

NOTICE OF FILING

Details of Filing

Document Lodged: Affidavit - Form 59 - Rule 29.02(1)
Court of Filing: FEDERAL COURT OF AUSTRALIA (FCA)
Date of Lodgment: 27/05/2024 2:57:25 PM AEST
Date Accepted for Filing: 27/05/2024 2:57:41 PM AEST
File Number: VID1023/2023
File Title: MOIRA DEEMING v JOHN PESUTTO
Registry: VICTORIA REGISTRY - FEDERAL COURT OF AUSTRALIA



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 Dayna Thompson

VID 1023 of 2023

Federal Court of Australia
District Registry: Victoria
Division: General

MOIRA DEEMING

Applicant

JOHN PESUTTO

Respondent

Affidavit of: **Dayna Thompson**

Address: [REDACTED]

Occupation: Accountant

Date: 27 May 2024

I, Dayna Thompson of [REDACTED], affirm:

- 1. I am an accountant with a construction company.

Meeting Moira

- 2. I first met Moira in about 2010. I met her through a Liberal Party program called "Future Leaders". This is a program run by the Victorian Liberal Party and is aimed at developing the leadership skills of the participants. I was taking part in the program, and I cannot recall whether Moira and/or her husband, Andrew, had already completed the program or were also taking part in the program at the time. I have since developed a close friendship with Moira. I see her very frequently, at least once a week. We often go for walks together and have dinner.
- 3. Upon meeting Moira, I found her to be very caring and kind. She was open and honest about her values. In the time I knew Moira prior to 19 March 2023, she always tried to

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OP

Simon BRAY
[REDACTED]

help the people in her life in any way she could. She was very positive and always thought the best of people. I am quite a cynical person; if I would say something like “*that person is dodgy*” or “*that person seems to be a bit fake*” or in any way suggest that a person may have more dubious intentions, Moira would always push back against this and give people the benefit of the doubt. She would assume the best in everyone until she was proven wrong.

4. The people who I mix with that know of Moira are from the broader Liberal Party. Before 19 March 2023, her reputation amongst those people was as someone who was very personable, honest and friendly.

Publications

5. I have been provided with a copy of Mr Pesutto's statements which I am informed are defined in the Statement of Claim as:
 - (a) the Media Release;
 - (b) the 3AW Interview;
 - (c) the ABC Interview;
 - (d) the Press Conference; and
 - (e) the Expulsion Motion and Dossier.
 (collectively, the **Publications**).

Damage to Moira's Reputation


6. I am friends with a lot of people who follow politics, particularly the activities of the Victorian Liberal Party. Since the Publications, I have seen several posts by friends on Facebook that were disparaging of Moira. For example, I recall seeing comments to the effect of “*the Liberal Party will not win government in Victoria whilst it has extremists like Moira Deeming in its ranks.*”
7. I am a member of a Liberal Party Facebook group called “*Web Warriors*”. This is a page in which members can share their views and opinions about Liberal Party matters. Following the Publications, I saw negative comments about Moira on this page which suggested that she ought to be expelled because she attended the Let Women Speak Rally on 18 March 2023 and had associated with Nazis.
8. I had not seen any comments of this nature about Moira, on any forum, before 19 March 2023.

Emotional Impact on Moira

9. I have spoken in person with Moira on numerous occasions since the Publications. She has told me that the Publications have been very upsetting for her and she has found dealing with the allegations to be very stressful.
10. She has also told me that, shortly after the Publications, she received numerous messages which were very nasty. She said to me that she couldn't believe that people who read the Publications would think that she is a Nazi or Nazi sympathiser. She has also said to me that she has become increasingly scared that people will see her and her family and associate them with the allegations, and as a result perceive them as Nazis or Nazi sympathisers.
11. She has told me that people within the Liberal Party have started treating her differently and are distancing themselves from her, which she has found to be upsetting. She has said to me she was particularly hurt by the fact that she had known many of these people for a long time.
12. I have observed through her tone of voice and through her general expressions that she was visibly upset when discussing the impact of the Publications with me. This has been ongoing since March last year.
13. Moira used to be very outgoing but since the Publications I have noticed she has become reclusive and quiet. Despite previously being very trusting of people, I have seen that she has started to become more cynical and less naturally trusting.
14. Since the Publications, I have observed that she looks like she has not been sleeping. For example, I have started to notice she has bags under her eyes. There has been a negative change in her mood since the Publications which is consistent with someone who is not getting enough sleep, and this has gotten worse over time. Moira has also told me she does not sleep, because she is stressed about the impact the Publications will have on her children.
15. Moira is someone who takes things to heart. She is deeply upset by her perception that Mr Pesutto has falsely labelled her as a Nazi. The stress and concern for her safety and the safety of her children and their future will always stay with her. I do not think she will ever be the way she was before the Publications.


Simon BRAY


Affirmed by the deponent
at Melbourne
in Victoria
on 27th May 2024
Before me:



Signature of deponent



Signature of witness

Simon BRAY

Name and qualif



Simon BRAY
