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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.

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MOIRA DEEMING v JOHN PESUTTO

ANNEXURE B to Applicant's Submissions

Extent of Publication

Media Release

[*In this section of the submissions, any line numbering used refers to the line numbering used on the version of the Media Release at CC:6 (Ex.A26).*]

1. The Media Release was:
 - a. sent by email at 8.42pm on 19 March 2023 (CC:330 (Ex.A159)) to 767 journalists and other persons: Statement of Agreed Facts (SOAF) at CD:2, p4 at [9(c)];
 - b. uploaded to Mr Pesutto's website (CA:6 (Ex.A26)) where it had approximately 28 unique views between 19 March 2023 and the date it was removed from that website: SOAF at CD:2, p4 at [9(a)]; and
 - c. uploaded to the website of the Victorian Liberal Party (CA:7 (Ex.A76)) where it had approximately 26 unique views between 19 March 2023 and the date it was removed from that website: SOAF at CD:2, p4 at [9(c)].
2. In addition, there were many mainstream media outlets which reported the sense and substance of, or referred to parts of the content of, the Media Release:

No.	Date and Time (first published)	Published By	Title of Publication	Reference in Annexure 4A of Mr Campey's second report (CB(2):4.1)	Parts of Media Release Published	CB Reference	Number of Views
1.	19 March 2023, 8.55pm	The Age (and Mr Campey's schedule states that it was republished under two other mastheads)	<i>Liberals move to expel Moira Deming over neo-Nazi rally links</i>	Fourth entry, p1 of 9	Quotes lines 3-4, summarises and quotes from lines 5-7, quotes lines 8-9, summarises lines 10-11, quotes lines 12-14	CB(2):6.14, p1	
2.	19 March 2023 at 9.56pm	The Herald Sun (and Mr Campey's schedule states that it was republished under nine other mastheads)	<i>Liberal MP Moira Deeming faces expulsion after neo-Nazi rally</i>	Sixth entry, p2 of 9	Quotes lines 1-10, summarises line 12, quotes lines 15-18	CB(2): 6.14, p6	Approximately 15,204 views: SOAF at CD:2, p5 at [10(c)]
3.	19 March 2023 at 9.58pm	The Canberra Times (and Mr Campey's schedule states that it was republished under 74 mastheads)	<i>Vic Liberal MP set for expulsion over anti-trans rally</i>	Fifth entry, pp1-2 of 9	Summarises lines 1-2 (including the words 'abomination' and 'affront'), quotes lines 3-4, summarises lines 5-7, summarises lines 8-9, quotes lines 10-15	CB(2): 6.14, p1	

4.	20 March 2023, 10.03am	Daily Mail Australia	<i>'Heil Hitler' salutes to be banned after cops bizarrely allowed a group of neo-Nazis to make one of the world's most reviled signs on the steps of parliament in broad daylight</i>	Seventh entry, p2 of 9	Summary of lines 1-2, summary of lines 5-6, summary of lines 8-9, quotes lines 10-11, quotes lines 13-14	CB(2): 6.14, pp16-21	Approximately 6,087 views: CB(2):11.2
5.	20 March 2023, 5.32pm	The Guardian	<i>Moira Deeming vows to fight expulsion push over involvement in protest attended by neo-Nazis</i>	Eighth entry, p3 of 9	Summary of lines 8-9 (including the word 'untenable'), quotes lines 5-7	CB(2): 6.14, p49	Approximately 73,158 views: SOAF at CD:2, p5 at [10(d)]
6.	20 March 2023	The Star Observer	<i>Liberal MP Moira Deeming Faces Expulsion For Attending Melbourne Anti-Trans Rally</i>	Ninth entry, p3 of 9	Summary of lines 1-2 (including the words 'abomination' and 'affront'), quotes lines 3-4, quotes lines 5-7, summarises and quotes lines 8-9, quotes lines 10-11, quotes lines 13-14	CB(2): 6.14, p57	
7.	20 March 2023	7News	<i>Liberal MP Moira Deeming set to be expelled over role in violent Melbourne anti-trans rally</i>	Tenth entry, p4 of 9	Summary of lines 1-2 (including the words 'abomination' and 'affront'), summary of lines 5-6, summary of lines 8-9 (including the word 'untenable'), quotes lines 10-11, quotes lines 13-14	CB(2): 6.14, p66	
8.	21 March 2023, 10.06pm	The Herald Sun (and Mr Campey's schedule states that it was republished under nine other mastheads)	<i>Libs vote as John Pesutto releases dossier on Liberal MP Moira Deeming following anti-trans rally</i>	Eleventh entry, p4 of 9	Quotes lines 1-11, summarises line 12, quotes lines 15-18	CB(2): 6.14, p71	Approximately 19,180 views: SOAF at CD:2, p5 at [10(e)]
9.	21 March 2023, 10.45am	News.com.au	<i>'Unsurprised': Dark truth behind ugly neo-Nazi protest</i>	Seventeenth entry, p6 of 9	Quotes lines 8-9 and 12-14	CB(2): 9.9	Approximately 10,484 unique views: CB(2):11.27
10.	21 March 2023, 11.30am	News.com.au	<i>Victorian Liberal MP could be expelled for attendance at Let Women Speak rally</i>	Eighteenth entry, p6 of 9	Quotes lines 8-9, summarises lines 10-11, quotes line 12, quotes lines 13-14	CB(2): 9.10	Approximately 81,186 unique views: CB(2):11.27
							TOTAL: 205,299

3. Further, there are in evidence the following tweets republishing the Media Release:

No.	Date and Time	Published By	Parts of Media Release Published	Exhibit	Number of Views
1.	8.44pm on 19 March 2023	Mitch Clarke (The Australian)	Lines 1-9	Ex.A260	15,300
2.	8.47pm on 19 March 2023	Lana Murphy (Nine News Melbourne)	Lines 5-11	Ex.A261	26,900
3.	8.48pm on 19 March 2023	Annika Smethurst (The Australian)	Whole	Ex.A262	248,000
4.	8.49pm on 19 March 2023	Sumeyya Ilanbey (The Age and Sydney Morning Herald)	Lines 1-9	Ex.A263	173,000
5.	9.13am on 19 March 2023	Sharnelle Vella (7 News Melbourne)	Whole	Ex.A286	37,700
6.	8.55pm on 19 March 2023	Simon Love (Sky News)	Whole	Ex.A264	6,393
7.	9.15pm on 19 March 2023	'DJT47'	Lines 1-11	Ex.A265	303
8.	9.23pm on 19 March 2023	'The Sage'	Lines 5-9	Ex.A266	34,400
9.	9.40pm on 19 March 2023	Richard Willingham (ABC News)	Whole	Ex.A267	11,200
					TOTAL: 533,196

3AW Interview

4. The 3AW Interview:

- was broadcast by 3AW radio at or about 8.55am on 20 March 2023 to an audience throughout the Melbourne RA1 licence area in Victoria; and
- was live streamed by 3AW radio at or about 8.55am on 20 March 2023 through, at least, the 3AW website (<http://www.3aw.com.au>): SOAF at CD:2, pp5-6 at [17].

5. In response to a Subpoena issued by the Applicant in these proceedings, Radio 3AW Melbourne Pty Ltd produced a GfK summary report of commercial radio survey results for Survey 2 in Melbourne, which shows, during the survey period (from Sunday 5 February 2023 to Saturday 25 February 2023 and Sunday 26 February 2023 to Saturday 1 April 2023) that the average audience of 3AW was 159,000 people for the 'Breakfast' time slot (between 5.30am and 9.00am) and 143,000 people for the 'Morning' time slot (between 9.00am and midday): CD:2, p6 at [19]. The GfK summary report is at CB(2):11.12. The relevant extract of the report is at p.3 of 5 and shows the following:

Average Audience (000's) by Session, P10+ [Potential: 4844]

Station	Mon-Fri 5:30am-12mn			Breakfast Mon-Fri 5:30am-9:00am			Morning Mon-Fri 9:00am-12:00md			Afternoon Mon-Fri 12:00md-4:00pm			Drive Mon-Fri 4:00pm-7:00pm			Evening Mon-Fri 7:00pm-12:00mn			Weekend Sat-Sun 5:30am-12mn		
	This	Last	+/-	This	Last	+/-	This	Last	+/-	This	Last	+/-	This	Last	+/-	This	Last	+/-	This	Last	+/-
SEN 1116am	13	11	2	18	17	1	17	10	7	15	11	4	14	12	2	5	6	-1	10	6	4
3AW	91	94	-3	159	171	-12	143	139	4	81	79	2	66	83	-17	34	34	0	66	67	-1
RSN 927	4	6	-2	10	7	3	5	6	-1	4	9	-5	1	5	-4	*	2	*	4	8	-4
Magic 1278	6	4	2	4	3	1	6	5	1	10	7	3	9	5	4	4	2	2	6	6	0
3MP 1377	9	8	1	5	5	0	15	13	2	16	16	0	10	10	0	1	1	0	6	7	-1
101.9 FOX FM	51	56	-5	78	74	4	59	79	-20	68	77	-9	57	60	-3	11	11	0	39	39	0
GOLD104.3	64	68	-4	83	86	-3	88	102	-14	93	96	-3	63	62	1	12	17	-5	48	55	-7
KIIS 101.1 FM	35	36	-1	54	54	0	40	45	-5	40	44	-4	47	43	4	9	8	1	28	30	-2
105.1 TRIPLE M	34	36	-2	39	39	0	44	49	-5	50	55	-5	41	38	3	7	8	-1	25	23	2
NOVA 100	35	39	-4	53	55	-2	42	48	-6	39	47	-8	46	52	-6	8	9	-1	30	31	-1
smoothfm 91.5	52	50	2	59	56	3	79	79	0	70	72	-2	52	47	5	15	14	1	44	43	1
ABC MEL	35	33	2	50	55	-5	59	51	8	34	30	4	35	30	5	12	11	1	24	24	0
3RN	13	12	1	22	19	3	11	13	-2	12	12	0	14	12	2	7	6	1	9	9	0
ABC NEWSRADIO	7	9	-2	15	19	-4	8	8	0	5	5	0	4	4	0	4	7	-3	6	8	-2
3UJ	20	19	1	30	27	3	25	32	-7	26	24	2	22	18	4	4	4	0	17	18	-1
ABC CLASSIC	7	6	1	11	8	3	9	9	0	7	6	1	7	8	-1	4	3	1	9	9	0
Total	545	552	-7	751	752	-1	744	768	-24	673	680	-7	570	565	5	163	173	-10	436	445	-9

6. In addition, the 3AW Interview was uploaded to the 3AW website on or around 20 March 2023 under the title “Liberals move to expel controversial MP over neo-Nazi rally links” (at URL <http://www.3aw.com.au/liberals-move-to-expel-controversial-mpover-neo-nazi-rallylinks/>) and there have been approximately 205 views of this article: SOAF at CD:2, p6 at [20].
7. Further, an article published by The Age on 20 March 2023 entitled ‘In the aftermath of a bitter protest, only one group is happy’ (the second entry in Annexure 5A to Mr Campey’s second report (CB(2):4.2)):
 - a. quotes lines 102-103 of the 3AW Interview (*‘I know Moira is not a Nazi. But my point is that she’s associating with people who are and that brings them into a place where it’s unacceptable for me as a leader’*);
 - b. reports: *‘Pesutto says Deeming was closely associated with Keen-Minshull, who, he alleged, had a “long rap sheet” of associating with Nazi sympathisers’* (which is a report of lines 17-20 of the 3AW Interview).

ABC Interview

Television

8. The ABC Interview was published by television broadcast on ABC Television at or about 9.39am on 20 March 2023 to viewers in Victoria, the Australian Capital Territory and the other States and Territories of Australia. The ABC Interview was part of the ABC News Breakfast episode on 20 March 2023, which had a combined audience of approximately 227,648 on ABC TV and ABC News: SOAF at CD:2, p6 at [29].

Streaming

9. The ABC Interview was also uploaded to and made available by streaming on ABC iView on 20 March 2023 as part of the ABC News Breakfast episode on 20 March 2023. The ABC News Breakfast episode on 20 March 2023 had an audience of 12,621 on ABC iView: SOAF at CD:2, p7 at [30].

Radio

10. The ABC Interview was also published by the ABC on radio. In response to a Subpoena issued by the Applicant in these proceedings, the ABC produced an Excel spreadsheet which shows that the average audience across every Monday during Surveys 2 and 3 in 2023 (Survey 2 being the periods from 5 February 2023 to 25 February 2023 and 26 February 2023 to 1 April 2023, and Survey 3 being the periods from 26 February 2023 to 1 April 2023 and 16 April 2023 to 20 May 2023) was 20,942 people: SOAF at CD:2, p7 at [31].

Online

11. The ABC Interview was uploaded on or around 20 March 2023 to the ABC website, including:
 - a. under the title ‘VIDEO: Victorian Opposition Leader moves to expel MP over anti-trans protest attended by neo-Nazis’; and
 - b. as part of an article titled ‘Victorian government moves to ban Nazi salute as Liberals move to expel MP Deeming over anti-trans rally’: SOAF at CD:2, p7 at [33].

12. There have been approximately 364 page views in Australia and approximately 31 page views outside of Australia of the article referred to in paragraph 11(a) above: SOAF at CD:2, p7 at [34(a)].

13. There have been approximately 134,954 page views in Australia and approximately 7,464 page views outside of Australia of the article referred to at 11(b) above: SOAF at CD:2, p7 at [34(b)].

14. In addition, mainstream media outlets have reported the sense and substance of, or referred to parts of the content of, the ABC Release – including the following:

No.	Date	Published By	Title of Publication	Reference in Annexure 6A of Mr Campey's second report (CB(2):4.3)	Parts of ABC Interview Published	CB Reference	Number of Views
1.	20 March 2023	ABC	<i>Liberal MP Moira Deeming says she will fight moves to oust her from party after attending Melbourne rally</i>	Third entry, pp1-2 of 3	Quotes lines 5-7 (that Mrs Deeming was 'actively involved in different ways in the organisation and promotion of this protest at which there were speakers with known links to neo-Nazis' and 'I won't have any of it'), quotes lines 10-12 ('These values that we saw on the steps of parliament were not consistent with the values I and the Liberal Party stand for'), summarises lines 39-41 (the article states: 'He said he did not tolerate any association with white supremacy')	CB(2):9.6	Approximately 96,874 page views in Australia and approximately 6,013 page views outside of Australia: CB(2):11.7
2.	20 March 2023	The Epoch Times	<i>Victorian MP to be Expelled for Attending Women's Rights Rally Against Transgenders in Sports</i>	Fourth entry, p2 of 3	Quotes lines 10-12 ('These values we saw displayed on the steps of parliament are not consistent with the values I and the Liberal Party stand for'), quotes line 20 ('We don't stand with neo-Nazis. We don't stand with white supremacists'), summarises lines 23-26 (the article states: 'Pesutto added that it was not up to him to decide whether Deeming's membership in the broader Liberal Party would be cancelled'), quotes lines 40-41 ('We will never tolerate or accept any association with neo-Nazis and white supremacists or anybody who sympathises with them')	CB(2):6.15, p1	
3.	20 March 2023	Politicom	<i>Lib MP punished for LGBTQ pushback</i>	Fifth entry, p2 of 3	Quotes lines 10-12 ('These values we saw displayed on the steps of parliament are not consistent with the values I and the Liberal Party stand for'), quotes	CB(2):6.15, p12	

					line 20 ('We don't stand with neo-Nazis. We don't stand with white supremacists'), summarises lines 23-26 (the article states: 'Pesutto added that it was not up to him to decide whether Deeming's membership in the broader Liberal Party would be cancelled'), quotes lines 40-41 ('We will never tolerate or accept any association with neo-Nazis and white supremacists or anybody who sympathises with them')		
4.	28 March 2023	Daily Mail Australia	<i>EXCLUSIVE: Inside the betrayal that drove Moira Deeming to fight for the protection of women's rights - and why the suspended MP will NEVER be silenced</i>	Sixth entry, p2 of 3	Quotes lines 4-7 ('Moira Deeming not only attended this protest on the steps of parliament, but was actively involved in different ways in the organisation and promotion of this protest at which there were speakers with known links to neo-Nazis' and 'I won't have any of it'), quotes lines 39-41 ('What I'm doing is a statement that we will not tolerate or ever accept any association with neo-Nazis and white supremacists or anybody who sympathises with them')	CB(2):6.15, p16	Approximately 9,678 views: SOAF at CD:2, p8 at [35(c)]
							TOTAL: 112,565

Press Conference

15. The Press Conference was live streamed and extracts of it appeared in the news (Ms Walton gave evidence she saw it on the news (T471.20-35).

16. There were:

- a. 194,224 views on 'SBS channel, linear broadcast TV';
- b. 4,239 views on 'SBS OnDemand (online) live stream'; and
- c. 1,822 viewers on 'Broadcast Video On Demand (BVOD) (SBS OnDemand)';

of an excerpt of the Press Conference on *SBS World News*: CB(2):11.5, pp2 and 8-9.

17. There were:

- a. 106 views on 'SBS Viceland channel';

- b. 41 views on ‘SBS OnDemand (online) live stream’; and
- c. 179 viewers on ‘BVOD (SBS OnDemand)’;

of an excerpt of the Press Conference on *SBS News in Mandarin*: CB(2):11.5, pp2 and 8-9.

18. In addition, the Press Conference was published at least on the following platforms:

- a. SBS News published an extract of the Press Conference on YouTube (at <https://www.youtube.com/watch?v=5JR-w4kUiGU>). This YouTube video is the ninth entry in Annexure 7A of Mr Campey’s report (at CB(2):4.4). There have been approximately 14,902 views of this video.
- b. 9News Melbourne live streamed the whole of the Press Conference on Facebook (at <http://www.facebook.com/9NewsMelbourne/videos/553565043370672/>). This Facebook post is the tenth entry in Annexure 7A of Mr Campey’s report (at CB(2):4.4). There have been approximately 8,800 views of this video.
- c. ‘S.P.A. by Shorey’ published the whole of the Press Conference on YouTube (at <https://www.youtube.com/watch?v=l7xa5XsANRE>). This YouTube video is the seventeenth entry in Annexure 7A of Mr Campey’s report (at CB(2):4.4). There have been approximately 152 views of this video.

19. In addition, mainstream media outlets have reported the sense and substance of, or referred to parts of the content of, the Press Conference – including the following:

No.	Date	Published By	Title of Publication	Reference in Annexure 7A of Mr Campey’s second report (CB(2):4.4)	Parts of Press Conference Published	CB Reference	Number of Views
1.	20 March 2023	Australian Financial Review	<i>Liberal MP’s position ‘untenable’ after Nazi rally</i>	First entry, p1 of 5	Quotes lines 17-19, quotes lines 64-67 (‘I’m not here to say that people can’t have different views. I’m here to say it will never be acceptable in this state of Victoria, as a member of the Liberal Party, to associate with anyone who is connected with or shared platforms with Nazis, white supremacists, ethno-nationalists, or whatever other odious agenda someone wishes to spout’), quotes line 130 (‘I can’t babysit every MP’), quotes line 334, quotes lines 404-405 (‘We need to take these strong, decisive steps to show that we will never support and that we will always oppose anything that is hateful or liable to incite’),	CB(2):6.16, p1-5	

2.	20 March 2023, 8.44pm	The Age	<i>Deeming vows to fight move to expel her from party room</i>	Second entry, p1 of 5	Quotes lines 404-405, summarises lines 38-44 and 72-76: 'Pesutto moved against Deeming for promoting the event and attending a post-rally karaoke night with the organiser, who, he argues, has shared platforms with white supremacists.' and 'Pesutto said Keen-Minshull had previously shared platforms with white supremacists', quotes lines 73-79, summarises lines 119-130: ('He said he was not aware of Deeming's promotion of the event until it took place, even though she had promoted it in parliament and on social media. She also addressed the rally on Saturday.')	CB(2):6.16 p6-10	
3.	20 March 2023	SBS News	<i>Victorian MP intends to fight expulsion as party leader 'satisfied' MP knew of rally's Nazi links</i>	Third entry, pp1-2 of 5	Summarises lines 38-44 ('Mr Pesutto said Ms Deeming's expulsion was necessary because of her association with organisers with links to extremists, including neo-Nazis and white supremacists.'), quotes lines 289-292, quotes lines 17-19 ('I will never, ever accept any member of the Parliamentary Liberal Party under my leadership ever associating with anybody who shares a platform with people who peddle hate, division and attack people for who they are.'), summaries lines 49-54 ('Mr Pesutto took umbrage with her decision to stay at the event when Nazi supporters showed up and celebrate afterwards with rally organisers, whom he said she led through the parliamentary precinct.'), summarises lines 137-139, and 144 ('Mr Pesutto said his advice was that no other Liberal MPs attended the rally but pledged to look into the matter.')	CB(2):6.16 p11-17	Approximately 2,495 total views on the 'SBS News site', 2,052 unique views on the 'Apple News app' and 3,020 total views on the 'Apple News app': CB(2):11.5, pp1 and 5-7
4.	20 March 2023	The Canberra Times	<i>Vic Lib leader 'satisfied' MP knew rally's Nazi links</i>	Fifth entry, p2 of 5	Summaries 289-290 and quotes lines 289-292 ('Victorian Liberal leader John Pesutto is satisfied outspoken MP Moira Deeming knew organisers of an anti-trans rally had established links to neo-Nazis'.; "I don't think it's open to me to be satisfied that Moira didn't know about their history," he told reporters on Monday. "It took us all of about 20 minutes or so after the rally on Saturday to investigate the histories of these people."'), summaries lines 49-54 ('Mr Pesutto took umbrage with her decision to stay at the event when Nazi	CB(2):6.16 p17-20	

					supporters showed up and celebrate afterwards with rally organisers, whom he said she led through the parliamentary precinct.’), quotes lines 17-19, summarises lines 137-139, and 144 (‘Mr Pesutto said his advice was that no other Liberal MPs attended the rally but pledged to look into the matter.’)		
5.	20 March 2023	The Guardian	<i>Moira Deeming vows to fight expulsion push over involvement in protest attended by neo-Nazis</i>	Sixth entry, p2 of 5	Quotes from lines 33-35, quotes lines 237-240 (“‘There wasn’t really any alternative but to do this, the reason being any question of an association, even indirectly, with Nazis, white supremacists, eco-fascists [sic] or whatever else is so odious in 2023 – as it should be – that I can’t see a way back,” he said.’), quotes lines 241-243 (“‘Under my leadership, we will never have anything to do with it, and more to the point, we will oppose it wherever we see it.’”), summaries lines 49-54 (‘Pesutto said Deeming escorted Keen through the parliament premises to the protest, attended the rally and did not leave when the neo-Nazi group arrived.’), quotes from lines 77-79 (“‘Thirdly, having seen the ugly scenes and having had an opportunity to disown and dissociate from those very people, Ms Deeming chose to celebrate, as evidenced on social media,” he said.’), summaries and quotes from lines 289-293 (‘Pesutto said it took his team about 20 minutes to investigate the organisers’ links to extremist groups, so he “can’t be satisfied” Deeming didn’t know about their associations.’), summarises lines 137-139 (‘He said he was not aware of any other Liberal MPs attending the event.’)	CB(2):6.16 p25-28	Approximately 73,158 views: CB(2):11.18
6.	20 March 2023	Sky News	<i>Victorian Liberal leader moves to expel MP Moira Deeming over alleged links to far right groups during heated anti-trans protest</i>	Eighth entry, p3 of 5	The article reported that: <i>‘In a press conference on Monday, Mr Pesutto blasted Ms Deeming for allegedly remaining at the rally after the pro-Nazi demonstrators arrived and for choosing to post Saturday night celebrations with people who promote far right views across her social media.</i> <i>Mr Pesutto said while he supported free speech and robust debate, any association with Nazi supporters</i>	CB(2):6.16 p39	

					<i>would not be tolerated under his leadership.'</i>			
7.	20 March 2023, 12.13pm (updated at 1.15pm)	The Age	<i>Deeming vows to fight 'unjust' move to expel her from Liberal Party</i>	Eleventh entry, p4 of 5	Contains a video excerpt of lines 4-31, summarises lines 119-127 ('He said he was not aware of Deeming's promotion of an anti-transgender rally until it took place on Saturday on the steps of the Victorian Parliament, where neo-Nazis gathered in support.'). quotes lines 73-77.	CB(2):9.14		
8.	24 March 2023	The Age	<i>Liberal MPs argue Deeming's expulsion would raise behaviour bar too high</i>	Fourteenth entry, p4 of 5	Contains a video excerpt of lines 4-31.	CB(2):9.17		
9.	25 March 2023	The Guardian	<i>The Moira Deeming question: Victorian Liberals are at war, but leader John Pesutto knows the party must change</i>	Fifteenth entry, p5 of 5	The article reports that: 'Pesutto told reporters it was not his job to "babysit MPs" and questioned why Deeming didn't leave when neo-Nazis showed up or why she decided to "celebrate" afterwards with organisers in a video posted on YouTube, during which they sipped champagne as they discussed the rally.', summarising and quoting lines 78-79 and 128-130, and quotes lines 299-300	CB(2):6.16 p40-47	Approximately 17,335 views: CB(2):11.21	
							TOTAL:	98,060

Expulsion Motion and Dossier

20. Mainstream media outlets have reported the sense and substance of, or referred to parts of the content of, the Expulsion Motion and Dossier – including the following:

No.	Date	Published By	Title of Publication	Reference in Annexure 8A of Mr Campey's second report (CB(2):4.5)	Parts of Press Conference Published	CB Reference	Number of Views
1.	21 March 2023, 9.29am (updated 8.30pm)	The Age (and Mr Campey's schedule states that it was republished under two other mastheads)	<i>Moira Deeming suffers blow in fight against expulsion from Liberals' party room</i>	First entry, p1 of 4	Whole. The article summarises the contents of the Expulsion Motion and Dossier, and contains a link to the whole document.	CB(2):6.17, p1 and CB(2):9.8	

2.	21 March 2023, 10.06 pm	The Herald Sun	<i>Libs vote as John Pesutto releases dossier on Liberal MP Moira Deeming following anti-trans rally</i>	Second entry, p1 of 4	Whole. The whole document is embedded within the article.	CB(2):6.17, p7	Approximately 19,180 views: SOAF at CD:2, p10 at [56(a)]
3.	21 March 2023, 4.00p m	The Guardian	<i>Bid to expel Moira Deeming deepens divide in Victorian Liberal party</i>	Fourth entry, p2 of 4	Part The article reports: <i>Meanwhile, Pesutto's letter of motion, addressed to Deeming, was publicly released on Tuesday morning, outlining the allegations she "conducted activities in a manner likely to bring discredit on the Parliament or the Parliamentary Party".</i> <i>He alleges Deeming attended the rally despite Keen being "known to be publicly associated with far right-wing extremist groups including neo-Nazi activist".</i> <i>A post-rally meeting with fellow attendees Keen, failed Liberal candidate Katherine Deves and organiser Angie Jones, was also raised by Pesutto.</i> <i>The document also highlights a tweet by Jones on Saturday, which read: "Nazis and women want to get rid of paedo filth, why don't you?"</i> ... <i>Attached to the letter, which was co-signed by senior Liberals David Southwick, Georgie Crozier and Matthew Bach, is a 15-page dossier of "evidence" supporting the allegation.</i> <i>It includes screenshots of a YouTube video of Deeming, escorting Keen to the front steps of parliament via the car park.</i> <i>Also included in the dossier are interviews Keen conducted with far-right networks and a screenshot of Keen using a Barbie doll wearing a Nazi uniform as her profile picture on the social media site Spinster.</i>	CB(2)6.18, p1	Approximately 27,856 views: SOAF at CD:2, p10 at [56(b)]

					<i>In the letter, Pesutto writes that Deeming will be “given an opportunity to explain [her] conduct” before the vote.</i>		
4.	21 March 2023, 7.04pm	9News	<i>Victorian Liberals to push forward with motion to expel MP Moira Deeming</i>	Fifth entry, p2 of 4	Part The article reports: <i>Leader John Pesutto's motion, which was publicly released this morning, seeks to expel Deeming from the parliamentary party room for organising, promoting and attending an anti-trans rights rally headlined by an activist "known to be publicly associated with far-right extremist groups".</i> ... <i>The motion also says Deeming's expulsion is being sought because she met with and published a video with Keen-Minshull, former NSW Liberal candidate Katherine Deeves, and activist Angie Jones after the rally.</i> <i>"Angie Jones on that day posted on Twitter words that, in the mind of any reasonable and lay observer, made association with Nazis including on 4.41pm by posting the words 'Nazis and women want to get rid of paedo filth. Why don't you,'" the motion reads in part.</i>	CB(2):6.18, p9	
5.	22 March 2023, 5.57am	The Australian	<i>Victorian Liberal leader John Pesutto's bid to expel anti-trans MP Moira Deeming splits Libs</i>	Third entry, pp1-2 of 4	Whole. The article summarises the contents of the Expulsion Motion and Dossier, and contains a link to the whole document.	CB(2):6.17, p8	Approximately 26,043 views: SOAF at CD:2, p11 at [56(f)]
6.	22 March 2023, 8.03pm	The Age (and Mr Campey's schedule states that it was republished under two other mastheads)	<i>Liberals fight for Deeming reprieve as anti-trans rights saga splits party</i>	Sixth entry, pp2-3 of 4	Part The article reports: <i>Pesutto's motion seeks to expel Deeming from the parliamentary party for her involvement in Saturday's anti-trans rights rally headlined by an activist who Pesutto says is "known to be publicly associated with far-right extremist groups".</i> <i>He also said she needed to be expelled over her post-rally meeting with British anti-transgender rights campaigner Kellie-Jay Keen-Minshull, Katherine Deves – a former</i>	CB(2):6.18, p15	

					<i>federal Liberal candidate who attracted fierce criticism for her views on trans women taking part in women's sport – and Melbourne anti-trans activist Angie Jones, who on Sunday tweeted: "Nazis and women want to get rid of paedo filth, why don't you?"</i>		
7.	26 March 2023, 7.30pm (updated on 27 March 2023)	The Age (and Mr Campey's schedule states that it was republished under two other mastheads)	<i>Deeming expulsion vote looks set to pass in key test for Pesutto</i>	Eighth entry, p3 of 4	Whole The whole document is embedded within the article.	CB(2):6.18, p21	
8.	27 March 2023, 10.11 pm	The Australian	<i>'Consequences': Victorian Liberal MP Moira Deeming may still be expelled</i>	Seventh entry, p3 of 4	Part The article reports: <i>Mr Pesutto last week released a 15-page letter he sent to Ms Deeming explaining why she should be dumped from the party, alleging she associated with people who expressed far-right views and shared a platform with an activist he claims advocated for a "white ethno state".</i> <i>Mr Pesutto said Ms Deeming shared a platform with Mrs Keen even though, he says, Mrs Keen "was known to be publicly associated with far-right extremist groups including neo-Nazi activists".</i>	CB(2):9.18	Approximately 42,908 views: CB(2): 11.23
							TOTAL: 115,987