

NOTICE OF FILING

Details of Filing

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

Registrar

Important Information

This Notice has been inserted as the first page of the document which has been accepted for electronic filing. It is now taken to be part of that document for the purposes of the proceeding in the Court and contains important information for all parties to that proceeding. It must be included in the document served on each of those parties.

The date of the filing of the document is determined pursuant to the Court's Rules.

Form 59
Rule 29.02(1)

Affidavit of Angela Dennis

VID 1023 of 2023

Federal Court of Australia
District Registry: Victoria
Division: General

Moira Deeming

Applicant

John Pesutto

Respondent

Affidavit of: **Angela Dennis**

Address: [REDACTED]

Occupation: Self employed

Date: 22 July 2024

I, Angela Dennis, of [REDACTED], affirm:

Background

- I provide private tutoring services to primary, secondary and tertiary education students. I tutor various subjects including maths, chemistry, and physics. I also teach beginner French, and English as a second language to students from overseers. I also proofread and edit on a freelance basis. I hold a dual Bachelor of Laws (Hons) and Bachelor of Science (majoring in Physics).

The LWS Rally

- I attended the 'Let Women Speak' rally held outside Parliament House on Spring Street in Melbourne on 18 March 2023 (**LWS Rally**).
- I attended the LWS Rally because I had concerns about the contemporary gender movement and its impact on sex-based rights for women. I thought this was an issue

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[Version 3 form approved 02/05/2019]

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that many others also had concerns about, but in respect of which they rarely spoke out about in public. I thought the LWS Rally would provide a safe space within which women could speak about this topic, and I was eager to hear other people discuss it.

4. Many of the LWS Rally attendees were introducing themselves to each other. The LWS Rally crowd predominantly comprised of left-wing women of varying ages. I was impressed that those I spoke with seemed to me to have an extensive knowledge of feminist theory. I recall speaking to someone who was de-transitioning. I recall I saw a few MPs, including David Limbrick and Moira Deeming.
5. At the LWS Rally, there was an atmosphere of excitement. I observed that everyone's excitement was elevated once Ms Keen arrived. I was quite close to the front, near the microphone and speakers. Throughout the event, various attendees, including Mrs Deeming, came up and spoke. I knew of Moira beforehand. I knew that she was a new MP who spoke about and was passionate about women's rights. Prior to the LWS Rally, I had never heard any suggestion that she had a negative reputation, including a reputation for having hateful or fringe or extreme views.
6. Throughout the LWS Rally, I watched and listened to the speeches, many of which I found to be very moving, and I conversed with other attendees in between.
7. I observed that there were several other groups outside Parliament House (in addition to and distinct from the LWS Rally).
8. In particular, I recall:
 - (a) There were two groups of pro-trans protesters - one gathered on the north side of Spring Street who were carrying red flags and the other group gathered opposite the LWS Rally.
 - (b) There was a group of anti-lockdown or anti-vax protesters. I was aware at the time that this group regularly protested outside Parliament House and I had seen them before. I did not pay them much attention but recall they were mostly older men, dressed in black; they were generally somewhat dishevelled. I saw they had a banner, but I do not recall what it said.
 - (c) At some point during the course of the LWS Rally, seemingly out of the blue, a group of men in black marched past us down Spring Street (**the Men**). I remember being concerned for my own safety. I didn't know who they were but I assumed they were Antifa as I was aware that people dressed in black (identifying as Antifa) had previously disrupted Ms Keen's other events. I heard other women at the LWS Rally who were saying they thought the men were Antifa. At the time, it did not occur to me that the Men were affiliated with Nazism. I do not recall seeing them do a Nazi

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salute, and I do not recall seeing them wearing any Nazi insignia. Even if I had seen them salute, I would not have known whether they were real Nazis because they did not have an appearance that I associated with Nazism – for example, they were all in black, and wearing shorts, rather the sorts of clothes (such as brownshirts or Nazi-style coats, and boots) that I would associate with Nazis. They marched past us and disappeared down Spring Street. I had not seen the Men prior to this. At the time, I was unsure as to what precisely had occurred as I was focusing on the speakers who were part of the LWS Rally. I could see the speakers were struggling to speak against the ambient sound of the various other groups that were outside Parliament House. I recall people regularly tried to close in to try and hear the speakers better. Most of the LWS attendees were trying to focus in on the speakers.

9. I did not engage with any of the other groups there that day, and I did not observe anyone from the LWS Rally speak to or engage with any other protest groups either.
10. After the rally concluded, there was still a great feeling of excitement. I (and others who I spoke to at the LWS Rally) found it to be a good bonding experience as we were there to support each other and discuss sex-based rights. There was a sense of pride and accomplishment that the LWS Rally had proceeded and had been a success despite the large threatening counter protest presence. There was a feeling of pride in speaking, and not letting us be drowned out. The mood was very upbeat and excited. Overall, my impression was that people (including myself) left feeling it was a success.

After the LWS Rally

11. When the LWS Rally ended, I spoke to a few other attendees, and someone mentioned there was a social event scheduled to take place afterwards. I helped pack up and carry the equipment, mainly microphones and speaker equipment, to a garage near Little Collins Street. We eventually ended up at the Sheraton Hotel, where we had a few drinks and discussed the LWS Rally. Those who attended (including Ms Keen) were discussing the LWS Rally, and the speeches we heard, with a great sense of excitement. To my recollection, no one discussed the Men in any depth. I recall someone made one comment in passing to the effect of "*those guys in black, what was that about?*". At this point, no one suggested that they were Nazis or in any way affiliated with Nazism. There was a general sense of confusion about them.
12. At 7.41pm on 20 March 2023, I sent an email to members of the Victorian Parliamentary Liberal Party, a copy of which is annexed and marked **AD-1**. The email accords with my recollection of the LWS Rally.
13. I wrote the email because I felt that Mr Pesutto was telling lies or was extremely misinformed and mistaken about Mrs Deeming and about the LWS Rally. My

understanding was that Mr Pesutto was suggesting that Mrs Deeming had some association or connection with the Men who by that time were being reported in the press as 'Nazis'. As I myself had attended the LWS Rally, and knew the Men were unconnected with the LWS Rally, I felt compelled to raise this with Mr Pesutto and the Victorian Parliamentary Liberal Party given they were going to be voting on whether to expel Moira from the Victorian Parliamentary Liberal Party. I wanted them to understand the facts and what had really occurred. That is why I said in my email:

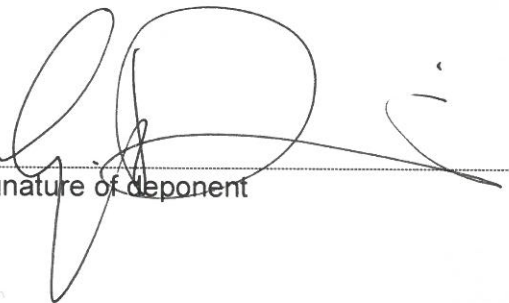
None of us had anything to do with the neo-Nazi group, the community group, or any of the other groups which showed up on the day. We were as shocked as anyone when they marched through. Yet claims are being made that the organisers, or Moira Deeming MP, were somehow connected with these Nazi elements. This is not true.

Moira is a courageous MP and human being. She stands up for the rights of women and girls, and for freedom of speech. If she is expelled [sic] from the party, because of lies and smears, I will not be voting for the Victorian Liberals in future.

- 14. I never received a reply to this email.
- 15. I have seen comments on social media directed at Moira that have suggested she is a Nazi or Nazi sympathiser.

Affirmed by the deponent
at Melbourne
in Victoria
on 22 July 2024
Before me:

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Signature of deponent



Signature of witness



Name and qualification of witness

JUSTICE OF THE PEACE FOR VICTORIA
Brian Waring

