

## **NOTICE OF FILING**

### **Details of Filing**

Document Lodged: Notice of Intention to Adduce Tendency Evidence - Form 64 - Rule 30.31  
Court of Filing: FEDERAL COURT OF AUSTRALIA (FCA)  
Date of Lodgment: 25/04/2024 10:45:52 AM AEST  
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File Number: NSD372/2023  
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.

CB4376

## Second Notice of intention to adduce tendency evidence

No. NSD372 of 2023

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

### MEHREEN FARUQI

Applicant

### PAULINE HANSON

Respondent

To: Pauline Hanson

I, Mehreen Faruqi, give notice, under subsection 97(1) of the *Evidence Act 1995*, that I intend to adduce further evidence of character, reputation, conduct or tendency to prove that Pauline Hanson has, or had, a tendency to act in a particular way, or to have a particular state of mind.

### Evidence required

1. The Applicant contends that the Respondent has a tendency to:
  - (a) make public statements (or endorse the public statements of other people that have been made) because of the race, colour or national or ethnic origin of a particular person who has, or group of people who have, one or more of the following attributes (**Group Attributes**).
    - (i) Person of colour;
    - (ii) Migrant to Australia;
    - (iii) Person with migrant heritage, born in Australia
    - (iv) Muslim person;
    - (v) Person with visible signs or expressions of religion;
  - (b) engage in commentary consistent with the Respondent holding white supremacist views, including by making hateful remarks about a person who has, or a group of people who have, one or more of the Group Attributes.

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Filed on behalf of (name & role of party) Mehreen Faruqi, Applicant  
Prepared by (name of person/lawyer) Michael Bradley, solicitor  
Law firm (if applicable) Marque Lawyers  
Tel (02) 8216 3000 Fax (02) 8216 3001  
Email [michaelb@marquelawyers.com.au](mailto:michaelb@marquelawyers.com.au); [laureng@marquelawyers.com.au](mailto:laureng@marquelawyers.com.au)  
**Address for service** Level 4, 343 George Street  
(include state and postcode) Sydney NSW 2000

2. The issue in the case to which the tendency reasoning applies is whether the conduct alleged by the Applicant at [1] of the Originating Application filed 3 May 2023, and [2] of the Concise Statement filed 13 June 2023, was engaged in by the Respondent *because of* the race, colour or national or ethnic origin of the Applicant or some or all of the people that share one or more of the Group Attributes.
3. In accordance with regulation 7 of the *Evidence Regulation 2018* (Cth), the Applicant relies on the particulars outlined in the below schedule for the purpose of proving the tendencies referred to in paragraph 1.

### Schedule of conduct

No.	Description	Conduct	Particulars/Source
1.	Statements made by the Respondent in a media release entitled 'Islamist terror imports must stop' which the Respondent is credited as authoring and which was published on 16 April 2024. The statements are said in the media release to have been made in response to the "terror attack on a Christian bishop at a church in Wakeley."	(a) <i>"Islamist terror imports must stop"</i>	This media release was published to the following social media platforms.  (a) The Twitter account '@PaulineHansonOz' ( <b>Hanson Twitter</b> ) on 16 April 2024 at 12:03pm, which can be accessed via the following link; <a href="https://twitter.com/paulinehansonoz/status/1780054349538029575?s=46&amp;t=aZp3k0PaM7-G0y2m9FQMzq">https://twitter.com/paulinehansonoz/status/1780054349538029575?s=46&amp;t=aZp3k0PaM7-G0y2m9FQMzq</a> .  Annexed at <b>pages 5-6</b> of this notice and marked <b>Annexure 'A'</b> is a screenshot of this tweet.  (b) The Facebook page entitled 'Pauline Hanson's Please Explain' ( <b>Hanson Facebook</b> ), which can be accessed via the following link; <a href="https://www.facebook.com/PaulineHansonAu/posts/pfbid034ZyBtREkS8E8bxLkcdcUCQVgwCBAAbK338NsiGG3S1VNMf6uk62TJm6pkUapSoWHbl">https://www.facebook.com/PaulineHansonAu/posts/pfbid034ZyBtREkS8E8bxLkcdcUCQVgwCBAAbK338NsiGG3S1VNMf6uk62TJm6pkUapSoWHbl</a> .  Annexed at <b>pages 7-8</b> of this notice and marked <b>Annexure 'B'</b> is a screenshot of this Facebook post.
(b) <i>"What we're seeing in countries like the UK, France and the Netherlands – which have allowed huge numbers of immigrants from countries where this appalling ideology is rife – is that too many of these people do not adopt the laws and values of the countries they settle in."</i>			
(c) <i>"Instead they demand their fundamentalism is simply accepted and adopted in their new countries, and they employ violence or radicalise young people into violence in perverse attempts to achieve this end or attack those who oppose them."</i>			
(d) <i>"Islamist ideology, which seeks to impose fundamentalist Islam across the world, is completely incompatible with Australian values of freedom, democracy and religious tolerance. People who have been immersed in this ideology in their countries of origin despise our values."</i>			
(e) <i>"The result is terror attacks in Australia, as we saw in Wakeley last night, extremist Islamic preachers in Australia calling for jihad and death – and getting away with it – and the intimidation and violence we've seen directed at Jewish Australians since 7 October."</i>			
(f) <i>"The most effective solution is to</i>			

		<p><i>ensure people with such ideology are never permitted to come here, but Labor doesn't care about the threat they represent and continues to import this ideology to Australia to shore up support for its western Sydney MPs, where many of these people end up living."</i></p>	
		<p>(g) <i>"This ideology is rife in many parts of the Middle East, including the Palestinian territories where the Albanese government has fallen over itself to hand out visas so people who overwhelmingly support the terror group Hamas can escape the consequences of Hamas' terror attacks on Israel. When will the major parties wake up and stop importing people and ideologies that are completely incompatible with Australia and its way of life?"</i></p>	
2.	<p>Statement made by the Respondent in a television interview with Danica De Giorgio on the television program entitled 'The Kenny Report' which was broadcast by Sky News on or about 17 April 2024 (the precise date is unknown to the Applicant but is known to the Respondent).</p>	<p><i>"If we don't stand up and have our say now, we are heading down the path of what England looks like now. England has a lot of areas there that not even the police, no one will go into, it's all Muslim dominated. They actually control the areas. You've got over one thousand shariah law courts. We have Muslims in this country marrying, getting on our welfare system, breeding and we are paying for all this. Yet the politicians turn a blind eye to it. It is a shame what is happening to our country, but until we call it out for what it is, terrorism is prevalent, and it has happened in the past in our country, and we need to address it."</i></p>	<p>Video footage of the Respondent making this statement is reproduced in a video which was published to the following social media platforms:</p> <p>(a) The Hanson Twitter on 18 April 2024 at 1:30pm, and which can be accessed via the following link;  <a href="https://twitter.com/PaulineHansonOz/status/1780800978117394697">https://twitter.com/PaulineHansonOz/status/1780800978117394697</a>.</p> <p>Annexed at page <b>9</b> of this notice and marked <b>Annexure 'C'</b> is a screenshot of this post.</p> <p>(b) The Hanson Facebook on 18 April 2024 at 1:25pm, and which can be accessed via the following link;  <a href="https://www.facebook.com/watch/?v=438472652056984&amp;ref=sharing">https://www.facebook.com/watch/?v=438472652056984&amp;ref=sharing</a>.</p> <p>Annexed at <b>page 10</b> of this notice and marked <b>Annexure 'D'</b> is a screenshot of this post.</p> <p>Links to each of the videos</p>

			referred to in the preceding paragraph are included at <b>page 11</b> of this notice and marked <b>Annexure 'E'</b> .
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Date: 25 April 2024



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Signed by Michael Bradley  
Solicitor for the Applicant

## Annexure A



**Pauline Hanson**    
@PaulineHansonOz



Media Release | Islamist terror imports must stop

Islamist fundamentalism has no place in Australia and those who would bring it here must be prevented from entering the country.

One Nation leader Senator Pauline Hanson, responding to yesterday's terror attack on a Christian bishop at a church in Wakeley, said Labor was ignoring the danger of importing Islamists to shore up votes in western Sydney seats held by Federal ministers.

"What we're seeing in countries like the UK, France and the Netherlands – which have allowed huge numbers of immigrants from countries where this appalling ideology is rife – is that too many of these people do not adopt the laws and values of the countries they settle in," she said.

"Instead they demand their fundamentalism is simply accepted and adopted in their new countries, and they employ violence or radicalise young people into violence in perverse attempts to achieve this end or attack those who oppose them.

"Islamist ideology, which seeks to impose fundamentalist Islam across the world, is completely incompatible with Australian values of freedom, democracy and religious tolerance. People who have been immersed in this ideology in their countries of origin despise our values.

"The result is terror attacks in Australia, as we saw in Wakeley last night, extremist Islamic preachers in Australia calling for jihad and death – and getting away with it – and the intimidation and violence we've seen directed at Jewish Australians since 7 October.

The most effective solution is to ensure people with such ideology are never permitted to come here, but Labor doesn't care about the threat they represent and continues to import this ideology to Australia to shore up support for its western Sydney MPs, where many of these people end up living.

"This ideology is rife in many parts of the Middle East, including the Palestinian territories where the Albanese government has fallen over itself to hand out visas so people who overwhelmingly support the terror group Hamas can escape the consequences of Hamas' terror attacks on Israel. When will the major parties wake up and stop importing people and ideologies that are completely incompatible with Australia and its way of life?"



**Senator Pauline Hanson**  
One Nation Senator for Queensland

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"Instead they demand their fundamentalism is simply accepted and adopted in their new countries, and they employ violence or radicalise young people into violence in perverse attempts to achieve this end or attack those who oppose them.

"Islamist ideology, which seeks to impose fundamentalist Islam across the world, is completely incompatible with Australian values of freedom, democracy and religious tolerance. People who have been immersed in this ideology in their countries of origin despise our values.

"The result is terror attacks in Australia, as we saw in Wakeley last night, extremist Islamic preachers in Australia calling for jihad and death – and getting away with it – and the intimidation and violence we've seen directed at Jewish Australians since 7 October. The most effective solution is to ensure people with such ideology are never permitted to come here, but Labor doesn't care about the threat they represent and continues to import this ideology to Australia to shore up support for its western Sydney MPs, where many of these people end up living.

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12:03 PM · Apr 16, 2024 · 212.4K Views



**Annexure B****Pauline Hanson's Please Explain** ✓

16 April at 12:06 · 🌐



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6.8K

1.5K comments 1K shares

Like

Comment

Share

Annexure C



Anthony Albanese is a weak leader running a party of gutless fools.

This Labor government will never be able to take the strong actions necessary to keep Australians safe because they care more about pandering to minority groups in Southwest Sydney so they don't lose seats.

Labor fears they will lose seats to independents running in areas like Blaxland (35% Muslim), held by Education Minister Jason Clare, Watson (27.2% Muslim), held by Minister for Employment Tony Burke, and Anne Stanley's marginal seat of Werriwa (17.2% Muslim).

For years I have warned Australians of the dangerous path we were headed down, and now it seems all my worst fears are being proven true.



1:30 PM · Apr 18, 2024 · 68.7K Views

311 666 3.1K 43

### Annexure D



**Anthony Albanese is a weak leader running a party of gutless fools. This Labor government will never be able to take the strong actions necessary to keep...**

Like Comment Share

2.3K · 524 comments · 14K views

**Pauline Hanson's Please Explain** · 18 April at 13:25 · [Follow](#)

[Overview](#) [Comments](#)

Anthony Albanese is a weak leader running a party of gutless fools. This Labor government will never be able to take the strong actions necessary to keep Australians safe because they care more about pandering to minority groups in Southwest Sydney so they don't lose seats. Labor fears they will lose seats to independents running in areas like Blaxland (35% Muslim), held by Education Minister Jason Clare, Watson (27.2% Muslim), held by Minister for Employment Tony Burke, and Anne Stanley's marginal seat of Werriwa (17.2% Muslim). For years I have warned Australians of the dangerous path we were headed down, and now it seems all my worst fears are being proven true. See less

Most relevant

Write a comment...

**Annexure E**

**Video:** Video entitled 'PM must take a stronger line on attack' uploaded to the Hanson Facebook and Hanson Twitter

**Date:** Published on 18 April 2024

**Link:** <https://fb.watch/rFi4zQnBkQ/>

**Link:** <https://twitter.com/PaulineHansonOz/status/1780800978117394697>

## **NOTICE OF FILING**

### **Details of Filing**

Document Lodged: Affidavit - Form 59 - Rule 29.02(1)  
Court of Filing: FEDERAL COURT OF AUSTRALIA (FCA)  
Date of Lodgment: 25/04/2024 4:58:58 PM AEST  
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Registrar

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CB4388

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: 25 April 2024

### Contents

Document number	Details	Paragraph	Page
1	Affidavit of Andrea-Marie Farrugia in relation to Second notice of intention to adduce tendency evidence, dated 25 April 2024.	[1] - [6]	1 – 3
2	Annexure "AF-5", being a copy of my email sent to the solicitors for the Respondent on 25 April 2024 serving the Second Notice.	[3]	4 – 5

I, Andrea-Marie Farrugia, solicitor, of Level 4, 343 George St, Sydney NSW 2000 affirm:

- I am a solicitor of the firm Marque Lawyers, the solicitors for the Applicant.
- On 25 April 2024, Marque Lawyers filed a Second notice of intention to adduce tendency evidence for filing with the Federal Court Registry (**Second Notice**) on behalf of the Applicant. As explained at paragraphs 3 and 4 of my earlier affidavit in these proceedings affirmed on 20 February 2024, the Applicant has previously filed a Notice of intention to adduce tendency evidence (**Original Notice**). The Second Notice supplements the Original Notice.

Filed on behalf of (name & role of party) Mehreen Faruqi, Applicant  
Prepared by (name of person/lawyer) Andrea-Marie Farrugia  
Law firm (if applicable) Marque Lawyers  
Tel (02) 8216 3000 Fax (02) 8216 3001  
Email [michaelb@marquelawyers.com.au](mailto:michaelb@marquelawyers.com.au); [laureng@marquelawyers.com.au](mailto:laureng@marquelawyers.com.au);  
[andreaaf@marquelawyers.com.au](mailto:andreaaf@marquelawyers.com.au)  
**Address for service** Level 4, 343 George Street  
(include state and postcode) Sydney NSW 200

*A Farrugia*

*L*