### NOTICE OF FILING

### **Details of Filing**

Document Lodged: Affidavit - Form 59 - Rule 29.02(1)

Court of Filing FEDERAL COURT OF AUSTRALIA (FCA)

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File Title: MEHREEN FARUQI v PAULINE HANSON

Registry: NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA

Registrar

### **Important Information**

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

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

Form 59 Rule 29.02(1)

### **Affidavit**

No. NSD372 of 2023

Federal Court of Australia

District Registry: New South Wales

Division: General

### **MEHREEN FARUQI**

Applicant

### **PAULINE HANSON**

Respondent

Affidavit of: Andrea-Marie Farrugia

Address: Level 4, 343 George Street, Sydney, NSW 2000

Occupation: Solicitor

Date: 20 February 2024

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Filed on behalf of (name & role of party)

Prepared by (name of person/lawyer)

Law firm (if applicable)

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Address for service Level 4, 343 George Street (include state and postcode) Sydney NSW 200

[Version 3 form approved 02/05/2019]

A Farrugia

- I, Andrea-Marie Farrugia, solicitor, of Level 4, 343 George St, Sydney NSW 2000 affirm:
- 1. I am a solicitor of the firm Marque Lawyers, the solicitors for the Applicant.
- 2. Unless otherwise indicated, I make this affidavit on my own knowledge, information and belief. Where I depose to matters on information and belief, I believe those matters to be true.

### Notice of intention to adduce tendency evidence

- On 3 October 2023, Marque Lawyers filed a Notice of intention to adduce tendency evidence (Original Notice) on behalf of the Applicant. An amended copy of the Original Notice was subsequently filed with the Court on 19 February 2024 (Amended Notice).
- 4. As explained at paragraphs 37-39 of this affidavit, the Original Notice and the Amended Notice are substantively the same, other than some minor typographical errors being rectified (in underline/strike through) in the Amended Notice. Accordingly and for ease, where I refer to the Original Notice and the Amended Notice together, I do so by referencing the **Notice**.
- 5. In this affidavit, and unless otherwise indicated, where I refer to a particular statement attributed to the Respondent which is referred to in the Notice, I do so by referencing the relevant line item number for that statement, being the number which appears in the first column (labelled 'No.') of the table entitled 'Schedule of Conduct' which is included at pages 2-49 of the Notice.
- 6. Between about 2 June 2023 and 3 October 2023, I sourced content to be included in the Notice. During this period, I did the following.
  - (a) I conducted a number of searches to identify and source the statements attributed to the Respondent which are referred to in the Notice. Further details in relation to the searches I conducted, and caused to be conducted, are outlined at paragraphs 7 to 366 of this affidavit.
  - (b) I caused Mr Xander Schwarz, a former paralegal under the employ of Marque Lawyers, to identify and source the statements attributed to the Respondent which are referred to in the Notice. Mr Schwarz is no longer employed by Marque Lawyers. Accordingly, and to the extent Mr Schwarz conducted any searches in relation to the Notice:
    - (i) I am unable to access Mr Schwarz's computer or his computer profile, and as a result I am unable to confirm the specific searches he conducted, however I believe, based on the instructions I gave to Mr Schwarz, that his searches would have been similar to those which I detail at paragraphs 7 to 366 of this affidavit; and
    - (ii) I reviewed any material identified by Mr Schwarz for the purpose of confirming whether it should be included in the Notice.

### **Preliminary searches**

- 7. Prior to undertaking searches to identify and source the statements attributed to the Respondent which are referred to in the Notice, I conducted, and caused to be conducted, searches using Google to identify incidents involving the Respondent which had been reported in the media, and which in my view, showed the Respondent demonstrating the tendencies referred to at paragraphs [1(a)]-[1(b)] of the Notice (Incidents).
- 8. I cannot recall the specific search terms I used to identify the Incidents, and I am unable to retrieve this information from my search history because my Google Chrome profile includes a feature

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- which permanently deletes my search history after 90 days. I believe this feature was automatically enabled at the time I commenced using Google Chrome because I do not recall setting it up.
- 9. The purpose of undertaking the searches described in the paragraph 8 above was to familiarise myself with the Incidents, and to identify the kinds of statements which the Respondent made in response to, or throughout, the Incidents. I then used this information to inform the searches (including the specific terms) I describe at paragraphs 10-36 below.

### B. Social media

Hanson Twitter Account

- 10. Line items 21, 24, 38-44, 48-52, 57, 60, 64, 71-72, 76-77, 85 of the Notice refer to statements made by the Respondent in Tweets which were published to the Respondent's Twitter account '@PaulineHansonOz' (Hanson Twitter Account) between 25 July 2013 and 5 July 2023 (Hanson Tweets).
- 11. I identified and sourced copies of the Hanson Tweets by doing the following.
  - (a) I conducted searches of the tweets which have been published to the Hanson Twitter Account using the 'Advanced Search' feature on Twitter which is accessible via the following link; <a href="https://twitter.com/search-advanced?lang=en">https://twitter.com/search-advanced?lang=en</a>. For the reasons explained at paragraph 8 above, I am unable to retrieve my search history through Google Chrome, and as a result I am unable to access the specific searches I conducted using the Advanced Search feature. However, to the best of my knowledge and recollection, I believe that the search parameters I used to identify and source the Hanson Tweets are as follows.
    - (i) Typing 'Pauline HansonOz' into the search bar entitled 'From these accounts'; and
    - (ii) Typing combinations of the following search terms into the search bar entitled 'Any of these words'.
      - (A) 'Islam' and 'Islamic';
      - (B) 'Muslim';
      - (C) 'Burga' and 'Burga ban';
      - (D) 'Aboriginal', 'Aborigine', 'Aboriginals', 'Aborigines', 'Indigenous' and 'Mob';
      - (E) 'ISIS' and 'ISIL';
      - (F) 'Halal';
      - (G) 'Sharia';
      - (H) 'Pray4MuslimBan' and 'PrayforMuslimBan';
      - (I) 'Africa' and 'African';
      - (J) 'China' and 'Chinese'; and
      - (K) 'Asia', 'Asian' and 'Asians'.

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- (b) Between about 2 June 2023 and about 3 October 2023, I reviewed the Hanson Twitter Account on occasion to identify whether any tweets which had been posted by the Respondent throughout this period should be included in the Notice. I do not recall how frequently I reviewed the Hanson Twitter Account throughout this period, however to the best of my recollection, I believe that it was approximately once to twice per month.
- (c) I reviewed an article entitled 'The Burqa Ban, Islamophobia, and the Effects of Racial "Othering" in Australian Political Discourses', authored by Benafsha Askarazai and published in the Australian Journal of Politics and History, Volume 68, number 2, 2022, which I sourced through the Wiley Online Library by conducting a search of the words "Pauline Hanson" and "racist". Pages 238-241 of this article contain a list of tweets which are attributed to the Respondent and/or the Hanson Twitter Account.
- (d) I also conducted various searches through the Google search engine. For the reasons explained at paragraph 8 above, I am unable to retrieve my search history through Google Chrome, and as a result I am unable to access the exact search terms I used to conduct these searches. However, to the best my recollection, I believe that the searches I conducted were combinations of some or all of the search terms referred to in paragraph 11(a)(ii) above, along with the words "Pauline Hanson Twitter", "Pauline Hanson Tweets" and "racist".

### Hanson Facebook

- 12. Line items 27-28, 31-32, 55-56, 62, 65-66, 68-70, 78-80 and 86 of the Notice refer to statements which were published to the Facebook page 'Pauline Hanson's Please Explain' (Hanson Facebook) between about 19 April 2015 and 6 July 2023 (Hanson Facebook Posts). The Hanson Facebook is accessible via the following link; <a href="https://www.facebook.com/PaulineHansonAu">https://www.facebook.com/PaulineHansonAu</a>.
- 13. I identified and sourced copies of the Hanson Facebook Posts by doing the following.
  - (a) I conducted searches of the Facebook posts which have been published to the Hanson Facebook using the search bar entitled 'Search' which is accessible through the Hanson Facebook. For the reasons explained at paragraph 8 above, I do not have access to the exact the search terms I used to identify the Hanson Facebook Posts, however, to the best of my recollection I believe that they were a combination of some or all of the search terms referred to in paragraph 11(a)(ii) above.
  - (b) Between about 2 June 2023 and about 3 October 2023, I reviewed the Hanson Facebook on occasion to identify whether any Facebook posts which had been published to the Hanson Facebook throughout this period should be included in the Notice. I am unable to recall how frequently I reviewed the Hanson Facebook, however to the best of my recollection, I believe that it was approximately once per month.
  - (c) I conducted various searches through the Google search engine. For the reasons explained at paragraph 8 above, I do not have access to the exact search terms I used to conduct these searches, however, to the best my recollection, I believe that they were combinations of some or all of the search terms referred to in paragraph 11(a)(ii) above, along with the words "Pauline Hanson Facebook", "Pauline Hanson Facebook posts" and "racist".

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### C. YouTube videos

### Hanson YouTube

- 14. Line items 25, 53, 58, 73-75, 83 of the Notice refer to statements made by the Respondent in videos which have been published to the YouTube account entitled 'Pauline Hanson's Please Explain' (Hanson YouTube) between about 25 October 2014 and 4 July 2023 (Hanson YouTube Videos). The Hanson YouTube is accessible via the following link; <a href="https://www.youtube.com/@PaulineHansonsPleaseExplain">https://www.youtube.com/@PaulineHansonsPleaseExplain</a>.
- 15. I identified and sourced copies of the Hanson YouTube Videos by doing the following.
  - (a) I conducted various searches on YouTube by typing specific search terms into the search bar. For the reasons explained at paragraph 8 above, I do not have access to the exact search terms I used to conduct these searches, however, to the best of my recollection, I believe that were combinations of some or all of the search terms referred to in paragraph 11(a)(ii) above, along with the words "Pauline Hanson" and "Pauline Hanson Please Explain".
  - (b) I viewed, and/or instructed Mr Schwarz to view, several videos that are available on the 'Videos' tab (which is accessible through the Hanson YouTube via the following link <a href="https://www.youtube.com/@PaulineHansonsPleaseExplain/videos">https://www.youtube.com/@PaulineHansonsPleaseExplain/videos</a>) for the purpose of identifying potential videos to be included in the Notice. To the extent Mr Schwarz identified any such videos, I then reviewed those videos to confirm whether they should be included in the Notice.
  - (c) I conducted various searches using Google. For the reasons explained at paragraph 8 above, I do not have access to the exact search terms I used to conduct these searches, however, to the best my recollection, I believe that they were combinations of some or all of the search terms referred to in paragraph 11(a)(ii) above. I also recall searching for videos which showed some of the Incidents by using search terms which described those Incidents.
- 16. Line items 88-92 of Notice refer to statements which have been published in episodes of the animation series entitled 'Pauline Hanson's Please Explain,' which was created by Stepmates Studios and which is available on the Hanson YouTube (Animation Series). I instructed Mr Schwarz to view the Animation Series for the purpose of identifying potential videos to be included in the Notice. I then reviewed the videos identified by Mr Schwarz to confirm whether they should be included in the Notice.

### Other YouTube videos

17. Line items 18, 26, 45 and 59 of the Notice refer to statements made by the Respondent in videos which have been published by various users to YouTube between 27 April 2010 and 6 July 2017. I identified and sourced copies of this material by conducting the searches referred to in paragraphs 15(a) and 15(c) above.

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### D. Media articles and media appearances

- 18. Line items 2, 9, 13, 17, 19-20, 23, 30, 33, 34, 46, 61, 63, 84, 93 refer to statements which are attributed to the Respondent and which were published in various media articles between 30 November 1996 and 5 July 2023 (**Media Articles**).
- 19. I identified and sourced copies of the Media Articles by conducting searches on Google. For the reasons explained at paragraph 8 above, I do not have access to the specific searches I used to identify the Media Articles, however, to the best of my recollection, I believe that they included the term "Pauline Hanson", along with combinations of some or all of:
  - (a) the search terms referred to in paragraph 11(a)(ii) above; and
  - (b) the following further search terms:
    - (i) "racist" and "racism";
    - (ii) "true black"; and
  - (c) descriptions of the Incidents.
- 20. Line items 6, 22, 35, 47, 54, 87 of the Notice refer to statements made by the Respondent in various media appearances that she made between about 1996 and 19 July 2023. I identified and sourced copies of the videos referred to in those line items by conducting the searches referred to in paragraph 19 above.

### E. Other material

Material obtained through libraries

- 21. Using the search terms referred to at paragraph 19 above, and reviewing the material contained in the search results which were responsive to those search terms, I identified a number of further sources that attributed statements to the Respondent, but which I was unable to access through the resources available on Google and the Respondent's social media accounts. I have summarised this material, along with the steps I took to source this material and annex it to the Notice at paragraphs 22-322 below.
- 22. Line item 1 of the Notice refers to a statement which is attributed to the Respondent in an article entitled 'Hanson Says no to Asia' which was authored by Simon Kelly and published by The Queensland Times on or about 7 June 1996 (Hanson Says No Article). I obtained a copy of the Hanson Says No Article by doing the following.
  - (a) I instructed Ms Stephanie Tran, a paralegal under the employ of Marque Lawyers, to source the Hanson Says No Article from the State Library of Queensland on 28 September 2023.
  - (b) I am informed by Ms Tran and believe that she subsequently:
    - (i) submitted a webform through the website for the State Library of Queensland requesting a copy of the Hanson Says No Article; and
    - (ii) received an email from the State Library of Queensland which attached (among other things) the Hanson Says No Article.

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- Copies of Ms Tran's correspondence with the State Library of Queensland including the attachments are annexed to this affidavit at **pages 10-13 and marked "AF-1"**.
- 23. The article annexed at page 50 of the Notice and marked "A" is a true copy of the Hanson Says No Article that was provided to me by Ms Tran.
- 24. Line items 3, 5 and 7 of the Notice refer to statements that have been published in a book entitled 'Pauline Hanson --- the Truth: On Asian Immigration, the Aboriginal Question, the Gun Debate and the Future of Australia,' which was published in 1997 (**The Truth Book**). I obtained a copy of The Truth Book by doing the following.
  - (a) I instructed Mr Schwarz to source The Truth Book from the State Library of New South Wales on about 4 August 2023.
  - (b) I am informed by Mr Schwarz and believe that he subsequently attended the State Library of New South Wales and obtained a copy of The Truth Book.
- 25. I subsequently instructed Mr Schwarz to review The Truth Book to identify any potential pages to be included in the Notice. I then reviewed the pages identified by Mr Schwarz to confirm that they should be included in the Notice.
- 26. The documents included at Annexures C, E and G of the Notice are true copies of the pages which I extracted, and caused to be extracted, from The Truth Book.
- 27. Line items 8 and 10-11 of the Notice refer to statements made by the Respondent in media releases and speeches which she made between 23 April 1997 and 1 July 1997 (Balson Documents). From my review of website for The University of Queensland Library, I am aware that the Balson Documents are available in a collection entitled 'UQFL366 Scott Balson Collection' at Fryer Library, The University of Queensland Library. I obtained copies of (among other things) the Balson Documents by doing the following.
  - (a) On about 6 September 2023, I requested to obtain copies of the Balson Documents (among other things) through the 'Fryer item request form' which is accessible via the following link; <a href="https://web.library.uq.edu.au/library-services/special-collections/fryer-item-request-form">https://web.library.uq.edu.au/library-services/special-collections/fryer-item-request-form</a>. A copy of the email I received from Fryer Library on 19 September 2023 which contains confirmation of my request is annexed to this affidavit at pages 14-18 and marked "AF-2".
  - (b) On 19 September 2023, I received an email containing a link to the file share platform AARNET FileSender which contained (among other things) the Balson Documents. A copy of this email is annexed to this affidavit at page 19 and marked "AF-3".
- 28. The documents included at Annexures H, J and L of the Notice are true copies of the Balson Documents which I obtained through the AARNET FileSender.
- 29. I subsequently instructed Mr Schwarz to review the material received from Fryer Library, including the Balson Documents, to identify any potential documents to be included in the Notice. I then reviewed the specific material which Mr Schwarz identified for the purpose of confirming whether it should be included in the Notice.
- 30. Line item 67 of the Notice refers to statements which have been published in a book entitled 'Pauline In Her Own Words' which the Respondent is credited as co-authoring with Tom Ravlic, and which was published on or about 13 April 2018 (In Her Own Words Book). I obtained a copy of the In Her Own Words Book by doing the following.

- (a) On 15 September 2023, I instructed Ms Georgia Lewis-Stark, a legal secretary under the employ of Marque Lawyers, to source the In Her Own Words Book from the State Library of New South Wales.
- (b) I am informed by Ms Lewis-Stark and believe that she subsequently attended the State Library and obtained a copy of the In Her Own Words Book.
- 31. I subsequently instructed Mr Schwarz to review the In Her Own Words Book to identify any potential pages to be included in the Notice. I then reviewed the pages identified by Mr Schwarz to confirm that they should be included in the Notice.
- 32. The documents included at Annexure BK of the Notice are true copies of the pages which I extracted, and caused to be extracted, from The In Her Own Words Book.

### Hanson documentary

- 33. Line items 4, 16, 29, 36 and 37 of the Notice refer to statements made by the Respondent in a documentary entitled 'Pauline Hanson: Please Explain!' which was directed by Anna Broinowski and initially released on or about 31 July 2016 (**Documentary**). I am informed by my colleague, Ms Lauren Gasparini, and believe that she watched the Documentary on Prime Video on 1 September 2023 and identified the statements referred to in these line items.
- 34. On about 28 October 2023, I am instructed by Ms Gabby Lee, a legal secretary under the employ of Marque Lawyers, and believe that she subsequently purchased the Documentary from the Google Play Store.

### Media and press releases

- 35. Line items 12, 14 and 15 of the Notice refer to statements made by the Respondent in press releases which were published between about 1 October 1997 and about 31 December 1997. I identified and sourced copies of this material by:
  - (a) reviewing the press releases available on Trove, and which can be accessed via the following link; <a href="https://webarchive.nla.gov.au/awa/1999072713">https://webarchive.nla.gov.au/awa/1999072713</a> 0000/http://www.onenation.com.au/press/press.html; and
  - (b) conducting searches of Trove using the terms "Pauline Hanson" and "press release" and reviewing the material that is responsive to those search results.
- 36. Line items 81-82 refer to statements made by the Respondent in media releases which have been published to the website located at <a href="https://www.senatorhanson.com.au/">https://www.senatorhanson.com.au/</a> (Hanson Website). I identified and sourced copies of this material by:
  - (a) navigating to the webpage entitled "News" on the Hanson Website, and selecting the option entitled "Media Release'; and
  - (b) reviewing the media releases available on this webpage.

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### F. Revised notice

- 37. Subsequent to the Original Notice being filed with the Court, I identified that:
  - electronic links contained in the sealed copy of the Original Notice did not work in that they either could not be clicked, or redirected to incorrect webpages;
  - (b) the annexure markings on pages 50 to 263 of the sealed copy of the Original Notice had been removed; and
  - (c) some of the descriptions of the statements and particulars referred to in the table included at pages 2-49 of the Original Notice contained typographical errors.
- 38. I believe that the issues referred to in paragraph 37(a)-(b) above occurred at the time at which the Original Notice was electronically filed with the Court. I have based this belief on the fact that these issues do not appear in the unsealed copy of the Original Notice which was contained in a Dropbox folder that I emailed to Mr Danny Eid, the solicitor for the Respondent, on 3 October 2023.
- 39. On 16 February 2024, I emailed Mr Eid a letter from Mr Michael Bradley which identified the issues and typographical errors referred to paragraph 37 above, and enclosed an unsealed copy of the Amended Notice, which rectifies the issues and typographical errors referred to in paragraph 37 above. A copy for Mr Bradley's letter to Mr Eid is annexed to this affidavit at pages 20-21 and marked "AF-4."

Affirmed by the deponent at Sydney in New South Wales on 20 February 2024 Before me:

OFarrugia
Signature of deponent

Signature of witness Lauren Gasparini Solicitor

Marque Lawyers

Level 4, 343 George Street

Sydney NSW 2000

This affidavit was affirmed and witnessed via audio visual link in accordance with Part 2B of the Electronic Transactions Act 2000 (NSW).

### **Andrea Farrugia**

From: SLQ Ask Us < slqaskus@libraryresearch.info> Sent: Thursday, September 28, 2023 3:45 PM

To: Stephanie Tran < stephaniet@marquelawyers.com.au>

Subject: ASK101346 Response to your request

You don't often get email from slqaskus@libraryresearch.info. Learn why this is important

### State Library of Queensland - Response to your question: ASK101346

Your question number: ASK101346

Our response to your question:

Dear Stephanie,

Thank you for your enquiry requesting the article "Hanson says no to Asia" from the *Queensland Times* of 8 June 1996.

I have attached a scan from our microfilm of the page 1 article, as well as the full interview article that was on page 13.

I trust this information will be useful. If you have another question please submit a new enquiry.

Your feedback in relation to this enquiry will help us to improve our service. Please share your feedback with us, using the feedback options below.

Kind regards,

Fiona Dixon, Librarian State Library of Queensland

Number of documents attached to this message:2

Attached documents may be listed at the beginning or end of this email

### Your original question:

Your Question:

Hi.

I'm writing on behalf of Marque Lawyers, we're a law firm based in Sydney. We're after a copy of an article titled 'Hanson says no to Asia' which was published by the Queensland Times on 8 June 1996. We urgently need this article for evidence and would really appreciate it if we could get a copy of it by this Friday (29th September).

Please don't hesitate to reach out if you need any additional information.

Thanks, Stephanie

List any resources you have already searched:

- NSW State Library (not available)

Use any of the following links for further correspondence with us.

Ask a different question
Other services related to this response

Please click a rating to comment on the service you received in relation to this response.

**★★★★★ Excellent ★★★★☆ Very good ★★★☆☆ Good ★★☆☆☆ Fair ★☆☆☆ Poor** 

The Ask Us Team State Library of Queensland

The information provided in this response has been provided to you by our service in good faith. However the information should not be relied upon without establishing its accuracy for yourself.

Please note that information goes out of date and, in particular, URLs that we might provide you may not continue to be available. The provision of a URL by this service does not constitute endorsement of that site and any fees or charges for using the site will be your responsibility. Downloading of images and/or text without the permission of the copyright owner may breach international copyright laws.

## The Queensland



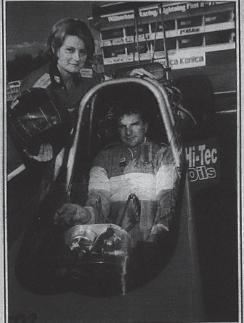
IPSWICH Oh what a

week it was!

Week in review, page 16 Weekend Review, page 13

Saturday, June 8, 1996

What Hanson really thinks



RACING AWAY: Santo Rapisarda car driver Steve Read and Tanya Campbell are ready for the Winternationals at Willowbank this weekend.

### Get set for Winternationals

MORE than 25,000 visitors are expected to head to Ipswich for this weekend's Minternationals at Willowbank Race Mayer.

Mayor Mayor John Nugent said the Winternationals was one of the bigest winternationals was one of the bigest into the area. "Cr Nugent said." "Jotels, motels and other businesses across the region were all booked solid."

As well as the titles on offer, drivers "DEditorial, page 14.

### Hanson says no to Asia

By SIMON KELLY

MEMBER for Oxley Pauline Hanson has called for a stop to Asian immigration and would be prepared to support a private-member's bill in Parliament placing restrictions on foreign investment.

During an intervior fine to mark her first 100 days in office Mes Hanson gave.

Me Hanson said while memployment was so high, immigration should be cut right back to a level equal to the number of people leaving the country.

She said she would like to see Asia immigrations slowed down.

"I'd like to see a bit of a stop on the Asian immigration," Ms Hanson said.
"I'think there's too many Asians coming into this country.
"You see, (former prime minister Paul)

Keating wanted us to be a part of Asia. as far as I'm concerned, Australia is not part of Asia, and I don't want to be a part of Asia, and I don't want to be a part of Asia.

Queensland president of the Vietnamese Community of Australia Dr Cuong Buil

said registrations of complete review of Anstra-lia is not home mortgages to be made to the member had the wild as welfare system and for interest payments on home mortgages to be made to the common mortgages to be made to the desire a payment on home mortgages to be made to the compart of natality and partial sale of Telstra and and proposed to divert years and proposed to divert years and proposed to divert years and proposition to any relaxation of laws relating to marriage.

Hand welfare system and for interest payments on home mortgages to be made to the one mortgages to be made to the compart of payments on home mortgages to be made to the compart of payments on home mortgages to be made to the compart of payments on home mortgages to be made to the compart of payments on home mortgages to be made to the compart of payments on home mortgages to be made to the compart of payments on home mortgages to be made to the payment of payments on home mortgages to be made to the payment of payments on home mortgages to be made to the payment of payments on home mortgages to be made to the payment of payments o

as far as I'm concerned, Australia is not part of Asia."

Queensland president of the Vietnamese Community of Australia Dr. Cuong Bui said Ms Hanson did not have a good enough understanding of the Asian community and Australia's place in the world.

"It all sounds very emotional to me," Dr. Bui said. "She needs to find out more about the Asian community before she goes offsaying these things.

"If's sad that she represents so many Asians in her area and still has these views."

"Other statements Ms Hanson made on her first 100 days in office included:

"It all Bounds are presents on many control of the statements of the statement of the s

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## review

Features Top 10s Music Movies

SIMON KELLY talks to Federal member for Oxley PAULINE HANSON on the eve of her hundreth day in office .



# Hanson's hundred days The Currier is the first word Pauline Hanson says abouther first 10 days. Let the complete the search of the statements on one part of files, there are no plants in the planter boxes and flew pictures on the wall. Thaven't even had time to go and or gaineighnist. If she least of my overriers, as said. Thaven't even had time to go and or gaineighnist. If she least of my ordicary as the property over there, and I resent them mining out here and doing it in our Management of the property over there, and I resent them mining out here and doing it in our mining out

The Queensland Times, Saturday, June 7, 1996 - Page 13

### **Annexure AF-2**

### **Andrea Farrugia**

From: Fryer Library <fryer.library@enquire.uq.edu.au>
Sent: Monday, 18 September 2023 12:00 PM

To: Andrea Farrugia

**Subject:** Application for copies of Fryer Library manuscript material form submission

[Enquiry: 230906-003848]

You don't often get email from fryer.library@enquire.uq.edu.au. Learn why this is important



### **Subject**

### Application for copies of Fryer Library manuscript material form submission

18/09/2023 11:59 AM

### Dear Andrea

Thank you for your request for copies. The total cost for digitizing these items will be \$156 (\$20 administration fee plus \$1 per page).

We expect that the scanning of these items should be completed by the end of the week.

The delay is due to a number of item being faxes on thermal paper. This can't be scanned and need to be photographed.

Do you wish to proceed with this request?

Kind regards

Belinda

Fryer Library

06/09/2023 05:17 PM

Submission ID: 108758

Submitted by Anonymous (not verified) on Wed, 09/06/2023 - 17:11

Select your service:

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Full name:

Andrea Farrugia

Organisation:

Marque Lawyers

Mailing address:

Level 4, 343 George Street, Sydney NSW 200

Phone:

0458757913

Email:

andreaf@marquelawyers.com.au

Declaration (order copies service):

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### Additional information:

As per my email of 6 September 2023, the documents may be used in connection with Federal Court of Australia proceedings no. NSD372/2023 which were commenced by Senator Mehreen Faruqi against Senator Pauline Hanson on 3 May 2023.

Fryer Call Number:

(02) 82163029

Item details:

**UQFL366 Scott Balson Collection** 

Box 1, Folder 1

Poster for ATSIC elections, 9 Oct 1999, 1 p

**UQFL366 Scott Balson Collection** 

Box 1, Folder 2

Program, notes and speeches relating to 'Prosper Australia!', Brisbane, 4 Oct 1997, 14

**UQFL366 Scott Balson Collection** 

Box 2. Folder 1:

o Fax from Pauline Hanson to Scott Balson, 4 June 1998, 1 p

o Fax from Pauline Hanson to Scott Balson, 19 June 1998, 1 p

o Questions and answers for an interview with Heather Hill, 25 Oct 1998, 2 p o Letter from Pauline Hanson to Scott Balson, 29 Apr 1999, 1 p

### **UQFL366 Scott Balson Collection**

Box 2, Folder 4:

- o Text of Pauline Hanson's speech at Gold Coast Launch, 1 July 1997, 14 p
- o Text of Pauline Hanson's speech in Adelaide, 11 Jun 1997, 13 p
- o Papers re: Hanson's visit to Western Australia and a website posting linking her to Hitler, 2 May 1997, 2 p
- o Fax of Pauline Hanson press release, 14 Jun 1996, 21 p
- o Fax of letter from Pauline Hanson to Scott Balson, re: establishment of the official Pauline Hanson Home Page, 18 Apr 1997, 1

### UQFL366 Scott Balson Collection

Box 2, Folder 5:

John Woodley, Senator for Queensland, 'Why Pauline is Wrong: Fact file on Aboriginal and Multicultural Issues' with covering letter, 30 Jul 1997, 9 p

### UQFL366 Scott Balson Collection

Box 2, Folder 7:

- o Notes comparing Pauline Hanson's statements with those of John Howard at Longreach headed 'Howard Longreach', nd, 1 p
- o Notes headed 'Singaporean Soldiers-Racist Attacks', nd, 1 p
- o Notes headed 'Hanson Effecting Asian Tourism', 13 Jul 1997, 1 p
- o Notes headed 'Boswell and Strategy', 19 Jun 1997, 1 p
- o Notes headed 'Ma Letter', nd, 1 p
- o Notes headed 'Triads', nd, 1 p

### **UQFL366 Scott Balson Collection**

Box 2, Folder 8:

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- o Pauline Hanson, 'So-called anit-racists are nothing but socialist thugs', 30 Sep 1997, 1 p
- o Pauline Hanson, 'Australia cannot afford a loan to Thailand', 12 Aug 1997, 1 p
- o Pauline Hanson, 'McNamara having a slow day', 22 Jul 1997, 1 p
- o Pauline Hanson, "So-Called Anti-Racism Committee plots personal assault on Hanson, 16 Jul 1997, 1 p
- o Pauline Hanson, Statement issued at press conference in Adelaide, 11 Jun 1997, 3 pp

Pauline Hanson, 'Howard has Amnesia!', 8 May 1997, 1 p

- o Pauline Hanson, 'Howard a hypocrite!', 7 May 1997, 1 p
- o Pauline Hanson, 'Send them back!', 6 May 1997, 1 p
- o Pauline Hanson, 'Big Australian slams little Aussie', 2 May 1997, 1 p
- o Pauline Hanson, 'Cannibalism is not the issue...the truth is', 22 Apr

1997, 1 p

o Pauline Hanson, 'Aboriginal call for trade sanctions treasonous', 21 Apr 1997, 1 p

**UQFL366 Scott Balson Collection** 

Box 2, Folder 9

Fax of newspaper cutting: George Lamont, 'What Asia's top business leaders think of Hanson', The Sydney Morning Herald, 21 Jul 1997, 3 p

**UQFL366 Scott Balson Collection** 

Box 3, Folder 3:

Margo Kingston, 'Party 's 'gone Fischering' as Pauline baits race hook', The Sydney Morning Herald, 12 Sep 1998, p 9

**UQFL366 Scott Balson Collection** 

Box 4. Folder 3

- o Letter from Pauline Hanson to One Nation supporters, 10 Oct 1997, 1 p
- o Pauline Hanson, 'An Independent Speaks', Australian Shooters Journal (Sep 1996), pp10-11
- o Extracts from Hansard with speeches by Pauline Hanson, various dates, 10 p
- o Pauline Hanson, letter to all One Nation branches, 30 Sep 1997, 1 p
- o News release: Pauline Hanson, 'So called anti-racists are nothing but socialist thugs', 30 Sep 1997, 1 p

**UQFL366 Scott Balson Collection** 

Box 9, Folder 1:

Rutherford, Jennifer, 'One love too many: the undoing of Pauline Hanson', Australian Journal of Politics and History, Vol. 47, No. 2 (2001), pp 192-208 [with handwritten comments by Scott Balson].

Do you require an itemised quote?:

Yes, please provide a quote for this request

I agree to abide by the conditions for approval: agree\_conditions

I acknowledge the privacy statement outlined above: acknowledge privacy statement

Question Reference # 230906-003848

### **Annexure AF-3**

### **Andrea Farrugia**

From: AARNET FileSender <no-reply@aarnet.edu.au>

Sent: Tuesday, 19 September 2023 2:55 PM

To: Andrea Farrugia

**Subject:** AARNet FileSender: Fryer Library copy request\_UQFL366\_Scott Balson Papers

You don't often get email from no-reply@aarnet.edu.au. Learn why this is important

Hello,

The following file has been uploaded to <u>AARNet FileSender</u> by <u>b.spinaze@uq.edu.au</u> and you have been granted permission to download its contents.

### **Transaction details**

File Fryer Library\_UQFL366\_Scott Balson Papers.zip (99.8 MB)

Expiry date 09/10/2023

Download link https://filesender.aarnet.edu.au/?s=download&token=d19f93eb-958c-4a9a-8228-8f05981f7b81

Best regards,
AARNet FileSender

Translate this email: <a href="https://filesender.aarnet.edu.au/?s=translate">https://filesender.aarnet.edu.au/?s=translate</a> email&token=5d365418-de2f-4e57-bd92-2c99e2abefe3

### **Annexure AF-4**



Our reference MB/14217 Phone (02) 8216 3000

Email michaelb@marquelawyers.com.au; laureng@marquelawyers.com.au

16 February 2024

Danny Eid Danny Eid Lawyers 522 Marrickville Road Dulwich Hill NSW 2203

By email: danny@dannyeidlawyers.com.au

Dear Danny

### Federal Court of Australia proceedings 372/2023 - Faruqi v Hanson

- We refer to the Notice of intention to adduce tendency evidence, which was filed on behalf of our client on 3 October 2023 (Notice).
- 2. Having conducted a further review of the Notice, we have identified that:
  - (a) many of the links contained in the sealed copy of the Notice do not work in that they either cannot be clicked, or they redirect to incorrect webpages; and
  - (b) the annexure markings on pages 50 to 263 of the sealed copy of the Notice have been removed.
- 3. We suspect that these issues occurred at the time at which we electronically filed the Notice with the Court, as they do not appear in the unsealed copy of the Notice that was served on your client on 3 October 2023. In any event, we apologise for any inconvenience that these issues may have caused in respect of the sealed copy.
- 4. In addition to the matters outlined above, we have identified some minor typographical errors in the descriptions of the statements and particulars which are referred to in the table included at pages 2-49 of the Notice. These typographical errors are administrative in nature, and largely relate to the dates.
- 5. In light of the matters outlined above, and in the interest of assisting both your client and the Court in navigating the Notice, we have **enclosed** with this letter an amended copy of the Notice



which rectifies the issues identified in this letter, and amends the typographical errors (in underline/strike through). We confirm that no substantive changes have been made to this document.

- 6. We intend to file the amended copy of the Notice with the Court, and confirm that we will provide a sealed copy upon receipt from the Registry.
- 7. If you have any questions in relation to the above, please do not hesitate to contact me.

Yours sincerely

Michael Bradley

Managing Partner