



27 September 2021

Director of Public Prosecutions
Reserve Bank Building
20-22 London Circuit
Canberra City ACT 2601

**Outstanding documents – Police v Bruce Lehrmann – Sexual Intercourse without consent
CC2021/8143**

Dear Mr Drumgold,

An updated copy of the mention brief provided to both DPP and Defence on 6 August 2021 will be provided to ACT Policing Judicial Operations on a USB memory device on Tuesday 28 September 2021. The following amendments have been made:

1. [REDACTED] Counselling Records have been removed;
2. [REDACTED] Records have been removed;
3. Audio only copy of the Evidence in Chief Interviews have been removed;
4. [REDACTED] Records redactions have been locked;
5. Medicare report redactions have been locked;
6. PBS report redactions have been locked;
7. Consent to access iCloud redactions have been locked; and
8. Consent to acquire data redactions have been locked.

The audio visual copies of the complainant's Evidence in Chief Interviews dated 24 February 2021 and 26 May 2021 will be provided on CD on Tuesday 28 September 2021 to ACT Policing Judicial Operations.

Additionally, the following documents obtained since the 6th of August 2021 have been included in a separate folder on the USB memory device:

1. Floor plan of Ministerial Suite [REDACTED]
2. Transcript of Record of Conversation with [REDACTED]
3. Transcript of Record of Conversation with [REDACTED]
4. Transcript of Record of Conversation with [REDACTED]
5. Image of a Facebook message as described by [REDACTED]

Since provision of the brief on 6 August 2021, the investigation team has sought the following further evidentiary items relevant to the brief of evidence and will seek to provide these items to your office as a matter of priority.

1. Diary notes of former Police Assistant Commissioner Leanne [REDACTED]
2. Record of Conversation with [REDACTED];
3. Transcript of Record of Conversation with [REDACTED]

4. Record of Conversation with Heidi Yates;
5. Police Statement of Detective Senior Constable Kirsty [REDACTED];
6. Supplementary Police Statement of Detective Leading Senior Constable Trent Madders;
7. Supplementary Statement of Digital Forensic member Peter [REDACTED];
8. iCloud report for Ms Higgins account;
9. Statement of Forensic member Jennifer [REDACTED];
10. Section 3E Crimes Act 1914 Search Warrant – Premises warrant – Queensland – Not executed;
11. Section 3LA Crimes Act 1914 order – Not executed;
12. Transcript of audio recording of Mr Lehrmann requesting access into Australian Parliament House;
13. Audio recordings between Parliamentary Security Services staff;
14. Transcripts of recordings between Parliamentary Security staff;
15. Email from Ms Higgins to Mr Lehrmann.

As of 24 September 2021, the following items remain outstanding. It is anticipated that these items will be available for provision to your office by 31 October 2021.

1. Police Statement of Detective Sergeant Gareth Saunders;
2. Police Statement of Detective Sergeant Jason McDevitt;
3. Supplementary Police Statement of Senior Constable Emma Frizzell;
4. Statement of [REDACTED];
5. Statement of [REDACTED];
6. Transcript of Record of Conversation with Heidi Yates;
7. Section 3E Crimes Act 1914 Search Warrant – Uber records;
8. Uber records of Mr Lehrmann; and
9. Uber records of Ms Higgins.

The following statements requested by your office regarding complaint evidence have not been obtained for the following reasons:

1. [REDACTED] – All attempts to contact have gone unanswered. [REDACTED] [REDACTED] will be listed in the third schedule;
2. [REDACTED] – Determined to have no relevant evidence to offer;
3. [REDACTED] [REDACTED] – Police cannot locate or contact [REDACTED];
4. [REDACTED] [REDACTED] – Determined to have no relevant evidence to offer.

The complete downloads of the complainant's 3 phones, and accused's phone consists of many thousands of pages. Each download will require redaction before they can be provided, and this will take considerable time, however the team is currently working through these downloads.

Furthermore, the investigation team is in the process of compiling the disclosure certificate and seek a meeting with your office to discuss items contained within Schedule 1: relevant protected material that is subject of claim of privilege or immunity, prior to its submission.

Yours sincerely,

Scott Moller
 Detective Superintendent
 Criminal Investigations
 ACT Policing