

NOTICE OF FILING

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A handwritten signature in blue ink that reads 'Sia Lagos'.

Registrar

Important Information

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Form 59
Rule 29.02(1)

Affidavit of Andrew Stephen Deeming

VID 1023 of 2023


Federal Court of Australia
District Registry: Victoria
Division: General

MOIRA DEEMING

Applicant

JOHN PESUTTO

Respondent

Affidavit of: **Andrew Stephen Deeming**
Address: 
Occupation: Quality Manager (currently unemployed)
Date: 27 May 2024



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Filed on behalf of (name & role of party) Moira Deeming, Applicant
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[Version 3 form approved 02/05/2019]

I, Andrew Deeming, of [REDACTED], say on oath:

Background

1. I am the husband of Moira-Louise (Moira) Deeming.
2. I was born in Moonee Ponds, Victoria.
3. I attended Overnewton Anglican Community College (Keilor) and the Good Shepherd (Gladstone Park) for schooling. I obtained a Bachelor of Science (Medical Science) at La Trobe University (2000-2003).
4. After graduating, I was employed by the Australian Red Cross Blood Service as a Laboratory Technician (2004-2007), a Quality Systems Officer (2007-2011), an Acting Quality Associate (June 2009-March 2010 and December 2010-April 2011) and an Acting Quality Manager (January 2010 and December 2010-January 2011).
5. From 2011 until late February 2023, I worked as Quality Manager of the BMDI Cord Blood Bank (**BMDI CBB**) at the Murdoch Children’s Research Institute (**MCRI**).
6. During my time as Quality Manager at the BMDI CBB, I also took on two additional contracts:
 - (a) Acting Director of the BMDI CBB (July-August 2019); and
 - (b) Quality Manager of the Children’s Cancer Centre at the Royal Children’s Hospital (October 2021-September 2022). I was asked to do this role as a maternity relief position due to my expertise in the field.
7. Moira was elected as a Member of the Victorian Parliament for Western Metropolitan Region in the Legislative Council on 26 November 2022. Moira and I decided around this time that, because our children are and have always been our foremost priority and we wanted them to have one parent at home with them, and because of the anticipated demands of Moira’s new role in Parliament, to which she was ready to dedicate herself, I would quit my job at the MCRI so I could care for and home school our children. We have four children - now aged 6, 8, 12 and 16.

Moira’s Statement of Claim

8. I have read Moira’s Statement of Claim filed in these proceedings. I adopt, in this affidavit, the defined terms used in that Statement of Claim.

Moira

9. I met Moira in 2003 at La Trobe University. At that time, she was studying a Bachelor of International Relations and I was studying a Bachelor of Medical Science. I was the President of the La Trobe University Liberal Club at the time.



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 [REDACTED]

10. At that time, when I first met Moira in 2003, I was struck by her intelligence, sense of humour, and quick wit.
11. Even at that time in 2003, I observed that other people also thought highly of Moira. I observed that she had a way of connecting with people from all walks of life. She also took to leadership roles in our soccer club, captaining and running the outdoor and indoor women's soccer teams despite never having played before she got to university.
12. Moira and I started dating in mid-2003. I was living with friends in Watsonia and she was living with her brother in Watsonia. Over the next year or so we dated on and off. We got engaged in early 2005 and married in October 2005.
13. Around this time, in approximately 2005, we joined the Liberal Party and were members in Highett despite not living there. We had started a branch with others associated with the La Trobe University Liberal Club. We would have our meetings at Liberal Party headquarters in the city or over at Highett.
14. To save money so we could get a deposit for a home of our own, we house sat or share housed over the next few years. First, we lived in Pakenham Upper. After that, we moved in with Moira's mother for a few months in St Kilda. While living in St Kilda, I got to see the Sacred Heart Mission across the road from us where I knew from Moira that she and her Aunty, Terri Gellert, had volunteered together every Saturday for many years.
15. In 2006, Moira started studying for her Diploma of Teaching at the University of Melbourne. We moved to live in a house in Reservoir for about 18 months, and while we lived there Moira started teaching at various government and non-government schools in short-term contracts and relief teaching roles across the north-eastern suburbs.
16. We ended up renting a place in Ivanhoe. We had our first-born, [REDACTED] whilst we were living there in February 2008.
17. Around this time, in 2008, with a new-born baby and other various commitments, we let our membership of the Liberal Party lapse as we could no longer commit enough time.
18. To save on rent after 12 months in Ivanhoe (which was the first year on our own as new parents), we began share housing again, living with our baby in one bedroom and sharing a house with others including my father, my mother, and a family with whom Moira had lived during university.
19. By 2009, Moira had begun a permanent teaching role.
20. We moved into a house in Taylors Hill in October 2010.



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21. We had our second born, [REDACTED]. [REDACTED]
[REDACTED]
[REDACTED]
22. Inspired by a talk which Moira and I attended by John Anderson AC, we rejoined the Liberal Party in early 2014.
23. Also in 2014, Moira decided she would run for the seat of St Albans in the 2014 state election.
24. Moira fell in love with campaigning during that election. I observed when supporting her campaigning that she was a natural at speaking to voters and that they responded well to her. Some voters expressed to me that they were excited and pleasantly surprised to see a young female who was a working class teacher and a local and someone with a strong Labor pedigree who was now a Liberal.
25. Moira did not win that seat but many Liberals who I spoke to, both locals and Liberals in the wider party, told me they were impressed with how well she conducted herself and her result.
26. In approximately September 2014, Moira resigned from her teaching role to home-school our daughter [REDACTED] for term 4. She was also taking care of our toddler son [REDACTED].
27. In approximately December 2014, Moira invited a Vietnamese asylum-seeker called Manh to live with us. We already had one boarder and our two kids living with us at the time; we moved our kids into one room and Manh started living with us. Moira arranged for Manh to get free enrolment at Catholic Regional College Sydenham and persuaded the school to give him free equipment and uniforms. Moira and I would take him to and pick him up from school. He lived with us for approximately a year.
28. In 2016, Moira gave birth to our third child, [REDACTED].
29. In 2018, Moira gave birth to our fourth child, [REDACTED].
30. In 2018, Moira was encouraged by a number of Liberal Party members to run for the number two spot on the Liberal Party ticket for the Western Metropolitan Region but ultimately was unsuccessful.
31. Moira afterwards campaigned, with me, as part of the team to help elect Liberals in the state election. I recall that many people (although I cannot now recall who) from the Liberal Party told me they were impressed that she did not act out as some people do when they lose. I observed that she again loved speaking with voters and campaigning. I observed that she was well respected amongst the Liberal Party and in the community from this campaign because she never lost her temper, never used ugly language, and was always



polite. I observed that while campaigning she managed to win the respect of people who were not Liberal voters because of her polite manner.

32. Later in 2020 I convinced Moira that she should run for local council. Not only did Moira win, but she got the largest vote of any of the Liberals running in the western suburbs - almost double that of the next closest candidate (and he had just been Mayor). I was very proud of her.
33. I observed at council meetings and in conversations with councillors at public events that Moira built genuine friendships across party lines and that she had a reputation amongst other councillors, and in the general community in which I mixed, as someone who was fearless and relentlessly polite in standing up for what she thought was right and in the best interests of her residents. Her reputation, amongst the people with whom I mixed, was also evident to me in that she was being contacted regularly in my presence by members of the public offering her support and encouragement.
34. In 2022, Moira decided to run for the vacant number one spot on the Liberal Party ticket for the Western Metropolitan Region. She won her preselection with wide support from the various factions of the Liberal Party, which I took to demonstrate her wide support and appeal in the Victorian Liberal Party.
35. In November 2022, Moira was elected as a member of the Victorian Parliament for the Western Metropolitan Region. I was incredibly proud of her.
36. On the morning of Moira's maiden speech to Parliament, 21 February 2023, I received a phone call from Moira's mother. She said that Moira's aunt Terri Gellert had died. I knew this would be devastating to Moira. Terri was a mother like figure to Moira. I knew from Moira that Terri and her husband Emery (a Holocaust survivor) had taken care of Moira before and after school for years when her mother was working long hours. Whenever Moira and I had visited Terri I could see the special bond between her and Moira. Moira's mother and I agreed it was best to wait until after Moira's maiden speech to tell her this sad news.
37. I attended Moira's maiden speech and saw that the gallery was full of Moira's supporters. It was as diverse a group of people as you could imagine - Christians, Muslims, atheists, lesbians and gay men, and detransitioners. There were members of the Liberal Party, Labor Party and the Greens.

Moira's Reputation (Prior to 19 March 2023)

38. In general, those I knew who also knew or knew of Moira prior to 19 March 2023 - including our friends, family, and work colleagues - regarded her as a friendly, warm and positive person. She was regarded as someone who truly cared about others. She was respected

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as holding strong principles. I observed regularly over time that, even if people disagreed with some of Moira's views, they nonetheless respected how passionate she was about those views and that she genuinely held them in good faith, and never looked down on others or cast them as having bad faith in their opinions. Over the years to 19 March 2023, I was amazed at how many people have ended up as fierce supporters of her just because she was friendly and respectful.

39. Prior to 19 March 2023, Moira and I attended and mixed within the church communities of Brimbank Presbyterian Church and Melton Presbyterian Church. Her reputation amongst the members I knew within these churches at that time was a someone who was friendly and warm, fun and inclusive and willing to serve and help. In addition, Moira's work as the Researcher for the Church and Nation Committee of the Presbyterian Church was highly regarded. I would often hear from Ministers that they loved Moira's work and they found it very helpful in understanding the issues that the church was facing in the world of politics. They would tell me that they would often share this work with their congregations.
40. As I have set out at paragraph 33 above, before 19 March 2023, I mixed with and had conversations with Moira's colleagues on the council in the City of Melton and councillor workers when I attended council events with Moira. Amongst these councillors, including many who were Labor or left leaning, she had a reputation for being competent, caring and across the issues and as a team player who would put aside party-political issues to work well as a team to deliver for their residents. Moira was seen as a team-player and not in it for herself. She had a reputation for being honest and an advocate for councillor workers. She told them she was not interested in running for mayor or deputy mayor, that she would be willing to vote for anything on merit – and, because it was actually true, that impressed them.
41. Amongst the Liberal Party members and supporters that I mixed with before 19 March 2023, Moira had a reputation as a person who was competent and enthusiastic about serving the Liberal Party and the community generally. I observed that Moira was often asked to help out beyond the election cycle. She (and I) were asked to be on the Leadership Committee of the Future Leaders program and we did that for a number of years. As Chair of the Sydenham State Electoral Commission (SEC), Moira was often asked by neighbouring SECs to join together for fundraisers. Moira was sought out by various Liberal groups to speak on Safe Schools as she was known to be across the issue and she was able to explain it clearly to a wide range of people. I observed, when campaigning together with Moira in the lead up to the election and during the election when campaigning on voting lines with her, that Moira's work ethic at elections and her ability to connect with voters was greatly admired by party members and supporters and constituents.

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SOLICITOR GENERAL
VICTORIA
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42. Moira has told me and I have observed that, as a result of the publications on 19 and 20 March 2023, she has been reluctant to associate with some of these people because she perceives that their attitudes towards her have changed and they no longer like and respect her as they did previously. As set out further below, I have observed her to become more introverted, isolated and reclusive since the publications about her and the associated negative publicity.

The 'Let Women Speak' rally

43. On 18 March 2023, Moira and I attended the 'Let Women Speak' Rally (**LWS Rally**).
44. Moira went to meet Kellie-Kay Keen at her hotel and I went straight to the rally point.
45. When I arrived, I saw a number of people milling about. At first I thought they were all there for the LWS Rally but after a few minutes it became clear to me that there were a number of different groups in front of Parliament – I observed that there was:
- (a) an anti-lockdown/vaccination group – I recall there was one man who had a megaphone and was telling off everyone else for not being there every week like he was;
 - (b) a children's right's group;
 - (c) some men dressed in black who I initially thought were Antifa because they dressed the same (all black with their faces covered); and
 - (d) a large pro-trans rights group which had gathered on Bourke Street and was facing Parliament.
46. The police had separated the LWS group, and each of the groups referred to at subparagraphs 45(a), (b) and (c) above, from the pro-trans rights group. Throughout the afternoon, I observed that this pro-trans rights group became increasingly loud and hostile, and eventually violent. I observed some people from that group making threatening gestures and throwing objects including bottles at the LWS group.
47. At some stage, a group of far-left socialists waving red flags came down Spring Street and the men in black started to antagonise them. I observed that these two groups kept antagonising each other. But as these groups were down by the Princess Theatre, I would estimate a good 30 meters away from us, my attention was more focussed on the pro-trans rights group directly opposite us on Bourke Street. I stood in the gap in the middle of the two groups, ready if necessary to try intervene if anyone from the pro-trans rights group broke through the line of police towards the LWS group. A few did but they did not get far before the police were able to drag them back.



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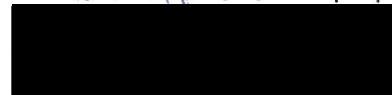


48. The pro-trans rights group facing Parliament was growing more and more violent. I saw multiple people punching police horses. I was increasingly concerned and I was scanning the crowd looking for danger.
49. Well before the event was finished the men in black were up on the steps at the other end of Parliament. However, as the potential danger seemed to be right in front of me, I did not pay much attention to what these men were doing at the other end. They then left, walking across the front of Parliament and again antagonising the socialists. This is when they did the Nazi salute. At the time, I had thought they were doing that to 'troll' and antagonise the socialists rather than it being a legitimate Nazi salute, because they had no Nazi insignia and were not dressed like I thought Nazis dressed like.
50. The LWS Rally ended early. I went home and Moira went out to debrief with some of the other women and to celebrate a fairly large and successful turn out.
51. I have read Mr Pesutto's Defence filed on 29 January 2024 in this proceeding. In his Defence, Mr Pesutto makes false allegations about Moira's conduct before, during and after the LWS Rally and about her associations with Angie Jones and Kellie-Kay Keen, two of the organisers of the LWS Rally. To the extent necessary, I will respond to those false allegations in reply to any evidence sought to prove the allegations in the Defence.

Publication of the Media Release on 19 March 2023

52. Prior to the Media Release, I do not recall seeing any negative press on 18 or 19 March 2023 about Moira having attended the LWS Rally. I recall there was negative press about the presence of the Nazis, and I recall there was reporting which Moira and I regarded as inaccurate (for example, characterising the LWS Rally as an 'anti-trans' event), but I do not recall seeing anything about Moira until after Mr Pesutto's Media Release.
53. In the evening of 19 March 2023, Moira attended a meeting at Parliament House with John Pesutto and the other Members of the 'Leadership Team' of the Parliamentary Liberal Party. I drove her to the meeting and waited in the car while she met with them. After the meeting, Moira told me that the Leadership Team had told her it proposed to expel her as a Member of the Parliamentary Liberal Party.
54. Later that evening, sometime after approximately 8.30pm, Moira saw the Media Release. I do not recall how she saw it. For the remainder of that evening, Moira was consumed by the Media Release and we discussed it practically nonstop. From my discussions with her, and my physical observations of her, I could see she was shocked and surprised by the publication of the Media Release. Part of this was because Moira and I had previously discussed, after her meeting with the Leadership Team, that we had expected there would be a fair process by which Mr Pesutto would raise, internally with the Parliamentary Liberal Party, whether Moira should be expelled and the reasons for the proposed

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expulsion. Moira told me she had thought this would be handled internally and that, when the evidence and facts were inspected, it would not get to that stage. I recall her repeatedly saying words to the effect 'I can't believe he did this'. She expressed to me the sentiment (that evening and many times subsequently) that she felt betrayed and disappointed that Mr Pesutto had already issued a public statement about the proposed expulsion. She looked stunned. She was teary and quiet. I could tell she was deeply saddened to read the Media Release. Then she started panicking about how everyone would think she and our family were Nazis. She appeared extremely anxious and distressed that night. She was repeating to herself over and over again that she was worried people would think she was a Nazi. I had observed Moira had experienced anxiety and panic previously, but not for years, and I had never ever seen her suffer anxiety and panic to this extent.


55. I also read the Media Release that evening. When I read it, I was outraged. I thought Mr Pesutto was saying that Moira had attended the same rally as the Nazis. I thought he was suggesting, at a bare minimum, that Moira had associations with Nazis and far-right persons and at worst that she was a Nazi or that she shared Nazi and far-right beliefs. It seemed to me that Mr Pesutto was portraying the LWS Rally as a far right-wing Nazi rally and the organisers of the LWS Rally as Nazis or as having Nazi associations. I discussed this with Moira, and she thought the same. She kept saying that people were going to think she was a Nazi. In our discussions, I could see and hear how distressed Moira was. She was worried that the media, and the public, were understanding Mr Pesutto's words to mean exactly that – that she was a Nazi sympathiser and that was why she needed to be expelled from the Parliamentary Liberal Party.
56. Over the next few days, I began receiving phone calls about the situation from people we knew. I had to reassure them that of course Moira did not *'attend a rally with Nazis'*. I remember one call in particular from a close friend and a previously very strong supporter of Moira who had heard the stories and needed me to reassure them. One ridiculous sentence which stood out was 'Why was she wearing the same colours as the Nazis?'. It seemed to me that the persons I spoke to believed Mr Pesutto and even after my reassurances they did not seem fully convinced.

Further Publications on 20 and 21 March 2023

57. I observed Moira being upset on 20 March 2023, when Mr Pesutto made a series of public statements about her and the proposed expulsion.
58. I observed that she became increasingly anxious, distressed, and depressed. She told me she did not know when it would stop. She was unable to get out of bed. She looked scared and tense like an animal caught in a trap. She kept crying on and off.



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59. [REDACTED]

60. The first option we discussed was that Mr Pesutto and the Leadership Team had no understanding of context and didn't realise Wikipedia was not an entirely reliable source of information and that a person cannot fairly be held responsible for the actions of another person and even more so when the person is three degrees of separation away. We discussed that this first option would be surprising considering the Leadership Team was meant to be the best that the Liberal Party had to offer.

61. The second option we discussed was that Mr Pesutto and the Leadership Team knew the claims they were making against Moira were untrue but were willing to proceed with them anyway. I observed that when we discussed this second possibility it particularly disturbed Moira and we discussed that it meant Mr Pesutto and his team were willing to bully and humiliate an innocent woman in order to get their way and serve their political purposes. After talking these possibilities through with me, Moira told me she believed the second possibility was true. She told me she thought Mr Pesutto didn't care about the truth, and didn't care about the impact his lies were having on her. Moira expressed to me concern that far-left reactionaries would seek to hurt her due to her now alleged association with Nazis. Despite her years of advocacy she had never expressed concerns about politically targeted violence before.

62. The following day, 21 March 2023, there were articles reporting on the Expulsion Motion and Dossier. I observed that Moira was shocked and traumatised when she read these articles. She told me that she feared many people in the public would believe the claims because this was her leader making the claims. She also told me that she feared many people would just read the headlines of the articles, or would skim read them, and believe the claims. With the Dossier appearing online she had a mixed reaction. She was upset this had been leaked. She told me that she felt like this was a large scale coordinated attack on her. She told me she had some hope that when people looked at the Dossier they would see how poor the evidence against her was. But she also told me she was worried that people would ask why the Leader of the Liberal Party would have said these things, about a Member of his own Party, if they were untrue.

Meeting on 27 March 2023



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63. There was a party room meeting on 27 March 2023 to determine the Expulsion Motion (**27 March Meeting**).
64. I accompanied Moira to Parliament House to give her emotional support which she required because of the deeply emotional impact of the previous week since the Media Release was published. I waited in Moira's office while she attended the 27 March Meeting.
65. Moira had previously written a speech which she intended to read at the meeting. She had previously told me she felt she had been backed into a corner and forced by Mr Pesutto's statements about her into a position where she had to reveal, in her speech, deeply personal aspects of her past in an attempt to explain her view that biological females should be entitled to their own private spaces. She told me she felt degraded and humiliated by this. Moira is a very private person when it comes to showing emotion. She shows them at home but not in public. She told me that giving this speech was going to make her cry and she did not want to expose her deepest traumas to the people who were putting her through this new trauma. She described to me that she felt as though she was being 'forced to stand in front of them naked', or words to that effect, but that she felt she had no choice in order to clear her name for our children.
66. After the 27 March Meeting, Moira joined me in her office. I could see she was drained and exhausted. She told me she had delivered her speech to the party room and, as she had feared, she had cried in front of the party room which she said was deeply humiliating. She was deeply upset she had had to reveal these things about herself.
67. Moira told me that the party room had agreed to a compromise whereby, instead of proceeding to a vote on the Expulsion Motion, she would accept a 9-month suspension, after which she would automatically be re-instated to the party, and loss of her role as Whip, and there would be a joint statement from her and Mr Pesutto which would fully exonerate her from all the allegations that had been made about her.
68. Moira and I waited in her office for the joint statement to be prepared.
69. Mr Pesutto and a pack of people walked past Moira's office. Moira asked Mr Pesutto a question along the lines of 'What's happening with the statement?'. He responded along the lines of 'We'll send someone to come and get you'.
70. After some time, someone (I cannot recall who) did come to get Moira. She asked this person if she could bring me but they said no.
71. When Moira returned, she told me Mr Pesutto had not even showed up at all. She said that Mr Southwick had given her what was supposed to be 'her half' of the joint statement to sign. She said she was absolutely furious about the statement which Mr Southwick had



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presented to her to sign. She told me that he had threatened her that, if she did not sign the proposed statement, they would have to return to the party room to vote on the Expulsion Motion. She told me he had said that, if that occurred, because she had made so much trouble and forced a new meeting, the other MPs would be furious and would definitely expel her this time and her career would be over. She told me she had said to Mr Southwick 'That's fine, I'd rather be expelled than sign this statement'. She told me she had rung Mr Wells on her way back. I understood he had been acting as an intermediary between her and the Leadership Team. She told me she had blasted him because she felt she had been betrayed. She told me Mr Wells had said he would sort it out but she needed to do her part of the statement first. Moira appeared furious. She told me she felt blackmailed by Mr Pesutto and Mr Southwick, humiliated, and powerless.

72. Moira asked me if I could join her at the next joint session with them because she was in an emotional state, was so exhausted (she had not drunk or eaten enough), and believed that Mr Southwick and the others were bullying and ganging up on her.
73. Moira and I, with David Hodgett, met with Mr Southwick and Nick Johnston (who at that time was Mr Pesutto's Director of Communications) in the Liberal Party meeting room. We worked on editing Moira's half of the joint statement until it was in an agreed form. Moira asked if we could stop and finalise it the next day because Mr Pesutto was not even there and she was so tired. But Mr Southwick said no. He said they just needed to get her half done. Moira appeared annoyed at Mr Southwick because he kept rejecting her proposed wording. She told him that because he was in the original Sunday night meeting with the Leadership Team and because he had made the deal in the party room, he knew that the words she wanted to say were consistent with what she had told the Leadership Team on the Sunday and were consistent with what the party room had agreed in the 27 March Meeting.
74. Mr Southwick said that did not matter. He said what mattered was that Moira's statements would be seen to be 'contradicting the leader'. This made Moira look incensed. She told Mr Southwick that if Mr Pesutto stopped lying then she would stop contradicting him. She kept asking why Mr Pesutto was not there. I cannot recall Mr Southwick's response, other than that he appeared to me to be making excuses as to why Mr Pesutto was not there. Mr Southwick kept pressuring Moira to denounce Angie Jones, Kellie-Jay Keen and the LWS as Nazi associates and bigots. Moira got especially angry at this and told him never to ask that again or she would walk out. Mr Southwick kept saying words to the effect of 'You have to back up the leader' and 'You can't contradict your leader'. At some stage Moira said that the Leadership Team hadn't shown her the evidence at the meeting on Sunday and Mr Southwick replied that they didn't have the evidence on the Sunday. I recall the look on Moira's face. She gave a wry smile and rolled her eyes and shrugged.



her shoulders and looked around her at the others in the room. She said something like 'Did you hear that?' to Mr Hodgett. She was incredulous.

75. By the time the statement was in an agreed form, Moira was barely functioning and appeared to me as if she had just been through a terrible trauma. She was emotionally and physically exhausted and wanted to go home.

76. After Moira later found out that Mr Pesutto had done his own press conference and that he had not cleared her and instead had said that she had made 'concessions' that he wanted, Moira appeared furious. She told me she had been tricked and lied to and I agreed. I have never seen Moira so angry. She told me she thought that Mr Pesutto was banking on the Liberal Party Parliamentary team ethos of not wanting to 'contradict the leader' as a way of getting his way.

77. [REDACTED]

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Escape to Queensland

78. During the period from the publication of the Media Release on 19 March 2023 until the 27 March Meeting, Moira withdrew into herself. She was intensely anxious. She stopped eating and I had to remind her to eat. She lost track of time and was visibly shaken and exhausted at the idea of going out in public. She told me she started having nightmares about being attacked by people who thought she was a Nazi. She told me she felt powerless against all these powerful people. She told me she was upset that she was being portrayed not just as a Nazi but also as a 'troublemaker' within the Liberal Party for even attempting to defend herself. I observed that this outraged her. I saw her receive threats online and by email - people threatened to spit on her; they mocked her; they called her a terrible mother; they threatened our children. Moira expressed to me her fear of being recognised and attacked. As her husband, this made me feel enraged and protective. I do not like it anymore when she has to go out in public alone. It makes me extremely nervous. It only takes one act of violence; one person thinking that they are moral and upright for 'punching a Nazi' as their catch-phrase goes. When I became enraged, I observed Moira become even more upset that I was upset.

79. The media reporting about Moira during this initial period was relentless. It seemed like every few hours there was a new article in a paper or a new news report on TV or some

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[REDACTED]

new post on social media. It was hard for Moira to keep up with it all. Her anxiety was extreme. She was in severe shock and went very quiet. She was receiving telephone calls but she was finding it hard to speak to anyone, even if they were ringing to say they were on her side. She appeared to me at this time frozen in her trauma. She told me she felt isolated and terrified of physical attacks and reputational ruin. Looking at her phone, I saw many unanswered calls and texts. I would try to encourage her to at least get back to some of her supporters but it was too much for her. She appeared to me to be totally overwhelmed.

80. Our family life grounded to a halt. Our home schooling stopped. Moira and I were extremely stressed. Our youngest two kids did not understand what was going on - Mum and Dad were stressed and were trying to shield them from it but they could tell something was wrong. Moira basically disappeared even though she was at home. She could hardly speak. She was just alone in her room all the time. We had to try explaining to our older kids what had happened. They understood the facts but could not get their head around the motives. Moira was busy trying to clear her name for our kids, but that meant she did not have the time or emotional energy for them. My time and energy was split between keeping the household running (as Moira no longer had the time or energy to help) and trying to help Moira where I could.
81. We had the press constantly outside our house during this period. They would approach us with their cameras if we went to the car, even if we had our kids with us. They frequently knocked on the front door. On two or three occasions they tried to talk to our young children through the front door and asked them to open the door. We discovered one day that our side gate was opened when it was previously locked. To this day we do not know if it was press or a member of the public that tried to get in. I observed that this was extremely stressful for Moira. She called the police and they started patrolling our area. We ended up having to get a series of security cameras installed to help partially ease Moira's mind. Moira expressed to me that she felt under house arrest and we did not leave the house and run the gauntlet of the press. Our kids missed out on their sports and other activities during this period.
82. By 28 March 2023, Moira was in tears. She told me she couldn't handle all the intrusion. She said we had to get out. So I looked online that night and booked flights and accommodation and we left Victoria for far-North Queensland for about 2 weeks from 29 March 2023 to 12 April 2023.
83. When we were away in Queensland, I vividly remember Moira calling out in her sleep, obviously having a nightmare. I had to wake her up but she was so out of it she thought I was someone attacking her and she did not know where she was for a few seconds. And she tried to fight me off. She was covered in sweat and looked absolutely terrified. She



MICHAEL R. JUSTICE OFFICE
 ABSOLUTELY TERRIFIED
 [REDACTED]

told me she had had a nightmare about the men in the Leadership Team having her watched and everything she did analysed and attacked. Previously, Moira has had nightmares over the years but they had decreased in frequency and severity. At times I woke her from them, and she calmed down quickly. But I had never seen her like this. When I woke her, and when she was pushing and flailing, it was like she was in a trance. It still haunts me when I think about it.

84. On our last couple of days in Queensland, Moira appeared to me depressed and she told me she was stressed about having to go back to Victoria where she would go back to being recognised and abused and back to Parliament where, she felt, Mr Pesutto and the Leadership Team were out to get her and where she was constantly denigrated publicly and privately.
85. As we were waiting for our Uber to the airport, our son asked Moira if she was okay and she broke down in tears. Prior to this, I do not recall Moira ever crying in front of our children. She only cried for a few seconds but all the children were upset because they had never seen her like that. Moira and I had worked so long and hard on undoing the damage done to her from her prior abuses but after Mr Pesutto's attacks she appeared to me more of a wreck than she had ever been.
86. After we returned from Queensland, our kids continued to be worried about the press coming back. For months afterwards, if they saw a van in the street, they would run to us and ask in a worried tone 'Are the press back?'. I observed our children's reactions to be very distressing for Moira.

Impact of the Publications

87. I am aware of Mr Pesutto's publications sued on in these proceedings (**the Publications**).
88. I have observed, and Moira has told me, that a number of people have cut off contact from her since the Publications. These people have included former friends and members of the Liberal Party. She has told me people have unfollowed her on Facebook. I help Moira to administer her Facebook page so I have also seen this for myself.
89. Since the Publications, I have regularly seen posts on social media (Facebook and Twitter) which have been disparaging of Moira. I have seen people making explicit claims she is a Nazi or supports Nazis as well as people implying she is a Nazi or supports Nazis. I would say this occurs most days. I have seen Facebook and Twitter posts from Liberal Party members and branches condemning her. One described her as the 'Eva Braun of the West'. This was posted on a Facebook group called 'Web Warriors', which is a Facebook group for members of the Liberal Party. It was posted by someone we previously had a pleasant relationship with.



MOHAMMED ALI JP
C C HONORARY JUSTICE



90. A Liberal Party member told us he was having a discussion with his elderly mother and the topic of Moira Deeming came up. He relayed to me that she said "*Ohh that Moira's causing trouble.*"
91. I have observed, and Moira has told me, that she now fears going out in public. Often I will suggest we go out and she will be reluctant to leave the house. She has told me she is fearful whenever she is approached by a stranger who says they know who she is.
92. Moira has told me that at times she has felt she is being pursued and stalked by Mr Pesutto and the men in the Leadership Team. She has expressed to me her worry about being bullied and excluded and gossiped about and mocked by everyone at Parliament except those few who had supported her.
93. Before the Publications, Moira was booked in to attend a local rugby club's jersey blessing ceremony. I believe it was to be held in April 2023. She told me she was very much looking forward to this. Moira found out only when she was a young adult that she had Māori heritage and in recent years had been trying to connect with that culture. Moira relayed to me that one of her staff members was contacted by the club and was told that Moira was uninvited 'until this matter was cleared up'. I discussed this with her and she told me that she understood this to mean the Nazi association allegations. I could tell that Moira was devastated at being shunned like this. She told me she thought that now even Christians were starting to either believe these allegations or that they did not want to be associated with her because of the potential bad press, whereas previously she had felt, and we had both observed, that as a general rule Christians tended to be supportive of her.
94. After this incident, I suggested, given our background in soccer, that Moira should contact the soccer clubs in the western suburbs and ask how she can help them. She was reluctant to do so and eventually admitted to me that she was worried that she would be treated badly because of Mr Pesutto's accusation and she felt it was too risky to try to go to sporting clubs. She was only able to visit one sporting club after that and it was a club that my family has had a more than 30 year association with. Similarly, after this Moira said she did not want to make appointments to visit schools because she was afraid of cancellation or being accused of being a Nazi.
95. We have had many discussions about this, and about her emotional state since the Publications. Moira has told me she has felt guilty for not being able to 'make herself go' to events she believes MPs should go to, like clubs and schools and meetings with the community. She has told me she has felt humiliated that, as an adult, she was afraid to go out in public. She has told me she has felt ashamed and depressed and didn't want people to know about it.



96. Moira and her local SEC organised a 'friend-raiser' event on 30 July 2023 which was aimed at growing the Liberal brand, membership and message (rather than being a fundraising event). But then people started a campaign against the event. We were forced to hire extra security and on at least one occasion the venue threatened it may have to cancel. [REDACTED]
[REDACTED] The fear of violence from these protestors made it extremely tense for Moira in the lead up to the event and on the night. She told me she was worried that she would be blamed if these protestors became violent because she had already been blamed for the actions of others at the LWS Rally.
97. As 2023 progressed, Moira became more and more anxious. On the day before Parliament sessions, she would be stressed and would withdraw from me and the kids. She struggled to get out of bed. She was so anxious about how she was going to be treated during the Parliament week. After Parliament sessions, she would then be withdrawn for a day or two. Again she would stay in bed, unable to relate to me or the kids. As the year continued, instead of being withdrawn and stressed for a day before Parliament, it became two days before, then three and even up to four days before. Her recovery after Parliament sessions also went from one or two days to three or four days. It got to the point where she would only have three or so days without being stressed and withdrawn. After the summer break of 2023/2024, she told me she was dreading having to go back to face the bullying and sneers in Parliament.
98. Moira had previously always loved campaigning. One thing we often did together in our area was handing out Liberal branded shopping bags. Moira has loved doing this in the past. In the lead-up to Australia Day 2024, and the attempts by some to cancel it, I suggested that we could get a team together and organise for some Moira Deeming shopping bags and/or Australia Day merchandise to hand out at the local shops. I thought this was a great idea, but I saw the look on her face as I excitedly told her my plan. Her eyes first widened as if scared, then she lowered her eyes and lowered her head. She said words to the effect "*I can't. I'm scared about people recognising me. It only takes one violent person to hurt me.*" This was an activity we had done many times previously before the Publications. I could tell she felt embarrassed that she could no longer do this.
99. Our family had great plans for 2023. It was meant to be the culmination of many years of work and experiences. I had planned on a peaceful transition to life as a stay at home dad and a homeschool teacher. Moira and I had planned on sharing domestic duties as best we could. But after the Publications, our life fell apart and so did our family. Moira was unable to do the home duties and home school tasks we had planned. I had to take on almost all home duties and home schooling tasks whilst trying to care for my emotionally damaged, withdrawn and traumatised wife. Our children do not understand

MOHAMMED ALI IP
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why Mum cannot play with them or why she needs to go to bed early when she gets home. I have struggled with time and energy to keep the house as neat and tidy as we would have liked. Moira has told me she feels immense guilt about being home 'but not present'. She tells me she knows her children need time with her but she has not had anything left to give to her own children. For Moira, being a mother is the most important role in her life.


100. [REDACTED]
[REDACTED] Moira started panicking, telling me that if the perpetrator thought Moira was a Nazi too, our house and more importantly our kids' lives would be at risk. As a result, Moira and I have taken steps to remove our address from the public record. She lives in fear.
101. Moira is different now as a result of the Publications. I recall thinking a number of times about how much she has changed. She is now very rarely jovial when that was one of the main traits she was known for previously. She is withdrawn and afraid to go out in public which has meant we cannot go out much as a family. She has become scared of campaigning and meeting new people when that is what she most loved about politics. Also, Moira previously had an amazing ability to read and remember details. But I have observed that she now struggles to remember things or think clearly at all anymore. She is always tired and in some kind of daze - like shell shock. She goes from one thing to another and does her best but she is not herself at all. She used to always want to see her close friends. But now she is so withdrawn that she never contacts them and forgets to contact them back and so they are all worried about her and they contact me to see if she is okay. She keeps putting on a brave face in public but in private she just went quiet and couldn't speak to anyone, including me, the kids and her closest friends.
102. Prior to the Publications, Moira had had to deal with other traumas. She was always strong and stoic in doing so. I often would try to encourage her that it was 'okay to cry'; I thought this may be a good and natural release for her. But she rarely did. Since the Publications, she has cried often; she has been unable to hold back her tears.
103. I am worried the Publications have damaged Moira and she will not recover.

MOHAMMED ALI JP
JUSTICE OFFICE



Sworn by the deponent
in Victoria
on 27 May 2024
Before me:

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Signature of deponent

KEILOR DOWNS POLICE
COPERNICUS WAY
KEILOR DOWNS 3038

Signature of witness


MOHAMMED ALI JP
C/O HONORARY JUSTICE OFFICE

Name and qualification of witness JUSTICE OF THE PEACE FOR VICTORIA

