38 consideration was upload to NCIDD?

39 A. That might not have been my focus at the time. I'm
40 really not sure. Sorry, I'm just reading it again. Yes,
41 I'm not sure if - why that wasn't my focus.

42
43 Q. I know overnight you are going to go and you are going
44 to read version 1 of the project report, which you were
45 happy with, but perhaps when you do that, you might
46 consider that that report also focuses on and deals with
47 uploads to NCIDD?

1 A. Mmm-hmm.

2

3 Q. I will ask you some more questions about that in the
4 morning, then.

5

6 Now, going back to paragraph 61, you see you say it's
7 your view:

8

9 *... then as it still is now that while it*
10 *involved laboratory processes it was*
11 *a decision that needed to be made by*
12 *QPS ...*

13

14 A. Yes.

15

16 Q. And you say:

17

18 *... which would explain why I said that.*

19

20 A. Yes.

21

22 Q. Now, I want to suggest to you that doesn't explain why
23 you said that, does it, in that it might explain why you
24 said "It is a QPS decision"; it doesn't explain why you
25 added the words "(so to speak)"?

26

27 A. No, it doesn't.

28

29 Q. The Commissioner asked you some questions about this
30 last time, and you've obviously reflected upon this now for
31 several weeks. Do you have an explanation that you can
32 offer as to why it is that you said "(so to speak)"?

33

34 A. No, I actually really can't recall why I added that or
35 what the purpose was. It may just have been
36 a misunderstanding about what it actually meant.

37

38 Q. A misunderstanding about what what meant?

39

40 A. "(So to speak)", in the context of the email.

41

42 Q. You think you didn't realise what those words meant?

43

44 A. I don't think I did, no.

45

46 Q. Let's go back to the email, then, and can we just blow
47 up the text of that email in the middle of the page,
Mr Operator, from Ms Brisotto. You see the first sentence
says:

48

49 *No, I don't, as the information in the*

1 *options paper was taken from the report*
2 *they had already read.*

3
4 A. Yes.

5
6 Q. Then the second sentence says:

7
8 *I also think the options paper shows the*
9 *information that was presented to the QPS*
10 *did not offer opinions or recommendations,*
11 *only options for them to consider.*

12
13 And then the third sentence says:

14
15 *The decision is therefore theirs (so to*
16 *speak).*

17
18 A. Yes.

19
20 Q. You see - if we just move that maybe to the top of the
21 screen, Mr Operator, so Ms Brisotto can see what she put in
22 her statement. You see in the statement, you omitted some
23 words? So you framed it as if what you said in the email
24 was, "It is QPS decision (so to speak)", whereas in fact
25 the words in the email are, "The decision is therefore
26 theirs (so to speak)", and that's referring back to the
27 previous sentence, which says:

28
29 *I also think the options paper shows the*
30 *information that was presented to the QPS*
31 *did not offer opinions or recommendations,*
32 *only options for them to consider.*

33
34 A. Yes, I do see that.

35
36 Q. And so what you were writing back to Ms Allen was
37 this, wasn't it: one, the information that was in the
38 Options Paper had come from the draft reports - that's the
39 first sentence?

40 A. Yes.

41
42 Q. The second is that the Options Paper only shows
43 information; it doesn't, on its face, carry opinions or
44 recommendations?

45 A. Yes.

46
47 Q. And then the third is that because the Options Paper,

1 on its face, doesn't carry opinions or recommendations, it
2 follows that "The decision is therefore QPS's (so to
3 speak)"?

4 A. Yes.

5
6 Q. In the second sentence, when you prefer to the Options
7 Paper not offering opinions or recommendations, do you say
8 when you wrote this email, you didn't understand why it
9 would be of significance that the Options Paper did or
10 didn't offer opinions or recommendations?

11 A. So the significance of it not offering opinions or
12 recommendations? I think it - well, based on the answer,
13 I think, you know, it was a decision for QPS, so it shows
14 in the response that's what I believed.

15
16 Q. Tell me if you agree with this: you always understood
17 in relation to Project #184 that the outcome would be
18 a decision by police as to what they wanted to do?

19 A. I don't think - yes, that's my opinion now, yes.

20
21 Q. No, it's not just your opinion now. You understood at
22 the time, back in 2017 when you commented on version 1,
23 that the outcome of all of this would be a decision that
24 would be made by Queensland Police?

25 A. That's not how the project reads at the time.

26
27 Q. What do you mean by that?

28 A. In the bottom of the project, in version 1, it talks
29 about a decision being made and then that being provided
30 back to the QPS.

31
32 Q. For their agreement?

33 A. I don't think it says that, if I could have a look at
34 the bottom of that again?

35
36 Q. Do you want the bottom of version 1 of the project
37 report or are you looking for the project proposal?

38 A. No, I think the project report.

39
40 Q. Okay. So if we bring up [FSS.0001.0001.0914] and go
41 to page 17 of the document, or 17 in the bottom-right
42 corner. You are talking about item number 5, are you? Can
43 we just blow that up at the bottom of the screen.

44 A. Yes.

45
46 Q. Just tell us what you say your understanding was?

47 A. At the time - sorry, can I just check if this water is

1 fresh?

2
3 THE COMMISSIONER: Of course you can. You can do that at
4 any time.

5
6 THE WITNESS: As I read it now, this reads to me that once
7 the change was decided on, that would be the point where
8 the change was communicated to the QPS to ensure they were
9 aware of the ranges.

10
11 MR HODGE: Q. Do you say you thought at the time, or
12 now, or both?

13 A. As I'm reading it now. So in reflection of the
14 project proposals more recently - and I can't comment on
15 what I thought then, especially in December 2017, but
16 reading it now, it reads that the recommendations at that
17 point in time communicated the change after a decision had
18 been made.

19
20 Q. So when you read it now, you think it reads as if the
21 lab was going to --

22 A. The original versions.

23
24 Q. -- make the decision?

25 A. Yes, the original version, yes.

26
27 Q. Now, tell me, though, if we agree about this: if we
28 go back, for example, to the project plan, so that,
29 operator, is [FSS.0001.0001.0856], and we go to the
30 page which is .0857 and blow up the bottom of that page,
31 going over the page, "Expected Outcome", you see that - we
32 looked at this before, Ms Brisotto, the third paragraph
33 says:

34
35 *It is an expectation that any*
36 *recommendations are communicated with QPS*
37 *in order to agree on possible new workflow*
38 *strategies.*

39
40 A. Yes.

41
42 Q.

43 *This could include not automatically*
44 *processing low quant samples with*
45 *microcons, but to hold and communicate "low*
46 *DNA quant" to QPS. Samples could be*
47 *processed upon request based on case*

1 *assessment by QPS.*

2

3 A. Yes.

4

5 Q. I'm trying to understand your evidence. I assume you
6 agree with me that the original project plan was that there
7 would be recommendations that would be arrived at and
8 communicated to QPS in order to reach an agreement about
9 changes to workflow?

10 A. Yes, that's how it reads, yes.

11

12 Q. And that must have been your understanding at the
13 time?

14 A. Yes.

15

16 Q. Do you say reading version 1 now, you think that by
17 the end of the year there might have been some change in
18 approach, so that although it refers to recommendations,
19 those weren't recommendations that were going to go to QPS;
20 they were just going to be decided, and then, once they
21 were decided, they would be communicated to QPS?

22 A. That's how it reads in that version.

23

24 Q. But is that what you thought at the time?

25 A. By the time the, I guess, January decision - or the
26 January came around, and there have been comments about
27 options for QPS, which is in the spreadsheet, the feedback
28 spreadsheet, I think further in my statement where there is
29 a possibility that I had discussed with Justin at a point
30 in time that the decision was QPS's, not ours, to make, and
31 that may have been based on, I guess - I don't know - my
32 thoughts at the time.

33

34 Q. I understand. I think where we're at is, by January
35 or February 2018, January and February 2018, you thought
36 that a decision would have to be made by QPS as to whether
37 they would agree to make changes to workflow?

38 A. Yes. I didn't think that was our decision to make.

39

40 Q. It wasn't your decision to make unilaterally?

41 A. Yes.

42

43 Q. Presumably, had QPS just, out of the blue, said to the
44 lab, "We want you to fundamentally change your workflow",
45 the lab wouldn't have just agreed to that?

46 A. No.

47

1 Q. So it was always going to be a matter of agreement
2 between the lab and QPS?

3 A. Yes.
4

5 Q. And so then if we go back to that email which the
6 operator has helpfully kept on the left-hand side of the
7 page, and if we blow that up again, you see, coming back to
8 that second sentence, you say:
9

10 *I also think the options paper shows the*
11 *information that was presented to the QPS*
12 *did not offer opinions or recommendations,*
13 *only options for them to consider.*
14

15 A. Yes.
16

17 Q. So why was it of significance at the time that the
18 Options Paper didn't offer opinions or recommendations?

19 A. I think it was, I guess, something that must have been
20 discussed. I mean, it's in the name of the paper itself,
21 "Options Paper", so likely that was a point at the time.
22 I can't recall why it was of that great a significance in
23 that.
24

25 Q. Well, let's think about it. You are sending this
26 email in response to an email from Ms Allen asking whether
27 or not the Options Paper should be attached to an email
28 that she's going to send to the staff.

29 A. Yes.
30

31 Q. And so your response is identifying the things that
32 you think are of significance in deciding whether or not to
33 send the Options Paper to the staff; do you agree?

34 A. Yes.
35

36 Q. And so when in the second sentence you say, "I also
37 think the options paper shows the information that was
38 presented to the QPS did not offer opinions or
39 recommendations", you must have been saying that because
40 you thought that was of significance to answering the
41 question as to whether or not the Options Paper should be
42 sent to the staff?

43 A. Yes, it appears so.
44

45 Q. And that must mean that you thought that it was of
46 significance to Ms Allen as to whether or not the staff
47 knew about opinions or recommendations that were made to

1 the QPS?

2 A. Yes.

3

4 Q. The question then is why? Why did you think that was
5 of significance to that issue of whether or not the Options
6 Paper should be shown to the staff?

7 A. I guess - look, I'd be guessing here, at the moment.
8 It was the difference - one of the differences between the
9 draft that they'd seen and the paper that was being
10 provided. And I think it's important to show that police
11 were either the decision-makers or involved in the decision
12 as well.

13

14 Q. That's a separate issue, as to whether or not they
15 were involved in the decision or the decision-makers. But
16 this is about whether it was significant that they knew or
17 didn't know - I'm sorry, whether it was significant for the
18 staff as to whether a recommendation was or wasn't made to
19 QPS?

20 A. I'm not sure, I'm sorry.

21

22 Q. Well, let's keep thinking about it. It can't be
23 because there was some inherent problem with making
24 recommendations about this subject matter to QPS, can it,
25 because that was what was envisaged by the project plan
26 that you had signed off on?

27 A. Yes.

28

29 Q. So it can't be that there was some issue with making
30 any recommendations to QPS?

31 A. Mmm, yes.

32

33 Q. So it must be that it was an issue about what was
34 recommended to QPS, if anything?

35 A. Again, I can't recall. Beyond what's written there,
36 I'm sorry, I can't recall.

37

38 Q. Let's keep going. You looked at version 1 of the
39 Project #184 report, and you had been happy with the
40 recommendations that were contained in that report?

41 A. Yes.

42

43 Q. And so unless you'd heard that somebody else within
44 the lab was unhappy with those recommendations, there would
45 be no reason, would there, for you to think there would be
46 an issue with providing recommendations to the QPS or
47 telling other members of the senior management that there

1 had been recommendations to the QPS?

2 A. I don't believe so, no.

3
4 Q. So it must follow, mustn't it, that when you sent this
5 email, you knew that whilst you had been happy with the
6 recommendations that had been in version 1 of the report,
7 that other people had been unhappy?

8 A. I don't - I don't recall if I knew other people were
9 unhappy or they were happy, because the feedback that I was
10 included with - in from Allan McNevin was that he was happy
11 and would support higher.

12
13 Q. Yes, I understand Mr McNevin wanted to test even less.

14 A. Mmm.

15
16 Q. But do you say you were unaware of anybody else's
17 feedback other than Mr McNevin, or you don't know?

18 A. I can't - I don't know. I can't recall other
19 feedback.

20
21 Q. It is just that if we bring back up that witness
22 statement of 17 October - so perhaps, operator if we can
23 put that on the right-hand side of the page, this is
24 [WIT.0014.0152.0001] - sorry, no, could we put that on the
25 right-hand side of the page, so we can keep the email on
26 the left-hand side, and then if we go to page 22 of the
27 numbering at the bottom, page 23 of the PDF, and blow up
28 paragraph 60, you see in the first sentence of that
29 paragraph you say:

30
31 *I did not know at that time that any of the*
32 *management team had any difficulty with the*
33 *draft report and so did not have any reason*
34 *to think that the Options Paper would cause*
35 *any concern.*

36
37 A. Mmm.

38
39 Q. Do you say to the Commissioner, positively, that you
40 had no knowledge, as at the beginning of February 2018,
41 that other members of the management team had any
42 difficulty with the recommendations in the project report
43 drafts?

44 A. I can't recall.

45
46 Q. Why did you say in your witness statement, then, that
47 you signed three days ago:

1
2 *I did not know at that time that any of the*
3 *management team had any difficulty with the*
4 *draft report ...*
5

6 A. I think that was a mistake and it should have read
7 "I do not recall".
8

9 Q. I see. So it should have read, "I do not recall
10 whether at that time I knew or did not know that any of the
11 management team had any difficulty with the draft report"?
12

13 A. Yes.
14

15 Q. I see. Doing the best you can for us, is there an
16 explanation you can offer for why the sentence doesn't say
17 that and, instead, positively says:
18

19 *I did not know at that time that any of the*
20 *management team had any difficulty with the*
21 *draft report ...*
22

23 A. I think it was just within the last couple of days,
24 I had a lot on my plate in relation to providing the
25 statements in a short turnaround time.
26

27 Q. Well, I just want to be careful about this. This is
28 your statement from 17 October.
29

30 A. Yes.
31

32 Q. And you did another statement on 18 October.
33

34 A. Yes.
35

36 Q. This statement from 17 October - it's one you've been
37 working on for a couple of weeks, isn't it, since you
38 finished giving evidence?
39

40 A. It was a combination of the request I received on
41 Friday night.
42

43 Q. Yes, I'm sorry, you are saying this statement both
44 addresses some things that you became aware of in a request
45 from Friday night - but not this part?
46

47 A. No.
48

49 Q. No. This is something you'd been working on for
50 a couple of weeks?
51

52 A. Yes.
53

1 Q. It really doesn't explain it, does it, why being busy
2 in the last few days would have caused you to say
3 positively:
4

5 *I did not know at that time that any of the*
6 *management team had any difficulty with the*
7 *draft report ...*
8

9 A. No, it doesn't. All I can say is it was a mistake,
10 because I don't recall.
11

12 Q. So if we then go back to your email on the left-hand
13 side of the screen and we think again about that second
14 sentence, let's again try to think of explanations for that
15 second sentence. One explanation for why you would think
16 that it would be okay to send the Options Paper because it
17 did not, on its face, offer opinions or recommendations was
18 because you knew at the time that there were members of the
19 management team who did have difficulty with the
20 recommendations in the draft report; do you agree with
21 that?

22 A. By that time, it - it's a possibility. I'm not sure.
23

24 Q. Well, that's an explanation for why you would have
25 thought it was significant in deciding whether or not to
26 provide the Options Paper to staff - that the Options Paper
27 didn't, on its face, offer opinions or recommendations?

28 A. Yes, it is a possibility.
29

30 Q. And can you think of or help us with any other
31 explanation for why it would be significant as to whether
32 or not the Options Paper should be provided, based on the
33 fact that it didn't contain opinions or recommendations on
34 its face?

35 A. Other than, I guess, further explaining - are you able
36 to scroll down to the bottom of the email?
37

38 Q. Of course. Operator --

39 A. Not that one, sorry.
40

41 Q. -- could you unzoom it and just perhaps zoom in on the
42 bottom half of that page, so Ms Brisotto can see both the
43 email from Ms Allen and the response.

44 A. I don't know, other than providing, I guess, more
45 clarity around what was presented in the information back
46 from the superintendent, which talked about the different
47 options and the considerations.

1
2 Q. You don't really think that's an explanation for why
3 you said in the second sentence:
4

5 *I also think the options paper shows the*
6 *information that was presented to the QPS*
7 *did not offer opinions or recommendations,*
8 *only options for them to consider.*
9

10 A. There's many possibilities, because I can't
11 specifically remember.
12

13 Q. There's not, though, are there? There's only one
14 possibility, and the only possibility is it's because you
15 knew that other members of staff, other members of
16 management, disagreed with the recommendations?
17

18 A. I honestly can't recall if I was aware at that time.
19

20 Q. I understand that that's the position that you're
21 maintaining. What I want to understand is whether you can
22 offer to the Commissioner any explanation for what that
23 second sentence means other than the one that I have
24 suggested to you?
25

26 A. I can't offer up what I - unless - other than what
27 I've already offered, I can't.
28

29 Q. There's no other explanation, is there?
30

31 A. Not that I can think of at the moment.
32

33 Q. And this is the case, isn't it: you know that at the
34 time, there was controversy within the senior management as
35 to whether it was appropriate to cease the auto-microcon
36 process for samples between 0.001 ng/ μ L and 0.0088 ng/ μ L
37 for priority 2 samples?
38

39 A. I can't say that I know that.
40

41 Q. And you know that at the time, at least some members
42 of the senior management thought it was inappropriate to
43 make such a recommendation to the police?
44

45 A. I can't say that I know that, either.
46

47 Q. And you know that on the face of the Options Paper, it
doesn't reveal that any recommendation was made to police?

A. Sorry, could you repeat that question?

Q. You know that on the face of the Options Paper, it
doesn't reveal that any recommendation was made to police?

1 A. It doesn't appear to, no.

2

3 Q. It was the case, though, wasn't it, that you
4 understood that Ms Allen was going to make the
5 recommendation with which you agreed, that they should
6 cease auto-microcon for priority 2 samples with a quant
7 value between 0.001 ng/ μ L and 0.0088 ng/ μ L?

8 A. No, I don't believe that was my opinion, that she was
9 going to make that recommendation.

10

11 Q. Why would you think that she was going to do anything
12 other than that, given that it was a recommendation put
13 forward by Mr Howes and one that you agreed with?

14 A. My thinking at the time, well, I guess now, is that it
15 was an Options Paper put forward for their decision on, and
16 the meeting that occurred with Cathie and Paul was,
17 I guess, to discuss the options.

18

19 Q. But why would you have thought she was not going to
20 put forward a recommendation, given that it was one that
21 Mr Howes had come up with and that you agreed with?

22 A. I don't - I don't think she - well, I'm not aware that
23 she did.

24

25 Q. Did she tell you that she wasn't going to?

26 A. I can't recall her telling me one way or the other.
27 It's my - I guess as best as I can recollect, she didn't
28 put a decision forward or a recommendation forward.

29

30 Q. But I'm just trying to understand, why do you say
31 that?

32 A. Because that's my understanding of it. I don't have
33 anything that offers, I guess, that she did put
34 a recommendation forward.

35

36 Q. I'm just trying to understand that. You know that the
37 entire purpose of the project was to put forward
38 a recommendation?

39 A. Yes.

40

41 Q. You know that you agreed with the recommendation, in
42 version 1 of the report?

43 A. Yes.

44

45 Q. So why would you have thought she wasn't going to put
46 forward a recommendation?

47 A. Because the Options Paper was drafted, I guess, to

1 provide the options as opposed to a recommendation;
2 otherwise --

3
4 Q. Then why was that? Why was the Options Paper
5 a departure from the plan to put forward recommendations
6 and drafted neutrally?

7 A. I think it says it in the title, "Options for QPS
8 decision."

9
10 Q. But why? You knew that the purpose of the project was
11 to put forward recommendations to the QPS?

12 A. I'm guessing - look, I'm assuming now it evolved over
13 that time, and the projects don't necessarily - the
14 purpose, I guess, for not just this project but other
15 projects, they can change over time.

16
17 Q. But you know this project didn't evolve. You know
18 that on 9 January 2018, there was a version 2 of the
19 report, and three days later Mr Howes was emailing you
20 asking you for a copy of the document so he could convert
21 it to an Options Paper. It wasn't a process of evolution,
22 was it?

23 A. It was a change.

24
25 Q. So why was there a change?

26 A. To provide the options to the police.

27
28 Q. No, they were always going to be provided to the
29 police, but there was going to be a recommendation. So
30 that's not the explanation for the change. Why was there
31 a change?

32 A. I don't know.

33
34 Q. Yes, you do. You know that the reason there was
35 a change was because other members of the senior management
36 disagreed with the recommendations?

37 A. I don't know that.

38
39 Q. Can you think of any other reason for the change?

40 A. Other than to not provide recommendations but to give
41 police the options.

42
43 Q. Well, that was a change. That was a change from what
44 the purpose of the project was, which we've looked at
45 already. So why the change?

46 A. To put it into an options rather than a project report
47 with recommendations.

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Q. Why the change not to make recommendations?

A. I don't know.

Q. Yes you do. You do know, don't you, Ms Brisotto? You know that the reason that there was a change was because other members of the senior management did not agree with the recommendations and therefore they could not be signed off on?

A. I can't agree with that, because I honestly don't recall.

Q. Can you think of any other explanation?

A. I can't provide one at the moment, I'm sorry.

Q. And you've thought about this for two weeks --

A. Yes.

Q. -- since I last asked you these questions?

A. Yes.

Q. And you can't think of any other explanation?

A. Not at this time, not that I'm aware of.

Q. And that's because there is no other explanation, is there? There is only one, and that explanation is that you and Mr Howes and Ms Allen knew that you could not get the rest of the senior management team to sign off on the recommendations?

A. No, I don't believe that.

Q. You don't believe it?

A. That --

Q. You think there is some other explanation?

A. I think the explanation is the options provided to the police. In a recommendation, it's not, I guess, a decision. Providing options to the police is where they can make a decision.

THE COMMISSIONER: Q. Well, originally the project proposed making a recommendation.

A. Mmm-hmm.

Q. So why wasn't the recommendation made? You say expressly in that email, "We did not offer opinions or recommendations." Good. Why was the project changed from

1 one that would make a positive recommendation to police
2 about a course to be followed to a document that, on its
3 face, didn't do that? What was the reason for the change?
4 One reason proposed to you --

5 A. Mmm-hmm.
6

7 Q. -- is that it was necessary to get a quorum to agree
8 to a project report before it would be a valid project
9 report, and that you and Mr Howes and Ms Allen knew that
10 you would not get a quorum, because Ms Reeves and Ms Rika
11 would not agree to it, and at least one of them had to sign
12 to create a quorum, constitute a quorum, under the standard
13 operating procedure. That's so, isn't it?

14 A. I believe so.
15

16 Q. Yes, and you knew that at the time, that you would not
17 get a quorum, but you wanted to go ahead with this, so you
18 dressed it up as an Options Paper that did not contain
19 a recommendation. That's the reason that's being put to
20 you. Well, you are not accepting that, but you are not
21 offering any other possible logical explanation, based upon
22 your long experience of how the lab works, how projects are
23 constituted, how changes to processes are made. You say
24 you can't think of a single other explanation to explain
25 the change from a document that would recommend a course of
26 action and take responsibility for it, that is, FSS would
27 take responsibility for it --

28 A. Mmm-hmm.
29

30 Q. -- into a document that merely presented options
31 without any weighting; is that right? I can only act on
32 evidence, and if there is no evidence to explain the
33 change, except the inference which Mr Hodge has put to you,
34 then I'm likely to draw that inference, you see.

35 A. Yes.
36

37 Q. So if you can't assist me with another rational
38 reason, that's the position I will be in at the end of the
39 day.

40 A. I don't think - the 184 project report was never,
41 I guess, in that format for presentation to an external
42 party. It was an internal report, and they are. So a form
43 of providing it to a client for their, I guess, decision on
44 would have potentially taken another form, anyway, and the
45 outcome of that was, in this particular case, the Options
46 Paper. Why it doesn't have recommendations - to not
47 provide, I guess - for police to consider what is being put

1 forward for them, without explaining them.
2

3 Q. I'm sorry, I don't understand that.

4 A. Without, I guess, biasing them against one view over
5 the other, to provide the options and the risks and
6 benefits associated to them, which I don't - as I've
7 discussed previously, did not go into as much detail as it
8 could have.
9

10 MR HODGE: Q. I think in fairness, I need to point out
11 to you at least two of the things that that doesn't
12 explain. It doesn't explain why Project #184 wasn't
13 concluded, and it doesn't explain why, in your email on
14 5 February 2018, you identified as a matter significant to
15 the decision as to whether or not to send the Options Paper
16 to the rest of the management team the fact that the
17 Options Paper didn't, on its face, offer opinions or
18 recommendations?

19 A. I don't know why 184 wasn't completed. There was an
20 email further that talks about watermarking the original
21 versions and replacing it or superseding it with the
22 Options Paper. That was, I think, Justin's email on
23 5 February.
24

25 THE COMMISSIONER: Q. Let me put it to you directly:
26 the reason the form of process was changed from a project
27 to something called an Options Paper was to evade the need
28 to achieve a quorum of approval, because it was known that
29 objections upon a scientific basis had been made to the
30 proposed procedure and those objections could not validly
31 be answered by any scientific logic.

32 A. I don't believe - I mean, I still don't believe that's
33 the case, because I don't recall being aware of the
34 significant objections at that time.
35

36 Q. I thought earlier you said it wasn't that you were not
37 aware; it's that you could not recall whether you were
38 aware, and you changed your sworn statement to that effect,
39 didn't you?

40 A. I thought I said that. Sorry, I can honestly not
41 recall.
42

43 MR HODGE: Q. Yes, you see your statement says you
44 didn't know at the time. And then I asked you about that,
45 and you said you don't know whether you did or didn't know.
46 And then in answer to a question from the Commissioner just
47 a moment ago, you then said you don't think that the reason

1 was to avoid a problem with quorum, because you didn't know
2 at the time about there being issues raised by senior
3 managers. So we just need to understand what is your
4 story - that you knew or didn't know?

5 A. I don't recall knowing.
6

7 Q. You don't recall you didn't know? You don't recall --

8 A. I don't recall knowing that there was significant
9 objection.
10

11 Q. In fairness to you, does that mean, if we go back to
12 your 17 October statement and look at paragraph 60, where
13 it says, "I did not know at that time that any of the
14 management team had any difficulty with the draft report",
15 that you're back to saying that is true?

16 A. Sorry, I just thought I said I did not recall.
17

18 Q. Is the first sentence of 60 true or not true?

19 A. I do not recall, at that time when the Options Paper
20 was provided to the QPS, other objections.
21

22 Q. I will just ask this once more, I think, Ms Brisotto.
23 Are you saying to the Commissioner that as at the end of
24 January 2018, you did not know that other senior scientists
25 had raised objections, or are you saying today you don't
26 know whether you knew at the time that other senior
27 scientists had raised objections?

28 A. I'm saying I cannot recall, so I do not know.
29

30 Q. You cannot recall today whether you knew or didn't
31 know at the time?

32 A. Yes.
33

34 MR HODGE: Commissioner, I was going to move on slightly.
35 I think there are some propositions I will have to put to
36 Ms Brisotto, in fairness, but I might do that tomorrow,
37 I think, and I will just move on to deal with a couple of
38 other topics before we have to finish.
39

40 THE COMMISSIONER: Yes.
41

42 MR HODGE: Q. Can I ask you, then, about a slightly
43 different issue. Can we go to [WIT.0014.0021.0001]. This
44 is the email, which is the thing that you have quoted in
45 your statement, and if we blow up that sentence that you
46 were referring to, which is the third sentence, reading:
47

1 *Once a decision is reached ... we will need*
2 *to submit enhancements to VSTS and*
3 *create/write manual procedures for P3*
4 *samples both through Analytical and*
5 *reporting.*
6

7 A. Yes.

8
9 Q. I want to just understand some aspects of that. What
10 is VSTS?

11 A. VSTS at the time was a system used to request
12 enhancements in the forensic-register.

13
14 Q. When you refer then in the next line to
15 "creating/writing manual procedures for P3 samples both
16 through Analytical and reporting", do you recall what it
17 was that you thought was required?

18 A. Because - I don't specifically remember, but based on
19 this, and thinking about it, a manual process, until the
20 enhancements can be made within forensic-register, would
21 need, I guess, manual intervention as opposed to it
22 automatically flowing through the forensic-register.

23
24 Q. What is the thing that would automatically flow
25 through the forensic-register?

26 A. For P3s at the time, they would have been in
27 Profiler Plus, so they would have had different workflow
28 rules around them because of the way Profiler Plus moved
29 through the system as opposed to PowerPlex 21. So for the
30 P3 samples, once they continued in PP21, they would need
31 some, I guess, business rules within the forensic-register
32 so they moved from one process to the next, without someone
33 manually intervening and sending them to the next batch.

34
35 Q. The forensic-register, it distinguished between P1, P2
36 and P3 samples?

37 A. Yes, it can.

38
39 Q. Sorry, did you say it can?

40 A. It can, yes.

41
42 Q. Did it at the time?

43 A. It did for P2s and P3s, because they were allocated to
44 different kits, and that would be assigned at the evidence
45 recovery stage.

46
47 Q. I'm interested in the process and what happened to

1 P1s. Was it the case that at the time the Options Paper
2 was presented, before it was accepted, that samples that
3 were P1 or P2 samples were assigned to a PP21 workflow, and
4 samples that were P3 samples were assigned to
5 a Profiler Plus workflow?

6 A. Yes.

7
8 Q. Am I right in thinking, then, that for P3 samples,
9 with the switchover to PP21, it would be necessary to
10 create a new workflow for those samples?

11 A. It would be, yes.

12
13 Q. In relation to the distinction between P1 and P2
14 samples, am I right in thinking that at the time - that is,
15 at the time the Options Paper came in - there was no
16 separate workflow for P1 versus P2 samples?

17 A. I thought - I think there was. They would be upgraded
18 and they would go through Maxwell extraction.

19
20 Q. This was before the Options Paper was accepted?

21 A. Yes, I believe so.

22
23 Q. When you say there was a separate workflow, are you
24 saying there was one workflow for P1 and one workflow for
25 P2?

26 A. Not necessarily. So priority 1s would be allocated
27 a priority 1 in the forensic-register. And the way it was
28 set up - and this is within the forensic-register, because
29 that only became implemented mid-2017, so again I would
30 have to look back to see what exactly the process was at
31 the time, but priority 1s will go through I guess what we
32 call extraction on the Maxwell instruments because they are
33 smaller batches, and they would be tracked through faster
34 than the others because they would basically go to the top
35 of every list.

36
37 Q. I see. Was there a period of time after the Options
38 Paper came in when P1 samples, if they were in the
39 quantitation range between 0.001 ng/ μ L and 0.0088 ng/ μ L,
40 would not be processed?

41 A. There was, yes, I believe.

42
43 Q. Can you just explain to us why that was?

44 A. I don't - I don't know why, to be honest. Looking
45 back, it appears that priority 1s were, I guess, the
46 exception in any of the versions of the 184 project, and
47 I know that at the end of 2018, they were changed, that

1 process was changed to be automatically microconned. So
2 I'm not sure why the decision was made at that time or
3 whether that was - and I'd have to go back and have a look
4 at the email from Inspector - sorry, Superintendent
5 Frieberg in relation to if it lists the priorities.
6

7 Q. Sorry, if what lists the priorities?

8 A. The email from Superintendent Frieberg to Cathie and
9 Paul, I believe, that fed back the decision. I'm not sure
10 if it mentions priorities. I can't recall.
11

12 Q. I will go to that in a moment, but for you within the
13 lab, did you have an understanding of why it was that
14 priority 1 samples were not going through the auto-microcon
15 process when they were in that 0.001 ng/ μ L to 0.0088 ng/ μ L
16 range?

17 A. Not that I can recall. The decision at that time,
18 I guess, was inclusive of the QPS feedback. Also,
19 priority 1 cases are always allocated to a reporting
20 scientist, so they will track every sample through and
21 assess them for rework.
22

23 Q. I just want to understand, though, was there some
24 direction given that you can recall by somebody to the
25 effect that you would cease auto-microcon for priority 1
26 samples as well in the range?

27 A. Not that I can recall a specific direction given, no,
28 sorry.
29

30 Q. You can't remember ever having Cathie Allen
31 communicate to you that the QPS had said they didn't want
32 to do auto-microcon for P1 samples in that range?

33 A. I would have to look back at the emails. I think
34 within the minor change register, it also discusses the
35 priorities as well, but again I would have to have a look
36 at that to confirm.
37

38 Q. Was it the case that in 2018, there was never any
39 separate workflow set up so that P1 samples in that
40 low-quant range would be treated differently from P2 and P3
41 samples?

42 A. Yes, as I said before, I don't recall. I'd have to go
43 back and have a look at the processes, whether and where
44 that changed.
45

46 Q. When you say "go back and look at the processes"?

47 A. The standard operating procedures.

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Q. I see, so --

A. So the process I explained to you is - I don't know when that came in, that is, the process now, how long that's been in place. I would have to go back and check dates.

Q. What I'm interested in is the actual operation of the lab in 2018, when I think you have told us that for P1, for priority 1 samples in that low-quant range, they were also not being processed; is that right?

A. Yes, because I recall something at the end of 2018 in relation to the request to commence that again.

Q. I'm just interested in understanding at a procedural level - we'll get in a moment to the whys, but at a procedural level, was it the case that there was no separate workflow for P1 samples, for the low-quant P1 samples, from low-quant P2 and P3 samples?

A. Not up until that stage. They would be - and again, sorry, I would have to check, but they would, I believe, still be put on the Maxwell instruments, so they would go through faster, but they would still be on a quant batch with other samples.

Q. Is what happened that at the end of 2018, as you recall it, an issue was raised by the QPS because they realised that there seemed to be P1 samples in that low-quant range that also weren't being processed?

A. I believe there were some emails to Cathie, yes.

Q. Were they then forwarded to you?

A. I believe, yes, they were at that point in time, which is why I'm not recalling necessarily but recalling reading the emails.

Q. And, sorry, recall reading them recently?

A. Yes.

MR HODGE: Can we bring up [FSS.0001.0051.4972].

Sorry, Commissioner, I think I should tender that email that's up on the screen.

THE COMMISSIONER: Exhibit 115.

1 EXHIBIT #115 EMAIL FROM PAULA BRISOTTO TO JUSTIN HOWES,
2 DATED 19 DECEMBER 2017, BARCODED [WIT.0014.0021.0001]
3

4 MR HODGE: Q. We see at the top of the chain, the last
5 email in time is Ms Allen forwarding an email to you and
6 Mr Howes on 6 December 2018?

7 A. Yes.
8

9 Q. Is this the email that you were referring to?

10 A. I believe so.
11

12 Q. If we go to page .4982, you see this is an email on
13 14 November 2018 - I am told those numbers, the sample
14 numbers, should be redacted - that Inspector Neville has
15 written to Ms Allen and said there were over 15 priority 1
16 samples?

17 A. Yes.
18

19 Q. And you see, if we look at the paragraph below the
20 sample description, it says:

21
22 *Could you confirm if the profiles for the*
23 *four samples listed above were obtained*
24 *after micro-concentration was performed,*
25 *please. Could you also confirm if the*
26 *microcon step has been removed from the*
27 *workflow as a matter of routine for P1*
28 *samples.*
29

30 A. Yes.
31

32 Q. Then Inspector Neville's email goes on to say:

33
34 *My understanding as per the below was that*
35 *this was only to occur for P2. If this*
36 *process has been removed from the P1*
37 *workflow, could it please be reintroduced*
38 *as it will stop delays in obtaining results*
39 *that are considered urgent, please.*
40

41 A. Yes.
42

43 Q. Then if we go to the page which is .4980, you see at
44 the bottom half of the page, there is an email that
45 Ms Allen has sent back on 15 November replying to or
46 responding to I think Superintendents Simpfendorfer and
47 McNab, and do you see at the very bottom of the page it

1 says:

2
3 *During a meeting on 1st of Feb 2018,*
4 *Paul Csoban ... and I met with Supt Dale*
5 *Frieberg to discuss the Options Paper that*
6 *had previously been provided to the QPS for*
7 *decision.*

8
9 And then do you see it goes on to say, starting in the very
10 last sentence:

11
12 *During the discussion, the second part of*
13 *Option 2 (section a) was discussed, which*
14 *related to Priority 1 samples and the*
15 *Superintendent indicated that Priority 1*
16 *samples should be processed the same as*
17 *Major crime ... and Volume crime*
18 *samples ... which is not to be*
19 *automatically progressed through the*
20 *Microcon process.*

21
22 A. Yes.

23
24 Q. And then there are various things that are said in
25 that email, one of which is, you see it says:

26
27 *Automatic progression of samples through*
28 *the Microcon process means that all*
29 *available DNA extract will be consumed, so*
30 *no further testing can be conducted on*
31 *these samples after this step.*

32
33 A. Yes.

34
35 Q. Now, tell me if you agree with this: that statement
36 that "Automatic progression of samples through the Microcon
37 process means that all available DNA extract will be
38 consumed" - that's not true, is it?

39 A. Not if it's not microconned to full.

40
41 Q. And ordinarily it wouldn't be microconned to full,
42 would it?

43 A. Not - no, because the auto-microcon process was to
44 35 microlitres.

45
46 Q. Yes, and 35 microlitres means not to full and
47 therefore wouldn't all be consumed?

1 A. It wouldn't, no.

2

3 Q. Were you aware back at the end of 2018 that Ms Allen
4 had made this statement to police?

5 A. No.

6

7 Q. You didn't know?

8 A. I don't believe so.

9

10 Q. She forwarded the email chain to you.

11 A. I might not have read it in that much detail, given it
12 was an FYI email.

13

14 Q. I see. Then you see it goes on to say:

15

16 *As the decision on the automatic Microcon*
17 *process was made last financial year, the*
18 *budget for this financial year has been*
19 *adjusted for that consumable, so this will*
20 *increase the cost.*

21

22 A. Yes.

23

24 Q.

25 *If the QPS wishes for P1 samples to*
26 *automatically be processed through the*
27 *Microcon process, which leaves no available*
28 *extract for other testing, this process can*
29 *be re-introduced.*

30

31 A. Yes.

32

33 Q. And I just want to understand, do you say you were not
34 aware that Ms Allen had made these statements to the
35 police?

36 A. I - as I said, I might not have read it in any great
37 detail.

38

39 Q. Coming back to my question, were you aware that
40 Ms Allen was making these statements to police?

41 A. I may have been. I can't say that I read that email
42 in any great detail, though.

43

44 Q. Is it the case that in fact the true reason why
45 priority 1 samples were not being processed through
46 auto-microcon when they were in the low-quant range during
47 2018 was because of, effectively, an administrative error

1 that a separate workflow hadn't been set up for them?

2 A. I don't - don't believe so.

3

4 Q. Do you say - and I want you to think very carefully
5 about this --

6 A. Mmm.

7

8 Q. -- do you say that at any time you believed it was
9 true that the QPS had agreed, in February 2018, to cease
10 the auto-microcon process for P1 low-quant samples?

11 A. I would wish to have a look at the minor change
12 register which records changes such as this, just to see
13 what it stated in there.

14

15 Q. Just listen to my question.

16 A. Mmm-hmm.

17

18 Q. And I will break it up into two parts. Do you believe
19 it is true today that the QPS, in February 2018, had agreed
20 to ceasing the auto-microcon process for low-quant P1
21 samples?

22 A. I'm - I believe it may be true, if the minor change
23 register indicated that.

24

25 THE COMMISSIONER: Q. The register will show what the
26 lab was doing. It won't tell you what the police agreed
27 to?

28 A. No, I wouldn't know what the police agreed to at that
29 time.

30

31 MR HODGE: Q. So overnight you are going to look at the
32 minor change register, and from that you will be able to
33 tell us what, tomorrow?

34 A. If that was the understanding that was, I guess,
35 provided to us about the workflow at that point in time.

36

37 Q. I see. You will be able to look and see whether this
38 change to not process P1 samples is identified in the minor
39 change register?

40 A. Yes, from when the process was implemented, yes.

41

42 Q. And will you also be able to tell us, by looking at
43 those things, whether what had happened was there was just
44 an administrative error, or some form of error, and no-one
45 had created a separate workflow for P1 low-quant samples?

46 A. If the minor change register indicates that priority 1
47 and priority 2 samples should be reported as "DNA

1 insufficient", then the workflow would have reflected that.

2
3 MR HODGE: Is that a convenient time?

4
5 THE COMMISSIONER: Yes. We will adjourn until 9.30
6 tomorrow.

7
8 MR HODGE: Thank you, Commissioner.

9
10 **AT 3.45PM THE COMMISSION WAS ADJOURNED TO**
11 **FRIDAY, 21 OCTOBER 2022 AT 9.30AM**

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