Sergeant HOGAN's first Field Report on me noted that I 'constantly asked immature questions' and that I 'tried to present an image of toughness.' He later stated to Victoria Police that, 'Staff Cadet Knight performed adequately with all weapon training, his expertise was probably above average of his peer group. ... In actual training in the field in the rifle group ... for example he was actually leading and he performed well. But in the camp environment and group discussions he had a problem of peer group acceptance because he was constantly making statements about whether the Australian Army minded if officers went over to the trouble spots of the world. I picked this up fairly early with Knight and whereas sometimes this may be a settling problem I could see with Knight that this was going to be an ongoing problem. I spoke to Knight and counselled him about his attitude and interests as he expressed them. My assessment of him was recorded officially and passed on through chain of command. I particularly remember with Knight that I assessed him as being an immature person, despite his relative good performance in training'.

During the ICT, I failed the Duntroon Physical Fitness Standard (PFS) test (* The minimum standard for male cadets was 'C' grade, which required the completion of: a 3.2km run in under 13:45 minutes, followed by 7 complete chin-ups to a high bar, 60 sit-ups in 2 minutes, 25 complete push-ups with the requirement that the chest touch the floor between each push-up and the feet raised onto a 6-inch high bench, and 40 dorsal raises). I passed my PTT but only with a C grade.

After a 3-day field exercise (FEX) in the Mogo State Forest, near Bateman's Bay in southeast NSW – FEX "First Run" - we completed our ICT. Sergeant HOGAN's final Field Report on me noted that I had improved. He rated my performance as 'satisfactory', noted that I displayed 'good aggression', and rated me as '2' in relation to Group Influence. We returned to the college on 11 February 1987.

For the next three days (11-13 February 1987), we underwent further assimilation, which also involved constant and universal "bastardization" by the senior cadets in our companies. While we were in the barracks we were under the total, unsupervised control of the senior cadets. Throughout the evenings the senior cadets would inspect the uniforms and equipment of the 3rd Class cadets in their section by using constant "Show Parades". **Show Parades** in the barracks

were compulsory parades where a junior cadet was required to be at a specific location at a specific time, specified by the senior cadet ordering the Show Parade, to present a uniform and/or article of equipment for individual inspection. An example of a Show Parade order would be the following: "Staff Cadet Knight, Show Parade your parade belt, your parade boots, your parade uniform and your rifle outside my room at 2130hrs." These Show Parades could be given to junior cadets by senior cadets in addition to **Extra Drills** (EDs) - which involved extra drill with a rifle on the main parade ground - **Defaulters Parades** - which involved being marched around the main parade ground with full pack, webbing and rifle at 0625hrs and again at 1710hrs - and **Check Parades** - where a defaulter's attendance was checked at the college Battalion HQ. Show Parades were a constant for all junior cadets during the evenings leading up to the Lanyard Parade.

During this assimilation period, all junior cadets were required to observe a number of formalities. Whenever a senior cadet entered a junior cadet's room, the junior cadet was required to stand to attention. Whenever a junior cadet passed a senior cadet in a hallway or on a footpath, the junior cadet was required to come to attention and say, "Excuse me, please" followed by the cadet's rank. The same requirement applied whenever a junior cadet wished to enter a senior cadet's room or to talk to a senior cadet or was called over by a senior cadet. A junior cadet was required to end all conversations with a senior cadet with the same "Excuse me, please" followed by the cadet's rank.

On Friday 13 February 1987, the eve of the 3rd Class Lanyard Parade, all the 3rd Class cadets were given a test on the history and organization of the college. Those that passed the test, and only a very few did, were permitted to leave the college on local leave that night. The remainder, of which I was one, were confined to barracks to prepare for the Lanyard Parade. In Kokoda Company's 15 Platoon, Show Parades to senior cadets commenced at around 1900hrs and continued at regular intervals of 10-15 minutes until 2300hrs. At this point most of the 1st and 2nd Class cadets retired for the night and dispensed with ordering further Show Parades. One 2nd Class Cadet in 15 Platoon, Staff Cadet Dale BURNSIDE (CSC No 4775 - one of the senior cadets who had been at the "old" Duntroon), continued giving me Show Parades until 0200hrs; the last one he conducted from his bed.

This was despite RMC Standing Orders proclaiming that 'all cadets are to be left in privacy between 2200hrs and Reveille' (CSC Standing Order 1304h). Reveille was at 0615hrs, although most junior cadets arose between 0530-0600hrs in order to get a head start with their duties and uniform preparation.

Lanyard Parade

On Saturday 14 February 1987, the entire 3rd Class participated in the so-called Lanyard Parade, which formally recognized our acceptance into the college. Following this parade the universal "bastardization" of 3rd Class cadets generally tapered off. By the end of the month only certain selected junior cadets were still being "bastardised" on a regular basis. I was one of those select junior cadets. The reason for being targeted were unknown, especially given the fact that the worst offenders often had no experience of the junior cadet they targeted (i.e. they were in different platoons or even different companies). One explanation is that one senior cadet took a dislike to a particular junior cadet – for whatever reason – then "spread the word" to other senior cadets. My main tormenters in Kokoda Company were 1st Class Cadets who were not even in my platoon; they were at Company HQ or in 13 and 14 Platoons, located in the other half of ANZAC Block.

I have attached photocopies of the Kokoda Company group photographs that appeared in the June 1987 edition of the "Journal of the Royal Military College Duntroon", at pages 31-32. (Attachment 3)

Daily Routine

The daily routine at Duntroon was the following:

0615	Reveille
0625-0655	1st Defaulters Parade
0645-0730	Breakfast
0715	Sick Parade (at 5 Camp Hospital)
0730	Form-up for CSC Administrative Parade
0750-0810	CSC Administrative Parade
0820-1040	Lectures/Training

1040-1100	Morning tea
1100-1230	Lectures/Training
1230-1310	Lunch
1310-1320	CSC Mess Parade
1330-1640	Lectures/Training
1700-1800	Retreat (retire to barracks)
1710-1740	2 nd Defaulters Parade
1800-1845	Dinner
1800-1845 1850	Dinner 1 st Defaulters Check Parade
Urbs erons stobs	a sales il cuttode e mis mas silve d
1850	1st Defaulters Check Parade
1850 1930-2130	1 st Defaulters Check Parade Evening lectures
1850 1930-2130 2140	1 st Defaulters Check Parade Evening lectures 2 nd Defaulters Check Parade

The daily routine began with Reveille at 0615hrs. At Reveille the 3rd Class cadets in 15 Platoon were initially required to stand in their doorways at attention with the bottom sheet of their bed slung over their right shoulder. They were then required to yell in unison "Reveille! Reveille! Reveille!" This requirement was dispensed with after a few days. Junior cadets then mostly arose between 0530-0600hrs in order to get a head start with their duties and uniform preparation. After a few weeks, however, the senior cadets in 15 Platoon invented an order that no 3rd Class cadet was permitted to leave his or her room before 0615hrs, otherwise they would be charged with "disobeying a lawful order". The stated justification for this new order was that junior cadets moving around the barracks were apparently disturbing the "beauty sleep" of the senior cadets.

"Leaps & Jumps"

On one evening shortly after the Lanyard Parade the 3rd Class cadets in Kokoda Company were ordered to report to the hall in the middle of the second storey of barracks. When they arrived they found all the senior cadets assembled and dressed in various costumes and comical dress. One 2nd Class cadet, Staff Cadet Brett FITZPATRICK (CSC No 5170), was wearing shorts with a Luftwaffe jacket and peaked cap. Another senior cadet was dressed in a complete Ninja outfit. Major VERCOE and Sergeant JORGENSON were present as was Kokoda

Company's cadet CSM, Under Officer Philip "Mongo" REED (CSC No 4592), who informed the junior cadets that they were going to play "Leaps and Jumps" and that it was all in fun. "Leaps" referred to an exercise where those participating were required to change into a specific form of military dress and return to the assembly area within a specified time. The person directing the exercise nominated the form of dress and the time required in which to change. For example: "Go back to your room, change into Battledress and be back here in 2 minutes... Go!" The Kokoda Company cadets performed the "Leaps" exercise for around 40 minutes. While the 3rd Class cadets ran to and from their rooms the senior cadets delayed and obstructed them using such tactics as using water pistols, blocking the hallways or stopping cadets to ask them ridiculous questions. Although the exercise was taken in fun by all involved there were a few senior cadets who used "Leaps" as an opportunity to "rough-up the Fourthies" (a term for junior cadets carried over from when Duntroon was a 4-year course). Selected junior cadets were pushed into walls, tripped, and pushed or thrown heavily to the floor. During one "Leap" Corporal William YATES (CSC No 5148), a tall 20-year-old 1st Class cadet, grabbed me as I ran past and punched me hard twice in the stomach. (I have boxed in prison and sparred with heavyweight boxers. I know the difference between a playful tap and a serious punch. YATES' punches were delivered with full force). Major VERCOE and Sergeant JORGENSON remained in the hall during the "Leaps", so they were unable to observe or control these hallway incidents.

1st Charge

On Monday 23 February 1987, I was among seven cadets in Kokoda Company who were charged with Failure to Comply With a Lawful General Order in breach of s.29(1) of the *Defence Force Discipline Act 1982* (Cth) ("*DFDA*"). The charge related to having an insecure bayonet. As a Security Store, bayonets were required to be secured in the cadet's room when not in use. The Kokoda Company barracks had been inspected that morning by Sergeant J.J. SMITH, one of the drill instructors, who had discovered that I and six others had insecure bayonets in our rooms. This charge was heard at an OC's hearing held on 5 March 1987. It was my first charge and it disappointed me as I had hoped to maintain an unblemished record at the college. I was also annoyed because, like

most of the 3rd Class cadets in the barracks, I had no room key and no keys for my wardrobe locks (The senior cadets had reserved nearly all the lockable rooms for themselves). As a result, I had simply hidden my bayonet amongst clothing in a drawer.

The situation regarding the rooms in the Kokoda Company barracks had existed for some time. Only about two thirds of the rooms had door keys and these rooms were occupied mostly by senior cadets. The remaining third of the rooms in ANZAC Block – all occupied by junior cadets – were unable to be locked due to poor carpentry associated with the door frames. A similar situation existed regarding keys for the wardrobe locks and small safes in each room. It was around three months after my arrival at RMC that keys for the wardrobe locks and safes were finally issued. In many cases the keys were useless because of faulty locks and poor workmanship which made the closure and locking of wardrobe doors impossible. This condition caused widespread anger and frustration amongst 3rd Class cadets due to the large amount of clothing, books and equipment that was either stolen or "borrowed" by senior cadets from our rooms. At the time I was discharged from RMC in early July 1987, this situation with locks and keys still existed.

Bastardization of Junior Cadets

The "bastardization" of selected junior cadets consisted of various practices that were applied on a continual basis throughout each day. Practices included:

Repeated "show parades", where a cadet was required to repeatedly parade an article of clothing or an item of equipment at designated intervals before a senior cadet for his inspection, on occasion until the senior cadet went to bed: e.g. "Show parade your shirt to me in 10 minutes" repeated endlessly. The issuing of "show parades" could intentionally or otherwise clash with a cadet's other commitments; i.e. meal times or a Defaulters Check Parade. The cadet then bore the punishment for whichever commitment he chose to miss.

- Being shouted at or abused when travelling through the company barracks or around the college grounds, then being made to stop and stand to attention to receive a repeat of whatever was shouted after being abused for not initially stopping and standing to attention (* NB. Junior cadets were required to stop and stand to attention whenever a senior cadet spoke to them). The greater rush the junior cadet was obviously in, the greater risk he ran of being stopped and delayed for no reason other than to be abused.
- Being sent on errands at the behest of senior cadets, regardless of what the junior cadet was doing at the time: e.g. being sent to the local store to purchase cigarettes for a senior cadet.
- Being sent on errands for no purpose other than to occupy and vex the junior cadet. The most frustrating example of this practice was to be given a nonsensical message and told to deliver it to a non-existent cadet in a barracks on the other side of the college grounds. After a fruitless search the junior cadet would return and report that he could not locate the (non-existent) cadet in question, only to be abused for being incompetent and then sent off to attempt again to locate the named cadet. This process would be repeated until the senior cadets no longer found it amusing or tired of it.
- Senior cadets "borrowing" (and sometimes outright stealing) junior cadets' clothing, equipment, personal items, or even money, without asking. On one occasion I went without dinner for over a week because I could not find my cummerbund, which was required for the evening mess uniform (and I had to borrow the cummerbunds of fellow junior cadets to attend evening Defaulters Check Parades). I finally located it by chance: a 1st Class cadet in my section had "borrowed" it because he claimed his was dirty. On another occasion I was late to a theory class because a 2nd Class cadet in my platoon had "borrowed" my peaked cap I had left it momentarily on my bed whilst I went to the toilet in-between classes because he needed to go on an errand outside the company barracks and he "couldn't be bothered" retrieving his from his room nearby. It needs to be pointed out

that the above two examples (both described in detail below) are only select examples of what was a constant occurrence.

- Be awarded every unpopular, time consuming or tedious duty, even when it had originally been given to a senior cadet: e.g. substituting a junior cadet's name for their own name on a company duty roster (which occurred to me when I returned from FEX "Samichon").
- Having one's washing removed from the company washing machines or dryers in mid-cycle and tossed aside, when you weren't present, so that a senior cadet could do his own washing.
- Storming into a junior cadet's room without warning and then abusing the cadet for not immediately standing to attention (* NB. Junior cadets were required to immediately stand to attention whenever a senior cadet entered his room).
- Continually awarding Defaulters Parades for minor or non-existent "offences".
- Causing a junior cadet to be charged then absolving themselves of any responsibility: e.g. sending a junior cadet on an errand knowing that the cadet is required somewhere else at that time, then when the junior cadet is subsequently charged with being "absent from duty" denying that he sent the cadet on the errand.

These practices were applied only to certain junior cadets, which resulted in them standing out from their classmates. Those junior cadets who hadn't been targeted – the vast majority – were generally left alone by the senior cadets. Rather than complain of the "bastardization" or individual instances that would explain the cadet's dirty uniform, late arrival for class, etc, junior cadets that were targeted – myself included – chose to "tough it out" and answer every request for an explanation by instructing staff with the standard response of "No excuse, Sir."

All of the junior cadets that I am aware of being subject to targeted "bastardization" eventually resigned from Duntroon. These included staff cadets Steve RIDD (CSC No 5303), Kim EXAUDI-LARSEN (CSC No 5245), B.J. HILL (CSC No 5259), and S.S. MOODY (CSC No 5286).

On Wednesday 4 March 1987, I turned 19-years-old.

On Thursday 5 March 1987, I went before Major VERCOE to have my insecure bayonet charge heard. Cadets were required to get a senior cadet from their company to act as Prosecutor and another senior cadet to act as Defending Officer. Senior cadets were not averse to appearing as either counsel at charge hearings as it meant that they could be excused from other duties. I managed to obtain Staff Cadet Peter EDWARDS (CSC No 5045), a 22-year-old 1st Class cadet, as the Prosecutor and my section leader, Corporal Peter CRANE (CSC No 5037), as my Defending Officer. I plead guilty to the one count of Failure to Comply With a Lawful General Order in breach of s.29(1) of the *DFDA*. Corporal CRANE made a plea of mitigation on my behalf that Major VERCOE took into consideration before punishing me with a reprimand.

On the evening of Friday 6 March 1987, I went shopping in Canberra's Civic district with Staff Cadet Kim EXAUDI-LARSEN (CSC No 5245). After we had been shopping, we decided to have a few quiet drinks at the nearby Ainslie Hotel before we returned to barracks. Both of us were on local leave and were dressed in neat civilian attire. When we arrived at the hotel Kim reserved a booth for us in the rear of the bistro section, while I went to the bar to buy drinks. As I left the bar I was halted by Staff Cadet Ashley COLMER (CSC No 4716), a 2nd Class cadet in my section, who was seated with his girlfriend and a few other 2nd Class cadets. All of them, like me and EXAUDI-LARSEN, were on local leave and in civilian attire. COLMER stopped me and ordered me to take my woollen jumper off because, in COLMER's opinion, it "looked stupid." I hesitated because I was unsure as to what to do. I knew that the senior cadets' authority over junior cadets did not extend outside the college grounds whilst we were on local leave, but I was hesitant about disobeying COLMER anyway. COLMER kept repeating the 'order'. Treating it warily as a joke I refused, telling him that I liked it on. COLMER finally told me, "Remember who gives out the punishments back at the

college" and that he could make my weekend "hell". I then took my jumper off. I did not want to get treated any harsher than I already was. I found it increasingly distressing that I was being harassed not only at the college but also whilst on leave in the local area. I feared disobeying senior cadets on leave because of the backlash it would have at the college. This fear is highlighted but the events of 29-31 May 1987 (described in detail below).

On the day of the RMC inter-company sports carnival I decided to wear trouser braces with my RMC Recreational Dress (RMC blazer, grey trousers, white shirt and RMC tie). Although braces were acceptable according to the RMC Dress Regulations, they were considered unacceptable by a 1st Class cadet in 45 Section, Staff Cadet (recently demoted from lance-corporal) James MUNTZ (CSC No 4876). MUNTZ claimed that braces were a sign of individualism and individualism was not permitted until 2nd Class. He then ordered me to remove the braces and borrow a belt, which I reluctantly consented to do.

According to the senior cadets in 15 Platoon, the decoration of cadets' rooms, with such items as posters or stereos, was also not permitted until 2^{nd} Class. This was not an official regulation but merely a decision made by the senior cadets. Their stance, however, was relaxed after the mid-term leave in April 1987 and they permitted junior cadets to have such items as posters, stereos and indoor plants in their rooms.

I became increasingly annoyed at these types of petty "commands" from senior cadets.

2nd Charge

On Sunday 15 March 1987, I was charged for the second time. On this occasion it was for Absence From Duty in breach of s.23(1) of the *DFDA*. Two days earlier, I had found a note taped to my door from Staff Cadet Matthew QUIN (CSC No 4743), a 2nd Class cadet in Alamein Company, informing me that I was required as an official for the 1st XVIII football team that Sunday afternoon. The following morning I attended at QUIN's room but, finding him not there, left a note on his door informing him that I could not attend the football match because of family