

GAUTENG PROVINCIAL OFFICE

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NATIONAL OFFICE

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Please quote our reference number on all correspondence: Your ref.:

Our ref.: 5192/2020/ T Mvunyiswa/ (ZL)

18 June 2020

PERSONAL & CONFIDENTIAL

Mr JF Louw
Lionel Murray Schwormstedt & Louw Inc Attorneys
Po Box 4612
Cape Town
8000

By email: jflou@iafrica.com

Dear Sir,

RE: COMPLAINT AGAINST MR N L RAMULIFHO OF RAMULIFHO ATTORNEYS

The above matter bears reference.

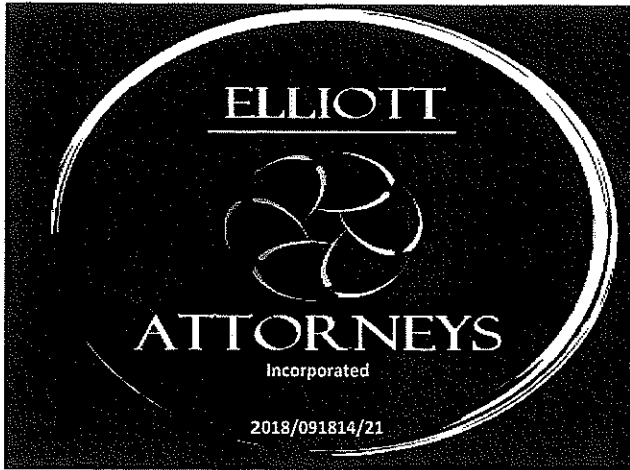
We attached herewith, a copy of the attorney's reply to your complaint.

Kindly let us have your written comments to the attorney's reply on or before **20 July 2020** to enable us to proceed with our investigations.

Yours faithfully,



T. MVUNYISWA
LEGAL OFFICER: DISCIPLINARY DEPARTMENT



Address: 594 Puccini Street
Constantia Park
Pretoria

Tel/Fax: 012 012 5067 / 012 012 5068

Email: keegan@elliottattorneys.co.za

Website: <http://www.elliottattorneys.co.za>

Our Ref: KRE/KR006LPC

Your Ref: 5192/2020/T Mvunyiswa/ (ZL)

Date: 16/06/2020

To: **Legal Practice Council**
Gauteng Provincial Office
Disciplinary Department

Per Email

RE: COMPLAINT BY MR JF LOUW // MR NL RAMULIFHO

The above matter refers as well as your correspondence dated 14 May 2020.

We confirm that we act on behalf of Mr Ramulifho herein, and accordingly kindly request that further correspondence herein be addressed to our office.

We thank you for the same.

With regards to the complaint against our client, we hold instruction to respond as follows, wherefore our client responds to said complaint as follows (the "complaint" herein after):

1. The letter that was filed states that the complaint is made in Mr Louw's personal capacity, but also as representative of two clients. The headnote of the affidavit that was filed implies that there are three complainants. No confirmatory affidavits were filed for the two other alleged complainants.

Director: **KR ELLIOTT**
(LLB)

Postnet Suite 326, Private Bag X20009, Garsfontein, 0042

2. Attached to the Complainant's affidavit was the affidavit made by Mr. Geffen, which was filed in a matter pending before the Pretoria High Court under case number 2391/2019.
3. In the aforesaid pending matter, our client filed a replying affidavit to the allegations.
4. The Complainant's affidavit and letter makes it clear that he has (or intends to) file a substantially similar complaint with the South African Police Service as a criminal complaint.
5. Inclusive of this complaint, the issues are therefore pending before two forums, and will, allegedly, soon be pending before three forums.
6. No confirmatory affidavits were filed by Ms. Tshikalange or her attorney (if any).
7. No confirmatory affidavit was made by the Complainant's client, Mr. Joseph.
8. The Whatsapp conversation referred to is not confirmed by either of the alleged authors.
9. Kindly further see the annexure hereto, which is a letter of demand which was directed to Ms. Tshikalange regarding the defamatory allegations that she made in the Whatsapp conversation (if at all).
10. Our offices hold instructions to issue summons against her for damages after the lapse of the dates therein.

We trust that the above is in order, and reserve our client's rights in this regard.

We kindly await your further advices herein.

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(LLB)

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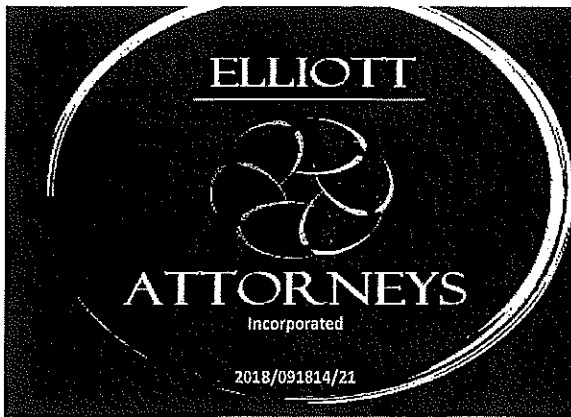
Kind regards,

ELLIOTT ATTORNEYS

KR Elliott

Director: **KR ELLIOTT**
(LLB)

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Constantia Park
Pretoria

Tel/Fax: 012 012 5067 / 012 012 5068

Email: keegan@elliottattorneys.co.za

Website: <http://www.elliottattorneys.co.za>

Our Ref: KRE/KR0010A

Your Ref:

Date: 03/06/2020

To: TAKALANI TSHITALANGE
Block B, Glenwood office park
Sprite avenue
Fairie Glen
Pretoria
IDT Building

RE: LETTER OF DEMAND - DEFAMATION

The above-mentioned matter refers.

1. Our offices act on behalf of Mr. Lesley Ramulifho ("our Client"). Our offices hold instructions to direct this letter of demand to you for payment of R 5 million.
2. Our instructions are that during or about October 2019 you made statements concerning our client, a copy of which is attached hereto as Annexure "A1".
3. The statements were *per se* defamatory, further and/or in the *alternative*, the content thereof is wrongful and defamatory in that it was *inter alia* intended by you to mean and/or was understood to mean that our Client is a criminal, *alternatively* a deceitful person, *alternatively* that he is guilty of misconduct.

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4. Our instructions are that your intention was furthermore to convey the innuendo that our Client is dishonest and to cause him irreparable harm to his reputation and image.
5. The statements would in the opinion of a reasonable person have the tendency to undermine, subvert or impair our Client's good name, reputation or esteem in the community or professionally.
6. The statements were false, defamatory and wrongful. In this regard, we note that defamation is a criminal offence – our client's rights accordingly remain reserved to institute criminal proceedings against yourself for, *inter alia*, *crimen injuria*.
7. Our client has a clear right to protect his reputation, good name, *fama*, right of dignity and right of freedom of trade, occupation and profession against *inter alia* unlawful defamatory attacks.
8. As a result of your unlawful conduct, as aforesaid, our Client has suffered damages to the amount of R 5,000,000.00 (Five Million Rand), excluding interest and legal costs.
9. Our instructions are to make the following demands:
 - 9.1 that you make payment of R 5 million into our trust account for payment to our client as damages (Trust details to be confirmed in writing should you accede hereto);
 - 9.2 that the above payment be made within 7 days of receipt hereof;
 - 9.3 that you state in writing within 7 days of receipt hereof that:
 - 9.3.1 you will immediately refrain from making defamatory and wrongful statements or remarks about our Client;
 - 9.3.2 that you unconditionally withdraw the defamatory and wrongful statements;

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9.3.3 that you unconditionally apologize for making those statements about our Client.

10. Should you elect to not take any or all of the above steps, then our Client will have no alternative but to approach the High Court for appropriate relief, including punitive legal costs, which will include the costs of senior and junior counsel.

We confirm that our client's rights herein remain reserved.

We accordingly await your urgent advices herein.

Yours faithfully,

ELLIOTT ATTORNEYS

KR Elliott

Director: **KR ELLIOTT**
(LLB)

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" A1 "

Conversation via WhatsApp between Joseph and Tshikalange on 8 October 2019

Joseph: I'm going to send you an affidavit to look at. I'll page it page by page via WhatsApp. I want to know if you know anything about it and whether it's your signature on the document. Thanks, Raymond

[PDF Pages of the Tshikalange Affidavit sent by Joseph to Tshikalange before conversation continued]

Joseph: The main things I'd like you to see is the affidavit signed by "you" that says you have settled with Ramulifho and he has paid back Lottery money he borrowed from Denzhe. And the other is a supposed new constitution, again signed by you.

Tshikalange: That's fraudulent I can't just resigned and give my Npo to Lesley, themba and Liesel. May you please check the Resolution it has been audited from the date, my I'd number and signature

Tshikalange: I don't know what is happening at denzhe since Lesley Ramulifho hijacked my Npo in 2016 .

Tshikalange: He took that R535 000 ,while I was not part of his fraud he must face the music alone with those people who have changed my resolution

Joseph: I think you should take the affidavit to the police and swear an affidavit saying it is a forgery and it's not your signature on it

Tshikalange If its like that I will take it the police and the problem is our government which is failing us because it recognizes only the rich people , I really need a lawyer on my side. Maybe things will work out for me

Joseph: I will expose them but I need help. Please urgently take the fake affidavit to the police and make an affidavit saying you were never consulted and had nothing to do with compiling it, and that it is not your signature. And send me a copy. My email is rayjoe@iafrica.com Thank :)

Tshikalange: Thank you I will do that tomorrow, do you know that he called me same day that you called me on the 29 August saying that he won case is it was against you and the sheriff is going to attach the property.

Tshikalange: He lost the case and had to pay all my legal costs

Tshikalange: He said he is going to give me lot of money and just said ok.