

OUR REF:DOAA/NO/1/2025

YOUR REF: TBA

DATE:13TH OCTOBER, 2025

TO:

EDGAR OBARE

TEL: | +254...

Dear Mr. Obare,

RE: DEMAND & NOTICE OF INTENTION TO COMMENCE LEGAL PROCEEDINGS FOR DEFAMATION AGAINST NANCY OMWERI

We refer to the above matter.

We act on behalf of **NANCY OMWERI** (hereinafter referred to as 'our client'), who has instructed us to address you as follows:

On 6th October, 2025, our client came across comments on your Instagram page 'bnnbasic' and a hashtag '#Nancyomweri #Bnnbasic' on a link you had given to your followers. Upon reviewing the posts on your pages and link,

(link: <https://t.me/bnnkenya/77005?single>),

it became evident that you gave a platform to your followers to anonymously publish several malicious and unfounded allegations against our client. At the time of drafting this notice, the post had garnered several reactions, comments, and shares. Accompanying the posts/comments is a photograph of our client. You deliberately manipulated the facts to falsely suggest that our client has romantic relations and a baby with former Cabinet Secretary Fred Matiangi. However, our client has narrated her story which disproves your narrative.

Upon careful review and analysis of the posts and the accompanying comments, it is evident that you have defamed our client and seriously damaged her reputation by making/spreading the following false and injurious statements/insinuations:

1. THAT our client is a woman of loose morals who has engaged in inappropriate relations with the former Cabinet secretary, Fred Matiangi.
2. THAT our client has deceived her husband by being disloyal.
3. THAT our client has a habit of looking and sleeping with old men at the back of her husband.
4. THAT our client depends on men (some who are foreign) for survival yet our client has a job
5. THAT our client is devoid of integrity.

Furthermore, your social media platforms which are still running continue to brazenly attack and defame by posting additional damaging materials against her, which you intend to release to cause further harm.

Our client denies any knowledge of such information and is prepared to challenge you to produce this alleged evidence of her infidelity in a court of law as part of your defence.

It is crucial to underscore that our client is a well-known journalist and she enjoys substantial support and public trust. The false statements and insinuations you have made about our client are not only misleading but also gravely injurious to her reputation. The publications have caused her mental and psychological anguish and she is at the verge of losing her reputation among her colleagues, family members and all the people who believe in her.

Moreover, your actions constitute an offence under Kenyan law, specifically Section 23 of the Computer Misuse and Cybercrimes Act No. 5 of 2018, which states:

“Any person who knowingly publishes information that is false in print, broadcast, data or over a computer system, that is calculated or results to panic, chaos, violence among citizens of the Republic, or which is likely to discredit the reputation of a person commits an offence and shall on conviction, be liable to a fine not exceeding five million or to imprisonment for a term not exceeding ten years, or to both.”

In light of the foregoing, we hereby demand the following on behalf of our client:

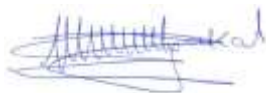
1. THAT you admit liability for defaming our client and pay damages amounting to Ksh. 10,000,000.
2. THAT you issue a full and effective public apology directed at our client.
3. THAT you retract the said publication from all your social media platforms.
4. THAT you immediately cease and desist from publishing any further defamatory statements about our client.

TAKE NOTICE that failure to comply with the above demands within seven (7) days from receipt of this letter will result in our firm receiving irrevocable instructions to pursue all legal remedies available to protect our client's reputation, including but not limited to instituting legal proceedings against you at your own expense.

Furthermore, TAKE NOTICE that you are hereby formally warned against disseminating this notice to any third party, save for your legal counsel.

Time is of the essence.

Yours faithfully,



Danstan Omari

For: DANSTAN OMARI & ASSOCIATES ADVOCATES

THE UNITED KENYA CLUB, STATEHOUSE ROAD, OPPOSITE ST. PAULS'S CHURCH, NEAR UNIVERSITY WAY ROUND-ABOUT, 2ND FLOOR, SUITE 14

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