

Your reference: NOH 43238

Tuesday, 18th April 2017

Ms Natalie O'Halloran, Solicitor
Professional Standards
Law Society of NSW
170 Phillip Street
Sydney NSW 2000

Dear Ms O'Halloran

Re: Complaint against Fiona Seaton

I this day received your letter dated 11th April 2017 in relation to the above, and thank you for such.

I note that you have placed my complaint under the banner of:

"Unethical conduct in that by letter dated 17th February 2017 the solicitor made false and unsubstantiated allegations of criminal conduct against the complainant."

I agree with the above, however, such, in my view, does not encapsulate fully the complaint made.

Fiona Seaton did indeed make a large number of untrue allegations of criminal activity against me, eg, alleging that I sent an E-mail in the name of Terence Goldberg of Turner Freeman Lawyers, alleging that I physically assaulted an elderly pensioner and alleging also that I caused and incited the physical assault of an another elderly person.

Ms Seaton, in her letter of 17th February 2017 to DG Thompson Lawyers, also states that I am a 'dangerous individual, with a history of documented violence', which, by the way, is entirely baseless.

Ms Seaton also goes on to say that I admitted such in the pendency of Supreme Court proceedings, which is, again, untrue.

Ms Seaton also states that I 'consistently and persistently stalked Terence Goldberg of Turner Freeman Lawyers', that I 'attacked Mr Goldberg in Martin Place', and harassed

Mr Goldberg while he was with a family member, as well as sending numerous anonymous letters and E-mails. All of those claims as made by Fiona Seaton are also false.

Additionally, Ms Seaton complains that I attended open Court on 23rd November 2016, in which the Honourable Justice Harrison was passing judgment. It is not up to Ms Seaton to make assumptions as to why I attend Court on any occasion. It is my right to do so without question or harassment from any party.

As you can see, my complaint goes well beyond Ms Seaton simply making allegations of criminal activity against me, as Ms Seaton has actively attempted to cause serious harm to my reputation within the legal profession. I work within the legal profession, although I am not a solicitor.

You are aware that I wrote to the NSW Police on 2nd March 2017 in relation to the written claims as made by Ms Seaton, seeking documentation from the NSW Police providing evidence that I do not have a documented history of violence. I have not yet received a response from the NSW Police, but will forward such to you as soon as it has been received.

As an aside, and in relation to the serious allegations of criminal conduct Ms Seaton makes about me, no person whatsoever, at any time, has sought the assistance of the NSW Police in relation to such claims.

It is a statement of fact that I have never been brought to the attention of the NSW Police during my lifetime.

Further, before Ms Seaton's letter to DG Thompson, Ms Seaton was unknown to me, and I to her. I am mystified as to Ms Seaton's motivations in falsely making such scurrilous claims about me.

There is, however, a protracted history between Turner Freeman and me, and an allegation of fraud was made by me to the NSW Police about a Turner Freeman solicitor which caused a fraud investigation to take place. Fiona Seaton was never involved in this matter.

The Turner Freeman solicitor in question, quite coincidentally, is the solicitor as repeatedly mentioned in Ms Seaton's letter of 17th February 2017 to DG Thompson Lawyers, and whom Ms Seaton alleges I attacked, and also on whose behalf Ms Seaton alleges I sent an E-mail using their E-mail system to do so, ie Terence Goldberg.

I do not have any objection to you sending any of the material I provided when making my complaint about Fiona Seaton, and in the interests of transparency and fairness, I would ask that all information be actually provided to Ms Seaton during the course of the Law Society's handling of this matter, and would therefore also request that a copy of this letter be provided to Ms Seaton.

I am indeed willing to attend the NSW Civil and Administrative Tribunal to provide evidence, if necessary.

I look forward to hearing from you further in relation to my complaint.

Yours faithfully

A handwritten signature in blue ink, appearing to read "Symn Waters". The signature is written in a cursive style with a large initial 'S' and a distinct 'W'.

Symn Waters