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Your Ref:

Our Ref: KF/LIT-284/17/1543030/kf

18<sup>th</sup> March 2019

Please contact: *Kenny Fung*  
(Direct Line: 3188 3137)

The Hong Kong Pui Ching  
Alumni Association Limited  
No.80 Waterloo Road, Kowloon,  
Hong Kong

By Fax (2715 2100) & By Post

Dear Sirs,

**Re: Defamation against Mr. Chan Chi Mong Hopkins**

We have instructions to act for Mr. Chan Chi Mong Hopkins.

Our client is an alumni of the Pui Ching Primary School (“**PCPS**”) and Pui Ching Middle School, the former supervisor of PCPS and Pui Ching Middle School, the former chairperson of Baptist Oi Kwan Social Service, a school manager of various schools in Hong Kong and Macau, a director of various non-governmental organisations and a Justice of Peace.

On or about 13<sup>th</sup> March 2019, you have published, or caused to be published, an article entitled “有關香港浸信會聯會向顧明均學長刊登道歉聲明事” (“**the Defaming Article**”) in your Facebook.

It was stated in the Defaming Article that :-

“... 其中一例是浸聯會在道歉聲明中公開承認前校監陳之望並不是一個具誠信而適合擔任學校領導的人，並立即撤銷陳擔任浸聯會屬下學校校董職務...”  
(emphasis added) (“**the First Defaming Expression**”)

As far as we understand, the expression “道歉聲明” referred to in the First Defaming Expression refers to the Public Statement published by The Baptist Convention of Hong Kong (“the Convention”) dated 27<sup>th</sup> February 2019 entitled “公開聲明” (“**the Convention’s Public Statement**”) and the First Defaming Expression was made purportedly by reference to the Convention’s Public Statement.

However, the Convention’s Public Statement did not, and has never suggested, that the Convention has disqualified our client from taking up the position as school manager of various schools managed by the Convention. Rather, our client did not offer himself for re-election of the position of the supervisor of PCPS upon expiration of his term of office ended 31<sup>st</sup> August 2018.

Accordingly, the First Defaming Expression is wrong, defamatory and wholly without basis.

The Defaming Article also provides, *inter alia*, that :-

“... 而陳更在未獲浸聯會及培正小學管理委員會的同意前，擅自以學校名義委託金杜律師事務所發出的不實的公開聲明 ...”(emphasis added) (“**the Second Defaming Expression**”).

Under the article of 中小學及持續教育部 of the Convention, the Convention has caused various school management committees be established (including that of PCPS) in order to perform the management function of various schools operated by the Convention. Accordingly, the school management committee of PCPS is empowered to perform such management function on behalf of the Convention.

By a resolution passed by the school management committee of PCPS on 25<sup>th</sup> May 2018, it was resolved that :-

1. Messrs. King & Wood Mallesons be appointed as the legal advisor of PCPS; and
2. Messrs. King & Wood Mallesons be authorized to issue a public statement on behalf of PCPS.

It has also be noted that Professor Wong Ling-tim, the current supervisor of PCPS was present in the said meeting and voted for the said resolutions.

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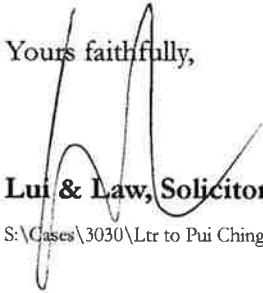
Accordingly, the instructions given to Messrs. King & Wood Mallesons to issue public statement on behalf of PCPS has been duly authorized by the school management committee of PCPS, letting aside that under the existing Education Ordinance (Cap.279), it was the school managers who shall perform the management function of a school but not its sponsoring body.

Accordingly, the First Defaming Expression is wrong, defamatory and wholly without basis.

We hereby give you notice that unless you withdraw the First Defaming Statement and the Second Defaming Statement within the next 7 days and to public a corrective statement in your Facebook account, we shall have no alternative but to take out appropriate legal action against you so as to protect our client's interest and reputation.

All our client's rights are hereby expressly reserved.

Yours faithfully,



**Lui & Law, Solicitors**

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