

10th August 2017

Benny Borg Bonello
Consumer's Association
47A, South Street,
Valletta

BY MAIL AND BY EMAIL

Dear Sir,

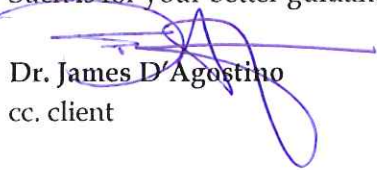
I am instructed by Citadel Insurance plc to refer to exchange of correspondence between you in relation to a complaint lodged with your Association by a certain Catherine Cilia with respect to travel insurance made available through her by HSBC, and to the post on your website dated 9th August 2017 available on url <http://camalta.org.mt/beware-hidden-limitations-travel-insurance/> with the facility to share this post on all social media.

This post is deemed by my client to be libellous and defamatory and intended to tarnish my client's reputation, and to causing commercial damage. The post is inaccurate and does not reflect what really happened. It also contains value judgments which, with all due respect, are inaccurate and are also not legally valid. The Association is certainly no authority to make value judgments or interpret insurance policies or similar legal documents. It is also noted that this case was not tried or decided by a Court or Tribunal, and hence this post is unwarranted and baseless. My client should not be treated in the same way as traders who do not honour decisions of the Consumer Claims Tribunal. It is also noted that complainant did not even avail itself of Citadel's internal consumer complaint mechanism for a remedy.

The fact that this page was uploaded on your website, notwithstanding a clear explanation from my client with respect to the contents of the insurance policy under examination is evidence in itself of the Association's attempt to damage my client's reputation by being prosecutor, judge and jury, without this complaint having passed through the usual channels. The title of the post itself, the position declared, and the facility encouraging readers to share the post on all social media are all evidence of an attempt to harm my client's reputation. The course of action taken by the Association is therefore abusive and illegal and cannot be tolerated.

In view of the above, you are therefore being called upon to immediately remove this post from your webpage and publish instead an apology towards Citadel with wording that will be agreed with my client. Should you not comply within 24 hours, my client is from now reserving its rights to proceed judicially against you both criminally and civilly, for libel, defamation, and consequent damages, without any further warning.

Such is for your better guidance.


Dr. James D'Agostino
cc. client