

in the matter of an Inquiry into Operation Burnham

MEMORANDUM OF COUNSEL FOR JON STEPHENSON

21 December 2018

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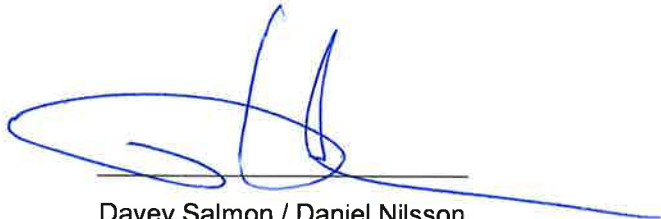
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MAY IT PLEASE THE INQUIRY

1. This memorandum responds in more detail to the Inquiry's Minute No 6.
2. Mr Stephenson is progressing correspondence with his sources. At this point, however, the details of only three can be provided. Confidentiality is claimed in respect of all others under s 68 of the Evidence Act 2006, pending further discussions with both sources and the Inquiry regarding appropriate protections.
3. In terms of the three sources whose details may be provided, sensitivities exists regarding the communication of those details to the Inquiry. Counsel will liaise directly with counsel assisting regarding means of delivery of those names.

Dated 21 December 2018

A handwritten signature in blue ink, consisting of a large, stylized 'D' followed by a series of loops and a long horizontal stroke extending to the right.

Davey Salmon / Daniel Nilsson
Counsel for Jon Stephenson