



Otto Krause Inc.

ATTORNEYS / CONVEYANCERS

Reg. No. 2002/003193/21

VAT No. 4830194967

Ons Verw:

Our Ref:

OTTO KRAUSE/ADS/MAT40964

U Verw:

Your Ref:

Datum:

Date:

2022-06-29

DISHONEST.WIKI

admin@dishonest.wiki

Dear Sirs

LETTER OF DEMAND

DEFAMATORY PUBLICATIONS DISHONEST.WIKI AND MISREPRESENTATIONS

1. We refer to the above matter and record that we are acting herein on behalf of:
 - 1.1. Gold Standard Banking Corporation AG as well as its Chairman Mr Josip Heit and its associated companies and products such as G999.
 - 1.2. Tony de Gouveia
 - 1.3. Andrew Eaton
 - 1.4. Brendon Earp-Jones
 - 1.5. Bruce Hughes

(Hereinafter jointly referred to as "our clients").

2. We further record that dishonest.wiki is an open-source intelligence (OSINT) wiki that purports to:

" focus on tracking the complex ponzi, MLM, MMM, crypto schemes and the people running them."

3. It is an accepted fact that such an OSINT wiki is actually the collection and analysis of data gathered from open sources (overt and publicly available sources) to produce

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actionable intelligence. As such OSINT is used every day by the public to amongst others further business research and gain insight into new business ventures. Wiki sites are trusted all over the world and require a strict adherence to the code of conducts and standards of OSINT sites.

4. The aforementioned therefore makes it possible to obtain business intelligence and this function that dishonest.wiki purports to offer may be viewed by many as a valuable tool to analyse businesses and obtain further information and intelligence regarding the subject matter of the wiki subject.
5. The public at large therefore make use of this function on a daily basis and the information published on these sites have a direct effect on the decisions taken by them.
6. Your OSINT wiki site records that:

"The masterminds behind these scams exploit victims without guilt or shame and they feel no sympathy. They often front, own, or sponsor charities and worthy causes as an extra layer to hide behind.

They are organized career criminals that will prey on the financially illiterate and steal pensions from the elderly. They will take all of your life savings and they will convince you to take a second bond on your home. They are highly convincing and manipulative and they will steal every last cent you have without remorse.

Don't feel sorry for them, be cautious and be careful, and always perform your own due diligence.

Remember, you are dealing with dangerous organized criminals, if it sounds too good to be true, it normally is."

7. As such it purports to be a site that will assist the public to take informed business decisions and not become the victims of scams (to put it bluntly). As such it is patently clear that any company or person listed on your site is automatically associated and tainted because such a person will be viewed by the reader as:

- 7.1. "The masterminds behind these scams,"
 - 7.2. That "exploit victims without guilt or shame and they feel no sympathy."
 - 7.3. "They are organized career criminals that will prey on the financially illiterate"
 - 7.4. "and steal pensions from the elderly"
 - 7.5. "They will take all of your life savings"
 - 7.6. "and they will convince you to take a second bond on your home."
 - 7.7. "They are highly convincing and manipulative"
 - 7.8. "and they will steal every last cent you have without remorse."
 - 7.9. "dangerous organized criminals".
8. Consequently, the publication of any persons name or Company name on your OSINT wiki is a highly perilous step if taken in the absence of proper supporting investigations and facts that supports the averments made therein. This is because it can and will cause that person or company so listed irreparable reputational damages and harm, to say the least.
9. Our clients' names appear on your OSINT wiki site and completely inaccurately record that our clients are associated with such complex Ponzi, MLM, MMM, Crypto schemes and scams. Our clients continually vehemently deny these allegations. No regulatory authority in the world has found our clients guilty of any such alleged actions and/or activities that your wiki site attempts to protect the public against.
10. Moreover, and in breach of your and the wiki code of conduct none of the listings referred to by your Editors and contributors regarding our clients are neutral, reliable or even credible. There are no references on your site or any reliable reference for the source of the information. As such your site falls foul of the standards that need to be met by a OSINT wiki and create not only suspicions but patently labels our clients, its business and them as criminals and/or carrying on illegal business activities.
11. Moreover, the listing of private individuals and the names of our clients as persons that "either known to be MLM/Pons/Pyramid Schemes, or likely are based on available information" further not only has a devastating affect on their good names and reputation but is also causing them irreparable financial and reputational harm.

12. In spite therefore of the obvious risks involved in naming and identifying a person or company, the site lists our clients names on your wiki, and in spite of the aforementioned OSINT standards, which have clearly not been met nor complied with in that it records:

"Companies either known to be MLM/Ponzi/Pyramid schemes, or likely are based on available information." (our underline)

13. However, none of the alleged available information is disclosed, shared or even verified and no evidence or supporting facts are provided to corroborate your allegations that our clients and its business is therefore so called:

- 13.1. "masterminds behind these scams,"
- 13.2. That "exploit victims without guilt or shame and they feel no sympathy."
- 13.3. "They are organized career criminals that will prey on the financially illiterate"
- 13.4. "and steal pensions from the elderly"
- 13.5. "They will take all of your life savings"
- 13.6. "and they will convince you to take a second bond on your home."
- 13.7. "They are highly convincing and manipulative"
- 13.8. "and they will steal every last cent you have without remorse."
- 13.9. "dangerous organized criminals".

14. Moreover, your wiki site falls foul of the prohibition created by the Protection of Personal Information Act (or POPI Act) in South Africa. Your wiki site publishes *inter alia* personal photographs of our clients, their business associates, their social and professional activities as well as their background information. We record that the POPI Act was specifically enacted to curb the aforementioned misuse of personal information and to protect the personal information and ones right of privacy. Your site falls foul of the prescripts of the POPI Act.

15. The POPI Act makes it clear that you are not allowed to collect, receive, record, organise, retrieve or use, distribute or share any personal information of our clients without their consent. Our clients have not provided such consent.

16. We remind you that the non-compliance with the POPI Act could result in not only reputational damage and/or potential civil damages claims against you but also punitive fines up to R10 million or ten (10) years imprisonment, or a combination thereof.
17. Moreover, you now also fall foul of the Cyber Crimes Act which regulates the online activities in question. This Act affords our client protection and helps victims of digital misconduct. The Act protects our clients against illegal digital and online activities such as undertaken by you because it not only protects against cyber crimes on the whole but also prohibits malicious communications. The acts of malicious communications, such as yours, are consequently illegal and carry criminal sanctions.
18. In light of the aforementioned it is our instructions to demand from you, as we hereby do, on behalf of our clients, that you immediately remove all references to our clients from your site and provide us with your unconditional written undertaking that none of your Editors will be allowed to proceed with any of the aforementioned illegal publications pertaining to our client.
19. Our clients' rights remain reserved, and the aforesaid is not necessarily exhaustive of the facts underlying the unlawful and wrongful conduct.

Yours faithfully

OTTO KRAUSE INC.

PER OTTO KRAUSE/ads

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