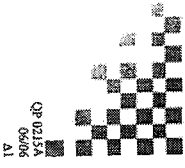




QUEENSLAND POLICE SERVICE
OBJECTION TO BAIL AFFIDAVIT



In the District Court held at Queensland

Ramzi Jabbour

-V-

Mohamed HANEEF

I, **Ramzi Jabbour** of **Australian Federal Police Counter Terrorism, Canberra**

in the State of Queensland, police officer, make oath and say as follows:

1. I am the investigating officer in respect of the charges alleged against the within named defendant.

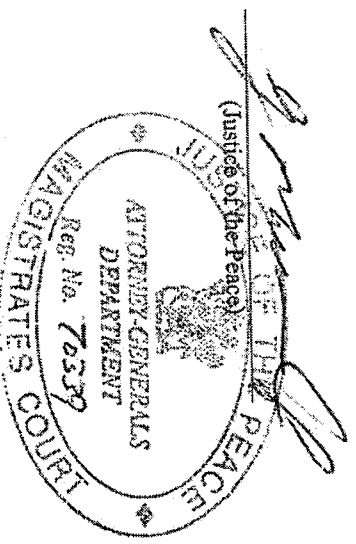
AFFIDAVIT
of
Ramzi Jabbour
2. All the facts, allegations and other matters referred to within the Annexure(s) marked with the letter 'A' attached to this affidavit are true and correct to the best of my knowledge and belief.

Sworn by the above named deponent at Brisbane
(Place)

aforesaid this 14th day of July 2001
(Date) (Month) (Year)

Director of
Public
Prosecutions,
Brisbane

[Signature]
(Deponent)





QUEENSLAND POLICE SERVICE
OBJECTION TO BAIL AFFIDAVIT ANNEXURE



QP 0215A
06/05
A1

A

Instructions:
1. Original to be attached to court brief (QP 9) for information of prosecutor when objection to bail is warranted
2. Copy to station file.
3. Copy to Director of Prosecutions without delay, by fax (fax no. 07 3220 0035) or personally.
4. Forms to be sworn.

Investigating police officer's details
Family name: JABBOUR Given name(s): Ramzi
Rank: Federal Agent Reg. no.: 5055 Police station: AFP Counter Terrorism
Contact phone no.: _____

Defendant's details
Family name: HANEEF Given name(s): Mohamed
Date of birth: 29/09/1979
Usual address: Unit 15/45 Pohlman Street
Suburb/Town: SOUTHPORT State: QLD Postcode: 4215
Occupation: Doctor

Has previous criminal history? Yes No (If Yes, attach copy.)
Statute, section and short title of offence(s):
Criminal Code Act 1995 (Cth), section 102.7(2) (Providing Support to a Terrorist Organisation)

Note: Attach copies of all Bench Charge Sheets

PART 1 Indictable offences alleged to have been committed whilst on bail/used a firearm, etc. (Show cause—section 16(3) Bail Act 1980)

- (a) Has an offence been committed against the *Bail Act*? Yes No
- (b) Is the defendant alleged to have committed the indictable offence(s) whilst on bail for any other indictable offence(s)? Yes No
(If YES, answer all remaining questions; if NO, answer question (e) only)
- (c) What was the previous indictable offence for which the defendant was granted bail?
- (d) What was the date and court in which bail was granted for the previous offence?
- (e) Was a firearm, offensive weapon or explosive substance used, or threatened to be used, in the commission of the offence with which the defendant is charged? Yes No

PART 2 Summary of facts—Unacceptable risk if released on bail
Section 16(1) and 16(2) of the Bail Act

- (a) If released, in your opinion, would the defendant:
 - (i) fail to appear and surrender? Yes No
 - (ii) commit an offence? Yes No
 - (iii) endanger the safety and welfare of the public? Yes No

- (iv) interfere with witnesses or otherwise? Yes No
- (v) obstruct the course of justice in relation to himself/herself or another person? Yes No
- (b) In your opinion, should the defendant remain in custody for his/her own protection or welfare? Yes No

Provide facts to substantiate the marked boxes. Include details of the following relevant particulars:

- (i) the nature and seriousness of the offence(s);
- (ii) the character, antecedents, associations, home environment, employment, background and place of residence of the defendant;
- (iii) the history of previous grants of bail to the defendant;
- (iv) (if applicable) evidence additional to the court brief implicating the defendant.

(Note: section (iv) is of importance. Unless it appears there is a strong crown case, bail may well be granted. As far as you can, list the evidence available to prove each element of the offence(s) charged. FACTS, not opinions, are essential here.)

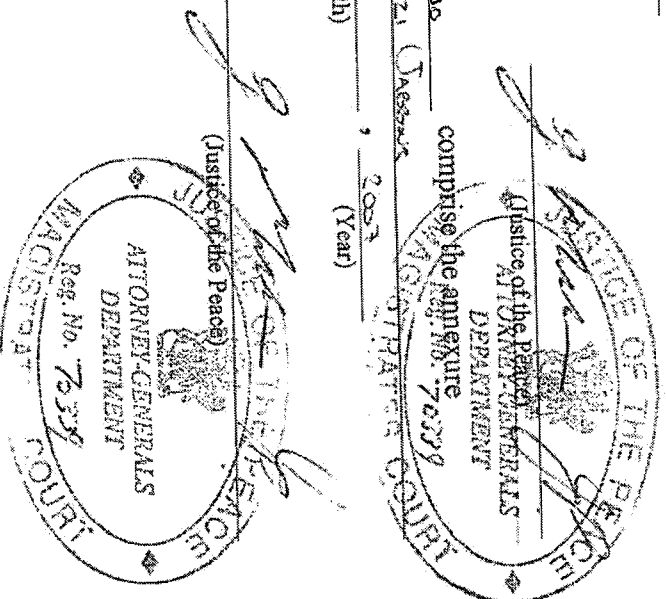
I, **Ramzi JABBOUR** of **AFP Counter Terrorism**, in the State of Queensland, police officer, make oath and say that I am one of the investigating police officers with respect to the matter referred to within the schedule and all the facts and circumstances contained in it are true to the best of my knowledge.

SWORN at *Spring Hill* day of *July*, *2007* herein before me.
 this *14th* day of *July*, *2007*
 (Date) (Month) (Year)

Ramzi
 (Deponent's signature)

This and the number of preceding pages numbered one to *two* comprise the annexure marked with the letter 'A' referred to in the affidavit of *Ramzi Jabbour* sworn before me this *14th* day of *July*, *2007*
 (Date) (Month) (Year)

Ramzi
 (Deponent's signature)



AUSTRALIAN FEDERAL POLICE

BAIL APPLICATION

DEFENDANT: Mohamed HANEEF

BORN: 29 September 1979

CHARGES: 1 x Providing Support to a Terrorist Organisation
Section 102.7(2) Criminal Code (Cth) 1995

CHARGING OFFICER: Federal Agent Ramzi Jabbour
Counter Terrorism

ANTECEDENTS:

1. The offence that Mr Haneef has been charged is a serious offence in that he has supplied support to a terrorist organisation, which could have resulted in the death and or injury of multiple innocent persons. It is a serious offence pursuant to Section 8A(c) of the Bail Act 1978 applies (see detail below)
2. No previous bail application has been heard for this matter as this is the first appearance of the defendant.
3. Mr Haneef is an Indian citizen and not a resident of Australia. Mr Haneef has an Indian passport and has family and associates in the UK and India, including a wife and new born child in India. It is alleged that Mr Haneef has had significant contact with people in the United Kingdom who have been involved in the terrorist acts in London and/or Glasgow during 29-30 June 2007.
4. Mr Haneef was arrested on 2 July 2007 at Brisbane International Airport as he was attempting to depart Australia for India. Mr Haneef was travelling on a one way ticket. It is alleged that Mr Haneef was attempting to depart Australia before authorities could become aware of his involvement in the above terrorist acts.
5. Mr Haneef made last minute arrangements with regard to his residence and personal property and effects prior to his attempt to depart the country. Mr Haneef has the ability and motive to depart the country if released, which would render him unavailable to appear before the court.
6. The investigation is ongoing and it is not yet known whether all people who were complicit in the terrorist acts in London and/or Glasgow, whether presently located in the UK or elsewhere, during 29-30 June 2007 have been identified and/or detained.
7. If Mr Haneef was released from detention it would be extremely difficult for authorities to monitor his movements and who he communicates with, either in Australia or overseas (UK and India).
8. If he was to communicate with people who were either involved in or associated with the terrorist acts in London and/or Glasgow during 29-30 June 2007, he could take steps to:

FOR POLICE & DPP USE ONLY

Page 1 of 5

- a. have potentially incriminating evidence that has not yet been located destroyed; and/or
- b. organise for others to assist him to provide innocent explanations for potentially incriminating evidence. →
- 6. Mr Haneef has demonstrated his ability and willingness to conceal his connection to the UK suspects and to evade law enforcement inquiries by attempting to flee the country on 2 July 2007 after he discovered from his family that his connection to the UK suspects had been identified.
- 7. There is a presumption against bail as articulated in section 15AA of the Crimes Act 1914 (Cth) for Terrorist offences.

* See also attached proposed bail conditions.