



Australian Government Solicitor
Level 21, 200 Queen Street Melbourne VIC 3000
GPO Box 2853 Melbourne VIC 3001
T 03 9242 1222 F 03 9242 1333 DX 50 Melbourne
www.ags.gov.au

19 August 2013

Canberra
Sydney
Melbourne
Brisbane
Perth
Adelaide
Hobart
Darwin

Mr Andrew Dillon
General Manager – Legal and Business Affairs
Australian Football League

Via Email: Andrew.dillon@afl.com.au

Dear Mr Dillon

ASADA Investigation: Essendon Football Club

We now act for the Australian Sports Anti-Doping Authority (ASADA) and we write further to ASADA's letter dated 14 August 2013. ASADA has been informed by the solicitors for Mr Hird that they have been given access to the Data Room maintained by the AFL's legal representatives and have been able to access more than 1,300 documents.

Could you please advise us of the protocols surrounding any provision of access to documents in this data room to Mr Hird's legal representatives?

Further, can you please advise us of the basis of any access, and the protocols for any such access to material disclosed by ASADA to the AFL under clause 4.21 of the National Anti-Doping Scheme?

In addition, we note that Andrew Demetriou is reported as stating on 3AW in an interview with Neil Mitchell that the AFL Commission may hold a public hearing and that it is the AFL's "intention to release" the Interim Report.

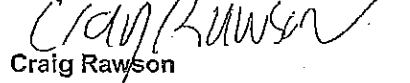
ASADA also notes the comments attributed to Mr Demetriou on the AFL.com website in which it states that "he corrected claims that the interim ASADA report could not be used at the hearing" and that he said "the plan was to refer to ASADA's report in the hearing".

ASADA notes that any public disclosure of the Interim Report or its use in a public hearing would be contrary to the NAD Scheme, the *Privacy Act 1988* and the basis on which it was supplied to the AFL.

A2125626

We seek your urgent response by 4.00pm today, failing which ASADA may take such further action as it is advised without further notice.

Yours sincerely



Craig Rawson

Senior Executive Lawyer

T 03 9242 1248 F 03 9242 1317

M 0419 230 709

craig.rawson@ags.gov.au