

IN THE SUPREME COURT OF VICTORIA
AT MELBOURNE

B E T W E E N:

THE QUEEN

- and -

HORTY MOKBEL

**SUPPLEMENTARY CONFIDENTIAL AFFIDAVIT OF
TIMOTHY GEOFFREY JOHNS**

Date of document:
Filed on behalf of:
John Cain
Victorian Government Solicitor
637 Flinders Street
MELBOURNE 3000

4 September 2008
Chief Commissioner Police
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I, **TIMOTHY GEOFFREY JOHNS**, Detective Senior Constable of the Victoria Police, stationed at the Purana Task Force, Crime Department in the State of Victoria, **MAKE OATH AND SAY AS FOLLOWS:**

1. I am a Detective Senior Constable of the Victoria Police, stationed at the Purana Task Force, Crime Department. I make this affidavit by and with the authority of the Chief Commissioner of Police who is the recipient of a subpoena to produce documents to this Court in the abovenamed proceeding.
2. I refer to and repeat the contents of my earlier affidavit sworn 3 September 2008. In particular I refer to paragraph 10 of that affidavit

and the reference on page 5 to "Information Report 319 (Exhibit TGJ-2)" and I provide the following further information in support of the claim of public interest immunity based on informer privilege.

3. The information sought pertains to a longstanding debt of in excess of \$1 million dollars allegedly owed to ^{Mr Cooper} by Tony Mokbel for past amphetamine production. Because the alleged debt is apparently long overdue ^{Mr Cooper} has been demanding payment and Tony Mokbel has refused to pay for reasons unknown to police. Information provided to police includes reference to ^{Mr Cooper} belief that he was in fear of the Mokbel family, that he has never been paid for his services but that he believed he would eventually be paid.
4. This information was disclosed to Purana Taskforce detectives by Informer X. If this information is released it will become very apparent to ^{Mr Cooper} that this information came from Informer X as police believe he only disclosed his personal thoughts on the matter to one person, namely Informer X. Informer X has informed police also that he had ^{Mr Cooper} confidence sufficiently for those types of personal thoughts to be disclosed to him.
5. Accordingly, this information includes references to certain information provided by ^{Mr Cooper} to a single individual who is Informer X who has in turn provided that information to police and if it became known that police had possession of this information it is certain that ^{Mr Cooper} could identify Informer X. There is also the probability that ^{Mr Cooper} would disclose his identity to others if this information was disclosed.

SWORN by the said TIMOTHY GEOFFREY)
JOHNS on the 4th day of September 2008)

Before me: