



Form 59  
Rule 29.02(1)

**Affidavit**

No. 1503 of 2024

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

**Peter Wertheim AM** and another  
Applicants

**Wissam Haddad** and another  
Respondents

Affidavit of: Guy Peleg  
Address: **REDACTED**  
Occupation: Senior Engineering Manager  
Date: 25 March 2025

**Contents**

Document number	Details	Paragraph	Page
1	Affidavit of Guy Peleg in support of the Applicants' Claim sworn on 24 March 2025	1-17	1-5

I, Guy Peleg **REDACTED** Senior Engineering Manager, say on oath:

**Background**

- I am 37 years of age, and I am Jewish.

Filed on behalf of (name & role of party) The First and Second Applicants  
 Prepared by (name of person/lawyer) Mark Deutsch  
 Law firm (if applicable) Deutsch Miller  
 Tel +61 2 9210 7777 Fax 92107799  
 Email mark.deutsch@deutschmiller.com  
 Address for service Level 9, 53 Martin Place, Sydney NSW 2000 Australia  
 (include state and postcode)

[Version 3 form approved 02/05/2019]

2. I was born a Jew, I am a Jew, my kids are Jews. My grandmother's family were terminated by the Nazis, and my grandma was the sole survivor. I will never shy away from my identity, and I am proud to be Jewish. I was raised on my grandmother's stories of what she has done and achieved.
3. In 2017, I migrated to Australia from Israel and became an Australian citizen. I am Indigenous to Israel, and I recognise my roots. My connection to being Jewish is a "one soul, one heart" kind of connection. I care deeply for the Jewish community.
4. One of the reasons why my family and I moved to Australia was that we wanted a different environment to raise kids. As much as I love Israel, it is not easy to raise a family there. I consider myself as very progressive for Israel and I like a secular country. I saw Australia as a multicultural country, and a place where my kids can be friends with everyone.
5. When I first came to Australia, I used to play soccer and my teammates were people from all walks of life, some people in the team were from Egypt, Lebanon and Pakistan. All the players knew that I was a Jew, but no one in my team cared about it. There were occasions when we were opposing a team that had a majority of Muslim players, and on some occasions some Muslim players would identify that I was Jewish and tried to start fights during the matches. When this would happen, my teammates would help me and support me.
6. When I got my first job living in Australia which was around 2017, I was never treated differently because of my background as a Jew. However, I have had experiences where I realised that Jews are a minority and can be treated differently. One example of this is when I came into the office one day and I became friendly with a colleague whose parents came to Australia in the 1970s as refugees from Palestine and we collaborated and talked often at work. However, after 7 October 2023, when I recently saw him, I went to greet him, and he acted as if he did not know me and behaved as if I was not there. I put this down to the environment of antisemitism and hatred of Jews that has exploded since 7 October 2023.
7. Following 7 October 2023, I have also experienced in the workplace that people think that it is okay to call Jews "Zionists", and at work I feel that I have been excluded from meetings where there is a majority of Muslims. I am experiencing more and more incidents of antisemitism and exclusion for being Jewish following 7 October 2023, and it has caused division in my experiences of dealing with other Australians.
8. I grew up with a Holocaust surviving background, and the experiences I have mentioned above remind me that there are people who do not like Jews. When I was growing up, I



recall that my grandmother said to me in effect that "something will happen" (to Jews) in the future and the worst thing to do if that occurs is inaction. If something is to happen, I should never sit still and I should speak up and take action. I understood that what she meant by this was that there is always a risk to Jews in the world. My grandmother set an example of facing fears, but this did not mean that I am not fearful about these risks. For example, when there were bombs exploding in buses in Israel, my grandmother made a point of catching buses still. Examples like these taught me not to be scared, to not be fearful, and to be proud to be Jewish. At the time, my mother told me not to catch the bus which reinforced that there was risk and danger.

9. I am aware that as a Jew, there is always a risk that exists for us in terms of our safety, and I now get calls from my mother every week who is very worried about me and my family and our safety in Australia following the events of 7 October 2023. Antisemitic attacks such as the firebombing of a synagogue in Melbourne, vandalism and graffiti, including setting cars on fire near synagogues and child care centres, gets media attention overseas. Recently, my daughter went to a school camp and she needed to identify in the forms if she was a Jew. When this happened, I questioned whether I should conceal her identity and not identify in the form that she was a Jew, because of everything that has happened following 7 October 2023 and fear for her personal safety, or that she might be abused or discriminated against.

#### Speeches

10. I am very active on X (formerly known as Twitter) and social media. I recall seeing the parts of the speeches by Mr Haddad on social media during November 2023. At the time, I did not see and watch the videos of the entire speeches, but I did see repeated references to Mr Haddad and his comments, as well as clips of some of the speeches all over social media. At the time, Jewish people were re-sharing shortened clips of Mr Haddad's Speeches on X, my WhatsApp Group (which I discuss at paragraph 11 below), and Facebook. I also saw references to Mr Haddad's speeches in news outlets like News Corp Media and SKY News. I usually read The Australian also, so I may have read about them there.
11. I am a member and administrator of a group on WhatsApp called "Social Media Warrior" (**WhatsApp Group**) and the majority of the members are from the Jewish community who post a lot of material that is in the media, recent events or topics they want to share and discuss. For me, the purpose of the group is to have a place where members feel comfortable, have support to openly discuss issues that affect them and that may be relevant to the Jewish community.




12. In around November 2023, I recall reposting on the WhatsApp Group and on my Twitter account one of the videos of Mr Haddad. I am not sure exactly which video it was, but I recall Mr Haddad was saying in effect to kill Jews. I recognise the video as a part of the montage of speeches I was provided by the Applicants' solicitors which I talk about at paragraph 14 below. I have tried to locate my post, however, I have been unable to find it. When I watched this video of Mr Haddad and heard what he was saying, I was shocked as I know the history of the Holocaust and what happened to Jewish people, and for me, Mr Haddad was calling to kill us. My initial thought when I saw this video and when I saw Mr Haddad in the media following November 2023, is "here we go again", and what I mean by this is here are the events that led to the Holocaust again. I went live on Twitter and talked about what Mr Haddad had said in his speech in a virtual "room" as I wanted to amplify that Mr Haddad was really making a call to kill Jews. This made me think of my grandmother's history, and what she went through. I was offended and insulted by Mr Haddad's comments because of my Holocaust surviving background, which is why I wanted draw attention to it.
13. After watching snippets of Mr Haddad's speeches in the media during November 2023, I thought that it was sickening and that Mr Haddad was spewing vile hate straight out of Mein Kampf and Hitler's ideology by saying to go and kill a Jew. As I have said above, it reminded me of my grandmother's experience in the Holocaust and what she had been through. I was very angry and offended about this to the point where I wanted to break something. I thought that my country, Australia has failed me, and I thought of my grandmother's words that something will happen, and I could now see that something was happening.
14. On 6 March 2025, I watched a montage of speeches by Mr Haddad, given to me by the Applicants' solicitors, Deutsch Miller (the **Speeches**). I was also asked by the Applicants' solicitors to read some articles. I did not read any of the media articles I was provided.
15. Watching the Speeches took a mental toll on me. I felt really angry, insulted and offended after watching the Speeches, and it took me a few hours to wind down. For me, Mr Haddad was speaking about blood libels from 1939 by saying go and kill Jews, Jews are vile, and they cannot be trusted. I can see how these Speeches can make people hate Jews, and I can understand how some people can be radicalised by watching the Speeches, as Mr Haddad is singling out and vilifying Jewish people. The possibility of the radicalisation of the Muslim community in Australia makes me fearful, as I am a family person, and I need to look after my family. One of my immediate thoughts when I saw the Speeches was that I should move my family to Thailand out of fear of what could happen and where Mr Haddad's Speeches could lead to. I felt excluded after



watching the Speeches, and fearful to be a part of the wider community anymore. It made me lose hope for cohesion in Australia being a multicultural country when people like Mr Haddad are saying these things. An example of what I mean by this is when I came to Australia from Israel, my family and I would go to the Dandenong markets to do shopping, which is known for being very multicultural and is a major market in Victoria. Whenever I would go with my family, I never felt that anyone thought there was anything wrong in us being Jewish. I felt safe. Today, I do not go there anymore with my family as I am worried that someone could have an issue with my family being Jewish, and something negative could happen such as verbal or physical abuse.

- 16. Mr Haddad's Speeches were to me, textbook Mein Kampf, and not about if Israel has the right to exist, it was about Jews. To me, Mr Haddad was saying in his Speeches that Jews are taking over the world. Watching the Speeches was Nazi Germany all over again and I was frustrated about how people could not see through it. We have been through it all, we have done that. I recall that Mr Haddad said something about Jews being filthy, Jews spreading diseases and inspiring war, which made me think of Nazi Germany.

**Concerns over my identity**

- 17. I do not wish my address to be made public or given to Mr Haddad. [REDACTED] [REDACTED]. If, however, my address was to be made public or given to Mr Haddad, I would reluctantly still provide evidence, but I would have a degree of concern.

Sworn by the deponent  
at [REDACTED]  
in Victoria  
on 25 March 2025  
Before me:

)  
)  
)  
)  
)



Signature of deponent

Poppy Carlie Isabella Kambas  
Solicitor / Australian legal practitioner  
Level 9, 53 Martin Place  
Sydney NSW 2000

  
Signature of witness

This affidavit was signed in counterpart and witnessed over audio video link in accordance with s 14G of the *Electronic Transactions Act 2000* (NSW).

## 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: 30/04/2025 11:12:57 AM AEST  
Date Accepted for Filing: 30/04/2025 3:43:39 PM AEST  
File Number: NSD1503/2024  
File Title: PETER WERTHEIM AM & ANOR v WISSAM HADDAD & ANOR  
Registry: NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA



*Sia Lagos*

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.