



Dear Mr Hampton

1. I address you on behalf of the Western Cape Government, and refer to your numerous recent public utterances via your blog in respect of Minister Winde, Minister Bredell, Premier Zille, Ms Strydom and various other Western Cape Government officials acting in the course and scope of their duties. Notwithstanding the fact that it appears some years ago you were sentenced to 60 days' imprisonment for contempt of court, suspended for three years on condition you did not publish any more defamatory statements or photographs of Knysna's deputy mayor, it appears that your appetite for publishing gross defamatory allegations regarding officials of government remains undiminished. We understand that in that matter the judge advised you that the deputy mayor's conduct could not be wrongful and unlawful simply because the blogger (you) declared it to be so. You were ordered to remove certain posts and pay the legal costs.
2. Despite an expectation that such a ruling against you would have educated you as to the consequences of the publication of defamatory statements that have no basis in fact or law, your recent blogs show this not to be the case. Over the past while you have accused Minister Alan Winde and Minister Anton Bredell of acting in an illegal, corrupt manner, without any substantiation for such conclusions, i.e. based on your say-so alone. In addition, you have accused the Premier and her private secretary, Donnae Strydom of being complicit in alleged threats made to you by firemen, as

well as intentional "cover-ups" in relation to the Knysna fire, without any credible or legal basis to do so.

3. We note that on the 25th of May you publicly stated that you now intend to "sue" various officials and confirmed: *I will be suing and laying criminal charges against the Democratic Alliance, from local councilors to the DA Federal Executive, Premier Helen Zille and Mmusi Maimane. **The action will include government officials** and 'opposition' members who either collaborated with them or criminally failed to act on the evidence I provided.*
4. We note further that in this blog you confirmed that this "Legal process will soon begin" and have acknowledged that any of the various persons you assert you will be suing will have a right to counter-claim against you.
5. The advice which has been given to WCG employees whom you defamed in the past is not to waste time and money initiating costly and time-consuming court proceedings against you, especially given the cost of litigation and what appears to be a somewhat dire personal financial circumstance on your part which may render any court ordered recovery speculative at best.
6. However, the increase in slanderous personal attacks on various members of the Western Cape Government of late has caused a reconsideration of this approach to your actions and some officials are of the view that court action against you, with or without a charge of criminal liability might be a realistic solution to ensure that your ongoing defamatory action stops.

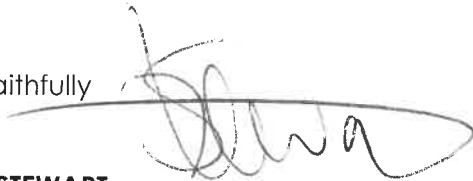
7. Given that you have now stated your intent to sue, it would appear that this option, via a counter-claim, will now arise and you are accordingly hereby informed that any official cited by you in the legal proceedings you have publicly stated will be instituted shortly, will be provided with advice as to the counter-claims he or she may wish to lodge against you. In this respect, your purported defence to such claims i.e.:

"...And where I may have used strong words, it was reaction based on frustration at unpunished crime and your attack. Anything you may claim would pale in comparison to what you have done to me. "

is rejected. Any respondent or defendant cited by you will be within his or her right to counter-claim against you for the full damages he or she may have suffered as a result of the content of your blogs to date.

The Western Cape Government stands for good governance and corrupt-free administration and one of the outcomes that any further judgments against you may achieve, is a court-ordered cessation of the dissemination of any further false or defamatory allegations which seek to unlawfully undermine that standing. In our view this may be the more worthwhile objective of any counterclaim that is filed, ie irrespective of any financial damages that may accompany any such order against you in due course.

Yours faithfully



FIONA STEWART

LEGAL ADVISER

CHIEF DIRECTORATE: LEGAL SERVICES

DATE: 1/6/2018