

IN THE COUNTY COURT  
OF VICTORIA AT MELBOURNE

BETWEEN:

**THE CROWN**

and

**HEIDI JANE TAYLOR**

**MEMORANDUM OF ADVICE**

**Brief**

1. The defendant (“Taylor”) has been charged with:
  - a) one count of importing a prohibited import, in contravention of s233B(1)(b) of the *Customs Act (C’t)* 1901;
  - b) one count of possession of a prohibited import which has been imported into Australia, in contravention of s233B(1)(c) of the *Customs Act*; and
  - c) one count of attempting to import a prohibited import, in contravention of s233B(1)(b) of the *Customs Act*.
2. I am instructed that Taylor will plead to counts 1 and 2.
3. I am briefed to advise the prosecution as to the evidence in relation to count 3, and as to the likelihood of securing a conviction against Taylor on that charge.

**Facts**

4. The relevant facts are set out in the chronology appended to my advice.
5. In short form, the facts are as follows:

6. On 7 June 2001, Australian Customs Service intercepted three packages at the Melbourne Airmail Transit Centre at Tullamarine. The packages were similar in nature. Each package contained an A5 cardboard folder. In each case, the folder contained packing material and approximately 270 white tablets. The tablets have since been analysed and have been found to contain ecstasy ("MDMA"). MDMA is a prohibited import under the *Customs Act*.
7. Two of the packages were addressed to "Heidi Taylor" at Bayview on the Park Hotel, 52 Queen Road, Melbourne ("the Bayview Hotel"). The third package was addressed to "Heidi Tailor" at the same address.
8. Australian Federal Police ("AFP") were contacted, who arranged for the tablets to be substituted with harmless material and monitoring devices. On the morning of 13 June 2001, AFP agents then arranged for the packages to be delivered to the Bayview Hotel. Taylor was a guest at that hotel. She accepted receipt of the packages. Remote surveillance of the packages was then conducted.
9. In the evening of 13 June 2001, AFP agents executed a search warrant for Room 18 at the Bayview Hotel, where Taylor was staying. Taylor was present during the search. As a result of the search, a number of items were seized. One of those items was a rubber glove containing approximately 60 tablets. The tablets have since been analysed and have been found to contain MDMA. Taylor has made admissions in relation to the tablets in the rubber glove. It is the importation and possession of the tablets in the rubber glove that form the basis of counts one and two.

10. Taylor was informally interviewed during the search, which was tape-recorded in part. Later that evening, a formal interview took place at AFP offices, which was recorded both by audio and video.
11. During the same evening, AFP agents executed a search warrant for 26 Hawthorn Avenue, Hawthorn. I believe that this is the address of the Taylor's parents. I do not understand that any material was seized during that search.
12. Search warrants have since been executed against Commonwealth Bank of Australia and the Bank of Melbourne. The Bayview Hotel has also provided the prosecution with their booking records for Taylor and a partial list of telephone calls made by Taylor while staying at the hotel.

#### **Summary of the case for the Crown**

13. In my view, the best arguable case for the Crown is that Taylor was involved in a plan to import tablets containing MDMA into Australia by way of airmail packages sent from England. Taylor's role in the plan was to pack the tablets into packages in London, and to receive the goods in Australia.
14. There is some evidence of Taylor having participated in a broader scheme to import tablets on a regular basis, the detail of which is set out later in this advice. It is, however, not necessary to adduce evidence of that scheme as part of the Crown's case, as the Crown need only prove a single instance of attempted importation in order for the charge to be made out.

15. Given that the charge is one of attempt, one would normally have to concern oneself with questions of subjective intent, and whether there are acts of sufficient proximity to the commission of the crime (*Britten v Alpogut* [1987] VR 924 per Murphy J). In this case, however, it is clear that the crime of importation would have been perfected but for the interception of the tablets by Customs.
16. It follows from this that, subject to the prosecution proving the elements of the attempt, there will be no issue that there was an attempt to import a prohibited import into Australia. Assuming that the attempt can be proven, the primary question becomes: was Taylor knowingly involved in that attempt?

#### **Proving the Crown's case**

17. At the request of my instructors, I have prepared an outline of the Crown's case in the form of charts. Those charts set out the manner in which I propose that the case should be proven.
18. As a guide to interpretation of the charts, I note that there are five interlinking charts. Chart 1 directs itself to the fact of the attempted importation. Chart 2 sets out three probanda to support the claim that Taylor was knowingly involved in the attempt. The reasoning to support those three probanda is set out in charts 3, 4 and 5.

19. Conclusions of fact that are indispensable elements in the proof of a higher probandum are marked with a plus (+) sign. My instructors will of course be aware that those conclusions must be proven beyond reasonable doubt, whereas elements that are not so marked need only be proven on the balance of probabilities (see: *R v Shepherd* (1990) 170 CLR 573).
20. The charts also highlight the strengths and weaknesses of the prosecution case. Where appropriate, I have commented on those strengths and weaknesses in this advice.
21. My instructors will note that, generally speaking, I have referred in the charts to real evidence in preference to testimonial evidence where possible. For example, evidence describing the packages and their contents is drawn from the photograph book of Garland, rather than from Garland's statement itself. The reason for this is because of the inherent reliability of real evidence. There is also the strategic importance of putting real evidence in the hands of the jury.

Chart 1: There was an attempt to import a prohibited import into Australia

22. Commencing with chart 1, there are two penultimate probanda that must be proven in order to show that Taylor attempted to import a prohibited import into Australia. Applying *Shepherd's* case, they must be proven beyond reasonable doubt and are marked accordingly in the chart. The penultimate probanda are that:
  - a) there was an attempt to import a prohibited import into Australia; and
  - b) Taylor was knowingly involved in the attempt.

23. As noted above, there would appear to be little difficulty in proving that there was an attempt to import a prohibited import. There are three elements to be shown in order to prove the attempt, all of which must be proven beyond reasonable doubt:
- a) there was an attempt to import tablets into Australia;
  - b) the tablets contained MDMA; and
  - c) MDMA is a prohibited import.
24. It seems clear that there was an attempt to import tablets into Australia. In particular, the evidence shows that the tablets arrived in Australia from overseas. The proposition is proven by the presence of cancelled English stamps and airmail stickers on the packages (photographs exhibit EB/13), together with the evidence of Foster that the tablets were detected at the Melbourne Airmail Transit Centre.
25. As to the third limb to be proven, MDMA is defined as a prohibited import under the *Customs Act*. I have noted this on the chart.
26. As to the second limb to be proven, it should also be a simple matter to prove that the tablets contained MDMA, provided that continuity of the tablets can be proven from the point of detection by Foster to the laboratory analysis of the 'A' sample by the chemist Larsen.
27. I sound a note of concern on this point, however. Foster and Noyce were the first two persons to deal with the tablets. In their statements they describe tablets with a 'w' logo being found in one of the packages. Garland, however, who observed the tablets in all three packages, states that the tablets in each package had an eagle logo on them. Garland makes no reference to tablets with

a 'w' logo. Larsen, who was provided with a sample from each of the three packages, also describes tablets with an eagle logo and makes no reference to tablets with a 'w' logo.

28. Garland performed a "*presumptive and subsequent pre-analytical chemical test*" on the tablets, while Larsen performed the full forensic analysis of the sample provided to her. Both of those tests indicated the presence of MDMA in the tablets. Garland is a scientist employed by AFP, while Larsen is a chemist with Australian Forensic Drug Laboratory ("AFDL"). It is therefore the evidence of Larsen and, to a lesser extent Garland, that establishes that the tablets contained MDMA (Foster also x-rayed the packages, but could only state that "*they contained what appeared to be Ecstasy tablets*").
29. On these facts, it would appear to be open for the defence to argue that the tablets that were tested for the presence of MDMA by Garland and Larsen were **not** the tablets that were detected in the packages by Foster. I have set this argument out as an objection in chart 1. The Crown's answer to such an attack would be to rely upon the evidence as to continuity. Given that the defence's argument mounts a direct attack upon continuity, however, I would not expect proof of continuity of the tablets to be held in high regard by the jury.
30. If the defence set out above were to succeed, the prosecution case would fail on the rather embarrassing point that it could not be proven that the tablets contained MDMA.
31. There may be a simple explanation for the apparent inconsistency in the description of the tablets. None the less, it is a matter that must be investigated at an early stage and resolved if possible.

Chart 2: Taylor was knowingly involved in the attempt

32. This is the crucial element of the case, and the one that is most likely to be the subject of sustained attack by the defence. Given that there is no direct evidence of Taylor's involvement in the importation attempt, it is an element that relies upon circumstantial evidence for its proof.
33. In order to prove that Taylor was knowingly involved, in my view it will be necessary to prove beyond a reasonable doubt that:
- a) Taylor was involved in the attempt to import the packages into Australia;
  - and
  - b) Taylor believed that the packages contained MDMA.
- (refer chart 2)
34. I have also set out a supporting probandum in chart 2, that Taylor was involved in a system of importation of MDMA into Australia. As noted above, it will not be necessary to prove Taylor's involvement in that system in order to prove the offence.

Chart 3: Taylor was involved in the attempt to import the packages into Australia

35. The fact of the attempt to import the packages is set out in chart 1. This interim probandum is directed to Taylor's involvement in the attempt to import the packages.

36. In my view, there are two possible arguments to prove Taylor's involvement in the attempted importation of the packages. Either she posted the packages to Australia or arranged for them to be posted, or alternatively, she arranged to receive the imported packages upon their arrival in Australia. In my view, only one of these arguments need be proven in order for the interim probandum to be made out.
37. The former argument, that Taylor posted the packages, looks at first blush to be the more attractive limb to be explored. This is because, if it can be shown that Taylor posted the packages to Australia or arranged for them to be posted, it supports the inference that she was aware of the content of the packages. This would lend weight to the claim that Taylor knew that the packages contained MDMA (refer chart 4). There is scant material in my brief, however, to show that Taylor was involved in the posting of the packages.
38. My instructors will note from the chart that this limb relies heavily upon the evidence that Taylor's fingerprint was found on packing material in one of the packages. Indeed, it is the only real evidence that directly connects Taylor with the packages before their arrival in Australia. The chart attempts to draw a number of inferences from this fact: that she prepared one or more of the packages, that she prepared them for posting to Australia, and further that she did post them to Australia, or at least arrange for them to be posted to Australia. In doing so, support is drawn from the fact that the packages are similar in their content and method of packaging, and that the packages were all posted from London, Taylor's current city of residence (although note the objection that one of the packages may have been sent from Cambridge: refer Taylor's ROI).

39. It must be acknowledged, however, that the chain of reasoning in this limb is weak. It is probably acceptable to invite the jury to infer that, if Taylor's fingerprint is found on the packing material in one of the packages then she must have been involved in preparing one or more of the packages. Without further evidence, however, I can not see how it can be inferred from this that Taylor was the one who posted the package to Australia, or arranged for them to be posted to Australia, or even knew that they were to be posted to Australia.
40. In my view, the second limb contains the stronger proposition to be explored by the prosecution. This is the proposition that Taylor arranged to receive the imported packages upon their arrival in Australia, and can therefore be taken to have been involved in importing them. The proposition is based upon the fact that the packages were sent to the Bayview Hotel, coupled with the conclusion of fact that Taylor had arranged to receive the packages at the Bayview Hotel.
41. There is evidence that the packages were addressed to Taylor at the Bayview Hotel. From this evidence it can be inferred that the sender knew that Taylor would be at the Bayview Hotel at the time when the packages arrived in Australia. It is unlikely that the sender would have known that Taylor was at the Bayview Hotel at that time unless Taylor had provided the sender with that information. This provides the basis for a conclusion that Taylor told the sender, or a person associated with them, to send the packages to her at the Bayview Hotel. This leads to the conclusion that Taylor had arranged to receive the packages at the Bayview Hotel. Secondary support for the conclusion is derived from the fact that Taylor signed for the packages (Zanetti).

42. Given that the postage stamps and addresses on the packages indicate that it is likely that the packages were sent from overseas to the Bayview Hotel, it can be inferred that Taylor had arranged to receive the packages upon their arrival in Australia.

Chart 4: Taylor believed that the packages contained MDMA

43. This is the second element that in my view must be proven beyond reasonable doubt in order to show that Taylor was knowingly involved in the attempt to import MDMA into Australia (refer chart 2).
44. Although there is evidence to show that Taylor prepared one or more of the packages, there is no direct evidence to show that Taylor believed that the tablets in the packages contained MDMA. The conclusion must therefore be drawn together by way of inferences from the known facts.
45. One point to be made is that in order to prove Taylor's involvement in the attempt, it is only necessary to prove that Taylor **believed** that the packages contained MDMA. It would not seem to be necessary to prove that Taylor **knew** that the packages did in fact contain MDMA (see: *R v Shivpuri* [1986] 2 WLR 988; *Britten v Alpogut* [1987] VR 924).
46. The probanda that support the claim that Taylor believed that the packages contained MDMA are as follows:
- a) Taylor knew that she was carrying tablets that contained MDMA; and
  - b) Taylor believed that the tablets in the packages were the same type as the tablets carried by her.

47. Both probanda must be proven beyond a reasonable doubt.
48. The first probandum, that Taylor knew that she was carrying tablets that contained MDMA, is supported by Taylor's admission to this effect (statement of De Stefano, statement of Bracks, Taylor ROI). The admissions during the informal interviews with Bracks and De Stefano may meet some difficulty with admissibility, although it is clear that Taylor was cautioned prior to being questioned, and that caution was recorded on audiotape (Bracks, exhibit EB/24). There is also the point that Taylor has pleaded to the charges of importation and possession of MDMA in relation to the tablets carried by her.
49. The second probandum required to support the claim is that Taylor believed that the tablets in the packages were the same type as the tablets carried by her. This probandum is supported by Taylor's knowledge that both sets of tablets had the same physical appearance. If Taylor knew that this, it can be inferred that she believed that they were the same type of tablets.
50. In order to show that Taylor knew that both sets of tablets had the same physical appearance, it is necessary to prove that the tablets did in fact have the same physical appearance, and further that Taylor looked at both sets of tablets.
51. Larsen has inspected samples from both sets of tablets and should be able to give evidence of the similarities in shape, size, colour and logo. At this point on the chart, I have again noted as an objection the discrepancy as to the logo, which will need to be resolved.

52. Taylor carried one set of tablets in a rubber glove in her bra and then in her handbag. She had been given these tablets before leaving London (Taylor, informal ROI). She therefore had the opportunity to look at those tablets. Given that her fingerprints were found on the packing material on package '03', it can be inferred that she prepared that package. If she prepared that package (which contained tablets), she would have had the opportunity to look at the tablets in that package, or perhaps all of the packages.
53. Given that Taylor had the opportunity to look at both sets of tablets (i.e. those in the packages and those carried by her), it can be inferred that she took that opportunity. If she looked at both sets of the tablets, then she would have seen that both sets had the same physical appearance. This leads to the conclusion that Taylor knew that the two sets of tablets had the same physical appearance, and the subsequent conclusion that she believed that they were the same type of tablet.
54. A supporting proposition for Taylor's belief is also set out in chart 4. The supporting proposition is that Taylor had devised a 'storyline', recorded in Taylor's notes, in which the main character was a female who imported MDMA into Australia from England (exhibit EB/PSR 0017218). The 'storyline' is similar to Taylor's position, but there are discrepancies and, at the end of the day, it is just a story. In my view, the support provided by the 'storyline' is weak.

Chart 5: Taylor was involved in a system of importation of MDMA into Australia

55. As noted above, in my view it will not be necessary to prove that there was a system in order to show that Taylor was involved in the attempted importation on this occasion. There is, however, some evidence of a system of importation, which may lend general support to the Crown's case that there was an attempted importation on this occasion.
56. There would appear to be two propositions that the Crown could attempt to establish to support the existence of a system. They are that:
- a) Taylor had an arrangement with a Timothy Dempster for the importation of MDMA into Australia; and
  - b) Taylor travelled between London and Australia regularly, for an improper reason.
57. As to the latter proposition, in my view it is weak. It is certainly unusual for a young woman without a job to travel between Australia and London twice in four months. The chart, however, notes the obvious objection, that Taylor's parents and sister live in Melbourne. There could be all sorts of reasons as to why Taylor returned to Australia from London twice in four months, which may be readily explainable by her family connection to Melbourne.
58. As to the former proposition, this is largely based upon the unusual nature of the relationship between Taylor and Dempster. In particular, there are the telegraphic transfers of funds to Dempster (exhibits EB/15 & EB/16), which on this occasion occurred on the same day that Taylor received the packages (refer chronology attached). There is also evidence to suggest that Dempster arranged for Taylor to travel to Australia (e-mail correspondence from Dempster exhibit

EB/PSR 0017214), including payment of at least one night's accommodation at the Bayview Hotel (statement of Deering).

59. The chart sets out the inferences that could perhaps be drawn from such unusual behaviour. Despite this, there is no evidence that Dempster is involved in the importation of drugs, nor does there appear to be any direct evidence to connect Dempster with the packages. Taylor was not asked about Dempster in either the formal or informal interview, nor did she make any admissions concerning him (Taylor's ROI). Unless more is discovered as to the nature of the relationship between Taylor and Dempster, in my view aspects of that relationship lend some support for the proposition that Dempster and Taylor were in an arrangement to import MDMA, but the material is far from conclusive on the point.

#### **Likely defence theories**

60. The defence will presumably attack the discrepancy in the description of the tablets that were initially detected in the packages, when compared with the description of the tablets that were analysed for the presence of MDMA. I have commented on this above.
61. The defence will also point to the paucity of direct evidence implicating Taylor in the importation. Such an argument is, of course, always open to the defence on a circumstantial case.

62. In my opinion, the most likely defence theory is that, while Taylor may have agreed or arranged to receive the packages, she had no knowledge of their contents. Such a theory would be consistent with the admission made by Taylor in her informal interview that she was requested to receive the packages on behalf of an acquaintance called 'Katrina' (exhibit EB/24).
63. If this theory were adopted by the defence, then the attack would be upon the proposition set out on chart 4, that Taylor believed that the packages contained MDMA. Chart 2 indicates that this proposition must be proven beyond reasonable doubt in order to establish Taylor's knowing involvement.
64. The strength of the likely defence theory is that there is limited evidence to show Taylor's belief as to the content of the packages. The argument for the Crown is one that is almost entirely constructed from inferential reasoning.
65. The weakness in the likely defence theory is that the inferential reasoning is founded upon a very strong piece of real evidence, namely the presence of Taylor's fingerprint on the packaging material in one of the packages. If Taylor had no connection with the preparation or posting of the packages (which no doubt the defence will allege), and therefore had no knowledge of the contents of the package, then how did her fingerprint come to be on the packing material?
66. If Taylor was involved in the preparation or posting of the packages, there is an inference that she had knowledge of the contents of the packages, for the reasons set out in chart 4.

67. In my view, the presence of Taylor's fingerprint on the packing material is a matter that calls for an explanation to be given by the defence. In particular, it will require an explanation that negates the inference that Taylor saw the tablets that were placed in the package, and saw that they had the same physical appearance as the tablets containing MDMA that she carried into Australia.
68. In the absence of a cogent explanation being provided by the defence, in my opinion the inference relied upon by the prosecution is strong. If no explanation were given, then it may appropriate to request that the trial judge give the jury a *Weissensteiner* direction (*R v Weissensteiner* (1993) 178 CLR 217), although I leave that question for trial counsel to consider.
69. Another possible defence theory is that Taylor was not involved in the posting of the package to Australia, and therefore was not involved in the importation. Chart 3 sets out the inferential reasoning to support the proposition that Taylor did post the packages, or arranged for the packages to be posted, to Australia. None the less, the argument has its difficulties, as noted above. The better argument is that, regardless of whether or not Taylor was involved in the posting of the packages, she clearly arranged to receive the packages upon their arrival in Australia. The inferences to support that proposition are also set out in chart 3.
70. There is also the possibility of a defence theory that Taylor was involved in the importation of the packages, knew that there were tablets in the packages, but did not know that the tablets contained MDMA. Given that Taylor admits that she was carrying tablets with the same physical appearance, and that she knew that those tablets contained MDMA, this strikes me as a theory that would not

impress a jury greatly. I consider the likelihood of such a theory being pressed as remote.

#### **Other matters of relevance**

71. I have already referred to the need to investigate the discrepancy in the description of the tablets in the packages, to avoid an attack upon continuity of the evidence. I suggest that further statements be taken from those persons who observed the tablets between the time of their detection at the Transit Centre and the receipt of the sample at the premises of AFDL.
72. A further problem with continuity of evidence is whether Zanetti delivered two or three packages to Taylor. McTavish states that he handed three envelopes to Zanetti to be delivered to Taylor, while Zanetti states that he received two packages from Bracks to be delivered to Taylor. Barton states that he monitored two packages. Bracks does not refer to the packages. In terms of the matters required to make out the offence, it matters not whether two or three packages were delivered to Taylor. In particular, the package containing Taylor's fingerprint appears to have been delivered to Taylor by Zanetti (compare Garland, Park & Zanetti). None the less, my instructors may wish to investigate the inconsistency to see if it can be resolved as the defence is likely to use the inconsistency as a diversionary tactic.

73. When charting the evidence to support the Crown's case, I have not referred to the e-mail from Taylor to 'Si' (EB/PSR 0017222). The text of the e-mail is set out in the statement of McTavish. At this stage, it is not known who 'Si' may be, although it could be speculated to be Taylor's sister. In the absence of context, the text of the e-mail is entirely ambiguous. The e-mail could refer to Taylor being involved in the importation of drugs, just as easily as it could refer to a variety of other things. There would appear to be no harm in tendering the e-mail as an item found in the search, but in my view there is little point in dwelling upon its content.
74. I have not been provided with a copy of the Bayview Hotel's record of Taylor's telephone calls of 12 June 2001 (exhibit EB/12A). It would be appreciated if my instructors could provide me with a copy of that document, and determine the identity of the persons that Taylor called that day. This may provide further material to tie Taylor to the importation of the packages.
75. One other avenue that may be worth pursuing is whether there is any correlation between the handwriting on any of the packages and the handwriting in the red exercise book (which I presume to be Taylor's handwriting). If a connection could be made, then it obviously strengthens the prosecution case. I am mindful, however that expert evidence will be required to pursue this avenue, and that the only handwriting that is known to be Taylor's is that contained in the Australia Post signature book (Zanetti).

**Likelihood of conviction**

76. Subject to the discrepancy in the description of the tablets being resolved, there should be little difficulty in proving that there was an attempt to import a prohibited import into Australia. It should also not be difficult to prove that Taylor had arranged to receive the packages upon their arrival in Australia, and was therefore involved in their importation.
77. The question for the jury will, in my opinion, be whether or not Taylor believed that the packages contained MDMA.
78. While there is little evidence to prove Taylor's belief as to the contents of the packages, the existence of her fingerprint on the packing material in one of the packages provides a strong basis for an inference that she was aware of the contents of at least one of the packages. When tied with Taylor's knowledge of the tablets carried by her, then there is a basis for concluding that Taylor believed that the tablets in the packages contained MDMA.
79. The most important piece of evidence in the Crown's case is the fingerprint on the packing material. Much will depend upon the ability of the defence to explain this evidence away.
80. If the defence is unable to provide a cogent explanation for the presence of the fingerprint on the packing material, then in my view there are good prospects of securing a conviction on count 3.

Thank you for your instructions.

COUNSEL

Encl: Chronology  
Charts 1-5

IN THE COUNTY COURT  
OF VICTORIA AT MELBOURNE

BETWEEN:

**THE CROWN**

and

**HEIDI JANE TAYLOR**

**PROSECUTION’S CHRONOLOGY OF EVENTS**

<b>Date</b>	<b>Event</b>	<b>Source</b>
24 May 2000	Defendant (“Taylor”) departs Australia from Sydney on flight TG992.	Kate Emilia Bolte, exhibit EB/08
30 March 2001	Taylor arrives in Australia at Sydney on flight AC3133.	Bolte, exhibit EB/07
10 April	Taylor applies to transfer AUD\$1,991.08 to Timothy Dempster, Barclays Bank, London (“first transfer”).	Andrew Richard Sully, exhibit EB/01
9 May	Taylor applies to transfer AUD\$3,041.29 to Nobo-Valley Properties, London (“second transfer”).	Sully, exhibit EB/02
11 May	Commonwealth Bank is instructed to redirect second transfer to Timothy Dempster, Barclays Bank, London.	Sully, exhibit EB/02
20 May 2001	Taylor departs Australia from Melbourne on flight BA18.	Bolte, exhibit EB/06

31 May 2001	Bayview on the Park Hotel (“Bayview Hotel”) receives email confirming reservation for Taylor, checking in on 8 June 2001 and checking out on 9 June (“first reservation”).	Murray Deering, exhibit EB/10
	First reservation is paid for with Taylor’s Mastercard.	Deering & Sully
	Taylor is booked to Room 18.	Deering
3 June	Taylor sends email to ‘Si’.	Thomas Courtney McTavish, exhibit EB/PSR 0017222
3 June	Bayview Hotel receives email confirming reservation by Timothy Dempster, checking in on 7 June 2001 and checking out on 8 June (“second reservation”).	Deering, exhibit EB/11
	Second reservation is paid for with a different Mastercard to Taylor’s credit card.	Deering & Sully
4 June	Bayview Hotel receives email from Timothy Dempster, advising that second booking is for Taylor, who is arriving at 6:00am on 8 June.	Deering, exhibit EB/12
6 June	Airline seat booked from London to Bangkok, confirmed in email correspondence from Timothy Dempster in possession of Taylor.	Bruce Neville, exhibit EB/PSR 0017214
7 June 2001	Airline seat from Bangkok to Melbourne, confirmed in email correspondence from Timothy Dempster in possession of Taylor.	Neville, exhibit EB/PSR 0017214

7 June 2001 2:30pm	Australian Customs Service intercept and x-ray three packages from various addresses in London. The packages are addressed to “Heidi Taylor” (two packages) and “Heidi Tailor” (one package), at the Bayview Hotel. The packages contain tablets that appear to be Ecstasy.	Alice May Foster
8 June	Taylor arrives in Australia at Melbourne on flight BA7316.  Taylor checks into Bayview Hotel.	Bolte, exhibit EB/05  Deering
12 June	Taylor makes telephone calls from the Bayview Hotel.	Deering, exhibit EB/12A
13 June time unknown	AUD\$750.00 is withdrawn from Taylor’s account, from CBA ATM at 77 Fitzroy Street, St Kilda.	Sully, exhibit EB/04
13 June 11:00am	Two of the intercepted packages are delivered to Taylor at the Bayview Hotel. Taylor signs for the packages.	Vito Bernard Zanetti, exhibit EB/14
13 June 3:10pm	Taylor sends \$663.83 by telegraphic transfer to Timothy Dempster, Barclays Bank, London.	Joanna Koutsoukianis, exhibits EB/15 & EB/16
13 June 2001 5:55pm	Australian Federal Police (“AFP”) execute search warrant for Room 18, Bayview Hotel.  AFP seize the following items in the possession of Taylor:	McTavish, Neville, Dennis Brian Barton, Lisa Michelle Bracks, Georgina Mia De Stefano,

	1. envelope containing airline ticket in the name of Heidi Taylor, 2. email correspondence in the name of Timothy Dempster; 3. business card in the name of Timothy Dempster; 4. red exercise book; 5. Australian Passport in the name of Heidi Taylor; and 6. rubber glove containing 60 tablets.	Neville, exhibit EB/23           De Stefano, exhibit EB/26
13 June 2001 8:00pm	AFP execute search warrant for 26 Hawthorn Avenue, Hawthorn.	McTavish, Zanetti, Neville
13 June 8:11pm	De Stefano and Bracks interview Taylor.	De Stefano, Bracks
13 June 9:25pm	Taylor is remanded into custody.	De Stefano, Bracks
21 June	Airline seat booked from Melbourne to Bangkok, confirmed in email correspondence from Timothy Dempster in possession of Taylor.	Neville, exhibit EB/PSR 0017214
22 June	Airline seat booked from Bangkok to London, confirmed in email correspondence from Timothy Dempster in possession of Taylor.	Neville, exhibit EB/PSR 0017214
20 July	AFP execute search warrant for Bank of Melbourne, 409 St Kilda Road, Melbourne.	Bruce Neville
24 July 2001	AFP execute search warrant execute for CBA, 367 Collins Street, Melbourne.	Bruce Neville









