

# MAKINSON d'APICE

L A W Y E R S

25 November 2021

Partner: Nicholas Regener

Our Ref: 213684:NSR

## BY EMAIL:

Luke Moore

Dear Mr Moore

### State of New South Wales ats Luke Brett Moore

We refer to your various letters and emails to the writer and various other individuals (including members of New South Wales Police Force) concerning publications made by SC Daniel Keneally that you had threatened to kill another Police officer and the circumstances that flowed from that publication, including a search of your house, seizure of your goods, your arrest, remand and prosecution for various offences.

We act for the State of New South Wales (**State**), which entity would be vicariously liable for the tortious circumstances that arose from the subject matter of your claims if you litigated those claims and they were proved in Court.

The State accepts SC Keneally was in error when he said that you wanted another Police officer "*Dead.*" The State regrets what was said. The State also regrets not having investigated your assertions that you had not threatened the life of another Police officer more expeditiously and acknowledges that more timely investigations would have discovered the audio recording you made contradicted SC Keneally's assertions.

Yours faithfully

**Makinson d'Apice**

Document tendered by Mr Roberts.
Received by M. Dowd.
Date: 31 / 8 / 22.
Resolved to publish <input checked="" type="radio"/> Yes / No