

UNDER

THE INQUIRIES ACT 2013

IN THE MATTER OF

A GOVERNMENT INQUIRY INTO  
OPERATION BURNHAM AND  
RELATED MATTERS

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MEMORANDUM OF COUNSEL FOR THE CROWN

6 May 2019

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**CROWN LAW**

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**MAY IT PLEASE THE INQUIRY:**

1. This memorandum accompanies the third tranche of classified material that the Inquiry has identified for public release by the Crown, comprising two documents. This material has been subject to review and redaction in consultation with the reviewers, Mr Keith and Mr Johnstone, in accordance with the Inquiry's classification review protocol.
2. These documents may reveal previously classified information, which has not been publicly released before now, including in response to requests under the Official Information Act 1982. The documents also contain legal advice, for which the privilege for communications with legal advisors, under s 54 of the Evidence Act 2006, has been waived for the limited purpose of this inquiry. The Crown emphasises that the information being made available for public disclosure at the request of the Inquiry does not reflect the nature or extent of information that would ordinarily be considered necessary or appropriate to make public.
3. As noted in the memorandum of 25 March 2019, the relevant Crown agencies and the reviewers continue to review the classification of documents produced to the Inquiry, pursuant to the protocol. It is expected that substantial further information will be declassified for disclosure to other core participants and the public in the course of the Inquiry.

6 May 2019



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