













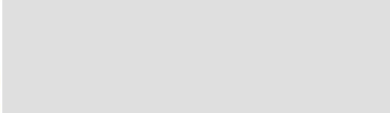
- (a) statewide subacute beds;
- (b) day programs;
- (c) assertive mobile youth outreach services;
- (d) step up/step down units; and
- (e) residential rehabilitation units (Youth Resi).<sup>14</sup>

25. As a result of this model a range of new services have been implemented.

#### COMMENTS ON TABLE 4C REASONS FOR CLOSURE

26. In relation Table No. 4C: Reasons for Closure<sup>15</sup> Counsel Assisting have referred in reasons 8, 9 and 10 to a Briefing Note of 26 October 2012 as having been prepared or drafted by Dr Cleary. It was not. As Deputy Director-General, Dr Cleary did not draft briefs but received them. The briefing note of 26 October 2012<sup>16</sup> was drafted by others and forwarded to Dr Cleary who returned the Brief with a note attached to it requesting changes before it would be considered.<sup>17</sup>

  
GW Diehm QC

  
CJ Conway  
Counsel for Dr Michael Cleary  
23 March 2016

<sup>14</sup> Statement of Dr Cleary paragraphs 140 and 222

<sup>15</sup> COI.028.0001.0225

<sup>16</sup> QHD.004.013.9670

<sup>17</sup> Statement of Dr Cleary paragraph 84 and [T14-25]