

Rule 29.02(8)

**Certificate of Annexure/Exhibit**

Federal Court of Australia

No. VID of 2023

District Registry: Victoria

Division: General

**Julian Knight**

Applicant

**Defence Force Ombudsman**

Respondent

**Exhibit “JK-1”**

Personal Account submitted by Julian Knight to the Defence Abuse Response Taskforce on 26 November 2013.

**DEFENCE ABUSE RESPONSE TASKFORCE  
DEFENCE ABUSE REPARATION SCHEME**

**PERSONAL ACCOUNT**

STAFF CADET JULIAN KNIGHT (3204059) CSC No 5266

Commonwealth of Australia

STATUTORY DECLARATION

*Statutory Declarations Act 1959 (Cth)*

**PERSONAL DETAILS & BACKGROUND**

I, **JULIAN KNIGHT**, Prisoner, of Port Phillip Prison at Laverton North in the State of Victoria,

1. **Family name:** Knight
2. **Given name:** Julian
3. **Home address:** Port Phillip Prison  
Doherty's Road  
Laverton North Vic 3026
4. **Occupation:** Prisoner

make the following declaration under the *Statutory Declarations Act 1959 (Cth)*:

My submission to the Defence Abuse Response Taskforce (DART) relates to my service as a staff cadet at the Royal Military College, Duntroon, from 13 January 1987 to 10 July 1987. During this period, I was a 3<sup>rd</sup> Class cadet in 45 Section, 15 Platoon, Kokoda Company.

This submission is taken from my own recollection, extensive notes that I made of my experience at Duntroon during 1987-88, my service records, and a number of other secondary sources.

I have outlined in detail my experience at the Royal Military College, rather than just describe the incidents of bastardization that I was subject to, so that a clearer picture emerges of my overall experience at the college. A number of the incidents described below were of a minor or vexatious nature, but they happened on a daily basis and in combination with each other and with incidents of a more serious nature, they made my tenure at the college unviable.

## **Introduction**

I was born on 4 March 1968 in Melbourne, Australia. My father was an officer in the Royal Australian Army Education Corps (RAAEC) during 1968-1988. My earliest memories are of my father in uniform and the Centurion tanks at Puckapunyal, where we lived during 1970-1972. I attended kindergarten at Puckapunyal and later at RAAF Point Cook. I then attended primary school at Stanley Fort, Hong Kong, during 1973-1975.

I had wanted to enlist the Army for as long as I can remember. From around the age of 12 my ambition was to emulate my father and become an officer in the Australian Army. During my school years my goal was to attend the Officer Cadet School (OCS), at Portsea.

As a precursor to military service I was a Boy Scout in the 1<sup>st</sup> Point Cook Scout Troop at RAAF Point Cook during 1976-1979 (during the ages 8-11). I rose to be a "Sixer" in the Cubs and a "Pack Leader" in the Scouts. In my last year as a Cub, I was awarded the prize for the most badge work completed but I was also demoted from "Sixer" to "Seconder" after pushing over another Cub.

## **Cadet Service**

During 1982-84 (ages 14-16), I served as a cadet in the Norwood High School Cadet Unit (NHSCU), although I was a student at Fitzroy High School during this time. Whilst a cadet in the NHSCU, I attended two annual camps and two training weekends. I also completed junior NCO and senior NCO courses in 1983, and I rose to the rank of corporal. I also obtained the Adventure Training Award (ATA) in 1983. The Cadet Under Officer (CUO) of the NHSCU Senior Platoon in 1983 was CUO Jason THOMAS (CSC No 4758), who attended RMC/ADFA during 1984-86 and who was a 2<sup>nd</sup> Class cadet at Duntroon in January 1987.

During 1984-85 (ages 16-17), I served as a cadet in the Melbourne High School Cadet Unit (MHSCU) after transferring from the NHSCU. I kept the rank of corporal when I transferred from the NHSCU. In mid-1984, I was discharged from the MHSCU after failing to attend a training weekend. I was later allowed to re-

join the MHSCU but I was forced to forego my rank. I served as a cadet for the remainder of my time with the MHSCU. I served in the unit's 5 Platoon, the "adventure training" platoon (and also the platoon for demoted cadets or those cadets expelled from other platoons). The platoon leader and platoon sergeant of 5 Platoon in 1983 were CUO Dechlan ELLIS (CSC No 5693) and Patrick "Pat" BELL (CSC No 5678), both of whom (along with three other Melbourne High School cadets) attended the Australian Defence Force Academy in 1986. Whilst a cadet in the MHSCU, I attended two annual camps and two training weekends, and three training weekends with the 4<sup>th</sup>/19<sup>th</sup> Prince of Wales's Light Horse Regiment.

During my service as a cadet, I marched as a guidon bearer in the ANZAC Day parades in Melbourne in 1983, 1984 and 1985.

On 28 July 1985 (at age 17), I applied for entry into the January 1986 intake of the Australian Defence Force Academy (ADFA). At the examination day on 13 August 1985, I was deemed to be not academically strong enough for ADFA, and I was told to re-apply for entry into the Royal Military College, Duntroon, (RMC Duntroon) as soon as I was old enough (\* Duntroon candidates had to be at least 18½ years old upon entry to the college). The final recommendation of the army psychologist, Captain J.R. WARN, was recorded as being that I needed 'more development. e.g. work for a year after HSC, ARES, and he could be a good prospect for RMC. Too weak academically for D.A.'

In November 1985, I completed my Higher School Certificate (HSC) at Melbourne High School. I was subsequently awarded my HSC in January 1986, with C-grade passes in five subjects (English, Australian History, 18<sup>th</sup> Century History, Geography, and Politics) and with an Anderson Score of 271/410.

### **Army Reserve Service**

On 1 October 1985 (at age 17), I applied for enlistment into the Australian Army Active Reserve whilst still at school. I was subsequently enlisted as a private on 26 November 1985. From 4 December 1985 to 12 January 1987, I served as a trooper in the 4<sup>th</sup>/19<sup>th</sup> Prince of Wales's Light Horse Regiment (4<sup>th</sup>/19<sup>th</sup> PWLH).

In February 1986, I worked briefly as a door-to-door promoter. During March-May 1986, I attended La Trobe University in Melbourne as an undergraduate student in the Bachelor of Arts degree course. For the remainder of 1986 I was unemployed and devoted most of time to Army Reserve service. During 1986, I served over the maximum 100 training days allocated to Reservists.

I attended my 16-day Army Reserve Recruit Course in February 1986 (at age 17), an Assault Troopers Course in April 1986 (at age 18), an A Vehicle (Armoured Personnel Carrier) Drivers Course during April-May 1986, and a Radio Operators Course in October 1986. I obtained above average marks in all categories of assessment in my Recruit and Assault Troopers courses. I initially did well on my A Vehicle Drivers Course, being one of two students to give a driving demonstration to a local TV news crew, but I developed a personality clash with my ARA instructor and I was later ejected from and subsequently failed the course. I was the Student of Merit for my Radio Operators Course.

During 1-15 February 1986, I attended my Recruit Course at the Army Reserve's 3 Training Group at Puckapunyal. I passed all the tests and examinations, and I was the top recruit in my platoon with ratings of '1' in all the assessment categories ('1' being the highest grade on a scale of 4 - Unsatisfactory, 3 - Below Average, 2 - Average & 1 - Above Average). I attained all 1 ratings when assessed at both the end of week one and at the conclusion of the course, with the assessment categories being the following: acceptance of discipline, self-discipline, teamwork, determination, navigation, dress and bearing, personal organization, drill at halt, drill on march, weapons, field training, and physical assessment. I passed my Physical Training Test (PTT) (\* Which had to be completed by all Army personnel on an annual basis and which required the completion of: 60 sit-ups in 2 minutes, 7 complete chin-ups to a high bar and a 5km run in under 25 minutes) with a high B grade, and I ran the 5km run portion of the PTT in 19:45 minutes. My platoon commander, 2<sup>nd</sup> Lieutenant Max DE WAN, made the following Course Final Assessment: 'REC KNIGHT achieved good results throughout the course. He worked hard to assimilate the training. REC KNIGHT invariably participated in platoon activities with enthusiasm. His dress and bearing was adequate but there was room for improvement in this

area. REC KNIGHT displayed a good acceptance of self and military discipline. His physical fitness and co-ordination was good.'

During 4-20 April 1986, I attended my Assault Troopers Course at Site 6, Puckapunyal. The course's Senior Instructor, Captain G.L. SMITH, made the following comments in my Course Report: 'Tpr Knight was adequately prepared for the course. He participated in all course activities. He readily assimilated most instruction with ease and rarely required additional assistance. His dress and bearing was adequate.'

During 26 April-11 May 1986, I attended my A Vehicle (M113 APC) Drivers Course at 4<sup>th</sup>/19<sup>th</sup> PWLH's A Squadron depot in Sale and at the Dutson bombing range. I grasped the driving aspects of the course quite quickly but I developed a personality clash with my ARA instructor, Sergeant Gary WYND. On 6 May 1986, I failed the verbal test on Instant Panel Reactions. On 7 May 1986, the twelfth day of the 16-day course, I failed the re-test. Failing this re-test effectively meant that I had failed the entire course. That afternoon a regional TV station sent a reporter and a camera crew to the Dutson range to file a story on the A Vehicle Drivers Course. The training was suspended while two APCs were used to provide a demonstration of the recovery of an APC from a bog, and a display of cross-country driving. Two trainees were required to drive the two APCs used throughout the demonstration and the driving display. The two trainees chosen by the course's Senior Instructor, Lieutenant O'DOWD, were Lance-Corporal BROWN, who later won the course's Student of Merit award, and me. The TV crew filmed the recovery demonstration and the display of cross-country driving. During the cross-country driving demonstration, the TV crew filmed me driving my APC from the back of Lance-Corporal BROWN's APC. The story was broadcast that night during the TV station's evening news broadcast. The following morning I was seen by the driving course's ARA Trade Testing Officer (TTO), WO2 Kevin HUNTER, in one of the offices at the barracks. HUNTER informed me that I was being thrown off the drivers course because I had failed my Instant Panel Reactions re-test. Sergeant WYND made the following comments in my Course Report: 'Tpr Knight approached the course with an immature attitude. During the course he did not apply himself and required constant supervision. He lacks mechanical aptitude and will find this aspect difficult to improve unless he is

prepared to get himself dirty rather than watch others work. Although he grasped the techniques of driving early in the course, he developed a brash and overconfident manner which at times placed both vehicle and crew in jeopardy.'

During 3-19 October 1986, I attended my Radio Operators Course at Sale. I was the course's Student of Merit on the basis of my 'hard work, determination and responsibility.' The course's Senior Instructor, Lieutenant CHAMBERS, made the following comments in my Course Report: 'Tpr KNIGHT was adequately prepared for the course. He worked well throughout to achieve good results. He is determined, aggressive in his studies and seeks responsibility. Tpr KNIGHT has a good knowledge of all subjects. To attend the next available A VEH D & S [Driving and Servicing] Course.' During the course I passed my PTT with a high A grade.

During my service with the 4<sup>th</sup>/19<sup>th</sup> PWLH Regiment I attended weekly training nights and various training weekends, and a number of Freedom of Entry and other ceremonial parades. I also volunteered for camp advance parties, dining-in nights and general full-time service both with 4<sup>th</sup>/19<sup>th</sup> PWLH and at Armoured Centre, Puckapunyal.

In November 1986, I attended the 4<sup>th</sup>/19<sup>th</sup> PWLH Regimental Annual Range Shoot weekend at Puckapunyal, and attained the highest score in the Regiment with the L1A1 Self-Loading Rifle.

In November 1986, I also represented the 4<sup>th</sup>/19<sup>th</sup> PWLH Regiment in the annual 3<sup>rd</sup> Military District Army Reserve Inter-Unit Military Skills Competition at Fort Gellibrand, Williamstown.

### **RMC Selection**

In January 1986, the Australian Defence Force Academy (ADFA) opened as a tri-service officer training establishment as a campus of the University of New South Wales. It replaced the Army's RMC Duntroon, the Navy's Jervis Bay and the RAAF's Point Cook officer training establishments. The "old" RMC Duntroon, which had operated from 1911-1985 as a 4-year training college, was transformed into a "new" 18-month officer training establishment as a

replacement for the 12-month course that had operated at OCS Portsea during 1952-1985. Although I had dreamed of attending OCS Portsea, by the time I was old enough to enlist as an officer cadet it had been replaced by the "new" Duntroon.

On 4 March 1986, I turned 18-years-old.

On 30 July 1986, I applied for entry into the January 1987 intake of RMC Duntroon.

On 1 September 1986, I attended the examination day for entry to RMC at the Defence Force Recruiting Centre in Melbourne. I passed this stage of the selection process and proceeded on to the Officer Selection Board.

In the Commanding Officer's Report to the Selection Board my Squadron Commander at 4<sup>th</sup>/19<sup>th</sup> PWLH, Major Peter ALKEMEDE, made the following final assessment of me: 'Tpr Knight has only served in B Sqn for a short time but since joining has impressed his NCOs with his enthusiasm and willingness to undertake additional duties. I consider that Tpr Knight is suitable for consideration by the Selection Board for Officer Selection.'

On 2 October 1986, I attended the Selection Board for RMC at Simpson Barracks, Watsonia. The Board consisted of four middle ranking serving officers (Lieutenant-Colonel P.E. BUNYAN, Lieutenant-Colonel J. ROBERTSON, Major O. STRACHAN and Major P. NEUHAUS). I later learnt that the Board believed that I had been "fully briefed" by my father before attending the Board. This was not the case. All of the Selection Board members rated me as borderline or satisfactory in nearly all of the assessment areas. They were unanimous in grading me as weak in Intellectual Potential and Academic Potential. My Peer Group Assessment in both Friendship and Leadership were rated as good. The other members in my group, three serving soldiers and three civilian applicants, rated me as 1 in both categories, which was the highest mark of a scale of 1 to 6. The Selection Board members were also fairly consistent in their final evaluation of me as a potential ARA officer. In the 'Comments' section of their Profile Reports, three members of the Board expressed their opinion that I might not be able to cope with the



academic work at RMC. Lieutenant-Colonel BUNYAN noted that I 'was able to contribute to most of the exercises and the rest were prepared to follow. He is well motivated to the Army and is keen to learn... He has more than he is showing although he may find the academic work at RMC difficult.' Lieutenant-Colonel ROBERTSON wrote that I was a 'strong performer' who was 'effective and supportive of others.' He also noted that during the practical exercises in the gymnasium I 'showed strong verbal skills and virtually ran the group.' He also noted my 'Strong motivation for the military.' Major STRACHAN commented that I 'presented strongly, he was confident and forthright in his manner. He participated in and directed group activities. However consider he may be overconfident and his ability may not match his belief in himself.' Major NEUHAUS noted that I was; 'Generally a reasonable candidate', although 'his performance today was made to appear better because of a very weak group.' Each member of the Selection Board was required to give an overall grade on a scale of: Not Suitable, Not Yet, Marginal, Adequate, Satisfactory, or Good. Although I was graded as Adequate by the Psychologist, I was graded as Marginal by the President, Military Member and Academic Member. My Final Board Grading was Marginal, the lowest grade for acceptance to RMC. This grade was defined as; 'Has definite limitations which make him ... a marginal selection. Could develop into an adequate junior officer.' As a result of my final grading, I was placed on the short list for the January 1987 intake at RMC. One other member of my Selection Board group, Glynn LOVEGROVE (CSC No 5275), was also placed on the short list for the January 1987 intake.

On 16 October 1986, whilst attending a radio operators course at Sale with my Army Reserve regiment, I was informed that I had been placed on the list of candidates for the January 1987 intake at RMC.

On 18 December 1986, I was informed of my acceptance into the January 1987 intake at RMC.

### **RMC Duntroon**

On 12 January 1987 (at age 18), I was enlisted in the Australian Regular Army (ARA) as an officer cadet at Simpson Barracks, Watsonia. The following day I

arrived at RMC, Duntroon, with the rest of the civilian entrants from Victoria. I was one of around 130 3<sup>rd</sup> Class Staff Cadets in the January 1987 intake, all of whom were aged between 18½ and 25. At the time I entered RMC there were around 300 senior cadets (1<sup>st</sup> Class & 2<sup>nd</sup> Class) there. [\* The 18-month course at Duntroon was divided into three 6-month “classes” as opposed to the two 6-month “classes” of the 12-month course at the Officer Cadet School, Portsea, that it replaced. I once asked a 1<sup>st</sup> Class cadet in Kokoda Company, Corporal Gavan CARTER (CSC No 4939) – the last officer cadet from OCS to graduate – “Was Portsea was anything like this [Duntroon]?” He instantly, and almost contemptuously, replied, “Portsea was nothing like this!” I must add that I found Corporal CARTER to be the most approachable of all the senior cadets I encountered at Duntroon]

The then Commandant of RMC was Major-General Murray BLAKE. The Director of Military Art (DMA) was Colonel Rodney EARLE, the Commanding Officer (CO) of the Corps of Staff Cadets (CSC) was Lieutenant-Colonel David KIBBEY, and the Chief Instructor (CI) of the Military Training Wing (MTW) was Lieutenant-Colonel Simon WILLIS. The RMC Regimental Sergeant Major (RSM) was WO1 J.W. BURNS.

In January 1987, there were approximately 450 cadets at RMC Duntroon, divided into five companies (Alamein, Kapyong, Long Tan, Gallipoli and Kokoda)

I was given the Corps of Staff Cadets (CSC) number 5266 and I was assigned to 45 Section, 15 Platoon, Kokoda Company. Kokoda Company at that time was housed in ANZAC Block in the northeast corner of the college grounds. Kokoda Company consisted of 78 cadets (of which 27 were 3<sup>rd</sup> Class “junior” cadets) divided into three platoons (13, 14 & 15 Platoons). The majority of senior cadets were ADFA graduates who had started their officer training at the “old” Duntroon.

The Officer Commanding (OC) of Kokoda Company was Major Todd VERCOE. The ARA Kokoda Company Drill Sergeant was Sergeant C.A. JORGENSON.

My first week at RMC was spent at the college being issued uniforms, equipment and textbooks, receiving inoculations and being medically assessed, and

undergoing other induction procedures. The next four weeks (17 January-9 February 1987) were spent undergoing Initial Corps Training (ICT) at the nearby Majura Field Firing Range, a 3,035 hectare site adjacent to the Canberra airport about 10km from the college.

### **Initial Corps Training**

By the third week at Majura I had become somewhat estranged from the 11 other 3<sup>rd</sup> Class cadets in my section. The initial cause of the estrangement was my own immature larrikinism (tolerable in a trooper but not acceptable in an officer) which I displayed by asking facetious questions and making “smartarse” remarks. For instance, I responded to a number of tactical battlefield problems by suggesting the use of a “human wave attack”. The final occasion I made this remark, after a section-level attack across open ground into a tree line, the rest of the section broke into suppressed laughter. Our section instructor, Sergeant Kim HOGAN angrily responded by snapping, “Shut your fuckin’ mouth, Knight!” These type of comments drew the approbation of some of the instructors but particularly Sergeant HOGAN, who appeared to take an instant dislike to me due to my Army Reserve background (I never mentioned my previous Army Reserve service, but it was immediately apparent from my seven digit regimental number – Regular Army enlistees had six digit regimental numbers). His dislike was apparent in his repeated unprovoked disparaging remarks in front of the other cadets regarding my Army Reserve background. In a hierarchical, competitive environment like RMC, such comments tended to be instinctively adopted by your peers, much like children in a playground. This occurred less in your presence, than behind your back. When such comments and put-downs become universally accepted the result was that your reputation overshadowed your actual performance.

The most disheartening comment concerning myself occurred around the third week at Majura. I was told in confidence by one member of my section that another member of the section had said to the section, when I was absent, that I was “trouble” and was “bringing the section down.” My isolation was apparent by the end of the ICT during the end of course concert. My section put on a skit without me – I wasn’t even told they had been rehearsing one.