

SUPREME COURT OF QUEENSLAND

REGISTRY: BRISBANE
NUMBER: REDACTED

APPLICANT: REDACTED
RESPONDENT: THE BOARD OF TRUSTEES
OF THE BRISBANE GRAMMAR SCHOOL

AFFIDAVIT OF BQH

I, BQH, Retired REDACTED, of REDACTED REDACTED in the State of Queensland make oath and say as follows:

1. I am a Retired REDACTED. I began practice in 1959 and retired on REDACTED 1999. I was in private practice in REDACTED.
2. I am married to BQI and we have three children, sons REDACTED and BQJ and one daughter.
3. BQJ was born in 1968, and ~~currently lives in London and works as a REDACTED~~
4. In 1981, BQJ commenced Grade 8 (Form 2) at Brisbane Grammar School. REDACTED our elder son, was two years ahead of BQJ at the same school.
5. Both our sons were boarders at the school as my wife and I continued to live in REDACTED
6. One ~~evening~~ ^{afternoon} in the winter of 1981 when BQJ was in Grade 8, he telephoned my wife at home. She informs me that he said to her: "Kevin

ccf
BQH

ccf
BQH

Deponent: BQH

Taken By: *Craig Jensen*

AFFIDAVIT
Filed on behalf of the *Applicant* Plaintiff
Form 46 R.431

Frank Carroll Solicitor
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Lynch is a poofter. He put his hands down my trousers and fiddled with my penis."

7. I did not know exactly who Lynch was. I believed he was a Master at the school.
8. My wife and I immediately discussed the matter. One of us telephoned the secretary to Maxwell Howell, the Headmaster of the school, and made an appointment to see him the next day. We did not mention the abuse to the secretary during this telephone call.
9. My wife and I travelled down to Brisbane together to see the Headmaster. We drove to Brisbane specifically to support and comfort [BQJ] and to see Mr Howell regarding [BQJ]'s allegations.
10. We attended on Maxwell Howell during the morning. I believe the time was about 11 am. My wife waited outside Mr Howell's office while I went in to speak with him.
11. I went into Mr Howell's room and advised him why I was there. I told him, "My son [BQJ] has told us that Kevin Lynch has been fiddling with his [BQJ]'s penis."
12. After hearing my complaint, Mr Howell said: "Are you going to tell the police?" Mr Howell did not seem to be surprised at hearing what I had said but did seem concerned that I might tell someone else.
13. I told him that I did not intend to tell the police as I did not think that the offence was as serious as that. However, I told him that I felt I had to inform someone in authority at the school. I then said words to the effect: "If it was an isolated incident, it is up to you to speak with Lynch. If others are complaining as well, I would expect the school to take appropriate action to protect our children."
14. Howell's attitude remained non-committal. He said: "Yes. Righto. Thanks for telling me." He said that he would look into the matter. He then engaged in some pleasantries about how my sons were going generally. The meeting was all over in about 5 minutes.

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Deponent

[BQH]

Craig Jensen Taken by

15. He did not contact me again. In fact I had no direct contact with Howell during the rest of my sons' schooling at Brisbane Grammar School.

16. BQJ has informed me that he never had direct contact with Lynch again after this.

17. On 25 March 2001 my wife and I moved to Brisbane.

All the facts and circumstances above deposed to are within my knowledge save such as are deposed to from information only and my means of knowledge and sources of information appear on the face of this my Affidavit.

SWORN by BQH at Brisbane this 12th day of September 2005.

BQH

Deponent

REDACTE

Frank Carroll
Solicitor

Deponent:

Taken By:

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