

NOTICE OF FILING

Details of Filing

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Registry: NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA

Registrar

Important Information

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Form 17

Rule 8.05(1)(a)

STATEMENT OF CLAIM

No. _____ of 2023

Federal Court of Australia
District Registry: New South Wales
Division: General

ALEXANDER HART GREENWICH
Applicant

MARK WILLIAM LATHAM
Respondent

RELIEF CLAIMED

- 1 Damages, including aggravated damages.
- 2 An injunction to permanently restrain the respondent either by himself or his servants or agents from further publishing the matters complained of pleaded herein or any other matter giving rise to the imputations pleaded in paragraphs 15, 16, 24 and 25 below (or imputations not different in substance).
- 3 Costs.
- 4 Interest pursuant to ss 51A and 52 of the *Federal Court of Australia Act 1976* (Cth).
- 5 Such further or other order that the Court deems fit.

Filed on behalf of (name & role of party) Alexander Greenwich, Applicant
Prepared by (name of person/lawyer) Nicholas Stewart, Lawyer
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(include state and postcode)

APPLICANT

- 6 The applicant (**Mr Greenwich**) is and was:
- 6.1 a well-known Australian politician who is openly homosexual;
 - 6.2 an independent elected member of the NSW Parliament for the electoral district of Sydney, who has held that position for almost 11 years;
 - 6.3 an advocate for his constituents in Sydney, and others including the lesbian, gay, bisexual, transgender, queer/questioning, intersex, asexual (**LGBTQIA+**) community, families with children, women, people who are homeless, people in late stages of advanced disease seeking assisted dying, people with disabilities and First Nations people; and
 - 6.4 the former convenor and co-chair of Australian Marriage Equality, the not-for-profit organisation that led the campaign for same sex marriage in Australia, which Mr Greenwich led for 10 years until the achievement of same sex marriage in Australia.

RESPONDENT

- 7 The respondent (**Mr Latham**) is and was:
- 7.1 a well-known Australian politician;
 - 7.2 the former leader of the Federal Australian Labor Party and Federal Opposition;
 - 7.3 a member of the NSW Legislative Council since 2019;
 - 7.4 the leader of the One Nation Party, in NSW, since 2018;
 - 7.5 the operator of, and publisher of the content on, an account on the Twitter platform with the handle “@RealMarkLatham” (**Mr Latham’s Twitter account**), which at the date of this pleading was followed by over 66,800 Twitter users;

7.6 the operator of, and publisher of the content on, an account page on the Facebook platform known as “Mark Latham’s Outsiders” (**Mr Latham’s Facebook account**), which at the date of this pleading was followed by over 136,000 Facebook users, and which contains:

- (a) Facebook posts of Mr Latham published in the first person;
- (b) a profile photograph of Mr Latham;
- (c) a cover photograph of Mr Latham with the text, “*Mark Latham NSW Legislative Council One Nation NSW*”; and
- (d) an “Intro” description containing the text, “*Member of the NSW Legislative Council*”, and

7.7 the operator of, and publisher of the content on, an account page on the Instagram platform with the handle “@MarkLathamsOutsiders” (**Mr Latham’s Instagram account**), which at the date of this pleading was followed by over 12,400 Instagram users and which contains:

- (a) a profile photograph of Mr Latham’s book, *Take Back Australia*;
- (b) a display name with the text, “*Mark Latham NSW MLC*”; and
- (c) various photographs of Mr Latham, including ‘selfies’ of Mr Latham.

FIRST MATTER COMPLAINED OF – PRIMARY TWEET

8 On about 22 March 2023, a Twitter user, Susan Metcalfe, posted a Tweet (the **Metcalfe Tweet**) which:

8.1 linked to an article in the *Sydney Morning Herald* headed “Video shows LGBTQ protesters pleading for help outside Mark Latham event”, with a thumbnail photograph showing police officers amidst a crowd of people; and

8.2 contained the text:

“Mark Latham is a disgusting human being and people who are considering voting for One Nation need to realise they are voting for an extremely hateful and dangerous individual who risks causing a great deal of damage to our state’ – Alex Greenwich”.

9 At about 10.13am on or about 30 March 2023, Mr Latham posted via Mr Latham’s Twitter account, and thereby made available for publication, a comment on the Metcalfe Tweet as follows (the **Primary Tweet**):

“Disgusting? How does that compare with sticking your dick up a bloke's arse and covering it with shit?”

10 A copy of the Primary Tweet as it appeared on Mr Latham’s Twitter account is contained in **Schedule A**.

Primary Tweet – Publication

11 The Primary Tweet was immediately accessible to Mr Latham’s Twitter followers, which at the time of publication was about 66,700 followers.

12 At about 2.00pm on 30 March 2023, the Primary Tweet was deleted.

13 Prior to its deletion, the Primary Tweet was commented on, retweeted and seen by at least 6,171 people on Twitter, from which it can be inferred that Mr Latham published the Primary Tweet to at least 6,171 persons in the Australian Capital Territory and in the other States and Territories of Australia.

Primary Tweet – Identification

14 The Primary Tweet was of and concerning Mr Greenwich.

Particulars

The Primary Tweet was posted as a comment on the Metcalfe Tweet, which identified Mr Greenwich by name.

Primary Tweet – Imputations

15 In its natural and ordinary meaning, the Primary Tweet was defamatory of Mr Greenwich and carried the following defamatory imputation, or imputations not different in substance:

15.1 *Mr Greenwich engages in disgusting sexual activities.*

16 Further or in the alternative to paragraph 15 above, the Primary Tweet, together with the aid of the extrinsic facts particularised below, was defamatory of Mr Greenwich and was understood to convey the following imputation by way of true innuendo to persons who were aware of those facts, namely:

16.1 *Mr Greenwich is not a fit and proper person to be a member of the NSW Parliament because he engages in disgusting sexual activities.*

Particular of Extrinsic Facts

The extrinsic facts for the purpose of paragraph 16 above are:

- (a) the Metcalfe Tweet; and
- (b) that Mr Greenwich is a member of the NSW Parliament.

17 Mr Greenwich relies on the whole of the Primary Tweet in support of the pleaded imputations in paragraphs 15 and 16 above.

THE SECOND MATTER COMPLAINED OF – DT QUOTES

18 On or about 1 April 2023, Mr Latham made and thereby published the following statements to a journalist or other representative of the *Saturday Telegraph* (the **DT Quotes**):

“Sometimes in public life when you throw out insults they come back at you harder and truer...So boo-hoo Alex Greenwich.”

...

“When he calls someone a disgusting human being for attending a meeting in a church hall, maybe attention will turn to some of his habits.”

...

“Greenwich goes into schools talking to kids about being gay. I didn’t want to be accused of anything similar, leaving that kind of content on my socials.”

- 19 On or about 1 April 2023, the DT Quotes were republished on www.dailytelegraph.com.au in an article titled, ‘*Boo-hoo’: Latham doubles down after homophobic tweet outcry*’ (the **DT Article**), which as at the date of this pleading is accessible at:

<https://www.dailytelegraph.com.au/news/nsw/mark-latham-doubles-down-after-outcry-over-his-homophobic-tweet/news-story/ee6d5e4b80ff9308c2a75e20ef93af6>.

- 20 Mr Latham knew and intended that the DT Quotes would be republished; alternatively it was a natural and probable consequence of the publication of the DT Quotes that they would be republished, and accordingly Mr Latham is responsible for the republication of the DT Quotes in the DT Article.

DT Quotes – Publication

- 21 The DT Article is reproduced in **Schedule B** and the DT Quotes are contained in paragraphs 9, 10, 11 and 12 of the DT Article.
- 22 The DT Article was downloaded and read by, and thereby the DT Quotes were republished by Mr Latham to, persons in the Australian Capital Territory and each other State and Territory of Australia.

DT Quotes – Identification

- 23 The DT Quotes were of and concerning Mr Greenwich.

DT Quotes – Imputations

24 In their natural and ordinary meaning, the DT Quotes were defamatory of Mr Greenwich and carried the following defamatory imputation, or imputations not different in substance:

24.1 Mr Greenwich is a disgusting human being who goes to schools to groom children to become homosexual.

25 Further or in the alternative to paragraph 24 above, the DT Quotes, together with the aid of the extrinsic fact particularised below, were defamatory of Mr Greenwich and were understood to convey the following imputation by way of true innuendo to persons who were aware of that fact:

25.1 Mr Greenwich is not a fit and proper person to be a member of the NSW Parliament because he goes to schools to groom children to become homosexual.

Particular of Extrinsic Fact

The extrinsic fact for the purpose of paragraph 25 above is that Mr Greenwich is a member of the NSW Parliament.

26 Mr Greenwich relies on the whole of the DT Quotes and the context of the whole of the DT Article in support of the pleaded imputations in paragraphs 24 and 25 above.

DAMAGE

27 By reason of the publication of the Primary Tweet and the publication and republication of the DT Quotes (collectively, the **matters complained of**) Mr Greenwich has been exposed to hatred, contempt and ridicule, and has been gravely injured in his personal and professional reputation, and has suffered and will continue to suffer hurt, distress and embarrassment.

28 Mr Greenwich relies on the grapevine effect of each of the matters complained of, including because of the republication of the matters complained of, and the

substantial discussion of them on social media and in the news media, as set out in the particulars to paragraph 30 below.

- 29 Further particulars of the extent of publication and republication of the matters complained of will be provided after admissions in accordance with the Defamation Practice Note.

SERIOUS HARM

- 30 The publication of the matters complained of has caused, or is likely to cause, serious harm to Mr Greenwich's reputation by reason of the following facts and matters:

- 30.1 the extent of publication of the matters complained of, and republications of the matters complained of, including in news media and on social media, and the grapevine effect;
- 30.2 the seriousness of the imputations carried by the matters complained of;
- 30.3 the demeaning language used in the matters complained of in connection with Mr Greenwich's sexuality and assumed sexual conduct; and
- 30.4 hateful conduct by members of the public following and as a result of the publication of the matters complained of, including social media reactions, threats, repeated jibes, hatred, homophobic comments and contempt and ridicule through emails, letters and voicemails to his electorate office.

Particulars

- (a) As a natural and probable consequence of the publication of the Primary Tweet, the Primary Tweet was reported on by the news media, including (the **Primary Tweet Reports**):

- i. *The Guardian Australia*, authored by Tamsin Rose and published 30 March 2023 at 5:58pm AEDT, with the headline, “*Pauline Hanson calls on Mark Latham to apologise for ‘disgusting’ homophobic tweet*”, accessible at:

<https://www.theguardian.com/australia-news/2023/mar/30/one-nation-mp-mark-latham-chastised-for-homophobic-tweet-that-left-labor-minister-physically-sickened>

- ii. *news.com.au*, authored by Eli Green and published 1 April 2023 at 7:36am, with the headline, “*NSW One Nation leader breaks silence after homophobic tweet to Gay MP*”, accessible at:

<https://www.news.com.au/finance/work/leaders/one-nation-mp-mark-latham-slammed-over-homophobic-tweet/news-story/a3998315ba0d0c060e12acb99a0e9655>

- iii. *Nine News*, authored by Daniel Jeffrey and published on 30 March 2023 at 6:59pm, with the headline, “*One Nation NSW leader Mark Latham blasted for ‘disgusting’ homophobic tweet*”, accessible at:

<https://www.9news.com.au/national/mark-latham-one-nation-homophobic-tweet-alex-greenwich-pauline-hanson-criticism/eef555a3-6e0d-49e4-9a63-98df08582d4a>

- iv. *ABC News*, authored by Paige Cockburn and published 30 March 2023 at 5:44pm and updated 30 March 2023 at 5:56pm, with the headline, “*One Nation NSW leader Mark Latham under fire for graphic tweet directed at Alex Greenwich*”, accessible at:

<https://www.abc.net.au/news/2023-03-30/mark-latham-under-fire-alex-greenwich-offensive-tweet/102166530>

- v. *Special Broadcasting Service* (republishing AAP content), published on 30 March 2023 at 5:54pm AEST and updated 31 March 2023 6:51am AEST, with the headline, “*‘Disgusting’: Pauline Hanson rebukes Mark Latham for homophobic tweet to fellow MP*”, accessible:

<https://www.sbs.com.au/news/article/disgusting-pauline-hanson-rebukes-mark-latham-for-homophobic-tweet-to-fellow-mp/5tby5plsb>

- vi. *Daily Mail Australia*, authored by Jesse Hyland, published on 30 March 2023 at 1:50pm AEST and updated on 30 March 2023 at 6:46pm AEST, with the headline, “*The ‘appalling’ Mark Latham tweet directed at a rival who called him a ‘disgusting human being’ - and it’s shocked the political world*”, accessible at:

<https://www.dailymail.co.uk/news/article-11918047/Mark-Lathams-homophobic-tweet-gay-politician-Alex-Greenwich.html>

- vii. *Crikey*, authored by John Buckley, published on 31 March 2023 at an undisclosed time, with the headline, “*‘Disgusting’ Mark Latham tweet draws condemnation from all corners of politics*”, accessible at:

<https://www.crikey.com.au/2023/03/31/mark-latham-tweet-alex-greenwich/>

- viii. *Shepparton News* (republishing AAP content), published on 30 March 2023 at an unknown time, with the headline, “*Mark Latham slammed for homophobic tweet at fellow MP*”, accessible at:

<https://www.sheppnews.com.au/national/mark-latham-slammed-for-homophobic-tweet-at-fellow-mp-2/>

- ix. *Riverine Herald* (republishing AAP content), published on 30 March 2023 at an unknown time, with the headline, “*Mark Latham slammed for homophobic tweet at fellow MP*”, accessible at:

<https://www.riverineherald.com.au/national/mark-latham-slammed-for-homophobic-tweet-at-fellow-mp-2/>

- x. *Sky News*, authored by Patrick Hannaford, published 30 March 2023 at 9:00pm, with the headline, “*Andrew Bolt has unleashed on Mark Latham ‘disgusting and depraved’ homophobic tweet targeting NSW MP Alex Greenwich*”, accessible at:

<https://www.skynews.com.au/australia-news/politics/andrew-bolt-has-unleashed-on-mark-latham-disgusting-and-dedepraved-homophobic-tweet-targeting-nsw-mp-alex-greenwich/news-story/716b9c3f35adde9c42549cacb66a43b7>

- xi. *The West Australian*, authored by Farid Farid and Jacob Shteyman from AAP, published 30 March 2023 at 5:12pm, with the headline, “*Pauline Hanson slams Mark Latham for homophobic tweet*”, accessible at:

<https://thewest.com.au/politics/mark-latham-slammed-for-homophobic-tweet-at-fellow-mp-c-10202620>

- xii. *Canberra Times*, authored by Phoebe Loomes, published on 31 March 2023 at 2:38pm and updated on 31 March at 2:43pm, with the headline, “*Premier slams ‘vile, shameful’ homophobic Latham tweet*”, accessible at:

<https://www.canberratimes.com.au/story/8142782/premier-slams-vile-shameful-homophobic-latham-tweet/>

- xiii. *Australian Racing Greyhound*, authored by Josh Spasaro, published 31 March 2023 at 2:38pm, with the headline, “*Will greyhound fans support Mark Latham after vile tweet?*”, accessible at:

<https://australianracinggreyhound.com/news/will-greyhound-fans-support-mark-latham-after-vile-tweet/128785/>

- xiv. *Countrynews.com.au* (republishing AAP content), published on 30 March 2023 at an unknown time, with the headline “*Mark Latham slammed for homophobic tweet at fellow MP*”, accessible at:

<https://www.countrynews.com.au/national/mark-latham-slammed-for-homophobic-tweet-at-fellow-mp/>

- xv. *Port Stephens Examiner*, authored by Phoebe Loomes, published 31 March 2023 at 2.38pm and updated on 31 March 2023 at 2:43pm, with the headline “*Premier slams 'vile, shameful' homophobic Latham tweet*”, accessible at:

<https://www.portstephensexaminer.com.au/story/8142782/premier-slams-vile-shameful-homophobic-latham-tweet/>

- (b) The Primary Tweet Reports brought the contents of the Primary Tweet to the attention of a vast number of persons who would otherwise not have been aware of its contents.
- (c) Hateful comments were posted by Twitter users to the Primary Tweet, and liked by Mr Latham, including the following:

- i. *"Exactamundo!!"*, by the Twitter user with the handle @Leanna78358;
- ii. *"Gold!!!! Keep it up Mark as there is to many people asleep at the wheel.."*, by the Twitter user with the handle @AlwaysLivin;
- iii. *"I could not have said it any better Mark [clapping, thumbs up emojis]"*, by the Twitter user with the handle @JohnRMetzner;
- iv. *"Well, to me, that's disgusting - I choose not to think about that part when thinking of my gay friends who, just like all humans, have bad & good ones."*, by the Twitter user with the handle @ianplewis2;
- v. *"Touché"*, by the Twitter user with the handle @_aussie_brandon;
- vi. *"My first laugh-out-loud moment for today, thanks Mark [tilted laughing, crying emoji]"*, by the Twitter user with the handle @zcre011;
- vii. *"Best come-back ever! [laughing, crying emoji]"*, by the Twitter user with the handle @John55183604;
- viii. *"About time someone didn't hold back on what everyone really thinks about these grubs."*, by the Twitter user with the handle @DeanMuir9;
- ix. *"Why does it need a label, other than facts?"*, by the Twitter user with the handle @pl8spin;
- x. *"Boom! There it is [smiling emoji]"*, & *it needs to be said"*, by the Twitter user with the handle @moby Murray; and

- xi. *"I reckon that should be @Peter_Fitz tweet of the week #FitzToTW ... but I'm sure it won't be"*, by Twitter user with the handle @downunderdlee.
- (d) Further, as a consequence of the publication of the matters complained of, Mr Greenwich has received hate mail, hateful and/or threatening messages, and hateful and threatening telephone calls to his electorate office, including the following communications which may be inspected at the office of the solicitors for Mr Greenwich:
- i. email from [REDACTED]@gmail.com dated 1 May 2023;
 - ii. email from [REDACTED]@hotmail.com dated 1 May 2023;
 - iii. email from [REDACTED]@yahoo.com dated 1 May 2023;
 - iv. email from [REDACTED]@gmail.com dated 1 May 2023;
 - v. email from w[REDACTED]@protonmail.com dated 1 May 2023;
 - vi. email from [REDACTED]@hotmail.com dated 2 May 2023;
 - vii. website enquiry from [REDACTED]@yahoo.com.au dated 3 May 2023;
 - viii. email from [REDACTED]@gmail.com dated 3 May 2023;
 - ix. email from [REDACTED]@gmail.com dated 4 May 2023;
 - x. email from [REDACTED]@gmail.com dated 5 May 2023;
 - xi. website enquiry from [REDACTED]@gamil.com dated 5 May 2023;

xii. email from [REDACTED]@outlook.com dated 11 May 2023;

xiii. email from [REDACTED]@gmail.com dated 18 May 2023;

xiv. Anonymous letter in terms:

Greenwich

You piece of poofta shit

You fucking alphabet cunt

All you weirdo up the arse mongrels should be publically executed

Fucking poofta cunt!!!

xv. Anonymous letter in terms:

Poor pathetic Pedo Pooftah.

Throwing you "blokes"!!! over cliffs was too good For you!

Should be hung, drawn and quarded.

Fucking Fairy Faggot!

Horrible piece of Shit.

GO MARK !!

xvi. Anonymous letter in terms:

Hi Alex, took my elderly Mum along Oxford Street the other day What a shame the tacky T Shirt opp.

Your office needs to have tee shirts with crude 'I fucked your boyfriend' emblazoned on them for all to see. Also the Bunker Room with CUM JOIN US ON NUDE NIGHTS & have your ARSE WRECKED. The sleaze is disgraceful.

Won't be returning.

- xvii. Letter addressed to "Mr Sodomite Greenwich" in terms:

Faggot !!

Poofteh piece of Shit.

Go Mark !!!!

- xviii. Voicemail left on about 8 May 2023, stating: "*Alex Greenwich, you are a disgusting human being and your actions are even more disgusting. How dare you represent Sydney. Are you fucking serious? Go bury your head in shame.*";
- xix. Voicemail left on about 18 May 2023, stating: "*Oh hello Alex, or one of the little soy boys that may answer this, look at the recorded messages. I've just seen you on the TV. You dirty f'n fuckin' cunt. Listen, I've got one question for you and your little soy boys working in the office with you. One question. I bet your fathers are proud you are gay. You know they're fuckin' not. You fuckin' – yeah, you've got the word but – you fuckin' little soy boys.*";
- xx. Message to Mr Greenwich's Facebook Messenger from the profile 'Tony Adouni' dated 8 May 2023, stating: "*Where you born a disgusting pedophile,..do you know what horrors kids are going through because of pedophiles in power you sick bastard*" and "*MARK LATHAM FOREVER*";
- xxi. Message to Mr Greenwich's Facebook Messenger from the profile 'Tony Adouni' dated 14 May 2023,

stating: *“I dare you to break and burn more Lebanese Christian crosses you pedophile.”*;

- xxii. Message to Mr Greenwich’s Facebook Messenger from the profile ‘Brian Benson’ dated 18 May 2023, stating: *“Your are dirty fucken poofter you should have been put down at birth I believe in poofter bashing and so is your fucken lawyer”* and *“I am ex army we didn’t have your type in the army”*;
 - xxiii. Voicemail left on 19 May 2023, stating *“Miss Greenwich, poofter, paedophile, piece of shit faggot cunt. Jump over the gap you cunt.”*
- (e) On 30 March 2023, the Twitter user and media personality @hughriminton tweeted the Primary Tweet with the caption *“Extraordinary. This is One Nation NSW Leader #MarkLatham referring today to another elected politician who happens to be gay. #auspol.”* (**Riminton Tweet**). As to the Riminton Tweet:
- i. as at the date of this pleading, the Riminton Tweet has received about 1,008 replies; 870 retweets; 3,313 likes; and 646,700 views; and
 - ii. the responses to the Riminton Tweet include:
 - A. a Tweet by the Twitter user @blinkonoff dated 30 March 2023, *“I see a normal man speaking his mind. Are your feelings hurt? [rolling eyes emoji]”*;
 - B. a Tweet by the Twitter user @martinjzammit dated 30 March 2023, *“One thing Greenwich does behind closed doors, is look at his own portrait of Dorian Gray, for all those late term*

babies aborted, due to the bill he put forward in Parliament.”;

- C. a Tweet by the Twitter user @AngloSaxonVikin dated 30 March 2023, “*Contrary to unpopular belief, the majority of people also find this unusual, disgusting. Over 90% of people are heterosexual and a large majority of those are Christian. A fair percentage would find these acts depraved. the 'normalisation' of the acts of the 4% is quite unusual.*”;
- D. a Tweet by the Twitter user @AnthonySvejka dated 31 March 2023, “*So stating what gay sex is, is offensive? So why do we teach it to kids ?*”;
- E. a Tweet by the Twitter user @TroyMar00710894 dated 30 March 2023, “*Well he’s really not wrong... [two shrug emojis]*”;
- F. a Tweet by the Twitter user @judith_bourke dated 30 March 2023, “*It’s the truth*”;
- G. a Tweet by the Twitter user @John55183604 dated 30 March 2023, “*@hughriminton most men ,>90%, of men think the same way as @RealMarkLatham.*”;
- H. a Tweet by the Twitter user @humangummybear dated 30 March 2023, “*my only problem with this tweet is he took it down*”;
- I. a Tweet by the Twitter user @Bergermeister23 dated 31 March 2023, “*The Tweet is as vulgar as the act it describes.*”;

J. Tweets by the Twitter user @ObamaPhone dated 30 March 2023:

L1. *“Getting human shit on your dick would be even worse than abhorrent and repugnant tbh”;*

L2. *“True that is also gross. Good suggestion to outlaw sodomy again, it can’t be hygienic for anyone”;* and

L3. *“The most non hygienic part I can think of for the one true religion is dipping your fingers in holy water that 40 other people have dipped in. Still kinda seems like poo on your penis is worse, am I crazy?”.*

(f) On or about 31 March 2023, Mr Latham published a tweet containing the words “Never apologise, never explain” (the **Never Apologise Tweet**), and the responses to the Never Apologise Tweet include:

i. a Tweet by the Twitter user @benofbrisbane1 dated 31 March 2023, *“Good on ya mark, stick it right up ‘em. Well, not literally! [turd emoji and laughing, crying emoji]”;*

ii. a Tweet by the Twitter user @OneyedDannie dated 31 March 2023, *“Think the poo pirates have a health and safety issues. Thanks Mark for trying to clean that up.”;*

iii. a Tweet by the Twitter user @MchaleRichard dated 31 March 2023, *“Look mate. The poofs say worse things in public. I have no issues with your comments. But don't give this lot room to cry wolf. That poo jabber was just trying bait you. Stay strong mate.”;*

- iv. a Tweet by the Twitter user @Neety55 dated 1 April 2023, *“Why should you apologise mate, Alex won't and he's the one that said bullshit...you care about our kids futures he dont!!!!”*.
- (g) On 31 March 2023, @9NewsSyd tweeted: *“Premier Chris Minns unleashed upon Mark Latham regarding his comments towards Sydney MP Mark Greenwich Minns called out the One Nation Leader during a Q&A at the Lifeline International President’s lunch. @sophie_walsh9 #9news”* (**Sophie Walsh Tweet**). As to the Sophie Walsh Tweet:
- i. as at the date of this pleading, the Sophie Walsh Tweet has about 16 replies; 5 retweets; 6 likes; and 6,071 views; and
 - ii. the responses to the Sophie Walsh Tweet include:
 - A. a Tweet by Twitter user @kaykayopinion dated 31 March 2023, *“What mark latham said was the truth, why is everyone so offended? I'll tell you why, it's because deep down you all know it's a disgusting act but are too afraid to speak out”*;
 - B. a Tweet by Twitter user @AussieBotStudio dated 31 March 2023, *“For those offended by @RealMarkLatham’s comments, please fill out this form. Lodge it to P.O. Box 80085 SoftRooster Australia.”*;
 - C. a Tweet by Twitter user @DannyBMullen dated 1 April 2023, *“I think your reporting is worse than what either of them said. You're piling on Mark for saying the truth about Alex, grub act.”*;

- D. a Tweet by Twitter user @Marina100902 dated 1 April 2023, *“Good on Mark Latham for his honesty, that’s more than the current far leftist do....”*;
- E. a Tweet by Twitter user @ArdlawSmith dated 31 March 2023, *“Where’s the criticism of the defamatory tweet from Greenwich? While these sodomites keep ranting, real people will keep giving them hell.”*.

(h) On 2 April 2023, a comment was posted on Mr Greenwich’s Facebook page by user “Michael O’Donnell” which stated, *“Greenwich google cliff”*.

CONCERNS NOTICE

- 31 On 19 April 2023, being more than 28 days before the date of this pleading, Mr Greenwich, through his lawyers, gave a concerns notice to Mr Latham in accordance with the *Defamation Act 2005* (NSW) and its counterparts in the other States and Territories (**the Defamation Act**) in relation to the matters complained of (**Concerns Notice**).
- 32 On 17 May 2023, the solicitor for Mr Latham responded to the Concerns Notice and, *inter alia*, declined the settlement offer in the Concerns Notice.

AGGRAVATED DAMAGES

33 Further, the following conduct of Mr Latham, which is known to Mr Greenwich, was improper, unjustifiable and lacking in bona fides and has increased the harm suffered by Mr Greenwich so as to warrant an award of aggravated damages:

- 33.1 Mr Latham’s knowledge of the falsity of the imputations conveyed by the matters complained of; alternatively his reckless indifference to the truth or falsity of those imputations;
- 33.2 the conduct of Mr Latham in presenting the matters complained of in a demeaning, homophobic, and over-sensationalised manner;

- 33.3 the failure of Mr Latham to apologise when called upon to do so by the Concerns Notice and otherwise, in circumstances where an apology is self-evidently called for;
- 33.4 the response of Mr Latham to the Concerns Notice, which sought to ignore or downplay the obvious and demonstrable consequences of the publication of the matters complained of; and
- 33.5 the conduct of Mr Latham since publishing each of the matters complained of (the **Subsequent Conduct**), which:
- (a) in combination with the publication of the matters complained of, constitutes a concerted attack campaign against Mr Greenwich, which further exposes him to hatred, contempt and ridicule, and causes further harm to the reputation of Mr Greenwich;
 - (b) promotes the matters complained of;
 - (c) encourages members of the public to hate, hold contempt for and ridicule Mr Greenwich and to express that hatred, contempt and ridicule;
 - (d) includes repeated comments by Mr Latham about the matters complained of, including downplaying the matters complained of on social media, to news media journalists, and to broadcasters;
 - (e) attributes blame to Mr Greenwich; and
 - (f) includes repeated refusals to apologise to Mr Greenwich, in circumstances where an apology is self-evidently called for, or misrepresentations that Mr Latham has in fact made a sincere apology to Mr Greenwich in circumstances where Mr Latham knows that those misrepresentations are patently false.

Particulars of Subsequent Conduct

- i. On about 31 March 2023, Mr Latham published the Never Apologise Tweet referred to in paragraph 30.4(f) above. As

at the date of this pleading, the Never Apologise Tweet had: 46,800 views; 77 retweets; 196 replies; 24 quotes; 780 likes; and 4 bookmarks.

- ii. On or about 1 April 2023, Mr Latham published a tweet to Mr Latham's Twitter account (the **Normal People Tweet**) containing the words, "*I'm only saying what normal people know to be the truth. The elites deny this because they are caught up in a weird Identity Politics Cult. In which Alphabet people are accorded automatic sainthood. Just look at the trans shooter in the US!!* [tongue poke emoji]". As at the date of this pleading, the Normal People Tweet had: 109,200 views; 276 retweets; 45 quotes; 2,041 likes; and 12 bookmarks.
- iii. On or about 27 April 2023, Mr Latham "liked" a tweet on Mr Latham's Twitter account, which said: "*Stick your apology up you ass*".
- iv. On 27 April 2023, Mr Latham gave an interview to Chris Smith on TNT Radio, accessible at

<https://www.audible.com.au/pd/Mark-Latham-Senator-Hollie-Hughes-on-The-Chris-Smith-Show-27-April-2023-Podcast/B0C3QRXBQC>; and
<https://tntradiolive.podbean.com/e/mark-latham-on-the-chris-smith-show-27-april-2023/>

(Radio Interview). As to the Radio Interview:

- (A) A transcript of the Radio Interview is contained in **Schedule C**.
- (B) During the radio interview, Mr Latham stated, *inter alia* (see lines 210, 211 and 212) : "*well, the basic*

natural reality is that we don't go for anal sex with blokes and it's pukeworthy....”.

- (C) TNT Radio “broadcasts” through a mobile application and desktop browser to the world at large and operates “open phone lines” in the United States, Canada, the United Kingdom and Australia.
- (D) Mr Latham knew and intended that the Radio Interview would be publicised so as to attract the largest possible audience and would attract other media attention and so be reported widely; alternatively, it was a natural and probable consequence of the Radio Interview that it would be so publicised and reported.
- (E) As at the date of this pleading, the Radio Interview has been downloaded 2,200 times on the TNT podcast website:

<https://tntradiolive.podbean.com/e/mark-latham-on-the-chris-smith-show-27-april-2023/>

- v. On or about 27 April 2023, TNT Radio advertised the Radio Interview on Twitter (**Radio Interview Tweet**) by setting out the times that the interview would “air” in Brisbane, London and New York. The Radio Interview Tweet said:

“[star emoji] EXCLUSIVE [star emoji] Chris Smith talks with Australian politician and media commentator Mark Latham next on TNT Radio. #listenlive https://tntradio.live @chrissmithonair @RealMarkLatham 2PM (BRISBANE) 5AM (LONDON) MIDNIGHT (NEW YORK) #tntradiolive #livenews #chrissmith #marklatham”

As at the date of this pleading, the Radio Interview Tweet had: 1,229 views; 2 retweets; 1 quote; and 7 likes.

- vi. On 27 April 2023, Chris Smith posted on Twitter about the Radio Interview and as at the date of this pleading, it had: 10,400 views; 12 retweets; 2 quote; and 69 likes.
- vii. The Radio Interview was reported by other news outlets, including:

(A) *Daily Mail Australia*, authored by Stephen Gibbs and published 27 April 2023 at 6:06pm and updated 28 April 2023 at 8:09am, with the headline, “*Mark Latham launches horrific new attack on gay men and makes the extraordinary claim ALL “straight men” feel the same*”, accessible at:

<https://www.dailymail.co.uk/news/article-12019465/Mark-Latham-says-thought-gay-sex-makes-straight-men-want-vomit.html>

(B) *The Guardian Australia*, authored by Tamsin Rose and published on 28 April 2023 at 10:21am, with the headline, “*Mark Latham defends homophobic slurs, saying Pauline Hanson can’t understand “how straight men feel”*”, accessible at:

<https://www.theguardian.com/australia-news/2023/apr/28/mark-latham-defends-homophobic-jibes-saying-pauline-hanson-cant-understand-how-straight-men-feel>

- (C) Q News, authored by Jordan Hirst and published on 28 April 2023, with the headline, “*“Pukeworthy”:* *Mark Latham is ranting about gay sex again*”, accessible at:

<https://qnews.com.au/pukeworthy-mark-latham-is-ranting-about-gay-sex-again/>

- (D) *OUT in Perth*, authored by ‘admin’ and published on 27 April 2023, with the headline, “*Mark Latham delivers a fresh series of homophobic remarks*”, accessible at:

<https://www.outinperth.com/mark-latham-delivers-a-fresh-series-of-homophobic-remarks/>

- (E) *Star Observer*, authored by Shibu Thomas and published on 28 April 2023, with the headline, “*One Nation’s Mark Latham Muses About Straight Men Thinking About Gay Sex*”, accessible at:

<https://www.starobserver.com.au/news/national-news/new-south-wales-news/one-nations-mark-latham-muses-about-straight-men-thinking-about-gay-sex/223466>

- viii. On or about 27 April 2023, Mr Latham retweeted the Radio Interview Tweet via Mr Latham’s Twitter account.
- ix. On or about 29 April 2023, Mr Latham reposted the Radio Interview on Mr Latham’s Facebook Account, with the caption, “*Mark Latham clears up the facts about a recent controversy*”, and as at the date of this pleading that post has about 149 like reacts, 55 comments and 4 re-posts.
- x. On 28 April 2023, Mr Latham published on Mr Latham’s Twitter account, in the context of the NSW Premier Chris

Minns attending radio personality Kyle Sandilands's wedding the next day (**Alphabet Tweet**):

"I must be wonderfully Deplorable if Chris Minns wants to cancel me but he's attending Kyle Sandilands wedding tomorrow, complete with organised crime figures and a convicted drug smuggler as best man!! Kyle has 'picked on' the disabled and Alphabet people even more than me [crying laughing emoji]"

- xi. On 28 April 2023, Mr Latham replied to the Alphabet Tweet (**Alphabet Reply Tweet**):

"Where's [Alex] Greenwich when you need him?"

As at the date of this pleading, the Alphabet Reply Tweet has received: 12,300 views; 8 retweets; 1 quote; 100 likes.

- xii. On 2 May 2023, in response to NSW politician and Twitter user Abigail Boyd, using the Twitter handle @AbigailBoydMLC, posting a link to a *Sydney Morning Herald* article entitled, "NSW opposition leader vows to work with Latham despite homophobic slurs", Mr Latham tweeted (the **Abigail Boyd Tweet 1**):

"I'm very sorry for saying I hate the idea of having anal sex with another man. Has it become compulsory?"

As at the date of this pleading, the Abigail Boyd Tweet 1 has received: 84,700 views; 146 retweets; 24 quotes; 1,392 likes; and 9 bookmarks.

- xiii. On 2 May 2023, in response to NSW politician and Twitter user Abigail Boyd, using the Twitter handle @AbigailBoydMLC, posting a link to a *Sydney Morning*

Herald article entitled, “NSW opposition leader vows to work with Latham despite homophobic slurs”, Mr Latham tweeted (the **Abigail Boyd Tweet 2**):

“The Left has sexualised politics particularly through the predominance of LGBTQIAP+ issues. But of course, in the media double standard that applies, no one from the Right should ever participate in these debates and give their true opinion. We are lesser, disgusting human beings.”

As at the date of this pleading, the Abigail Boyd Tweet 2 has received 9,186 views, 33 retweets, 2 quotes and 461 likes.

xiv. On or about 2 May 2023, Mr Latham proceeded to “like” replies to Abigail Boyd Tweet 1 and Abigail Boyd Tweet 2, which were supportive of his position, as follows:

- (A) a tweet by the Twitter user @kotevski1 dated 2 May 2023, “*Well done M.L.*”;
- (B) a tweet by the Twitter user @BFacist dated 2 May 2023, “*100% agree. So does most of society just quietly*” and enclosing a photograph of text which reads:

“Put 100 women and 10 men on a deserted island. In 100 years, you will have a thriving community of men, women, boys, and girls. Now, put 100 trans women and 10 men on a deserted island. In 100 years you will find the skeletons of

110 men. Follow me for more science.”

(C) a tweet by the Twitter user @humangummybear dated 2 May 2023, “*Good to see you telling the truth & sticking to your guns, mate. More politicians should try it [clapping hands emoji, thumbs up emoji]”;*

xv. On 4 May 2023, Mr Latham tweeted (the **Can’t Win Tweet**):

“I can’t win: I apologised here and now Alex Greenwich has referred this Tweet (and many others) to the NSW Anti-Discrimination Board for action.

He’s obsessed with petty litigation against me for disagreeing with him.”

As at the date of this pleading, the Can’t Win Tweet has received 10,100 views, 21 retweets, 1 quote and 269 likes.

xvi. On 4 May 2023, Mr Latham tweeted (the **AVO Tweet**):

“Ultimately this is the great Greenwich crime: disagreeing with an entitled European Prince.

Lawfare instead of sorting it out in the parliament to which we have both been elected.

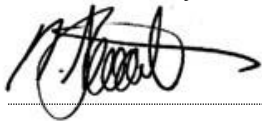
Should I take out an AVO for harassment? [four crying, laughing emojis]”

As at the date of this pleading, the AVO Tweet has received 5,587 views, 14 retweets and 128 likes.

INJUNCTIVE RELIEF

- 34 Following publication of the Primary Tweet, Mr Latham doubled-down by publishing the DT Quotes.
- 35 Since publishing the matters complained of, Mr Latham has engaged in the Subsequent Conduct.
- 36 It is to be inferred from the matter referred to in paragraphs 34 and 35 above that unless Mr Latham is restrained by the Court, Mr Latham will continue to publish the imputations set out in paragraphs 15, 16, 24 and 25 above or imputations that are not different in substance from those imputations.

Date: 26 May 2023



Signed by Nicholas Stewart


Lawyer for the Applicant

This pleading was prepared by Nicholas Stewart, solicitor for Mr Alex Greenwich, Ms Sophie Jeliba and Dr Matthew Collins AM KC, counsel for Mr Alex Greenwich.

Certificate of lawyer

I, Nicholas Stewart, certify to the Court that, in relation to the statement of claim filed on behalf of the applicant, the factual and legal material available to me at present provides a proper basis for each allegation in the pleading.

Date: 26 May 2023

A handwritten signature in black ink, appearing to read 'N. Stewart', written over a horizontal dotted line.

Signed by Nicholas Stewart

Lawyer for the Applicant

SCHEDULE A – THE PRIMARY TWEET

Susan Metcalfe  @susana... · 22/3/2023 ...

“Mark Latham is a disgusting human being and people who are considering voting for One Nation need to realise they are voting for an extremely hateful and dangerous individual who risks causing a great deal of damage to our state” - Alex Greenwich



smh.com.au
Video shows LGBTQ protesters pleading for help outside Mark Latham event

23 3 11 4,277

 **Real Mark Latham** ...
@RealMarkLatham

Disgusting?
How does that compare with sticking your dick
up a bloke's arse and covering it with shit?

10:13 am · 30/3/2023 · 6,171 Views

Mark Latham doubles down after outcry over his homophobic tweet

A defiant Mark Latham has returned to Twitter to decry “alphabet ideology” after breaking his silence about a homophobic slur he tweeted, and then deleted, about a Sydney gay MP. Read his response.



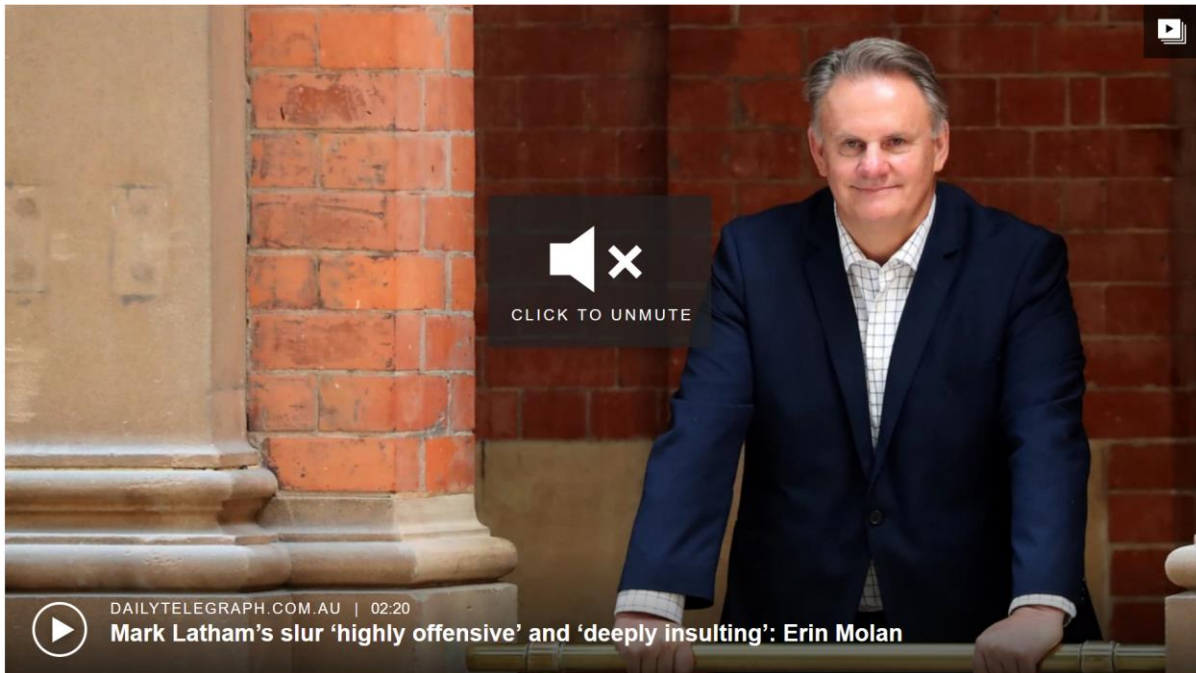
Linda Silmalis

Follow



@LindaSilmalis 7 min read April 1, 2023 - 1:38PM The Saturday Telegraph

46 comments



Sky News host Erin Molan discusses Mark Latham's homophobic tweet, saying it's "hard to fathom" after he's been seen liking several comments supporting his recent post. "Today he's 'liked' a number of comments supporting his original post," Ms Molan said. "We all have the right to an opinion to express ourselves to..."

1. Sky News host Erin Molan discusses Mark Latham's homophobic tweet, saying it's "hard to fathom" after he's been seen liking several comments supporting his recent post. "Today he's 'liked' a number of comments supporting his original post," Ms Molan said. "We all have the right to an opinion to express ourselves to exercise free speech. "This was none of the above; It was highly offensive and deeply insulting and there should be no place for it."
2. A defiant Mark Latham on Saturday doubled down on his decision to tweet a homophobic slur about fellow MP Alex Greenwich — declaring “boo hoo” — before later taking to Twitter to slam “alphabet ideology” and woke” media.
3. The controversial NSW One Nation MP stood by his original Twitter post, saying that insults can often “come back at you harder and truer”.
4. Mr Latham made the original Twitter post on Thursday in response to reports about a violent protest outside a church he had spoken at during the NSW election campaign.

SCHEDULE B – THE DAILY TELEGRAPH ARTICLE

5. It came after a comment by independent MP Alex Greenwich branding Mr Latham a “disgusting human being” who posed a risk to NSW.
6. Mr Latham’s explicit tweet — which remained online for about three hours before it was deleted — prompted One Nation boss Pauline Hanson to demand he apologise.



One Nation MP Mark Latham. Picture: Julian Andrews

7. Labor’s Upper House leader Penny Sharpe also condemned the tweet, saying she was “physically sickened” by it, and Equity Australia labelled them as “disgusting comments unbecoming of a member of parliament” which should be retracted.
8. Mark Latham remained silent on Friday, except for a tweet about former US president Donald Trump which said “never apologise, never explain” and was quickly deleted.



SCHEDULE B – THE DAILY TELEGRAPH ARTICLE

9. On Saturday, in a statement to The Saturday Telegraph, he said: “Sometimes in public life when you throw out insults they come back at you harder and truer ... So boo-hoo Alex Greenwich.”
10. “When he calls someone a disgusting human being for attending a meeting in a church hall, maybe attention will turn to some of his habits.”



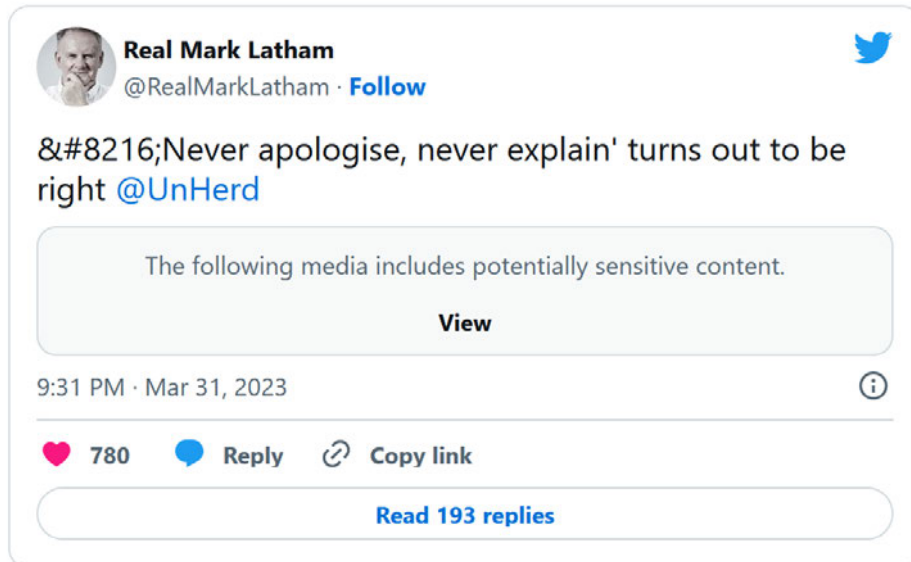
11. As for why he deleted the post, Mr Latham said: “Greenwich goes into schools talking to kids about being gay.
12. “I didn’t want to be accused of anything similar, leaving that kind of content on my socials.”
13. On Saturday morning, in response to the latest comments, Mr Greenwich said it was clear Mr Latham was unfit for office.
14. “@Mr Latham is clearly unfit for office and I hope he gets the help he needs,” he said
15. “I’m sure the public and a majority of my parliamentary colleagues share this opinion, especially following his vile homophobic and sexualised attacks at me, his transphobic views and the violence directed at the LGBTQ community at the Belfield rally. “

LATHAM’S FRIDAY TWEET

16. Mark Latham has made his first tweet since posting a homophobic tweet about a gay MP, with another quickly deleted social post suggesting he will “never apologise, never explain”.

SCHEDULE B – THE DAILY TELEGRAPH ARTICLE

17. The controversial NSW One Nation leader fired back on Thursday when independent MP Alex Greenwich said he was “disgusting human being”.
18. Mr Latham replied on Twitter with a homophobic tweet, which The Telegraph is choosing not to share due to its offensive nature.



19. The outspoken politician was widely panned for his remark and his One Nation boss Pauline Hanson demanded he apologise and new Premier Chris Minns labelling him a bigot.
20. But Mr Latham looks unlikely to do so.
21. He appeared to break his silence on the matter on Friday evening, linking to an article from 2019 about Donald Trump on how leaders should “never apologise, never explain”.
22. Mr Greenwich hit back at Mr Latham with a classy response on Thursday evening.



SCHEDULE B – THE DAILY TELEGRAPH ARTICLE

23. He posted a picture of himself alongside his husband on Twitter and wrote: “For those wondering how I’m doing after Latham’s homophobic attacks today, I’m fine and I’m more motivated than ever to deliver long overdue LGBTIQ+ reforms ... and I have the most handsome husband.”

24. Mr Latham’s tweet remained online for around three hours before it was deleted.

PREMIER LABELS LATHAM A ‘BIGOT’

25. Newly-installed Premier Chris Minns has blasted NSW One Nation Leader Mark Latham as a “bigot” over a homophobic tweet targeted at NSW MP Alex Greenwich.

26. Mr Minns confirmed he had spoke to Mr Greenwich on Friday morning and described him as “someone of character”.

27. When asked about Mr Latham’s comments, Mr Minns was blunt in his response.

28. “I think that they’re vile and shameful comments, and I think he’s revealed himself to be a bigot,” said Mr Minns speaking at Friday’s Lifeline International President’s Lunch.

29. “He’s an independent who is extraordinarily effective, and manages to elevate the conversation and make major changes in the state.

30. “One of the things that can’t be forgotten is that comments like his, even though in and of themselves they’re terrible, they unleash ghouls on people and on a person like Alex.”



Premier Chris Minns unequivocally denounced the words of NSW One Nation Leader, Mark Latham. Picture: NCA Newswire

31. Mr Minns also acknowledged that members of the LGBTQ+ community are two-and-half-times more likely to seek urgent medical help as a result of a mental health condition, which also motivated to speak out against Mr Latham’s comments.

SCHEDULE B – THE DAILY TELEGRAPH ARTICLE

32. “They need support from the leadership of NSW and it should be an unambiguous and universal condemnation of these comments,” he said.

‘I FEEL HURT’: ALEX GREENWICH RESPONDS

33. A Sydney MP who was the target of a homophobic tweet by Mark Latham has said he doesn’t expect parliament to take action against the One Nation leader, while condemning his comments as being from an unwell man.

34. MP Alex Greenwich and gay-rights campaigner said he hoped Latham was “doing okay” when speaking to the media earlier on Friday.

35. “I hope he has support around him, I hope that his friends and family are checking in on him,” Mr Greenwich said.

36. “I felt a great deal of hurt from them.

37. “I know that these are not the comments of a well person, of a reasonable person.”

38. The Daily Telegraph has chosen not to disclose the contents of the tweet due to its offensive nature.



Sydney MP Alex Greenwich. Picture:
NCA NewsWire / Damian Shaw

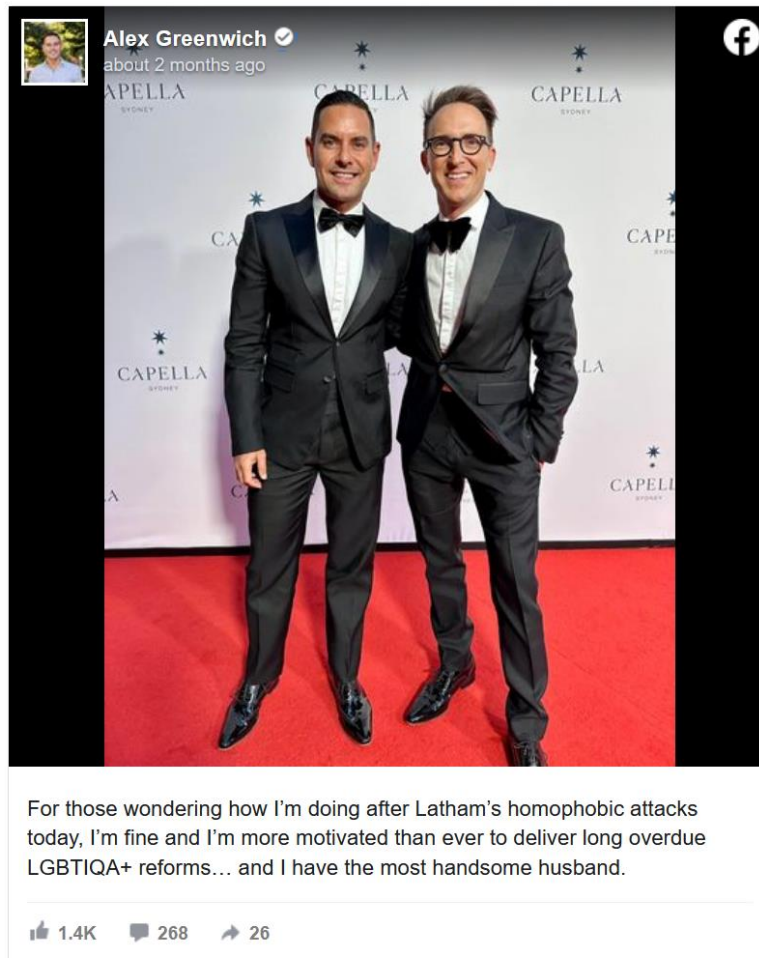


One Nation Leader Mark Latham has been criticised
for his tweet. Picture: Lisa Maree Williams/Getty
Images

39. The One Nation leader has gone to ground and not been heard from since deleting the tweet on Thursday.

SCHEDULE B – THE DAILY TELEGRAPH ARTICLE

40. Mr Greenwich, who had a “bit of cry” after the incident, said while he didn’t expect parliament to take action against Latham he did want the LGBTQTI community to feel protected.
41. “I’m not asking for anything else than our parliament saying we don’t support discrimination against the LGBTQ community. We don’t support harassment and what we are going to do is pass laws to protect them,” he said.
42. “Being LGBTQ shouldn’t make you a political target.”



43. Mr Greenwich said he had been encouraged by the words of his colleagues in their bid to support him, but didn’t appreciate Pauline Hanson calling for an apology.
44. “I’m less encouraged by the words of Pauline Hanson, we know just last week she sought to pass a motion attacking the trans community,” Mr Greenwich said.
45. “Pauline Hanson, Mark Latham, One Nation they are a group of people who target minorities one by one and don’t care about the harm they cause.”

SCHEDULE B – THE DAILY TELEGRAPH ARTICLE

HANSON CALLS FOR LATHAM TO APOLOGISE

46. One Nation Leader Pauline Hanson has slammed her party's NSW leader Mark Latham over "disgusting" comments on social media.
47. Ms Hanson called on Mr Latham to apologise for a homophobic tweet directed at Sydney MP and gay-rights campaigner Alex Greenwich sent on Thursday morning, and which has since been deleted.



One Nation Leader Mark Latham has been criticised for his tweet.

48. The Daily Telegraph has chosen not to disclose the contents of the tweet due to its offensive nature.
49. In a video statement, Ms Hanson said that neither she or her party condoned the comments.
50. "I think they are disgusting. I've actually tried ring Mark a couple of times, to no avail," she said.

SCHEDULE B – THE DAILY TELEGRAPH ARTICLE



One Nation party leader Pauline Hanson has called on Mark Latham to apologise.

51. Ms Hanson called on Mr Latham to apologise.
52. Labor’s Upper House leader Penny Sharpe also condemned the tweet, calling on Mr Latham to apologise immediately.
53. “I was physically sickened by that tweet,” Ms Sharpe said.
54. “Homophobia is always unacceptable and there is never an excuse. Mr Latham should apologise to Alex Greenwich immediately.”



SCHEDULE B – THE DAILY TELEGRAPH ARTICLE

55. Mr Latham was replying to this tweet by fellow MP Alex Greenwich.
56. Mr Latham was also criticised by Equality Australia for his comments.
57. “They were disgusting comments unbecoming of a member of parliament, he should apologise and retract those comments,” Equality Australia legal director Ghassan Kassisieh said.
58. “The best way for parliament to respond is to now get on with the job of removing discrimination against LGBTI people in our laws.”
59. Mr Latham was responding to Mr Greenwich calling him a “disgusting human being,” after [violence erupted outside a church in Belfield](#) last week where Mr Latham was speaking.
60. The tweet was one of a series of posts from Mr Latham about the incident.



61. In one tweet, Mr Latham took aim at “Alphabet freaks and weirdos seeking to blockade a suburban church, break crucifixes and burn them were looking for trouble”.
62. The violence — in which a police officer was taken to hospital after being attacked — was sparked as protesters disrupted a forum hosted by state MP Mark Latham on parental rights and religious freedom.

SCHEDULE B – THE DAILY TELEGRAPH ARTICLE

63. A spokesman for the parish said the violence appeared to start after the group protesting Mr Latham's views on transgender rights allegedly broke a crucifix.
64. Asked about Mr Latham's tweet, Mr Greenwich said: "I understand this tweet has been taken down, and I don't intend to engage with the matter further".
65. "My focus in the parliament will be working with the majority of members who support the LGBTQ community to progress important reforms."
66. Mr Latham did not respond to a request for comment.
67. It comes after The Australian reported that Mr Latham is due to face court next month after the MP was detected using his phone while driving.
68. In another tweet on Thursday, Mr Latham said President Barack Obama was "the ultimate whore" for charging up to \$900 for tickets to a speaking tour.

More Coverage

[Latham's defiant tweet after sparking outcry for being homophobic](#)[Two arrested after violent protest in Sydney's south-west](#)

Mr Latham was re-elected to the NSW Senate for another eight years on Saturday, with his number two candidate Tania Mihailuk also set to join one nation in the upper house.

However the party failed to make any major gains compared with its vote at the previous election.

[Join the conversation \(46 comments\)](#)

More related stories

SCHEDULE C – TRANSCRIPT OF RADIO INTERVIEW

Interview – Mark Latham 27 April 2023
(ML: Mark Latham CS: Chris Smith)

1 **Intro:** Chris Smith and Mark Latham on today's News Talk, TNT Radio.

2

3 **CS:** Well one of my regular Australian contributors to the show has been One Nation
4 Party leader of New South Wales, Mark Latham. As many of you who have
5 been listening to me since I started here would realise, he's a no-holds-barred
6 kind of fella. A former Labor leader. Became very close to being Prime Minister.
7 Now ever since New South Wales voters went to the polls last month he's being
8 taking a break from politics and from the media, and we've missed him on the
9 program, but he's back today. Now before he left on that break he found himself
10 embroiled in another major controversy after he was labelled 'disgusting' by
11 New South Wales independent MP Alex Greenwich. Now stick with me here,
12 this was because Mark fronted a church organised speaking engagement,
13 which a great distance from the church turned out to be violent. Nothing to do
14 with Mark Latham but of course Alex Greenwich went for the jugular and called
15 him 'disgusting'. But in response to Greenwich's attack Mark hit back by
16 pointing to Greenwich's homosexual activities as just as 'disgusting'. Now if he
17 had done that that way it may not have got the attention it did but the words he
18 used, according to his critics, and there are plenty, they were crass, disgraceful,
19 and appalling.

20

21 Now none of us are angels. None of us here are without sin. And I certainly
22 won't be doing what some of his critics suggest I should do when they wrote
23 their emails to me saying, "you can't have him on the show ever again".
24 Whatever you think, Mark Latham remains a formidable player in Australian
25 politics. He still is and his take on political events is truly insightful, which is why
26 he joins me once again today.

27

28 Mark Latham, welcome back to TNT Radio.

29

30 **ML:** Thanks very much Chris and I hope your program is going well. It should.

31

32 **CS:** Thank you, it is. It is. I'm enjoying it and getting plenty of calls from around the
33 place, which is usually a good litmus test. Let's get to this major controversy
34 before we get to some of the issues that are just unfathomable today, and there
35 are a host of them. Before your break, I recall you asking me in a private
36 conversation about what Alex Greenwich said about you following the violence
37 that erupted outside that church at the speaking event you were asked to be
38 part of. And I told you that he called you 'disgusting'. Did this infuriate you?

39

40 **ML:** Well he did more than that, Chris. Alex Greenwich had no idea what happened
41 that night in Belrose. He wasn't there, the media weren't there. They had no
42 understanding of what actually happened that night. Greenwich had seen me
43 earlier in the campaign at an interview with 2GB, had quite a cordial

SCHEDULE C – TRANSCRIPT OF RADIO INTERVIEW

Interview – Mark Latham 27 April 2023
(ML: Mark Latham CS: Chris Smith)

44 conversation on the street in front of that radio station. He made no attempt to
45 ring me up and say “what really happened there at Belrose?” I found out
46 subsequently that the group of LGBT—alphabet protesters who clashed with
47 the parishioners there, the Maronites and the Catholics, they’d been at it for 15
48 years. For 15 years the alphabet protesters had turned up at the Festival of the
49 Unborn Child and launched a protest against that church community. On the
50 night, out the front of the church, nothing to do with me, I wasn’t within cooee of
51 any of these activities, the protesters were breaking and burning a crucifix. And
52 I suppose after 15 years of this nonsense the parishioners snapped, ran across
53 the road and sorted them out. I subsequently condemned the violence. The
54 violence was counterproductive and I spoke at the church hall meeting I’d been
55 invited to in the election campaign. I said, “everyone disperse peacefully, keep
56 your hands to yourself, violence is not the answer, let’s sort this out
57 democratically at the ballot box”.

58
59 So none of this had anything to do with me. None of the violence had anything
60 to do with me and I’ll tell you what was disgusting, the fake news media fitting
61 me up the next day, all the commercial Sky News, saying “these were Mark
62 Latham supporters”. Well I don’t know if they were supporters of mine or not.
63 They were Middle Eastern people, I don’t know if One Nation has got a lot on
64 the Middle Eastern vote, I very much doubt it. So they were very keen, the left
65 wing media, to rope me into some responsibility for the violence. And Greenwich
66 went out there and said I was a dangerous person. Said that I’d incited the
67 violence. Said that I was a disgusting human being. Now you can get stuck into
68 people in politics but that’s probably as extreme as you can get. When you call
69 someone a ‘disgusting human being’, Chris, it’s an attack on their very
70 existence. And I took it to be an attack on my love of my children, my role in my
71 community, my work in public life. He’s attacked my very existence as a human
72 being, as disgusting. Well after a week of copping it on Twitter from his
73 supporters and all that, I told him what I thought was disgusting and I speak for
74 a lot of straight men, Chris, in saying that the idea of having anal sex with
75 another man would make you vomit. That’s what makes us straight. Now I know
76 there’s no category or letter in the LGBT-ABCWTF-alphabet for straight men,
77 but that’s how we honestly feel about people like Greenwich. Now for honesty,
78 of course, I’m paying a price and people say, “oh you shouldn’t have reflected
79 on his sexual habits”. Well normally I wouldn’t. Normally what people do in the
80 bedroom, as far as I’m concerned, well that’s their own business, as long as
81 they’re not causing anyone any harm. And what Greenwich does hasn’t been
82 of any concern to me whatsoever, until he labelled me, without a skerrick of
83 evidence or proof or fact, as a dangerous person, inciting violence and a
84 disgusting human being.

85
86

SCHEDULE C – TRANSCRIPT OF RADIO INTERVIEW

Interview – Mark Latham 27 April 2023
(ML: Mark Latham CS: Chris Smith)

87 Well Alex Greenwich, I told you what straight men regard as disgusting and if
88 you don't want to hear that sort of talk, and you don't want to hear that sort of
89 response, don't go out there with fake, confected allegations trying to rope me
90 into inciting violence in front of a church in the election campaign.

91
92 What Greenwich did, Chris, was reflect on what he wanted to be true. He wanted
93 to make me the villain. He wants to believe that because I say that they should
94 leave children alone, in terms of transgender conversion, I'm inciting hate. I'm
95 standing up for parents who think they've got a role in determining the outcomes
96 for their little kids. That's all. And Greenwich has gone way over the top without
97 any facts and I said what I honestly believed to be the truth in response to him.
98 I gave my opinion. It's not an opinion that's fashionable, obviously, it was crudely
99 expressed. The crude words were taken down off Twitter. But there will be no
100 apology for Greenwich because I'm still waiting for the apology for without any
101 evidence he defamed me severely in saying I was a dangerous person inciting
102 violence, a disgusting human being. Chris, for turning up to a meeting in a
103 church hall in an election campaign where I've been invited to speak about
104 issues that many of the grandparents and parents there wanted to hear about.
105 So that's what happened.

106
107 **CS:** If you'd had your druthers, would you have preferred not to use the words you
108 did? Like how does that compare with sticking your dick up a bloke's arse and
109 covering it with shit? It was a little bit over the top wasn't it?

110
111 **ML:** Well it's code for anal sex between blokes and I can tell you, Chris, if someone
112 held a gun to my head and said I had to have anal sex with a bloke I'd vomit.
113 I'd vomit all over him. And I speak for straight men. And this is what makes us
114 straight. I know straight men have got no place in their alphabet, we're derided
115 now as the villains in all circumstances, white men, colonisers, genocidal.

116
117 **CS:** Privileged.

118
119 **ML:** Sexual harassers, perverts. You know, I suppose in your circumstances, Chris,
120 you've copped it as a white man as well. We cop it left, right and centre from
121 these galahs who have sexualised politics. Now I'm very proud of the fact, unlike
122 today's Labor party, my main priority in public life is people who are down on
123 their luck and they've got the bum out of their pants. They grow in a public
124 housing estate, need to get a good education to get ahead or get a job. I've got
125 a big concern for the disadvantaged who are the poor by socio-economic
126 measures. Not this absolute confection. I mean the biggest fraud in the history
127 of our politics is the idea that because you're gay or lesbian or bisexual or
128 transgender that somehow you're automatically disadvantaged in life. There's
129 an ABC journalist who's writing in the Herald, who educated at Scots College,

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130 the privilege of talking on the ABC, Channel 10's Project, highly paid, dripping
131 with privilege, who's saying, "oh I'm a disadvantaged person, I'm the vulnerable,
132 I'm the person in need of special government protection" because someone said
133 something to him when he was at school at Scots College. Most of the people
134 I've represented in public life for decades could never dream of having the
135 money to ever go to Scots College. This is the greatest con job in the history of
136 politics, that the gays in particular, who are massively over-represented in
137 parliament and the media these days, are somehow disadvantaged. What
138 they're saying is that we're dripping in money and media and political access
139 and opportunities in life, but because someone might say something about our
140 sexuality we're the real vulnerable ones, much more than some kid growing in
141 Claymore in a public housing estate in Campbelltown. Well Chris, for all my sins
142 in life, and I have a few I've got to say, I don't fall for the con job. Sexuality and
143 gender has never been a big issue in politics because most Australians don't
144 give two hoots about it. Looking after the poor and the disadvantaged in Struggle
145 Street should be the priority of people in politics, much more than the LGBT-
146 alphabet baloney that they try and inflict upon us. There's a way of diverting the
147 fact that these are massively privileged people. The gay community has a
148 higher level of income, education, opportunities in life. I mean they're all over
149 politics in the media and to have this as some new form of disadvantage in
150 society is just complete and absolute BS.

151
152 **CS:** Okay, a couple of quick questions still related to this. You were accused of being
153 homophobic. I've known you for quite some time. I've never got that impression.
154 As a matter of fact, I remember you with Alex Greenwich and it was on 2GB and
155 you seemed to be enjoying his company and vice versa.

156
157 **ML:** Yeah, I said "everyone likes Alex, except for his policies". And he's a personable
158 sort of charming sort of fellow.

159
160 **CS:** So you're not homophobic?

161
162 **ML:** Well he's a European prince we find out so he's not real disadvantaged either
163 in life, compared to where people like me have come from. So I don't care about
164 Alex Greenwich's sexuality, other than in a circumstance, without bothering to
165 check with me, how hard was it to ring me up and say "Mark, we had a
166 discussion earlier in the election campaign, what happened in Belrose there last
167 night?" and I could have told him. I could have told, "Alex, I'm not a dangerous
168 person, I didn't incite violence and I'm not a disgusting human being for turning
169 up to an election meeting where I was invited in a church hall, with the parish
170 priest sitting on the stage, the parish priest sitting on the stage. Mothers,
171 grandmothers in the audience wanting to hear me speak about four important
172 issues, which were religious freedom, the transgender issues in schools,

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173 winding back the exemption for non-government schools and also parental
174 rights. That's all I spoke about and Greenwich is out there saying I've incited
175 violence and I'm demonising and got hateful speech about the alphabet
176 community. Well I don't really care too much about what they do in their
177 bedroom but I care a lot about mothers on the phone crying to me that the school
178 has told their little boy he's a girl, and is dressing him in a girl's uniform at school
179 without informing the parents. And these practices are breaking up families,
180 destroying some of the kids. I don't know why kids have got to be victims of this
181 child abuse, of schools telling them to change their gender. So that's all my
182 concern has been. I've got no feelings against Alex Greenwich other than if you
183 go around saying those things based on complete and utter lies about me, well
184 you'll get some of the truth back about yourself.

185
186 **CS:** Alright.

187
188 **ML:** [inaudible] in public life for a long time.

189
190 **CS:** Alright, last question. Your federal leader, Pauline Hanson, demanded you
191 apologise. Have you privately or will you? Or what are you waiting for?

192
193 **ML:** Well Pauline hasn't rung me at any stage during this. So I've had no contact
194 from her whatsoever and what I know is ...

195
196 **CS:** She said she left you a message.

197
198 **ML:** Well I'm assuming as a woman, she doesn't understand how straight men feel
199 about this. And I don't think gay men obviously wouldn't understand how straight
200 men feel about it. But it's true. It's an absolute fact, integral to our existence. It's
201 not confected outrage or confected point of view, but we find the thought of
202 having anal sex with another man to be off-putting, disgusting, horrible, vomit
203 worthy. So you know, that's just the reality. And that's not homophobia, that's
204 just nature. That's why we're straight men.

205
206 **CS:** Okay. What if Pauline Hanson says...

207
208 **ML:** And I know straight men get no place in these public debates. You can listen to
209 Channel 10 and the ABC and some of the people on Sky, and on it goes,
210 Channel 9, the Fairfax Media and we're all dreadful, dreadful straight men. Well,
211 the basic natural reality is that we don't go for anal sex with blokes and it's puke
212 worthy.

213
214 **CS:** Alright. Pauline Hanson might demand that you resign from the party if you don't
215 apologise. What will happen then? Are you prepared to do that?

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216 **ML:** Well she hasn't contacted me and I'm not apologising. So I'm not resigning from
217 anything, I'm not apologising and I'm not backing down because I don't believe
218 in going to a church hall meeting in an election campaign and having that pile-
219 on from the ill-informed, ignorant Alex Greenwich who made no attempt to ask
220 me what had actually happened and wanted me to be the villain. I mean, this is
221 complete fit-up and he had media allies on it and he had a great run in the
222 media. He told my colleague Tania Mihailuk, after my Tweet, that he was very
223 happy with the media coverage. He said on the Project he didn't need an
224 apology from me. He didn't need an apology from me. So what's this guy going
225 on about? It's all about the Greenwich agenda and his inner-city electorate of
226 trying to appeal politically, electorally to the alphabet community. He's their
227 great hero. Well look, if you think I'm going to fall for that trick you must think I
228 came down in the last shower.

229
230 **CS:** If you had your druthers would you have used different language?

231
232 **ML:** Well I suppose I would have spoken about anal sex, but that's what I was talking
233 about. You grew up in Guildford, didn't you Chris?

234
235 **CS:** Fairfield, close by.

236
237 **ML:** And Fairfield. And I grew up in Green Valley, mate, so saying that some bloke's
238 sticking his dick up some other bloke's bum or arse is not uncommon in the
239 language. So it was very direct language from the streets. It was too crude to
240 leave up there. It came down but yeah, I should have spoke about anal sex. But
241 is that the big problem here? I mean in the world of political correctness, any
242 straight talker honestly expressing an opinion, you say anything about the
243 alphabet people these days you're automatically the villain, the demon, the devil
244 and that's the way they play it.

245
246 **CS:** Okay. Let's talk about blackouts and let's talk about teachers being overworked.
247 I'll do that after a very quick break on TNT Radio.

248
249 [end of interview]