it was only the senior cadets, not the college authorities, who made the initial determination that the cadet in question was not officer material and, therefore, in need of "special treatment". The attitude of the majority of senior cadets was best summed up by their regular declaration that, "If the 'Push' doesn't get rid of them, we will!" It was this type of individualized, targeted treatment that distinguished the bastardization of the "new" Duntroon with that of the general bastardization of the "old" Duntroon. It was also a type of bastardization that did not exist at OCS Portsea.

The harassment I write of is not to suggest that all of my failings at Duntroon were attributable solely to bastardization. I accept that many of my failings were my own personal failings. One of my personal failings was that when I felt I was being singled-out by instructors I tended to "buck the system" (as evidenced by my ejection from my A Vehicle Drivers Course), whereas when I liked my instructors I tended to strive for perfection (as evidenced by being the Student of Merit on my Radio Operators Course). I was very much an individual who was severely affected by my level of morale. Very much a case of either winning a medal or getting court-martialled and not much in-between.

I was not, however, the only 3rd Class cadet who was harassed, victimized and persecuted. I cannot say that I was the 3rd Class cadet who received the worst treatment at the hands of senior cadets. I am ashamed to admit that I did not do more to support other junior cadets who were subjected to bastardization, particularly Staff Cadet RIDD, who was in my section. There were a number of other 3rd Class cadets who were subjected to constant abuse and victimization. The 3rd Class cadets who were subjected to "special treatment" similar to the treatment I received were: Steven RIDD, Kim EXAUDI-LARSEN, S.S. MOODY, and B.B. TAYLOR (CSC No 5324). On many occasions these cadets, like me, brought down punishment upon themselves, but in the main it was self-righteous and vindictive persecution from senior cadets. RIDD and I, however, also gained reputations as "troublemakers" because we would not back down when confronted by senior cadets (see Steven RIDD's sworn affidavit at Attachment 35). By the end of July 1987, RIDD, EXAUDI-LARSEN, MOODY and TAYLOR, along with numerous other 3rd Class cadets, had resigned their appointments as staff cadets at RMC. Myself, Staff Cadet RIDD and Staff Cadet TAYLOR resigned during 3rd Class. Staff Cadet EXAUDI-LARSEN resigned early in 2nd Class. I am unaware of when Staff Cadet MOODY resigned.

On one occasion I asked a 3rd Class cadet in Kokoda Company's 13 Platoon, Staff Cadet Stephen "Steve" GRACE (CSC No 5252), who was 24-years-old and both an ex-sailor in the RAN and a former soldier in an Army Aviation unit, what he had done the previous evening. He replied that following afternoon lectures, he got changed and went to the mess for dinner, then did some laundry, prepared for the next day's training and went to bed around 2200hrs. He then asked me what I had done. I told him, "I didn't have time for dinner and I got stuffed around and ran errands till 2 in the morning, then got up at 5.30 to get ready for the first Defaulters Parade." This exchange highlights the obvious difference in time management between a junior cadet that was left alone by senior cadets, and a junior cadet subjected to "special treatment" (compounded by deserved or undeserved disciplinary measures).

The harassment, victimization and general persecution that drove 3rd Class cadets to desert or resign varied in frequency, degree and nature. In addition to constant pressure to resign, selected 3rd Class cadets were also subjected to many forms of persecution including: theft of personal civilian and Army-issue property, verbal abuse and ridicule, derogatory references to civilian companions and friends, the assigning of more duties than other junior cadets, automatic charges instead of reprimands or Extra Drills awarded to other junior cadets, unauthorized and covert "borrowing" of their equipment which was then returned dirty or not at all, excessive Show Parades, the assigning of meaningless errands often involving the search for something or someone that did not exist, the forced subjugation to "regulations" that had been invented by senior cadets, threatened violence, physical attacks during "bishes" and at other times, the fire hosing or cocoa/flour/shaving cream bombing of their rooms, the forced subjugation to "orders" whilst on local leave, and derogatory remarks in relation to the cadet's background. This range of behaviour has previously and subsequently been reported (see particularly Bruce MOORE's book *A Lexicon of Cadet Language: Royal Military College, Duntroon in the Period 1983 to 1985*).

Theft & "Borrowing"

A major problem at the college whilst I was there was theft. The theft of Army issue equipment, uniforms and training manuals as well as personal civilian clothing at Kokoda

Company barracks can only be described as endemic. The extent to which items were stolen made it impossible to attribute it to one or even a couple of offenders. Theft from the laundries, platoon storerooms and even cadets' rooms was common. What is interesting to note is that ex-serving soldiers were especially disgusted with the amount of stolen items as it far surpassed the extent of thievery they had experienced as private soldiers or junior NCOs. Theft of items occurred within a time span as little as 20 minutes from the time the items were last observed. This applied especially to thefts from the laundry. Theft also occurred around the college. On one occasion during a lecture I left my rare Army-issue green insert folder in an open locker outside the classroom. When the lecture was over I returned to find that not only had the folder been stolen, but the thief had taken the time to empty the contents of the folder into the locker. The only personnel who had been present in the hallway during the lecture were senior cadets. The amount of theft I experienced at Duntroon far exceeded that I experienced at the various schools I attended, in the Army Cadets, in the Army Reserve, or even in the four Maximum Security prisons I have served time in over the past 35 years.

On one occasion, a 3rd Class cadet in Kokoda Company, Staff Cadet Craig SMITH (CSC No 5318), had his personal copy of a training manual stolen from his room. It was the same day that the 1st Class cadets were required to return their issued copies of that manual. The manual was one of the texts issued to 3rd Class cadets half-way through 3rd Class and was not returned until half-way through 1st Class. The next day all of the cadets in 3rd Class were issued copies of this manual. By chance, Staff Cadet SMITH was issued his personal copy of the manual that had been stolen the day before.

The most serious incident of theft at Duntroon while I was there was the theft of three pay packets. Three 3rd Class cadets in the Gallipoli Company barracks had their pay packets, each containing three weeks' cash wages, stolen from their rooms. On this occasion the 3rd Class cadets had been required to attend training immediately after attending a Pay Parade. As a result, they did not have the time required to bank their wages, so they left their pay packets in their rooms. Whilst they were undergoing training, the three pay packets were stolen. During this time, the only personnel in the Gallipoli Company barracks were senior cadets. The Special Investigation Branch of the Military Police investigated the thefts but no

suspects were charged. Not one of the Gallipoli Company senior cadets made a statement on the basis that they all "heard nothing, saw nothing, knew nothing" about the thefts.

Borrowing of equipment was also prevalent at the college even though it was an offence according to RMC Standing Orders (Standing Order No 1413). Cadets of all classes regularly borrowed equipment of each other but it was the senior cadets who constantly borrowed items from 3rd Class cadets with and without (most often without) their knowledge. It frequently occurred that a 3rd Class cadet would return to his or her room to obtain equipment needed for their next lesson, only to discover that it had already been "borrowed" by a senior cadet. Although rarely given, the most common excuse proffered by senior cadets for taking equipment or articles of clothing was that theirs was dirty or they did not have the time to find their own. In nearly all cases, it was left up to the 3rd Class cadet concerned to locate and retrieve, and then clean, the "borrowed" item. Senior cadets usually gave no explanation or apology for borrowing items without asking and they never left a message regarding the item's whereabouts. On a number of occasions such unauthorized borrowing resulted in myself, and other junior cadets, being late for lessons or spending hours searching for, locating and then cleaning missing items.

On one occasion, I was changing into my evening dress uniform when I discovered that my cummerbund – an essential item of the mess uniform – was missing from my room. I frantically searched for it and asked everyone in my platoon area if they had taken it. As I was late for mess, I was finally forced to borrow a cummerbund off another 3rd Class cadet, Staff Cadet Adrian MANNERING (CSC No 5339), who was not attending mess that evening. Over the next week I thoroughly searched my own room and the 15 Platoon storerooms, and questioned almost everyone in the platoon, but I failed to locate my cummerbund. A week had passed since the cummerbund had gone missing when I asked Staff Cadet MUNTZ, the only member of 15 Platoon I had not asked, if he knew the whereabouts of the cummerbund. MUNTZ casually replied that he had needed a cummerbund one evening the week before so he had borrowed mine. He then turned around and produced the cummerbund from one of his drawers, then tossed it to me. MUNTZ's own cummerbund was at that time draped over the back of his chair.

On another occasion, I returned to the barracks during a two-minute break between classroom lectures. I took off my peaked cap and left it on my bed while I went to the communal toilets. Upon returning a minute later, I discovered my cap had disappeared. I frantically searched for it and asked everyone in the vicinity if they had borrowed it but I failed to locate it. Five minutes later a 2nd Class cadet, Staff Cadet M. Harry WALDEN (CSC No 4629), walked into the hallway wearing my cap. WALDEN casually remarked that he had needed a cap to go on an errand and he did not have time to find his own, so he had gone into my room and grabbed my cap. I was, of course, late for the next lesson and after giving "No excuse" for being late, I was given two EDs by Sergeant P.R. HERNIMAN, the instructor conducting the lecture.

Incidents such as the above two examples were frustratingly common for me and other junior cadets. Although by themselves they were relatively trivial, they occurred with sufficient frequency to damage the cadet's reputation for punctuality and personal organization in the eyes of the instructors. The offer of "No excuse" for any unclean piece of "borrowed" equipment or clothing, or for being late to a lesson, was a standard response by junior cadets.

During my time at RMC, I also had senior cadets in my platoon ask for and demand a regular supply of cigarettes from me. They never repaid the favour and on one occasion, Staff Cadet WALDEN cheerfully said to me, "Don't worry. In a couple of months you'll have your own 'Fourthies' to scab off."

Such minor irritating treatment also extended to petty, but nasty, abuse. I was constantly abused by many senior cadets for wearing Australian Rules football shorts because they did not "like the look of them." I was ordered by numerous senior cadets to get rid of them because they were too tight for their own Rugby tastes. At times senior cadets also referred to my girlfriends and other civilian friends as sluts, dogs, bush pigs and "Boons".

Such bitter treatment also extended, on occasion, to other 3rd Class cadets. During one evening in early March 1987, Staff Cadet MUNTZ was holding Show Parades with me and the two other 3rd Class cadets in 45 Section, staff cadets Steven RIDD and Christopher WHITTING. During this inspection he threatened to stop Staff Cadet WHITTING from

seeing his wife and children the following weekend. WHITTING had not seen his family for nearly three months and he had been granted special leave to see them. MUNTZ angrily stated that he did not care and that if WHITTING didn't get his uniform up to MUNTZ's standard, then MUNTZ would make sure that WHITTING did not go on leave. After MUNTZ had dismissed us, WHITTING was so upset by MUNTZ's threat that he was almost in tears and was shaking with rage.

Complaint of Bastardization

Around this time a junior cadet in Kokoda Company complained to instructing staff that there was ongoing "bastardization" of select junior cadets in Kokoda Company. The identity of the cadet was not revealed but at the time I believed it may have been Staff Cadet Steven RIDD or Staff Cadet Kim EXAUDI-LARSEN (* In late 2021 Steven RIDD informed me that he was not the source of the complaint. I wrote to Kim EXAUDI-LARSEN in late 2013 about this matter but he was working overseas and my letter was returned to me by a relative). This report became known to senior cadets in the company and a meeting with the company's junior cadets was held in the ANZAC Block common room one evening after instructing staff had left for the day. Around 1930hrs all the 3^{rd} Class cadets in Kokoda Company were ordered to assemble in the company's recreation room. As soon as we were all present, we were then harangued for around half-an-hour by a group of around 4-6 senior cadets and told not to go to "the Push" (the authorities) with complaints about mistreatment. A very irate 2nd Class cadet (and Kokoda Company Administration NCO) Lance-Corporal NOBLE informed us that a 3rd Class cadet in Kokoda Company had gone to Major VERCOE and had complained about bastardization in the company. NOBLE then warned us not to go to the OC with such complaints, but to instead use the cadet chain of command; section leader, platoon sergeant, CSM (positions which were all occupied by senior cadets). NOBLE also told us that bastardization no longer existed at Duntroon and that if it did re-appear, then the senior cadets would "deal with it." Although NOBLE did not name the junior cadet who had complained to the OC, he accused him of overreacting and he warned everyone else not to do the same otherwise they would "get in the shit." During this assembly, NOBLE also berated the 3rd Class cadets for not going to my aid when I was attacked during the "bish" on 17 March 1987. (* In 2015, Brigadier NOBLE was questioned by an AGS lawyer during civil proceedings brought by me - see below - and claimed that he could not recall this incident. He did

not, however, swear an affidavit to this effect). Any thought of reporting incidents of bastardization or victimization to the college authorities were swiftly dispelled by this lecture.

I should state that during my time in Kokoda Company I cannot recall a single instance of being "bastardized" by Lance-Corporal NOBLE.

Soon after the Show Parade incident with MUNTZ, WHITTING moved out of the barracks to live with his family in the Canberra suburb of Hughes. In the meantime, Staff Cadet RIDD went AWOL and later returned to the college to resign (*see below*). With RIDD's departure and WHITTING's move out of the barracks, I was left as the only 3rd Class cadet in 45 Section outside of training hours. This usually meant from 1700hrs until 0700hrs the following morning. During these times, I had to complete any of 45 Section's duties, work details or errands by himself (It also meant that Staff Cadet WHITTING avoided the attention of senior cadets out-of-hours and that his room could be kept in permanent inspection order).

Desertions

During my time at RMC Duntroon, two 3rd Class cadets deserted (as opposed to simply going AWOL for a brief period).

After weeks of constant abuse, Staff Cadet Steven RIDD went AWOL early one morning in March 1987 (* In my complaint to the DART I described Staff Cadet RIDD's absence as "desertion". Mr RIDD objects to this description of his absence given that he intended to return to Duntroon as soon as he was guaranteed that his resignation would be processed. He also states that he went AWOL on 10 May 1987 and returned a week later - see his sworn affidavit at Attachment 35. I have read his Affidavit but I still recall this occurring in March 1987. RMC has recorded his date of resignation as 22 April 1987 and his date of discharge as 22 May 1987. When he went AWOL and later resigned is not particularly important; why he did so is what is relevant). After evading the Military Police in Melbourne and Queensland, he returned to Canberra a week later of his own volition. He rang the Commandant of RMC, Major-General BLAKE, and asked to return to the college if he was not court-martialled and was instead allowed to resign and be discharged from the

Army. Major-General BLAKE consented to his request and RIDD returned to Duntroon, resigned and was discharged the same day.

Soon after RIDD's absence a female 3rd Class cadet deserted and was apprehended by the Military Police at her home in Perth. She also returned to the college to resign her appointment and be discharged from the Army.

In both cases, AWOL charges were not proceeded with.

I also recall that a 2nd Class cadet in my section, Staff Cadet COLMER, was later found to be AWOL one morning. I recall his classmate, Staff Cadet DUNKLEY, being berated by the Kokoda Company commander, Major VERCOE, for not noticing his absence. Whatever the reason for Staff Cadet COLMER's absence, he later returned to the college and graduated with the rest of his class in December 1987.

Guidance Report

On Monday 23 March 1987, my Guidance Officer, Captain GOSS, wrote the following in a Leadership Assessment/Observation Report:

Scdt Knight's performance has improved as he has settled in at RMC, however he is an immature cadet who has had trouble relating to his peers. He has been given guidance in this area and at his age (18 years) I would expect his maturity to develop quickly. He accepts criticism and has a positive attitude to guidance.

I submit that this report is official recognition of my submission that I would have matured over the 18 months I would have been at Duntroon (see my comments on this point above).

FEX "Buna"

On Wednesday 25 March 1987, the 2nd and 3rd Class cadets began FEX "Buna" at the Mogo State Forest on NSW's south coast. Exercise Buna was an 8-day tactical field exercise involving section, platoon and company level training. Due to my wrist injury, I was limited

in the extent to which I could participate in the training. For the first half of the exercise I acted as the platoon signaller for WO2 CULLEN's platoon. I could only participate in the non-physical training but I did act as the "enemy" soldier during contact drills. For the second half of the exercise I joined a handful of other injured junior cadets at the C Company HQ. For the remainder of the exercise they acted as company signallers at the CHQ. The C Company commander was Major G.R. PIKE, with WO2 E.A. MADDEN as Company 2IC, and WO2 G. MAPLE as CSM. The HQ was a mobile HQ consisting of two Land Rovers, and it constantly moved location to remain within the vicinity of C Company.

4th Charge

At 0400hrs on Sunday 29 March 1987, I finished my two-hour radio piquet and returned to the lean-to shelter where the company signallers were sleeping to wake my replacement, Staff Cadet Keith TURKINGTON (CSC No 5330). I began shaking him and saying, "Wakeup, Turks. It's your turn for piquet!" TURKINGTON stirred and replied "Yeah. OK." I waited a few moments but TURKINGTON made no effort to get up so I shook him harder and repeated what I initially said except louder. TURKINGTON angrily retorted, "Yeah. Yeah. OK!" and began to get out of his sleeping bag. Seeing this, I got into my own sleeping bag and turned on my side. I could hear TURKINGTON moving beside me so I closed my eyes and almost immediately fell asleep. When everyone awoke at 0600hrs, we instantly noticed that the Company Command Post was unattended and the radios were unmanned. I stared at the radio tent for a few moments then with exasperation realized that TURKINGTON had gone back to sleep after I had woken him earlier. WO2 MADDEN immediately investigated what had happened and questioned TURKINGTON then myself. Following her investigation, I was charged by WO2 MADDEN with Leaving Post While on Guard Duty (my fourth military offence) in breach of s.32(1)(d) of the DFDA. I was angry with myself for not being more diligent in my efforts to ensure that my replacement was on duty before I retired (although I had been woken up in the same manner by the staff cadet on piquet before me). TURKINGTON later made a statement for the prosecutor (which he did not tell me about) in which he claimed not to have been woken by me. He stated that he 'was not woken up to carry out [his] radio picquet by SCDT KNIGHT' (Statement by SCDT K.A. TURKINGTON, 5 Apr 87). This charge was heard initially at an OC's hearing held on 15 April 1987 and ultimately at a CO's hearing on 24 April 1987.

On the last day of FEX "Buna", Tuesday 31 March 1987, all the cadets who were injured in some way were transported to the exercise HQ to wait for the rest of the cadets to arrive. The group of injured cadets consisted of about ten 3rd Class cadets - including myself - and around five 2nd Class cadets. Early that evening the group was waiting on the back of a truck to be driven back to the college when one of the instructors, WO2 G. JACKA, dropped the tailgate of the truck and ordered everyone off to help pack up the HQ. During the dismantling of the HQ tent and the loading of stores we [the 3rd Class cadets] noticed that the 3rd Class cadets were the only cadets present. I returned to the rear of the truck and asked the 2nd Class cadets if they would help us pack up. No-one replied so I returned to the HQ area. After all the stores had been loaded we [the 3rd Class cadets] returned to the truck to discover that the 2nd Class cadets had arranged our packs on the floor of the truck and were asleep on top of them. Myself and another 3rd Class cadet, Staff Cadet B.J. HILL, sarcastically thanked them for their help. As we sat down I tried to retrieve my pack from underneath a 2nd Class cadet, Staff Cadet Michael BATISTE (CSC No 4649). He quickly sat up and snapped, "How long have you been at RMC?" I asked him what that had to do with anything. He replied that when we reached 2nd Class we would be exempt from such duties as well. When we returned to the college I was castigated privately by one of the other 2nd Class cadets who had been on the truck for criticising a senior cadet. This was one of the examples of me supposedly "talking back" to senior cadets.

On Wednesday 1 April 1987, I was fronted before Major VERCOE to discuss my progress through the course. Major VERCOE noted in the official Record of Interview that I recognized that I had to improve my personal organization, my attitude, and my dress and bearing. Major VERCOE went on to note that, 'I confirmed this with him and told him I felt he had the potential to do better.' He finally noted that I 'accepted the counselling very positively.'

At 1730hrs on Tuesday 7 April 1987, I went before Major VERCOE to have my Absence From Duty charge relating to my non-attendance at the navigation theory re-training heard. After I plead guilty to one count of Absence From Duty in breach of s.23(1) of the *DFDA*, Major VERCOE sentenced me to 4 days Restriction of Privileges (RP) and 4 days Stoppage of Leave (SOL), to be served concurrently. This meant that I was not to leave the college