

## Consolidated Particulars of Aggravation

NSD 1727/2025

Federal Court of Australia

District Registry: New South Wales

Division: General

### CHARLOTTE MACINNES

Applicant

### REBEL WILSON

Respondent

The harm suffered by MacInnes as a result of the publications sued upon has been aggravated by her knowledge of the conduct of Wilson as particularised in this schedule. MacInnes relies upon each particular of aggravation individually, but also relies upon all particulars taken cumulatively, as evidence of a vindictive public campaign by Wilson, a cruel, calculated and dishonest ploy to derail the rise of MacInnes' career and exert improper pressure on MacInnes in relation to this proceeding.

No.	Aggravating Circumstance	Ref.
1.	Wilson's knowledge, prior to the Publications, of the falsity of the imputations (further <i>particulars/details</i> of which are set out in the pleadings).	SOC [31.1] Reply [5.5]
2.	Wilson's failure to respect the rights of an alleged victim of sexual harassment, by protecting MacInnes from any adverse action or retaliation in allegedly making a complaint against Ghost, and then her victimisation of MacInnes for not confirming she had made such a complaint and accusing her of lying and conspiring with Ghost and others in order to gain opportunities for herself and to bully and improperly pressure Wilson.	
3.	Wilson had attempted to take adverse and prejudicial action against MacInnes whilst in Hamilton Island by lying and seeking to persuade Ghost to agree to fire MacInnes from the film for making a complaint to Wilson of sexual harassment or misconduct against Ghost when she had been informed clearly by MacInnes she had not made such a complaint. Wilson's statement to Ghost was false and malicious and intended to damage MacInnes' reputation in Ghost's estimation.	SOC [31.2]
4.	Wilson made the Publications on and from 23 September 2024, knowing the above circumstances and knowing that MacInnes had	SOC [31.3]

	not made a complaint against Ghost, and did so without seeking any further information or verification from MacInnes.	
5.	Wilson made the Publications, knowing the circumstances set out in the Statement of Claim in relation to Wilsons' knowledge of the falsity of the imputations, and knowing that MacInnes had not made a complaint against Ghost and that she had been informed clearly by MacInnes she had not made such a complaint, and Wilson did so by disclosing and identifying MacInnes in the Publications as an alleged victim of sexual harassment or misconduct without MacInnes' permission or consent.	SOC [31.4]
6.	Wilson made the Publications, knowing the circumstances set out in the Statement of Claim in relation to Wilsons' knowledge of the falsity of the imputations, and knowing that MacInnes had not made a complaint against Ghost, and that she had been informed clearly by MacInnes she had not made such a complaint, and Wilson knew particularly that she had attempted to persuade Ghost to agree to fire MacInnes from the film for making the complaint when she had not even done so and lied to Ghost about it.	SOC [31.5]
7.	Wilson has refused by her conduct to apologise to MacInnes for and or retract the Publications.	SOC [31.6]
8.	Wilson's denials, in paragraphs 5, 8, 11 and 15 of her Defence, that each of the Publications was defamatory of MacInnes	Reply [2], [6]
9.	Wilson's allegation that, at the time of the filing of her Defence, at paragraph 9, that she did not know and did not admit publication of the Further May 2025 Post, in circumstances where the Further May 2025 Post had been published by Wilson, the text of the Further May 2025 Post was provided to Wilson as an annexure to MacInnes' Concerns Notice and was quoted in an article published by Variety on 20 May 2025, a copy of which was also provided to Wilson as an annexure to MacInnes' Concerns Notice.	Reply [3], [6]
10.	The denials by Wilson in paragraphs 24 to 28 of the Defence that each of the Publications caused, or was likely to cause, serious harm to MacInnes' reputation.	Reply, [4], [6]
11.	Wilson's attacks on and victimisation of MacInnes and AI Film Production Ltd ( <b>AI Film</b> ), and/or AI Film's servants and agents, persistently and repeatedly in publications Wilson made or caused to be made from at least around 10 July 2024 – including on or around 14 June 2024, 10 July 2024, 12 July 2024, 30 July 2024, 6 August 2024, on the Websites, 23 September 2024, November 2024, 16 May 2025 and in the further May 2025 publications.	Reply [5.2], [6]
12.	Wilson was predominantly motivated by an improper purpose or purposes in publishing each of the 23 September 2024 Post and 25 July 2025 Post, namely, (a) to harm MacInnes; (b) to harm Ghost, Cameron and Vince Holden, and other servants and agents of AI Film; (c) to put improper pressure on AI Film to sell to Wilson's company, Camp Sugar, the film The Deb as a 'distressed asset' and at a substantially reduced price; and/or (d) to further her own commercial interests, for reasons set out in the Reply and also by reason of (i) the extreme and intemperate language used by Wilson	Reply [5.6]

	in each of the Publications; (ii) the repeated attacks and victimisation by Wilson of MacInnes on social media and the media; (iii) the Websites, which Wilson published surreptitiously and with knowing falsity of the allegations against Ghost and MacInnes and denied publishing the Websites in the media including in the 60 Minutes interview; (iv) Wilson’s conduct in giving a statement to the Daily Mail which was published on 4 October 2025 claiming again that her allegations were true.	
13.	Wilson’s repeated threats to pursue a security for costs order against MacInnes.	Letter from Giles George to Wotton Kearney 22 October 2025
14.	Wilson’s allegations in paragraphs 25, 33, 65, and 69 of the Schedule to the Defence, that MacInnes ‘was not being truthful’.	Letter from Giles George to Wotton Kearney 6 November 2025
15.	Wilson’s participation in an interview aired by 60 Minutes and other media statements/interaction during the proceedings.	Letter from Giles George to Wotton Kearney 27 November 2025, Letter from Giles George to Wotton Kearney 20 January 2026
16.	Wilson’s publication of posts on her Instagram story on 18 March 2026.	Letter from Giles George to Dentons 18 March 2026
17.	Wilson’s conduct in pleading an unmeritorious reply to attack defence in circumstances where she knew that she had in fact attacked MacInnes in the Websites and has lied about her involvement in the publication of the Websites.	Letter from Giles George to Dentons 10 April 2026