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# IN THE SUPREME COURT OF VICTORIA AT MELBOURNE

## CRIMINAL TRIAL DIVISION

**No.** 8980100D

# B E T W E E N

**THE STATE OF VICTORIA**

Prosecution

-and-

**MR ALEX JOHNSON**

Defendant

# AFFIDAVIT

Date of Document: 10 September 2023 Solicitors Code: 176ABU

Filed on behalf of: Mr Alex Johnson DX: 19876221

Prepared by: Mr John Freeman Telephone: 03 9874 0092

REF: AOU899

Emails: [jfreeman@vicpol.com](mailto:jfreeman@vicpol.com)

I, *John Freeman* of *1 Brooke Street, Coburg, Victoria, 3153, Detective, Victoria Police,* make oath and affirm:

1. I am an experienced senior Detective with Victoria Police. I have spent the past 10 years of my career investigating the Melbourne Hogs organised crime organisation (‘the Organisation’). As such, I have extensive experience of the nature of the Organisation and how they operate.
2. Now produced and shown to me and marked ‘‘JF” is a true copy of the text conversation between the Defendant and Dan Deadly.
3. I have obtained as part of my investigation a text exchange between the Defendant and the suspected leader of the Organisation, Dan Deadly. In this text exchange, Dan Deadly stated to the Defendant that any ‘…who snitches will be taught a lesson’ and ‘…snitches can’t escape us…’.
4. This text exchange between the Defendant and Dan Deadly was after the Organisation suspected that the Defendant was communicating with the Victorian Police due to the arrest of three members in a sting operation. It demonstrates a clear threat to the Defendant that the Organisation will retaliate if they find out that the Defendant is informing on other members of the organisation.
5. This text exchange demonstrates the typical behavior that organised crime has to informants, something that the Melbourne Hogs have a particular history of.
6. In my 10 years as a Detective investigating the Organisation, I have been involved in three revenge killings of informants that have been linked to the Organisation. One of these revenge killings involved not only the murder of the alleged informant but also their partner. This demonstrates that the Organisation is ruthless in their goal to discourage informants and have not been afraid to take action in the past.
7. Dan Deadly, who has been the leader of the Organisation for the past five years, has a particular dislike for informants after their second in command was arrested and jailed for 35 years due to being a police informant. This informant was later murdered out front of a Melbourne café by two assailants conducting a drive by shooting. Due to the closed nature of the Organisation and the lack of evidence, the murders where never apprehended.
8. As demonstrated above, there is a significant risk to not granting the suppression order.
9. The information that is expected to be given by the Defendant is essential in bringing dangerous members of the Organisation to justice. This cannot occur if the Defendant is killed or threaten so that the Defendant decides not to inform due to the risk it poses to them.
10. In my professional experience, there is real risk of death to the Defendant should the requested suppression order not be issued by the court. As outlined above, there is a history of the Organisation targeting informants or expected informants. This risk continues after the trial and would still be present if the Defendant is incarcerated.
11. There have been several investigations I have been involved in or led, that were suspected revenge killings while the victim was in prison. The Organisation still has strong ties to incarcerated members and is one of the largest gangs in Australian prisons. The Organisation is suspected of smuggling contraband items (phones, drugs and weapons) into Australian prisons.
12. There is the risk that after the trial, should the Defendant be incarcerated, that the Defendant will be subject to violence. It is not difficult for the Organisation to smuggle in weapons and order a hit on a particular inmate. These hits are often carried out by inmates that have a life sentence and are not fearful of further punishment due to a killing while in prison.
13. In conclusion, in my decade of experience with the Organisation, I strongly suggest that the court issue the requested suppression order. There is a history of the Organisation committing revenge killings against suspected informants, and a public case puts the Defendant at extreme risk of retribution. The order also needs to be of sufficient length to protect the Defendant should they be incarcerated. While open justice is important, the information that the Defendant is offering to provide would make the community safer by taking dangerous members of the Organisation away from society.

# The contents of this affidavit are true and correct and I make it knowing that a person making a false affidavit may be prosecuted for the offences of perjury.

Sworn or Affirmed at Melbourne

in the State of Victoria on 1 September 2023

[signature of person swearing or affirming the affidavit contents, to be signed in front of the authorised affidavit taker]

Before me,

on 1 September 2023

Connor Davidson, Australian Attorney, 12 Brooke Street, Melbourne, Victoria, 3000

A person authorised under section 19(1) of the **Oaths and Affirmations Act 2018** to take an affidavit.

\* In accordance with section 27(1A) of the Oaths and Affirmations Act 2018, this affidavit was signed and sworn or affirmed by the deponent by audio visual link and the authorised affidavit taker has used a scanned or electronic copy of the affidavit and not the original in completing the jurat requirements.

[\*strike out this sentence if not applicable].

# FORM 43A

Rule 43.06(3)

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## Criminal Trial Division

**No.** 8980100D

# B E T W E E N

# THE STATE OF VICTORIA

Prosecution

-and-

**MR ALEX JOHNSON**

Defendant

# CERTIFICATE IDENTIFYING EXHIBIT OR EXHIBITS

Date of Document: 1 September 2023 Solicitors Code: 176ABU

Filed on behalf of: Mr Alex Johnson DX: 19876221

Prepared by: John Freeman and Connor Davidson Telephone: 03 9874 0092

Ref: AOU899

Email: jfreeman@vicpol.com

\*This is the exhibit marked “Texts between Mr Alex Johnson and Mr Dan Deadly (Head of the Melbourne Hogs)”

now produced and shown to Connor Davidson at the time of swearing/affirming the person’s affidavit on 1 September 2023.

……………………………………… ………………………………………

[Signature of deponent] [Signature of person taking affidavit]

Connor Davidson, 12 Brooke Street, Melbourne, Victoria, 3000, Australian Attorney

**Exhibit “Text Messages”**

Screenshots of a text conversation between Mr Alex Johnson and Mr Dan Deadly.