

**IN THE SUPREME COURT
OF NEW SOUTH WALES
SYDNEY REGISTRY**

COMMON LAW DIVISION

No. 20770 of 1997

AFFIDAVIT

Deponent: Christene Jann Cole
Sworn: 23 April 1999
Filed for The Salvation Army

EP

Plaintiff

LAWRENCE ALLAN WILSON
First Defendant

THE SALVATION ARMY
Second Defendant

THE SALVATION ARMY
Cross-Claimant

LAWRENCE ALLAN WILSON
Cross-Defendant

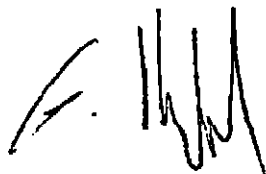
TEECE, HODGSON & WARD :
Solicitors
1 Chifley Square
SYDNEY NSW 2000
Telephone 9232 3733
DX 562 SYDNEY
Fax: 9231 6093
[Ref. RJN:970783]

On 23 April 1999, I CHRISTENE JANN COLE of the Salvation Army 140 Elizabeth Street, Sydney in the State of New South Wales, Social Worker say on oath:

1. I have been qualified in social work since 1985 and I am presently employed with Salvation Army in a capacity of a co-ordinator of family tracing services and special searches.
2. At the time when I first spoke to the Plaintiff in November 1994 I was the principal Child Care Officer and had access to records of the Salvation Army.
3. In the period commencing late 1969 until 1972 I resided at Bexley Boys' Home together with my husband who was employed there as a "Boys' Officer". At that time I had a son who was two and a half years of age and a daughter who was born in May 1970.
4. We moved out of Bexley Boys' Home for a short period of time and when we returned in 1973 I was employed in a "Little Boys' Cottage" as a "House Mother" for a period of seven months.
5. I am not able to recollect with certainty the time when I first spoke to the Plaintiff on the telephone however I am of the view that it took place on 7

Christene J. Cole

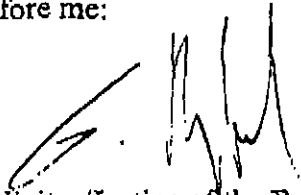
- of November 1994, when he referred to himself as a "walking time bomb".
6. On 7 November 1994, I received an authority from the Plaintiff authorising me to obtain records and other materials on his behalf. Annexed and marked "A" is a true copy of the said authority.
 7. Annexed and marked "B" is a true copy of the note I made regarding the telephone conversations I had with the Plaintiff on 7 November 1994 and 12 November 1994.
 8. Annexed and marked "C" is a true copy of the handwritten note I made following my telephone conversation with the Plaintiff's stepfather on 11 November 1994.
 9. Annexed and marked "D" is a true copy of a handwritten note following the telephone conversation I had with the Plaintiff's stepfather on 11 November 1994 and with the Plaintiff on 17 January 1996.
 10. Annexed and marked "E" is a true copy of a handwritten note I made following my telephone conversation with the Plaintiff on 1 December 1994 and 17 January 1996.
 11. Annexed and marked "F" is a true copy of the handwritten notes I made following my telephone conversation with the Plaintiff on 19 March 1996.
 12. Annexed and marked "G" is a true copy of the letter I wrote to Major Ken Sauz on 21 March 1996.
 13. Annexed and marked "H" is a true copy of a handwritten note I made regarding a telephone conversation I had with the Plaintiff on 17 April 1996.
 14. Annexed and marked "I" is a true copy of a typed note I made on 18 April 1996 regarding my telephone conversation with the Plaintiff on 17 April 1996.
 15. Annexed and marked "J" is a true copy of a handwritten note I made following a telephone conversation with the Plaintiff on 23 April 1996.
 16. Annexed and marked "K" is a true copy of a typewritten note I made on 23 April 1996 following my telephone conversation with the Plaintiff of the same date.
 17. Annexed and marked "L" is a true copy of the handwritten note I made following a telephone conversation with the Plaintiff on 6 May 1996.



Christine Cole

18. Annexed and marked "M" is a true copy of a handwritten note I made following a telephone conversation with the Plaintiff on 16 May 1996.

SWORN at
before me:



Solicitor/Justice of the Peace
1 Chifley Square, Sydney

Christene J. Cole