

CHANDRÉ GOOSEN JOUBERT
Cape Town

Your Reference:

Our Reference:
DPR/PM

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22 April 2021

Dear Madam

MRS SOUTH AFRICA (PTY) LTD / CHANDRE GOOSEN JOUBERT (8309190041084)

1. The above matter refers.
2. We confirm that our office act herein on behalf of Mrs SA Beauty Pageant (Pty) Ltd, with the registration number 2012/180612/07, trading as Mrs South Africa ("Mrs SA").
3. It is common cause that Mrs SA organises, manages and implements the coveted pageant known as "Mrs South Africa", in which you were a participant for the 2020/21 cycle.
4. It is furthermore fact that on or about 8 August 2020, you were announced as a top 50 (FIFTY) semi-finalised and progressed as a finalist on or about 14 November 2020, with the winner and top 3 (THREE) being announced on or

DIRECTORS:

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CONSULTANT:

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ASSOCIATES:

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OFFICE MANAGER:

L. Labuschagne (B.Acc)

Certified as a level TWO contributor to B-BBEE and a Value Adding Supplier

about 18 March 2021. You were not crowned as the winner, nor did you make the top 3 (THREE).

5. Following this, you have pursued a concerted campaign against our client, which includes but is not limited to:

- 5.1 forming WhatsApp groups, with former contestants of Mrs SA and others, with the purpose of forming and implementing a smear campaign against our client;

- 5.2 posting mysterious and indicative threats on social media platforms, indicating on an Instagram post on or about 15 April 2021, in which you state that "... have distanced myself from Mrs SA ...for reasons which will be revealed soon" and "I will reveal national and international. I stand for my women & whats [sic] fair";

- 5.3 when you were asked what you will spill you posted : "Mrs SA's fraud" and that "it's a scam";

- 5.4 alleging that our client's business is fraudulent in respect of its operations, personnel and motives;

- 5.5 directly or indirectly, and whether alone or with another or others, persuade, induce, encourage, procure or solicit defamatory comments against our client for the sole purpose of tarnishing its name and reputation;

- 5.6 approaching various judges of Mrs South Africa and other Mrs SA affiliates to allege bias and immoral procedure of the Mrs South Africa competition as a whole; and

- 5.7 approaching media with unfounded claims with the sole purpose of tarnishing our client's reputation.

6. Your posts contain directly defamatory statements as well as *innuendo* designed to defame our client and tarnish their brand.
7. In fact, several individuals have brought unequivocal proof of your defamatory actions to the attention of our client, which further evidences your malicious campaign.
8. We also record that in terms of your Instagram account it appears that you have a large following in excess of 45 000 (FORTY FIVE THOUSAND) and hence defamatory posts stand to cause our client grave harm.
9. Your defamatory statements cannot go without response. Our client is under the circumstances demanding that you immediately cease with the publication of defamatory statements as regards to our client. The defamatory statements are being directed at our client's contestants and clientele and are no doubt being made with the intention to damage their brand.
10. Should you fail to do so we confirm that we hold instructions to approach the High Court with the appropriate jurisdiction to interdict any such further conduct. We confirm furthermore that should our client suffer any pecuniary damages, same will be recovered from yourself by way of a civil action.
11. In the circumstances we demand your unequivocal, irrevocable, written undertaking by the close of business on Friday, 23 April 2021, that you shall immediately desist with your conduct and you shall desist from doing such in future.
12. Further, our client confirms and acknowledges your email dated 20 April 2021, in which you requested detailed records of Mrs SA in relation to your participation in the Mrs South Africa pageant. This included: copies of the signed contracts; webinars attended; information on the SMS voting system; and scoring sheets (of Mrs SA judges) relating to the top 50 (FIFTY) and final.

13. Our client agrees to provide you with the requested contracts, same are attached hereto. However, in line with our client's constitutional right to privacy, including the obligation to protect the information of others, as well as the terms and conditions of Mrs SA which you have agreed to, our client will not provide you with the other information requested.

14. We reserve our client's rights.

Yours faithfully,



**HONEY ATTORNEYS
PER: DP ROSSOUW**