

MinterEllison

1 December 2017

PRIVATE AND CONFIDENTIAL
For the recipient only – not for redistribution

Mr Sean Butler
5 Henley Place
ATTADALE WA 6156

and by email to sbutler@inet.net.au

Dear Mr Butler

Offensive and Defamatory Communications

1. We are in possession of your emails of:
 - (a) 23 November 2017 to Mr Euan Robertson transmitted at 1:20pm;
 - (b) 23 November 2017 to Mr Euan Robertson transmitted at 5:45pm
 - (c) 29 November 2017 to Mr Robertson transmitted at 12:25pm; and
 - (d) 30 November 2017 to Mr Leith Ayres, copied to Mr Robertson, transmitted at 7:46am, (together, the **Emails**).
2. The Emails contain material which gives rise to imputations that senior Bankwest managers and Mr Robertson personally (as the case may be) are:
 - (a) corrupt;
 - (b) dishonest; and
 - (c) engaged in illegal activity.
3. We are instructed that each of those allegations are wholly false and have no foundation in fact whatsoever. Accordingly the Emails constitute a serious defamation of our client's representatives and also of Mr Robertson personally.
4. Separate to the matters raised in paragraphs 2 and 3 above, the Emails also contain:
 - (a) language which is intended to threaten and harass Mr Robertson; and
 - (b) offensive and disparaging slurs of and concerning Mr Robertson which are intended to cause him significant embarrassment and reputational harm.
5. In all of those circumstances we are instructed to require that you immediately:
 - (a) cease from further distributing any of the Emails; and
 - (b) cease from sending, distributing or publishing any further communications of a similarly defamatory or offensive character concerning any Bankwest representative and Mr Robertson.



6. We are further instructed to inform you that:
- (a) your conduct in publishing the Emails constitutes a targeted campaign against Mr Robertson in respect of matters concerning your personal finances; as such it is inappropriate for you to continue engaging in this conduct ostensibly in your capacity as Advisor to Senator Georgiou in that it has the capacity to imply that your actions have the sanction of your employer; and
 - (b) our client will of course continue to respond to queries concerning your financial affairs from any duly constituted dispute resolution body or committee of inquiry but does not intend to correspond with you any further in relation to this matter.
7. Our client and its officers reserve all of their rights.

Yours sincerely

MinterEllison



Contact: Lital Hymans T: +61 8 6189 7837
F: +61 8 6189 7999 lital.hymans@minterellison.com
Partner: Kevin Stewart T: +61 8 6189 7872
OUR REF: LYH KNS