

PER EMAIL

CHERI WARD
Email: cheri@teamonfire.cash

"URGENT"

4 PAGES

cc: Van der Elst Attorneys
pieter@vdelaw.co.za

Your ref:

Our ref: S van Heerden/O9982

Date: 21 October 2015

Dear Sirs

PRO TRAVEL PLUS AND OTHERS / CHERI WARD

We act for and on behalf of Pro Travel PLUS ("PTP") and Jacqueline Whelan, Daniella Beukes, Sankie Beukes, Adri Ras, Arthur Pretorius, Tebogo Seate, Sam Sholoo, Annemarie Rensburg, Charlene Human, Mzaefane Mkhombeni, Fietie Rocher, Jaco Villiers, Christo Lambrechts, Ira Lambrechts, Johan Moelich, Julie Beukes, Nulandis Nulandis, Philhelene Engel, Nikki Rocher, Tertia Bredenkamp, Louis Jonker, Angelique Fleur, Eleonore Visser, Pieter Rhyn, Bianca Bredenkamp, Thabiso Magodiello, Craig Mc Farlane, Nelia Hickman, Karabo Magodiello, Schalk le Roux, Zephni Mynhardt, Philip Geldenhuys, Lola Martens, Anke Martens, Ofentse Magodiello, Christene Greef, Alina Khohlo, Nadja Myburgh, Lionel Coombes, Christell Weyers, Tian Kunneke, Pieter Beukes, Mariana Strauss, Mpho Seopa, Melissa Kuhn, Ben Walker, Igor Ivanov, Antonite Chisala, Ferenc Faddi, Leicester Alleyne, Adam Vajdics, Nandor Szolnoki, Jonathan Lawrence, Melanie Pares, Fina Marie, Paul Fowlie, Chris Pares, Vincent Placide, Humam Khan, Ahsan Irfan, Jameelah Vaughan, Deon Townsend, Jecenta Ellis, DeAntre Moreland, Gerard Nibalck, Melissa Bailey, Julius Ayanleke, Nia Naumu, Tiffini Watts, Armand Rangel, Chaka Phelps, Kyera Chandler, Hakim Chandler, Tracy Lewin, Bess Skosana, Syreeta Elmore, Vaughn Hurly, Christopher Phillips, Yaminah Robinson, Vincent Key, Johnnie Smith, Latasha Stewart, Debbie Rice, Shannon Fagan, Shawn Finney, Allison Trenchalk, Victoria Douglas, Christy Abernathy, Aaron Mason, Vivienne Budge, Rowena Awari, Theodore Dowe, Sid Balubal, Natasha Johnson, Welthia Apao, Maxine Dowe, Heidi Harris, Nathaniel Greene, Nathaniel Chandler, Erika Baines, Nicole

Shawn van Heerden: (T) +27 11 778 0612 | (E) svh@ramweb.co.za

2nd Floor, The Reserve, 54 Melville Road, Illovo, Johannesburg
P O Box 55232, Northlands, 2116 |
DX 123, Johannesburg
(T) +27 11 778 0600 | (F) +27 11 778 0677 | www.ramweb.co.za
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- 1 Our clients instruct that you have been a member of PTP since 21 April 2015 until 16 September 2015 when your membership was suspended by PTP as a result of your conduct which is currently the subject matter of an international investigation.
- 2 On 1 October 2015 we wrote to your attorney:
 - 2.1 Placing your suspension on the record; and
 - 2.2 Rejecting the defamatory statements made by your client and demands set out in relation to PTP and furthermore assured your client that all action taken by PTP was lawful and in the interests of the company;
- 3 Until your suspension, no less than one week ago, you have sold and promoted a brand and actively recruited additional members on a weekly basis in a company which she lead in SA. Notwithstanding the above, it has come to our client's attention that you have, since the dispatching of our letter of 1 October 2015, made written and verbal statements on social media

such as *WhatsApp* and *Facebook* to an undisclosed number of recipients, wherein you, *inter alia*, allege that:

1. PTP "*has not made good on promises*";
 2. You, as leaders, have "*no faith in PTP and its future*";
 3. PTP has "*scammed*" its leaders";
 4. PTP is "*a company ridden with issues*";
 5. PTP "*is done...PLEASE STEAR CLEAR. BE WARNED*";
 6. Advising members to "*Cancel memberships PLEASE DO NOT PUT ANY MORE MONEY INTO THIS*";
 7. PTP is a "glorified Ponzi".
4. The content of the publication contains false and inaccurate information and lacks particularity, which PTP or our clients have not been provided the opportunity to comment on, nor was the content confirmed by our clients. The allegations were furthermore not placed in the appropriate context and are misleading and create the innuendo that, PTP:
- 4.1 cannot be trusted;
 - 4.2 is a scam;
 - 4.3 and its products have no value;
 - 4.4 is shutting its doors;
 - 4.5 and its business has no benefits; and
 - 4.6 and its business and products is not a viable business.
5. The statements were published with the sole intention to injure PTP's good name and springboard off PTP's good name in an attempt to persuade the recipients thereof of the publication to terminate their relationship with PTP and join alternative network company which whom you had now associated yourself.
6. The statements made constitute defamation.
7. As a result of the above PTP has been severely prejudiced and suffered damages which our clients are in the process of quantifying.

8. We have accordingly been instructed to demand, as we hereby do, that you, with immediate effect, refrain, whether directly or indirectly, from making further defamatory and/or false statements to any third persons, by way of social media or otherwise.
9. Should we not receive an undertaking from you, to this effect, by close of business today, we have been instructed to launch an urgent application interdicting you from doing so. Please note that all legal costs incurred shall be recovered from you.
10. In the interim all of our client's rights are, and remain, strictly reserved.
11. A copy of this letter has been transmitted to your attorney.

Yours faithfully,



Shawn van Heerden

Ramsay Webber