

## NOTICE OF FILING

### Details of Filing

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*Sia Lagos*

Registrar

### Important Information

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Form 59  
Rule 29.02(1)

## Affidavit of Aaron Brian Hales

NSD 1727 of 2025

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

**Charlotte MacInnes**

Applicant

**Rebel Wilson**

Respondent

Affidavit of: **Aaron Brian Hales**  
Address: [REDACTED]  
Occupation: Singing Teacher / Business Owner  
Date: 20<sup>th</sup> December 2025

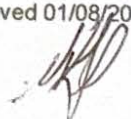
I, Aaron Brian Hales, affirm:

### Background

1. I am a music and singing teacher, and a business owner. I live and work in Perth.
2. I have a Masters degree in Music (MMus) and a Doctorate (PhD) in Music, English and Asian Studies.
3. I studied my Masters degree in London at the London College of Music in composition for the stage. This also encompassed musical direction, voice, and conducting.
4. On completion of this degree, I was offered a position teaching choral music and singing at Ravenscourt – a school where children could perform professionally on the stage or in film and television, whilst still remaining at school. I started teaching at Ravenscourt in 2000. I also performed nightly as a professional pianist.

Filed on behalf of (name & role of party)	<u>Charlotte MacInnes, Applicant</u>
Prepared by (name of person/lawyer)	<u>Patrick George</u>
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[Form approved 01/08/2011]

- 5. I decided to elevate my career and return to Australia to study my PhD. I wanted to research the historical evolution of the performing arts in Singapore – I used the musical theatre genre as a lens to evaluate the boundaries of censorship and creative control on both the Singaporean nation and the citizen.
- 6. On returning to Australia to commence this degree, I was offered a position at the Western Australian Academy of Performing Arts (WAAPA). I also established my own private singing and theory teaching studio.
- 7. My reputation spread around Perth and I began working with students at WAAPA as well as students auditioning for other universities around Australia. I began my PhD and commenced at WAAPA in 2004. I taught at WAAPA from 2004 until 2021. While I was at WAAPA I taught many different subjects including Song Repertoire Performance, Music Skills and Theory, Performance Practice, and Singing.
- 8. In addition to teaching at WAAPA, I also taught students privately from my home studio in Perth. For the most part I only taught students and artists who were proactive within the music industry. This is my own personal standard with which I work best. Generally, I work with tertiary students or students wanting to get into either a Diploma or Bachelor programme. I don't really teach young students but have had the opportunity to work with some ATAR pupils who have been sent my way. I like teaching professional artists and high level students much more than a primary school student or the 'vocational' student who has always wanted to learn singing 'on the side'. I have had the privilege of teaching some amazing people. I have graduates and artists performing in major musical productions in London, New York, Europe, Asia and Australia. Likewise, I have had my students accepted into every major university Bachelor Musical Theatre programme in Australia, Singapore and London.

**Charlotte MacInnes**

- 9. I have known Charlotte MacInnes since 2017 when she was a student at WAAPA. I taught her at WAAPA, and also privately, from 2017 until 2021.

- 10. [REDACTED]

11. [REDACTED]

12. Over the years that ensued, I not only taught Charlotte but also spent time with her socially.

13. In the years I taught her from 2017 until 2021, I formed the following views about Charlotte based on our interactions and my observations of her:

14. [REDACTED]

15. Musically, she was extremely talented. She was very much a contemporary singer when we met and it was essential that she learnt how to engage and use her head voice (soprano register) to her advantage, especially for the Music Theatre genre. She learnt very quickly how to negotiate this area of her voice. Once she entered her soprano register, everything changed. Her confidence shifted and she was able to engage with much harder and more dramatically sophisticated repertoire. Her voice also developed in tone, strength and endurance. She understood how to navigate between both a contemporary belt technique and that of a legit soprano. Within 18 months she was able to control her voice and produce a sound better than most graduates. By the end of her BA degree, I knew she was poised for great things. She has very much an eidetic memory for music, in that she can memorise and recall music perfectly. Her ability to recall repertoire and then sing it without any score in front of her was amazing. She learnt fast and retained any critical information that I offered towards her interpretation of the score and character as a whole.

16. [REDACTED]

[REDACTED]

17. [REDACTED]

18. [REDACTED]

19. [REDACTED]

20. [REDACTED]

21. [REDACTED]

22. [REDACTED]

**Charlotte's Reputation**

23. In the period from 2017 when I first met Charlotte up until prior to September 2024, I knew many people who knew or knew of Charlotte.

*[Handwritten signature]*

*[Handwritten signature]*

- 24. This included teachers and students at WAAPA, and other students I taught privately. It also included other performers and graduates from other institutions who have all watched Charlotte with interest since she graduated.
- 25. Charlotte's reputation prior to 23 September 2024, amongst the people to whom I have just referred, was that her voice was in a different league to other students and young singers. She had a reputation for having an incredible voice. She was regarded as having a star quality. I told her that she could be the next big thing if she met the right people at the right time. People were well aware of Charlotte whilst she was a student at WAAPA and there was a real excitement for her future.
- 26. Other students I interacted with and taught at WAAPA, or privately, admired and looked up to Charlotte. I had several students tell me words to the effect that Charlotte has the best voice they have ever heard. These students hoped to develop a voice similar to hers. She was admired by other pupils at WAAPA. Her performances were always on point and you were comforted as a spectator that she would deliver. There was never an issue of intonation or rhythmic discrepancy. Her performances were always so accurate and engaging. I was never concerned when she entered the stage for a performance practice (one of the classes where individual students would perform in front of a large crowd) as I just knew that she would deliver the highest standard. She received positive feedback from her other teachers, and from other students, after these performances.
- 27. When Charlotte got a leading role in "The Deb" (first as a stage production in 2022 and then the film version in 2023), as well as having been cast in a TV show in 2022, people I knew who also knew or knew of Charlotte would tell me they were excited for her and were not surprised by her immediate success. They expected her to succeed. People expressed to me the sentiment that she had the potential to rise to the top of the industry.
- 28. [REDACTED]
- 29. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]
- 30. Charlotte also had a reputation as being honest and an ethical and morally upright person.



### The Publications

31. I saw the 23 September 2024 Post soon after it was posted. I was in Singapore at the time.
32. I thought Rebel was insinuating in the post that Charlotte had accepted a bribe to stay silent about Amanda Ghost in return for being given the lead role in *Gatsby* and a record deal.
33. I spoke to Charlotte about this post soon after it was posted. It had a dreadful impact on her. She was incredibly hurt and insulted by it.
34. I also saw the 16 May 2025 Post although I cannot recall precisely when.
35. I thought it was saying that The Deb film would never get released because of Charlotte, and that she had lied and supported people who were blocking the film's release. It seemed to me that Rebel was singling Charlotte out to blame for the holdup of the film and for all the problems associated with it.
36. She was angry and humiliated by the post. She felt she was being unfairly targeted. She felt that, of all the people involved in the film, she was being singled out by Rebel. This was very upsetting for her, and to those close to her. She felt she had been named and shamed.


### Impact on Charlotte

37. I have had several conversations with Charlotte about Rebel's Instagram publications about her (**Publications**).
38. She has at times said she was trying to stay positive and work on her original music, but she was obviously very upset by the Publications.
39. I recall her saying she didn't want to return to Australia because she was worried about how people might regard her following the Publications.
40. She told me she was concerned about how the Publications were being interpreted within the industry in Australia. She was worried about the impact on her career and future.
41. She has expressed to me that she was bewildered and confused by the Publications. She said she didn't understand why Rebel was treating her like this. She said she felt a real sense of injustice and that she was being mistreated.
42. She told me she was disappointed that her first film had turned out like this.
43. She was outraged that Rebel was portraying her as a victim. She said she was upset she had been falsely 'outed' as a victim, and then had her reputation assassinated by Rebel. She didn't understand how Rebel could have so misconstrued what had occurred.

**Damage to Reputation**

- 44. The Publications have been the subject of gossip amongst people I know in the industry.
- 45. People have talked to me about the Publications. A few music teachers, for example, and many students, have raised them with me. Often they would ask me for an explanation and I have had to try to explain the situation to them as I understand it and say that the claims Rebel has made about Charlotte aren't true.
- 46. [REDACTED]

Affirmed by the deponent  
 at Perth *MERRABOOKA*  
 in Western Australia  
 on 20<sup>th</sup> December 2025  
 Before me:

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 )  
 )   
 )  
 )  
 ) Signature of deponent

  
 \_\_\_\_\_  
 Signature of witness

*VICTOR HERBERT SMITH*  
 \_\_\_\_\_  
 Name and qualification of witness

**VICTOR.H.SMITH**  
 JUSTICE OF THE PEACE  
 (8603) W.A.