

1 THE PRESIDENT: Yes, CMDR Rush?

2

3 CMDR RUSH: I call Mrs Richardson.

4

5 <GRACE FELICIA RICHARDSON, sworn: [10.03am]

6

7 <EXAMINATION BY CMDR RUSH:

8

9 CMDR RUSH: Q. Mrs Richardson, is your name Grace  
10 Felicia Richardson?

11 A. That's right.

12

13 Q. You reside at [REDACTED]

14 A. Yes.

15

16 Q. Your occupation is grazier?

17 A. Yes.

18

19 Q. Mrs Richardson, are you the sister of Laurence Snook?

20 A. Yes.

21

22 Q. Laurence Snook, your brother, was a Captain in the  
23 Army during the Second World War?

24 A. Yes.

25

26 Q. In relation to some events that he told you about  
27 during the course of the War, were you asked to prepare a  
28 statutory declaration? Perhaps if I could ask that that  
29 come up, it is WIT.026.0001. Do you see on the screen in  
30 front of you, Mrs Richardson, the statutory declaration  
31 which you signed on 21 January 2009?

32 A. Yes.

33

34 CMDR RUSH: I tender that statutory declaration, sir.

35

36 **EXHIBIT #229 STATUTORY DECLARATION OF GRACE FELICIA**  
37 **RICHARDSON, BARCODED WIT.026.0001**

38

39 CMDR RUSH: Q. You depose in paragraph 1,  
40 Mrs Richardson, that you were born on 18 March 1931?

41 A. Yes.

42

43 Q. Your brother you refer to, Laurence, was born on  
44 13 August 1909 in Meckering in Western Australia?

45 A. That's right.

46

47 Q. The family, prior to the outbreak of World War II,

1 lived in Western Australia?

2 A. Yes.

3

4 Q. You were the youngest of four children, and your  
5 brother Laurence was the eldest; is that correct?

6 A. Yes, that's right.

7

8 Q. He attended the University of Western Australia?

9 A. Yes.

10

11 Q. You depose in paragraph 4 that he undertook a degree  
12 in agricultural science and obtained not only his bachelor  
13 degree but an honours degree in that field?

14 A. Yes.

15

16 Q. After he completed his course at the University of  
17 Western Australia, he won a scholarship to pursue further  
18 his studies at Aberdeen in Scotland?

19 A. Yes.

20

21 Q. What was the nature of his agricultural science? What  
22 did you understand his course to be centred around?

23 A. He was very diverse, from my memory. He was mainly  
24 with animals. I think he had a very broad range of  
25 interests.

26

27 Q. When he came back from Scotland, did he undertake work  
28 in Western Australia?

29 A. He immediately joined the Cameron Highlander Regiment.  
30 He returned to Australia because he thought he should come  
31 back to here.

32

33 Q. He joined the Cameron Highlander Regiment?

34 A. Yes.

35

36 Q. Was that in a full-time position?

37 A. Yes.

38

39 Q. You refer to him moving from Western Australia to  
40 Sydney?

41 A. When the regiment went overseas, he was not allowed to  
42 go, I think. His qualifications were, they thought, more  
43 useful to be in Australia.

44

45 Q. So did he move from Western Australia --

46 A. He then went across to Sydney to a position which was  
47 based, I believe, at the Sydney University, but he resigned

1 and joined the Army again in Sydney.

2

3 Q. When he enlisted in the Army, on his Army records he  
4 gave his occupation as agriculturalist?

5 A. Yes. I believe he did not divulge his qualifications,  
6 because he joined up as a private.

7

8 Q. At that stage, were you in Western Australia?

9 A. Yes.

10

11 Q. You refer in paragraph 7 to your family sailing from  
12 Fremantle to Sydney in 1940?

13 A. Yes.

14

15 Q. And living at Bexley from about 1940 to 1946?

16 A. Yes.

17

18 Q. Do you recall your brother Laurence embarking for the  
19 Middle East?

20 A. Yes. He left fairly soon after we arrived in Sydney.  
21 We went to Sydney to see him before he left.

22

23 Q. As you depose in paragraph 8 at page 0002 of your  
24 statutory declaration, his Army records indicate that he  
25 left Australia on 19 October 1940 and returned to Australia  
26 on 23 May 1942?

27 A. Yes.

28

29 Q. When he returned, Mrs Richardson, did you see him soon  
30 thereafter?

31 A. I think he visited us in Sydney, because that was his  
32 home address at that stage, and then returned to Western  
33 Australia.

34

35 Q. After he disembarked, as it were, he spent some time  
36 with the family --

37 A. Not very long, I recall.

38

39 Q. -- and then returned to Western Australia?

40 A. Yes.

41

42 Q. To the best of your recollection, did he remain in  
43 Western Australia prior to embarking for New Guinea?

44 A. Yes.

45

46 Q. Do you know what unit or --

47 A. He was based at Hollywood Hospital, in the medical.

1 He was originally put into the medical sphere when he was  
2 actually in Tobruk and then was transferred to the medical.  
3 They caught up with him, he said - his qualifications. For  
4 the rest of the war, he was involved in the medical field.

5  
6 Q. Although his qualifications were --

7 A. Scientific.

8  
9 Q. -- not in medicine or in pathology; am I correct in  
10 that?

11 A. That's right.

12  
13 Q. His records indicate that he married in January 1943?

14 A. I think that was when it was, yes.

15  
16 Q. Where did he get married?

17 A. In Perth.

18  
19 Q. You refer in paragraph 9 of your affidavit to his  
20 departing for service in New Guinea in September 1943?

21 A. Yes.

22  
23 Q. Do you remember where he embarked for New Guinea from?

24 A. It would have been from Sydney - as far as I know.  
25 There was a lot of secrecy in those days.

26  
27 Q. In paragraph 10, Mrs Richardson, you indicate that at  
28 some stage prior to going to New Guinea, as I understand  
29 it, he stayed with the family in New South Wales?

30 A. Yes.

31  
32 Q. You set out there a conversation that you heard?

33 A. Yes.

34  
35 Q. Him talking to you and who else?

36 A. My sister Beulah and our mother, I think, was there.  
37 I'm not certain about that, but I think so.

38  
39 Q. Around this time, I think you indicate just prior or  
40 around about the time before he embarked for New Guinea in  
41 1943, you were 11 and your sister Beulah 13?

42 A. Yes. I may have just turned 12, but I was about 11.

43  
44 Q. You indicate that he would tell you stories about his  
45 work?

46 A. Yes.

47

1 Q. What was the nature of his work?

2 A. He told us about experiments that he did in the  
3 pathology sphere, but he also told us about operations and  
4 things - not on living people, but he did mention that he  
5 had done a number of autopsies.

6

7 Q. You say that he told you about an autopsy conducted on  
8 a body that he said was wearing a *Sydney* lifebelt?

9 A. Yes. My memory is that he said a lifebelt. Having  
10 been on a ship, I was aware that there were lifebelts, and  
11 maybe in my memory a lifebelt might have been my  
12 interpretation of what he meant, whether it was a life  
13 jacket or some other support thing, but my memory was that  
14 it was a lifebelt.

15

16 THE PRESIDENT: Q. A round ring?

17 A. Yes. That was my assumption of what he was saying,  
18 yes.

19

20 CMDR RUSH: Q. And your memory also is - correct me if  
21 I'm wrong - when you say "a *Sydney* lifebelt" --

22 A. Mmm, he said "*Sydney*".

23

24 Q. -- that there was some identification on the lifebelt?

25 A. Yes, he said it was - he identified the person as  
26 being from the *Sydney*.

27

28 Q. I am sorry, he identified --

29 A. He identified the person - well, I'm tying myself in a  
30 knot there. My memory is that he said it was a *Sydney*  
31 lifebelt. It could have been a life support of some sort.

32

33 Q. The event he was referring to had to be after 23 May  
34 1942 and by some weeks, having regard to his activities  
35 before he went back to Western Australia?

36 A. Yes.

37

38 Q. You say that he did not say where the autopsy was  
39 conducted?

40 A. No.

41

42 Q. I am reading from about the fifth line from the bottom  
43 of paragraph 10, where you say:

44

45 *Laurence did not say where or when he*  
46 *conducted this autopsy, but he did say that*  
47 *he asked his assistant (he referred to him*

1           *as his "offsider") to leave the room as the*  
2           *assistant was making it more difficult for*  
3           *him to do his work.*

4  
5           So I take it from what your brother told you that he  
6           indicated he was the person performing the autopsy?

7           A.    Oh, yes.

8  
9           Q.    And that he had an assistant with him, rather than him  
10          assisting someone to do the autopsy?

11          A.    Oh, no, he was doing the autopsy, and there was an  
12          assistant who found it rather unpleasant to be there.

13  
14          Q.    You also indicate, in the second-last line, that he  
15          stated to you:

16  
17                 *... the body was badly decomposed, or in a*  
18                 *"poor state", and that it was found "in an*  
19                 *area that they did not expect it to be*  
20                 *found".*

21  
22          But he didn't detail that?

23          A.    No, it was wartime. Even to children, one didn't  
24          indicate things like that.

25  
26          Q.    You go on to say that your brother passed away in 1998  
27          and left some personal diaries, which you indicate you have  
28          read, but there was nothing concerning the autopsy in the  
29          diaries?

30          A.    No. No.

31  
32          Q.    Was there anything else said to you about the body or  
33          about *HMAS Sydney*?

34          A.    No.

35  
36          Q.    Did he ever speak to you of the persons that he worked  
37          under in the area of the Army that he was engaged in?

38          A.    No, but in his diaries he did refer to Col Adey, who  
39          was his superior officer.

40  
41          Q.    Col Adey was a medical practitioner in the Army, who  
42          resided in Melbourne?

43          A.    Probably, yes.

44  
45          Q.    When he left the Army, what work did he take up?

46          A.    He went into the Department of Agriculture in Western  
47          Australia.

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Q. And, in the Department of Agriculture, went back to his degree, if you like, and his qualifications?

A. Mmm.

Q. Did he have any particular area of interest?

A. He was animal health officer, I think it was called. It had been suggested that he should continue in medicine after he left the Army, but he declined that invitation.

THE PRESIDENT: Q. Mrs Richardson, after the War, the issue of the loss of *HMAS Sydney* was a matter of some controversy at various times. Did your brother ever speak to you about this again?

A. No.

Q. Not at all, in the next 50-odd years?

A. Not at all - no. We didn't think of asking him, because - well, personally, I didn't know that there was a real issue, myself. Over the years, I used to hear it said that there weren't any survivors or any bodies from the *Sydney*, and I would think to myself, "Somebody hasn't done their research properly", because I knew of this. It was only about 2005 that I ever raised it again.

Q. How did you come to raise it in 2005?

A. I heard my son speaking to my husband about it, and I just announced, "Well, I know there was one, at least one body", and that's how it came out.

Q. After you had spoken to your son about it, what happened then?

A. It was taken up by the author of "Somewhere Below", John Samuels.

Q. Did Mr Samuels contact you or did you contact him?

A. Yes, he contacted me.

Q. How did he know to do that?

A. Through my son.

Q. So your son got in touch with him?

A. No, my son got in touch with me.

Q. I am sorry, how did Mr Samuels know to get in touch with your son, on the basis that your son knew that you had told him about --

1 A. Because he was publishing the book.

2

3 Q. I am sorry?

4 A. Because my son was publishing the book.

5

6 Q. What was the name of that book?

7 A. "Somewhere Below".

8

9 CMDR RUSH: Q. Your son is the owner of Halstead  
10 Press --

11 A. That's right.

12

13 Q. -- who were the publisher of the book?

14 A. But it was just a chance conversation.

15

16 THE PRESIDENT: Q. So your son is Mr Samuels' publisher?

17 A. He published that book, that particular book, yes.

18

19 CMDR RUSH: Sir, I have no further matters. May  
20 Mrs Richardson be excused?

21

22 THE PRESIDENT: Yes. Thank you very much, Mrs Richardson.

23

24 THE WITNESS: Thank you, Commissioner. Could I just add a  
25 little point?

26

27 THE PRESIDENT: Yes.

28

29 THE WITNESS: I have a concern that my brother's  
30 reputation may be in doubt. He is not here to defend  
31 himself or support the story. He was a very honourable  
32 man, very sensible, intelligent. When he talked to us  
33 about his work, he didn't tell us stories to make us squirm  
34 or whatever. He treated us as intelligent children, so he  
35 wasn't, like a lot of brothers, teasing us or spinning  
36 tales. I would just like to add that.

37

38 THE PRESIDENT: Yes. His reputation is in no way in  
39 jeopardy. The only question is whether or not I can accept  
40 what you have told me that he said to you. That's all.

41

42 THE WITNESS: Yes. Thank you.

43

44 <THE WITNESS WITHDREW

45

46 CMDR RUSH: Sir, LCDR Kerr will call the next witness.

47