

UNDER

THE INQUIRIES ACT 2013

IN THE MATTER

A GOVERNMENT INQUIRY INTO OPERATION BURNHAM
AND RELATED MATTERS

Memorandum for the New Zealand Defence Force providing a list of witnesses for the
public hearing during the week of 16 September 2019

30 August 2019

Solicitor acting:

JENNY CATRAN

Crown Law

PO Box 2858

Wellington 6140

Tel: 04 472 1719

jenny.catran@crownlaw.govt.nz

Counsel acting:

PAUL RADICH QC

Clifton Chambers

PO Box 10731

Wellington 6140

Tel: 04 974 5951

paul.radich@cliftonchambers.co.nz

1. In paragraph 13 of Minute 19 of the Inquiry, NZDF is directed to provide, today, a list of its proposed witnesses for the public hearing during the week of 16 September 2019.
2. The list, giving the position the witness held at the time of the events in relation to which they will be giving evidence, is as follows:
 - a) Lieutenant General Rt Hon Sir Jeremiah Mateparae GNZM, QSO, KStj (Retired) - Chief of Defence Force;
 - b) Lieutenant General Tim Keating, CNZM (Retired) - Chief of Defence Force;
 - c) Lieutenant General Rhys Jones, CNZM (Retired) - Chief of Defence Force;
 - d) Air Marshal Kevin Short - Vice Chief of Defence Force;
 - e) Rear Admiral Jack Steer, ONZM (Retired) - Vice Chief of Defence Force;
 - f) Major General Peter Kelly, ONZM, MNZM (Retired) - Director of Special Operations;
 - g) Commodore Ross Smith, RNZN, MNZM - Chief of Staff;
 - h) Brigadier Christopher Parsons, MNZM, DSD - Senior National Officer;
 - i) Colonel Rian McKinstry, MNZM - Senior National Officer;
 - j) Captain Christopher Hoey RNZN (Retired) - Director of Coordination;
 - k) Colonel Mike Thompson - Deputy Chief of Staff; and
 - l) Colonel Karl Cummins - Deputy Director of Special Operations.
3. In accordance with the Inquiry's directions, briefs of evidence for these witnesses will be provided to the Inquiry and to other core participants on Friday, 6 September 2019, together with the intended order in which it is proposed the witnesses will be called.



Paul Radich QC
Counsel for New Zealand Defence Force
30 August 2019

