

NOTICE OF FILING

Details 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 Renee Simone Gorman

VID 1023 of 2023

Federal Court of Australia
District Registry: Victoria
Division: General

MOIRA DEEMING

Applicant

JOHN PESUTTO

Respondent

Affidavit of: **Renee Simone Gorman**

Address: [REDACTED]

Occupation: Electoral Officer

Date: 24 May 2024

I, Renee Simone Gorman of [REDACTED], say on oath:

Background

1. I work part time for Moira as an electoral officer. I manage the social media relating to Moira's parliamentary work, and general media relating to Moira. I also work on various aspects of graphic design associated with Moira's office and provide general advice on media strategies. I started this role on 24 February 2023 after Moira personally reached out to me following her election to the Upper House in the Victorian Parliament.
2. Prior to working as an electoral officer, I was a graphic designer and communications manager at an engineering firm. Before that, I worked for the Institute for Public Affairs (IPA), specifically as a manager of the Generation Liberty program (GLP), a project aimed at creating forums for university students to discuss political ideas.

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

Meeting Moira

3. I met Moira in February 2019 at the ABC studio in Melbourne during the filming of the ABC program “Q and A”. We were introduced through a mutual friend that evening. We got along well on a personal level and found that we agreed on many political issues and shared mutual interests.
4. Over the next several years, we would see each other regularly every few months, particularly at political events such as the Conservative Political Action Conference Australia (**CPAC**), a conference for conservative speakers, with social elements between speeches that encourages networking and communication between likeminded people. We developed a close relationship and she even arranged for me to speak at a Liberal Party fundraiser in 2019.

Moira’s Reputation (Prior to 19 March 2023)

5. Moira was well known within my circle of friends and colleagues who were politically active. She often attended political conferences such as CPAC and functions organised by the IPA.
6. Before 19 March 2023, within these circles, Moira had a reputation for being knowledgeable, kind and generous. She was known as someone who was very giving of her time; wanted to help others; and stood by her principles. She was seen as someone who never did or said anything simply because it was beneficial or advantageous to her interests. Rather, she always acted in a manner that was consistent with her values and because she was passionate about the issue.
7. Before 19 March 2023, in the circles that I mixed, I noticed that, even amongst people who belonged to different political backgrounds who were in deep disagreement on numerous issues, all held her in high esteem. They, like myself, were drawn to her skills as a public speaker; they saw her as a talented and captivating speaker. They would remark to me immediately or shortly after seeing her speak at conferences and political fundraisers or events that she was articulate, charismatic and clearly supported her arguments with extensive research.
8. We both have mutual friends and acquaintances within the Young Liberal Movement of Australia, the youth wing of the Liberal Party (**Young Liberals**). Within the Young Liberals, before 19 March 2023 amongst the people I mixed, Moira had a reputation for being an exciting Liberal Party prospect who was passionate and acted with integrity. I recall many young women within the Young Liberals expressed to me their excitement that Moira was preselected and ultimately elected to the Upper House in Victoria. Many people within the Young Liberals were excited by Moira’s entry into politics and they were optimistic that she would have a meaningful impact in Victorian politics by voicing their

concerns in Parliament. Many within the Young Liberals had recently graduated from high school and were disappointed and disillusioned by the education system in Victoria; they were hopeful that Moira would raise awareness and address this issue in Parliament by proposing sound legislative and regulatory amendments to improve Victorian schooling. My friends in the Young Liberals who knew I had a personal and professional relationship with Moira expressed interest in getting into contact with her so that she could attend and speak at Young Liberal events on university campuses in Victoria.

9. Before 19 March 2023, amongst people in the political research circles I mixed, Moira had a reputation for being highly knowledgeable and for extensively researching topics before forming and expressing an opinion on them.
10. In 2019, Moira published an article in the IPA Review, a quarterly magazine. By publishing this article, Moira formed a number of professional relationships with IPA contributors, editors and staff (including those within the GLP). Many of the people associated with the GLP were excited by the prospects of Moira entering Parliament and remarked that she was passionate about improving the lives of Victorians and that she was a person of integrity. Within the IPA and GLP, people were excited about her entering politics. After meeting her in person, they would say to me that they thought that she was a person of integrity and that they could see that she would always engage in extensive research before expressing her opinion on a given subject, which they believed she would continue to do as an elected Member of Parliament.
11. Within the broader Liberal Party, amongst the people I mixed before 19 March 2023, Moira had a reputation for being an exciting young candidate who had great potential to become a major voice within the Liberal Party. Both Moira and I have mutual relationships with current and former Liberal Party Senators, including former Senator Amanda Stoker and Senator Jacinta Price. Both Ms Stoker and Senator Price always spoke very highly of Moira and held her in high esteem even before she was elected to the Victorian Legislative Council. Before 19 March 2023, they would tell me that Moira had great potential to be a successful member in the Upper House, and that she would be a major contributor to any successes of the Liberal Party in Victoria. They would describe her as a rising star within the Liberal Party and that she was doing “*great things*” as an elected official.

The Publications

12. I have been provided with a copy of Mr Pesutto’s publications about Moira in March 2023 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**)

13. Our office uses a software entitled “*Isentia*”. I understand that *Isentia* is a media monitoring tool. It is set up in our office to collect media data regarding Moira. Part of my role as an electoral officer is to use *Isentia* to monitor media about Moira. I recall the *Isentia* records on the days immediately following the Publications were substantially more voluminous than usual. [REDACTED]
[REDACTED] Prior to 19 March 2023, the *Isentia* reports were significantly less voluminous and modest in their reporting on Moira.

Impact of the Publications

Damage to her reputation

14. I recall that, shortly after the Publications, the voice message machine on Moira’s office phone, her publicly listed email inbox, and her social media accounts on Facebook and X were full of aggressive and hateful messages.
15. I did not extensively read the emails or listen to the voice messages, but I recall hearing some voice messages, in which the speakers said words to the following effect:
- (a) “*Is this the Nazi recruitment office?*”;
 - (b) Moira has made the Victorian Liberal Party irrelevant; and
 - (c) Moira was “disgusting” for associating with Nazis.
16. One of my colleagues in Moira’s office read out aloud a few of the emails that were received shortly after the Publications. I do not recall precisely the contents of these emails, but I remember thinking they were very nasty. My recollection is that the emails were accusing Moira of being a hateful bigot and that she (and the others who attended the Let Women Speak Rally on 18 March 2023) were obviously connected to and supported by the men who performed the Nazi salute on the steps of Parliament.
17. I reviewed social media about Moira following the Publications, including both public posts and private messages that were sent to Moira’s Facebook and X accounts. I saw a lot of social media material that was associating Moira with Nazis. For example, I specifically recall seeing a post on X or Facebook that stated words to the effect of “*I’m glad you have shown your true colours. TERFS and Nazis are the same, both are hateful groups*”.

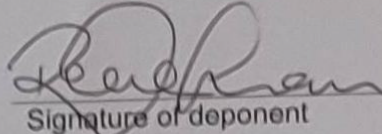
18. I recall that, shortly after the Publications, my dad contacted me to ask about the allegations Mr Pesutto was making about Moira. He said to me that, by attending a rally with Nazis, Moira had created "*such a mess*" and that she was "*making international news*" as a result. I tried to explain to him that Moira is not a Nazi or Nazi-sympathiser and has never been aligned with Nazis or Nazi-sympathisers. He said to me words to the effect of: "*Well, the Nazi connection has been made, but I'll have to take your word for it*". I could hear in his voice throughout the conversation that he was sceptical about my claims that Moira was not a Nazi or a Nazi-sympathiser. He said he was concerned that I was working with someone who had such controversy surrounding her. He was concerned that the Nazi allegations would subsequently be attached to my name and consequently damage my career and reputation.
19. Similarly, my friends and acquaintances at the Young Liberals did not want to express any public support for Moira after the Publications as they were concerned about being seen as associating with a Nazi sympathiser. The office stopped getting inquiries from the Young Liberals inviting Moira to appear at campus events.

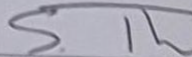
Moira's reaction

20. I have noticed that the Publications have had a significant impact on Moira emotionally. I have observed that she has become less communicative and much quieter than usual. It is as if she has retreated within herself. Moira was previously very present in the office and enjoyed working alongside her team. In the immediate days and weeks following the Publications, I noticed that Moira would only come in if she absolutely had to, for example, if it was a Legislative Council sitting day.
21. Moira has been visibly stressed since the Publications and the turmoil of being accused of being associated with Nazis has been intolerable for her.
22. I have observed that when discussing the Publications with me, Moira does not seem like herself; she sounds anxious and forgetful and she does not finish her sentences when speaking to me about them. More generally, I have observed that since the Publications, Moira would frequently look at me with glazed eyes, as though she was distracted or preoccupied by her thoughts, and I would need to bring her back to reality.
23. Physically, she has not looked like her normal self - her hair has not been as neat and perfect as it previously was and sometimes her makeup has not been applied properly. She often looks frazzled.
24. To my observation since the Publications, Moira has lost her spark and is a shell of her normal self.

25. Moira was extremely distressed by the allegations in the Publications, and was particularly upset by the fact that she was being accused of associating with Nazis. She told me that she felt that Mr Pesutto and the Leadership Team of the Parliamentary Liberal Party were unduly harsh towards her immediately after the Let Women Speak Rally. She specifically mentioned that she did not have (nor was offered to bring) a support person to her initial meetings with the Leadership Team on 19 March 2023.
26. Moira has been upset further by the subsequent media which reported on the Publications. She said this has painted her in a negative light. She said to me that she did not feel supported by Mr Pesutto or the Leadership Team. She said to me that if they had done their research properly they would have seen that the men who performed the Nazi salute on the steps of Parliament were not associated with her or any of the speakers at the Let Women Speak Rally. She thought that, if Mr Pesutto and the Leadership Team had shown more support for her, the subsequent media would have been less accusatory and aggressive towards her. She said she was deeply hurt by the fact that her own Leader was suggesting she had associated with Nazis.
27. Moira told me about an incident when the media turned up to her doorstep shortly after the Publications. She told me that her greatest concern about this incident was that the accusations against her, made by Mr Pesutto, did not simply affect her, but that her children were also put in the line of fire. She felt threatened and has expressed deep concern about how the Publications will impact her children immediately and in the long term. She has said that because her children share her last name, she did not want the allegations against her to follow her children and overshadow or prevent their employability in the future. She was scared that they would be identified in the media and also be labelled as Nazis for simply being her children. She said that she needed to clear her name so that this would not happen. She has told me that if her children were not homeschooled, she would likely have had to take them out from school out of fear of what would be said about them by other children or their parents. She said to me that, as a result, she has become increasingly stressed about the privacy and safety of her family. She has said to me that she is dedicated to clearing her name and her children's names.
28. I have observed that Moira's personality has changed so much as a result of the Publications. I am extremely worried about her ongoing health.

Sworn by the deponent
at Geelong
in Victoria
on 24 May 2024
Before me:

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) 
) _____
) Signature of deponent
)



Signature of witness

Name and qualification of witness

SHARON THOMPSON JP
C/O HONORARY JUSTICE SERVICES SUPPORT


S.T.H.
24-5-2024