

# GLENN THOMPSON

5<sup>th</sup> May 2009

Legal Services Commissioner  
Level 9  
330 Collins Street  
Melbourne  
Vic 3000

**By Facsimile 03 9679 8101**

Dear Commissioner.

Please find attached complaints in relation to:

- Barristers
  - Major General Garde AO RFD QC
  - Mr. J. Delany SC
  - Mr. G Ahern
  - Ms Sharon Burchell: and
- Solicitors
  - Mr. Steven Mark Edward
  - Ms. Michelle Elizabeth Dixon
- Firms
  - Maddocks
  - Arnold Dallas McPherson
  - Mason Sier Turnbull

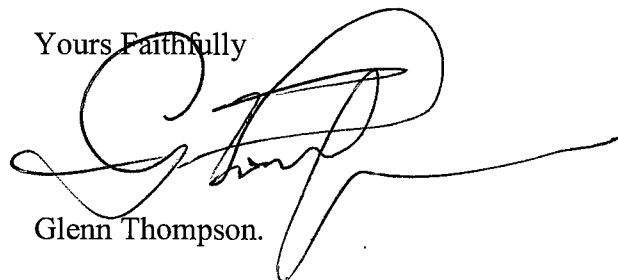
And barristers

- Mr. John Middleton SC. (now Justice Middleton of the Federal Court)
- Mr. Neil Adams, barrister.

Please note that all of these complaints are related and I have prepared a single Consolidated Section B of your complaint form and also please note that as said in my consolidated Section B the material published on website <http://courtsontrial.com> form also constitutes part of my consolidated Section B details.

**Total pages including this. 37**

Yours Faithfully



Glenn Thompson.

**Consolidated Section B. Details of the complaint by Glenn Alexander Thompson. 5<sup>th</sup> May 2009.**

This is not an ordinary complaint against a single lawyer. It is a complaint about the individual and collective conduct of the lawyers named herein and on the accompanying Complaint Forms.

The things complained of are extremely serious and go to the very heart of the administration of justice and democracy itself in the state of Victoria.

The conduct complained of by me is extensive and is a function or product of a legal system which tolerates and engenders lying lawyers.

The material set out on website <http://courtsontrial.com> together with this document constitutes **Section B of my complaint** against each of the lawyers and firms named in this document and my complaint forms.

The website sets out the complete details and contains copies of all relevant documents.

Based on the material set out on the website I am also providing information/complaint to the Chief Commissioner of Police, the Attorney General, all member of the Victorian Parliament and other relevant authority.

Note:- My website has only recently been published. I will be broadly advertising it in the near future. The things set out in it are of concern to the democratic conduct of the state of Victoria.

**Specific allegations – Part 1.**

My complaint is against the lawyers named herein and on the website <http://courtsontrial.com>

Based on the material set out on <http://courtsontrial.com> I say that the conduct of:

- Barristers
  - Major General Garde AO RFD QC
  - Mr. J. Delany SC
  - Mr. G Ahern
  - Ms Sharon Burchell: and
- Solicitors
  - Mr. Steven Mark Edward
  - Ms. Michelle Elizabeth Dixon

Includes but is not limited to, that they:

- Cooperated with one another to collectively and individually misrepresent both the law and the facts for the purpose of deceiving Master Efthim of the Supreme Court of Victoria and wrongfully obtaining a judgment in favour of their clients and for that purpose:
  - they collectively and individually misrepresented that section 9 of the Sale of Land Act 1962 was capable of being avoided by means of “contrived” 2-lot plans of subdivision and they specifically misrepresented the content of a document entitled “Book of Pleadings” so as to falsely and deceitfully misrepresent that I was aware that section 9 had been avoided by means of “contrived” 2-lot plans of subdivision.
  - by misrepresenting the law and the facts they individually and collectively contrived to deceive Master Efthim into believing that the “cause of action” in Supreme Court proceeding 6321/2005 was or was one and the same as avoiding section 9 of the Sale of Land Act 1962 by means of contrived 2-lot plans of subdivision.

- in knowledge of their proposed misrepresentations they collectively and individually conducted their case in such a manner as to conceal both the facts of their intended misrepresentations and their intention to misrepresent the law and the facts.
- Steven Mark Edward swore false affidavits for the purpose of legitimising his wrongful possession of the document entitled “Book of Pleadings” and which document was critical to their collective and individual misrepresentations.
- Major General Garde and Ms. Sharon Burchell and Mr. Steven Mark Edward authored an Outline of Submission contrived to introduce the “Book of Pleadings” while concealing the purpose of introducing the “Book of Pleadings”, namely to facilitate the misrepresentation of that document.
- Ms. Michelle Elizabeth Dixon, swore an affidavit, **contrived in such a manner** as to facilitate misrepresentations subsequently made in Outlines of Submissions authored by herself and Mr. J. Delany SC and Mr. G Ahern of counsel. In other words Ms Dixon swore an affidavit contrived in such a manner as to provide a basis for subsequent and dependant misrepresentations. I say and allege that this is tantamount to a false affidavit.
- Mr. J. Delany, Mr. G Ahern and Ms Dixon authored Outlines of Submission which were false misleading and deceptive and partly grounded on the **contrived** affidavit of Dixon.
- in company with the other lawyers named herein and under the specific instructions of Ms Michelle Elizabeth Dixon Mr. J. Delany made misleading, false and deceptive oral submissions to Master Eftim and which submissions were calculated to mislead the court and wrongfully obtain a judgment in favour of his clients and the clients of Major General Garde, Ms Sharon Burchell and their instructing solicitor Mr. Steven Mark Edward.
- In full knowledge they had obtained judgment based upon their overt misrepresentations the lawyers sought to and did deceptively gain further financial advantage for themselves and their clients by seeking indemnity costs orders.
- They collectively and individually did such other things as may be concluded from the material set out on the website <http://courtsontrial.com>
- They did not and could not hold a reasoned belief as to the truth of their representations.
- Cooperated with one another to repeat their deceptive misrepresentation at my appeal before Justice Osborn. At the appeal:
  - Dixon, Delany and Ahern authored and uttered a second Outline of Submissions dated 30<sup>th</sup> October 2006 which contained those things which, for the purpose of concealing their intended misrepresentations, had been omitted from their first Outline of Submissions dated 9<sup>th</sup> November 2005.
  - The second Outline of Submissions was also based upon the contrived affidavit of Dixon.
  - They repeated the misrepresentations which they had made before Master Eftim.
  - Major General Greg Garde falsely and deceptively represented:
    - *“...what subsequently happened was that there was a dispute that broke out between the Buchanans and the Thompsons as we apprehend the position with the consequent result that the development company that was controlled by the Buchanans denied any access to the water which that company had procured through the supply agreement to the Thompsons”*
    - *“There was under the provisions of the Act **a legally valid water agreement** in existence between the board and the development company and that under the water agreement, the development company **owned and operated the water supply reticulation system** within the cluster subdivision.”* (my emphasis)
  - These misrepresentations were a repeat of previous misrepresentations made to the Administrative Appeals Tribunal by Major General Garde in 1988 full details of which are set out on website <http://courtsontrial.com>

- Each of the abovementioned lawyers is fully aware that they did obtain a wrongful judgment from Master Efthim and which judgment was squarely based upon their overt misrepresentations as to law and fact.
- Each of the abovementioned lawyers is fully aware that they wrongly obtained a Judgment from Justice Osborn and which judgment was:
  - In part based or purportedly based upon the misrepresentations of Major General Garde as to the legality of the Water Supply Agreement.
  - In part based upon matters and things which are manifestly wrong and which have the effect of ignoring, denying and or concealing the fact that Delany, Ahern, Dixon, Garde, Burchell, and Edward misled Master Efthim and wrongfully obtained judgment based on those misrepresentations..
- Each of the abovementioned lawyers wrongfully obtained financial advantage by representing that I had made unsubstantiated allegations whereas the fact known to them was that they had specifically and overtly misled the court of Master Efthim and made misleading submissions to Justice Osborn.
- The abovementioned lawyers subsequently falsely represented to the Court of Appeal that they had obtained two true and correct Judgments against me whereas the facts known to them were that the judgments had been obtained, at least in part, due to their specific and overt misrepresentations.
- That Steven Mark Edward and Major General Garde did obtain financial advantage by making application to the Court of Appeal for the award of indemnity costs while knowing full well that the grounds of that application were false and deceptive.
- Each of the abovementioned lawyers conspired to and did pervert the course of justice.
- Such other things as may be concluded from the material contained on website <http://courtsontrial.com>

### **Specific allegations – Part 2.**

Complaint against:

- Mr. John Middleton SC. (now Justice Middleton of the Federal Court)
- Mr. Neil Adams, barrister.

Mr. Neil Adams and Mr. John Middleton SC specifically and apparently carelessly and recklessly misrepresented both me personally and my case before Master Efthim. Full details are on the Middleton page of website <http://courtsontrial.com>

### **Specific allegations – Part 3**

By individually addressed letter from me to each of the partners of the firms:

- Maddocks
- Arnold Dallas McPherson
- Mason Sier Turnbull

the partners and the firms were put on notice that the lawyers referred to Part 1 of these allegations may have misled the courts in the manner now set out on website <http://courtsontrial.com> and may have obtained wrongful judgment and costs orders.

Each of the partners of these firms and the firms have obtained and retained substantial financial benefit as a consequence of the misrepresentations.

To my knowledge none of these responsible persons has properly investigated these issues or alternatively they may be fully aware of the things now set out on website <http://courtsontrial.com> and have done nothing to either report or rectify these things.