

IN THE MAGISTRATES COURT AT BRISBANE

BETWEEN

GERALDINE FOOI-FONG ROBERTSON
OF 17-23 Buccan Road Buccan

Complainant

AND

MARK TOWNEND CEO of RSPCA
OF 301 Fairfield Road, Fairfield

Defendant

AFFIDAVIT

I, Geraldine Fooi Fong Robertson of 17-23 Buccan Road Buccan, in the State of Queensland, a 65 years old widow, kennel owner and pedigreed poodle breeder, make oath and say as follows:

1. I am the complainant in this application for a Peace and Good Behaviour Order against the said defendant in his role and duties as the Chief Executive Officer and as the Proper Person overseeing the contract between the Department of Employment, Economic Development and Innovation (DEEDI) and RSPCA;
2. I seek an order that the Defendant keep the peace and be of good behaviour for a period of five years.
3. I also seek an order that the Defendant be prevented from:
 - (a) Inciting others to assault, threatening to assault, molesting or threatening to molest me and inciting others to hatred of me;
 - (b) Releasing photographs, film and information to the media for publications;
 - (c) Publishing stories about me and my properties to the media and on web sites;
 - (d) Bringing the media with RSPCA, a contractor to the State of Queensland via DEEDI, to take photographs, to film and record my conservations;
 - (e) Inciting others to damage or threatening to damage my property and myself;
 - (f) Should RSPCA come to my property again accompanied by the Police then RSPCA must not dismiss the Police whilst on my property;
 - (g) RSPCA are not to contact my witnesses and vilify me to them;
 - (h) RSPCA are to allow me to record and take photographs of every thing any RSPCA personnel does and say when RSPCA personnel are around and near me or on my property.
4. Since August 2008, I live with my in house support person, Trevor Croll, who is there for my safety and security.
5. On the 9th January 2008 the Defendant's Inspectors accompanied by media and the Police with a warrant to look for sick and injured dogs. The Defendant's Inspectors invited the media onto my property and also released fabricated film evidence to the media. The Defendant's Inspectors ordered seizure of all the dogs without inspecting any dog.
6. From the 13th January 2008 onwards I saw myself on television news, in newspapers and on the Internet being vilified as an animal abuser.
7. From that time onwards my telephone began ringing non stop all day and night and the callers would tell me the nasty things they were going to do to me and abused me.
 - (a) Strangers came to my home abused and threatened me. I was assaulted with a bottle. On 13 January 2008, I telephoned 000 and the Police attended five (5) hours later. Police Job



- Number 934 at 1259hrs. The 2 Police Officers attended said they could not do anything as the perpetrators had left and I did not know who they were.
- (b) I had garbage dumped in my driveway many times. Mr Croll had seen the garbage containers being knocked over.
 - (c) I often received nasty racist letters addressed to me. **Exhibit GR1 are two such nasty letters.**
 - (d) When I was out shopping people would come up to me and abused me.
 - (e) When I went to my club of some 20 years I was abused. Other members were rude to me. I was shunned. Some of the employees whom I have known for years also shunned me.
8. Media releases and publications by the Defendant filled the Internet with malicious comments about me. Mr Croll had to write to each publisher to have most of this material removed regularly. **Exhibit GR10 is an affidavit of Trevor Henry Croll sworn 9 January 2010 which details his experience of this harassment of me and some internet forum content he down loaded from the Internet for another Court matter.**
9. The Defendant caused to be published, or provided to others to publish, in the Sydney Morning Herald an article on August 2, 2010 by AAP, which clearly identified the Complainant by her poodles seized from Waterford and identified her as a puppy farmer to be hated by others. That defamatory article did inflame the hatred of me initially started by the Defendant on 13 January 2008. The article of 2 August 2010 caused more offensive telephone calls to me. **Exhibit GR3 is this article.**
10. The Defendant is using the Complainant's neighbour Tennille Holmes to spy on the Complainant and is spreading malicious lies about the Complainant based on interpretations of the observations of this malicious neighbour. **Exhibit GR4 is an RSPCA report in the "complaints" made to them by Tennille Holmes.**
11. The Defendant through his Inspector Tracey Jackson engaged and encouraged one of my neighbours, Tennille Holmes, to spy and report to RSPCA all the happenings on my property. Tennille Holmes was reporting her malignant imaginations of what was happening in my home to RSPCA Tracey Jackson. The Defendant's Inspector Tracey Jackson maliciously emailed the Logan City Council to cause me further turmoil. **Exhibit GR5 is this email.**
12. The Defendant's Inspector Tracey Jackson was and still is spreading malicious unfounded lies and exaggerations about the Complainant with the purpose of harming the Complainant. Most of this information was supplied through using malicious spies. These lies included:
- (a) That Trevor Croll is a "*declared vexatious litigant*". Mr Croll was not and is not a declared vexatious litigant.
 - (b) "*Queen s ' s Birthday long we e k e n d there was a steady stream of people dropping off and picking up dogs*".
 - (c) "*ROBERTSON testified in the Brisbane Magistrates Court last year that she didn't have a permit or licence to house any more than 2 dog s , or to operate a boarding kennel , but that the council had "agreed to just leave (her) alone"*". The truth is that the Complainant has a fettered kennel licence for 75 adult dogs fluctuating daily, purchased when she purchased the property. If the Council wants to stop her from having dogs on her property the Council must purchase this licence from her or reissue the operating Council kennel license which was cancelled on a single barking complaint by a neighbour who had difficulties selling her property, since sold.
 - (d) "*I have attached a couple of photos that should give you an idea of the state of the property when we attended in January and February 2008.*" What Tracey Jackson failed to add is that this was just after the worst flooding rains in the past 48 hours in twenty years following extended drought for 5 years. The photos were also dubbed, some were taken on RSPCA property after fabrications and some photos were not of the complainant dogs. Also Ms



Jackson neglected to add that the puppies in the cages were hurriedly put into confinement for the puppies safety by the Complainant immediately prior to entry by RSPCA and their media entourage of some 30 persons. The puppies were still wet from playing in rain, which RSPCA Inspectors described as "urine and faeces".

Exhibit GR5 is this email distributed by Tracey Jackson.

13. On 9 January 2009 the Defendant's Inspector Tracey Jackson in front of the Beenleigh Court complex was overheard talking to the media in a manner to cause the media to further publish material that would cause hatred of her as a dog abuser. Television news that evening was damning of the Complainant and the complainant received further telephone harassment and the hand written letter in GR1 arrived shortly after. **Exhibit GR6 is a photo of Tracey Jackson talking to the media.**
14. In May 2008 the Defendant ran a 24 Hour RSPCA Telethon to raise money for "those poor neglected poodles" which severely vilified me as an animal abuser and caused further abusive telephone calls. The Defendant was responsible for a petition aimed at causing me more harm from petitioners and those in the legal profession. My then lawyers refused to act for me and tried to have me declared mentally ill such that I would lose my rights to litigate for the return of my dogs. **Exhibit GR9 is one such email.**
15. I am extremely concerned that the Defendant in his position of influence will again cause me bodily harm and probable deadly harm. I also fear he will continue to cause damage to my property by inciting others to hatred of me. I am worried that he will continue to cause others to assault me or threaten to assault me. I am also frightened that he will incite others to continue to cause damage to my property. When RSPCA came on 9 January 2008 and refused to allow a veterinarian to check and microchip my dogs before seizure I realised that I will never see them again. I was shocked and very upset. I started to experience chest pains on the left side of my chest on the 9 January 2008. Because of RSPCA intimidation with continuous harassment using lies and evidence fabricated by RSPCA, my health has deteriorated. **Exhibit GR7 from the Logan Hospital Emergency Department dated 10 August 2010 after spending 24 hours in Emergency when an ambulance had to be called after my irregular periods of intense pain on my left side of my chest became more frequent. Exhibit GR8 is a report from psychiatrist Dr Slaughter dated 28 July 2008 with addendum report dated 24 June 2008.**
16. All the facts and circumstances are within my own knowledge, save such as are from information only, and my means of knowledge and sources of information appear on the face of my affidavit.

SWORN by Geraldine Fook Fong Robertson at ~~Beenleigh~~ Logan this day 10 of September 2010.

LOGAN

Robertson

Justice of the Peace _____

[Handwritten signature]



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BETWEEN

GERALDINE FOOI-FONG ROBERTSON
OF 17-23 Buccan Road Buccan

Complainant

AND

MARK TOWNEND CEO of RSPCA
OF 301 Fairfield Road, Fairfield

Defendant

CERTIFICATE OF EXHIBIT

Bound and marked GR1 – GR10 are the exhibits to the affidavit of Geraldine Fooi-Fong Robertson sworn 10th September 2010


Deponent

*(Description of person taking affidavit)
(Person taking affidavit to sign)*


witness



CERTIFICATE OF EXHIBIT
Filed on Behalf of the Applicant
Form 47 Rule 435

Name: Geraldine Robertson
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