UNDER

THE INQUIRIES ACT 2013

IN THE MATTER OF

A GOVERNMENT INQUIRY INTO OPERATION BURNHAM AND RELATED MATTERS

MEMORANDUM OF COUNSEL FOR THE CROWN (DISCLOSURE OF DOCUMENTS BY DPMC)

12 July 2019

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MAY IT PLEASE THE INQUIRY:

- 1. In accordance with the Inquiry's additional requests for information outlined in its letters of 30 May and 25 June 2019, the Department of the Prime Minister and Cabinet (**DPMC**) conducted a further review of its disclosure processes and holdings to ensure it produces all material relevant to the Terms of Reference of the Inquiry which is in its possession and control.
- 2. As a result of this review, DPMC has identified two further documents relevant to the Inquiry's Terms of Reference. Under cover of this memorandum, DPMC now produces this material to the Inquiry. An Index of documents produced to the Inquiry by DPMC is provided in Appendix 1.
- One document carries national security classification. This material will accordingly be subject to the Inquiry's procedure for handling classified information.
- 5. DPMC will provide a statutory declaration outlining the process DPMC took to identify, review and provide all relevant information to the Inquiry.

12 July 2019

Aaron Martin

Counsel for the Crown