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DISTRICT JUDGE
EVANS NG
21 SEPTEMBER 2026

IN THE STATE COURTS OF THE REPUBLIC OF SINGAPORE

[2026] SGDC 311

District Court Originating Claim No 1487 of 2025

Between

Siti Azriah Binte Zainee

… *Claimant*

And

Abdul Rahim Bin Mohamed Wambri@Raye Wambri

… *Defendant*

JUDGMENT

[Tort] — [Defamation] — [Defamatory statements]
[Tort] — [Defamation] — [Qualified privilege]

Siti Azriah Binte Zainee
v
Abdul Rahim Bin Mohamed Wambri@Raye Wambri

[2026] SGDC 311

District Court Originating Claim No 1487 of 2025
District Judge Evans Ng
1 July, 11 August 2026

21 September 2026 Judgment reserved.

District Judge Evans Ng:

1 The Claimant was admitted as an advocate and solicitor of the Supreme Court of Singapore in July 2013 and practised until March 2022. She has since left legal practice and is now a teacher. This is her defamation action.

2 In August 2021, while she was in practice with Mr Sadari Bin Musari at his eponymous firm, Mr Sadari prepared a will for a client, who was the Defendant's mother. The will was executed in the presence of Mr Sadari and the Claimant, who signed as subscribing witnesses. The Claimant affixed a stamp bearing her name and the words "Advocate & Solicitor [¶] Singapore" and signed above it.

3 After the Defendant's mother passed away in January 2024, he raised some concerns regarding the validity of the will but did not file a formal legal challenge. Probate was granted in July 2024, and the Defendant was one of the

beneficiaries. Nevertheless, the Defendant was dissatisfied with Mr Sadari's handling of matters relating to the will. He made reports against Mr Sadari and the Claimant. The Claimant says two of those reports defamed her.

Police report

4 The first was a police report. The Claimant pleaded:[1]

> Moved by his dissatisfaction, […] the Defendant made a police report against Mr Sadari Bin Musari maliciously *accusing him* inter alia that *he had misled the Court* and other unsubstantiated allegations. In his police report, […] the Defendant had also libellously implicating the Claimant with reference to her and specifically naming her including the Court.
>
> [Italics added]

5 No police report answering that description is in evidence. The only police report exhibited in the affidavits of evidence-in-chief was one made by the Defendant on 14 September 2024.[2] Although this police report identified the Claimant and Mr Sadari as "Suspect[s]", its substance was exclusively about the Claimant and made no allegation against Mr Sadari. It does not correspond to the pleaded police report.

6 The statement of claim also does not set out the words from any police report said to be defamatory. This is contrary to a long-standing rule of pleading in defamation. The words complained of are material and must be pleaded with sufficient precision to identify the case which the defendant has to meet and to enable the court to determine whether the words bear the pleaded defamatory meaning: *Wright v Clements* (1820) 3 B & Ald 503 at 506 *per* Abbott CJ and *Harris v Warre* (1879) 4 CPD 125 at 128 *per* Lord Coleridge CJ. Therefore,

[1] Statement of Claim, paragraph 9.

[2] Bundle of Affidavits ("BA"), 37-39, 136-138.

neither the pleaded but unproved police report nor the unpleaded police report found in evidence can be treated as a basis for liability.

Complaint to the Law Society of Singapore

7 The other report was a complaint made by the Defendant on or around 16 September 2024 ("Complaint") to the Law Society of Singapore ("Law Society"), under s 85(1) of the Legal Profession Act 1966.[3] The Complaint was attached to an email sent to <regulatory@lawsoc.org.sg>. The email was copied to two members of the Council of the Law Society and one employee of the Law Society.[4] The email, comprising some covering text and the attachments, was sent by the Defendant's wife using her email address. It is undisputed that she did so on behalf of the Defendant; she is not a party or witness in this matter. The <regulatory@lawsoc.org.sg> email address was maintained by the Law Society to receive such complaints. There is no evidence that any of the three copied recipients opened the attachments containing the Complaint.[5]

8 The principal subject of the Complaint was Mr Sadari, not the Claimant. It raised four main allegations regarding Mr Sadari's handling of the Defendant's late mother's will — "Inaccurate Preparation of a Muslim Will", "Possibility of Misleading the Family Justice Courts using an Allegedly Invalid Muslim Will", "Failure to Provide Essential Documents", and "Alleged Allowance of Misrepresentation by a Legal Assistant".[6] The Claimant was expressly named only in relation to the last allegation:

[3] BA, 40-43.

[4] BA, 41.

[5] Notes of Evidence ("NE"), 1 July 2026, 67/1-2.

[6] BA, 42.

> It is deeply troubling that Mr. Sadari Musari, as the owner of Sadari Musari & Partners, allegedly allowed his legal assistant, [the Claimant], to falsely represent herself as a qualified lawyer by using a rubber stamp with the title "Advocate & Solicitor." This kind of behavior, if proven true, represents an outright breach of trust and is one of the worst forms of deceit in the legal profession. Such actions undermine the integrity of the legal system and should not be tolerated.
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> *See annex 2: The "Will" (3 pages) with the rubber stamp and signature of Siti Azriah Zainee posing as a lawyer.*
>
> *See annex 9: https://eservices.mlaw.gov.sg/lsra/search-lawyer-or-law-firm - Siti Azriah Zainee = No result.*
>
> [Italics in original]

9 The Complaint was dismissed.[7] The Defendant was notified of the outcome on 10 March 2025[8] and testified that he was "happy" with it.[9] He took no further steps against Mr Sadari or the Claimant.

10 Based on the contents of the Complaint, the Claimant pleaded[10] a number of defamatory meanings that I need not reproduce. In determining the meaning of the offending words, the perspective to be taken is that of the ordinary reasonable member from the relevant class of readers: *Chan Cheng Wah Bernard v Koh Sin Chong Freddie* [2012] 1 SLR 506 at [19]. Here, the Complaint was communicated within the Law Society's complaints process only. There is no evidence that it was published beyond that process. Having regard to the Complaint as a whole, including the qualifications "allegedly" and "if proven true", I find that it conveyed to the relevant hypothetical reader that there were reasonable grounds to suspect that the Claimant had falsely held

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[7] BA, 145-148.

[8] BA, 144.

[9] NE, 1 July 2026, 50/25-28.

[10] Statement of Claim, para 17.

herself out as a qualified lawyer when she attested the will. That imputation of professional dishonesty was defamatory.

Qualified privilege

11 The Defendant asserts the defence of qualified privilege. He contends that he had an interest in making the Complaint and that the Law Society had a corresponding interest in receiving it. He explained in cross-examination:

> Q: [W]hat adequate interest do you have to raise the concern regarding the preparation of the will?
>
> A: Again, will is a legal document. And when I see something amiss, non-compliance or irregularity even as members of the public, I would raise the concern to the authority. This is a legal document especially at the point in time, I am a legal beneficiary to my late mother's estate.[11]

12 As a beneficiary under the will whose validity or preparation he questioned, the Defendant had a legitimate interest in raising those concerns. The Defendant's interest need not be direct or substantial, provided that the recipient has a corresponding legitimate interest: *Price Waterhouse Intrust Ltd v Wee Choo Keong* [1994] 2 SLR(R) 1070 at [30]. The Law Society, as the body responsible for regulating lawyers and investigating complaints of professional misconduct, had such an interest: *Foo Diana v Woo Mui Chan* [2023] SGHC 221 at [58]-[60]. The allegation that the Defendant made regarding the Claimant was not extraneous to the occasion (*Lim Eng Hock Peter v Lim Jian Wei* [2010] 4 SLR 331 at [34]) — it formed the factual basis of the complaint that Mr Sadari had allegedly permitted a legal assistant to misrepresent herself as a lawyer. Hence, I find that the Complaint was published on an occasion of qualified privilege.

[11] NE, 1 July 2026, 62/13-19.

Malice

13 Proof of malice defeats the defence of qualified privilege. Where a claimant wishes to allege express malice, O 43, r 3(3) of the Rules of Court 2021 requires the claimant, with the Court's permission, to serve a reply giving particulars of the facts and matters from which the malice is to be inferred: see also *Lee Kuan Yew v Vinocur John* [1995] 3 SLR(R) 38 at [50] and [53]. The Claimant did not seek such permission and did not serve a reply. I need not determine the consequence of that procedural omission because, even if I consider the Claimant's case on malice on its merits, I find that express malice has not been made out.

14 Express malice may be established in either of two ways: (a) the Defendant knew that the defamatory imputation was false, did not believe it to be true, or was reckless as to its truth; or (b) notwithstanding an honest belief in the truth of the defamatory imputation, the Defendant published it with a dominant motive to injure the Claimant or some other improper motive: see *eg* *Chan Cheng Wah Bernard v Koh Sin Chong Freddie* [2012] 1 SLR 506 at [90] and *Ezion Holdings Ltd v Credit Suisse AG* [2018] 3 SLR 356 at [33]. I first consider the former.

15 Given the defamatory meaning found at [10], the question is whether the Defendant knew that there were no reasonable grounds to suspect that the Claimant had falsely held herself out as a qualified lawyer, or was recklessly indifferent to whether such grounds existed. This is a subjective inquiry and the threshold is high. Mere carelessness, impulsiveness or irrationality is insufficient; the recklessness must amount to wilful blindness: see *eg Gao Shuchao v Tan Kok Quan* [2018] SGHC 115 at [37]-[40]. The evidence does not establish either state of mind. Before making the Complaint, the Defendant

made searches on the Ministry of Law's Legal Services Regulatory Authority's online directory of lawyers ("LSRA Search") in September 2024 using Mr Sadari's name and the Claimant's name. The latter search returned no results.[12] He also carried out what he described as a "general search" on an online platform called "Law Guide Singapore".[13] He said that it indicated that the Claimant was a "legal assistant" at Sadari Musari & Partners and "not a qualified lawyer".[14] A screenshot produced by the Claimant[15] corroborated his recollection in that respect.

16 The Defendant's failure to exhaust every possible avenue of verification does not, without more, establish express malice. In cross-examination, he conceded that he understood the limitation of the LSRA Search — it was a "live"[16] search and did not establish the Claimant's status in 2021:

> A: Okay, at that point in time as a layman, when I do the search [in 2024], I would search the two names I saw, that Mr Sadari and Ms Siti. When I searched for Mr Sadari, it reflected his name, I'm okay to proceed. But when I searched for Ms Siti and the name is not appeared and I---there's no way---there's no way I can find out about the truth on her status at that point in time of back date to 2021. And based on this [LSRA Search], it stated that there's no result. Either I typed a wrong name, […] or the lawyer does not have current license, which in this case, it is true. But there is no point in time that I can know that happens. The only way for me to find the truth is through the authority. […] As a matter of fact, I did make a call to LawSoc and they are not revealing it over the phone. They say that I have to file an official complaint.[17]

[12] Affidavit of Defendant, paras 10-13; BA, 117-118.

[13] NE, 1 July 2026, 69/7-23.

[14] NE, 1 July 2026, 69/7-23; BA, 137.

[15] BA, 64-66.

[16] NE, 1 July 2026, 60/1-9.

[17] NE, 1 July 2026, 54/26-55/9.

That limitation, however, must be considered together with the other steps he took. Apart from the LSRA Search, he found an online listing describing the Claimant as a "Legal Assistant" and he enquired with the Law Society by telephone. He testified that, because he could not ascertain the historical position from those efforts, he regarded a formal complaint as the means of clarifying it. That evidence was not challenged.

17 The wording of the Complaint is also relevant. Although the Defendant used strong expressions like "falsely represent herself" and "posing as a lawyer", he qualified the allegations with the words "allegedly" and "if proven true". Read as a whole, the Complaint conveyed a suspicion that he was asking the regulator to investigate, rather than an allegation made regardless of whether there was any basis for it. I am therefore not satisfied that the Defendant knew that there were no reasonable grounds for the suspicion, or was recklessly indifferent, to the point of wilful blindness, as to whether such grounds existed.

18 I turn to the second basis on which express malice may be established, *ie* that the Defendant's dominant motive was to injure the Claimant or that he used the occasion for some other improper purpose. The Claimant's counsel sought to show that the Defendant's true purpose was to have the will invalidated. This point was repeatedly put to the Defendant in cross-examination.[18] I do not agree with the Claimant's position. Even if the Complaint had resulted in disciplinary proceedings against Mr Sadari, that would not, without more, have invalidated the will. The Defendant had not

[18] NE, 1 July 2026, 48/13-16; 48/29-49/2; 60/23-26; 60/30-32; 67/13-16.

pursued a challenge to the will and probate had already been granted.[19] There is insufficient evidence from which to infer that the Complaint was made to obtain a private advantage in relation to the estate.

19 There is also no evidence of any pre-existing animus, ill-will or spite on the Defendant's part *vis-à-vis* the Claimant. Although the absence of such evidence does not conclusively rule out malice, it does not support an inference that his dominant motive was to injure the Claimant. Nor is there evidence that the Defendant disseminated the Complaint beyond the Law Society's complaints process to embarrass or inconvenience the Claimant. For the above reasons, I am not satisfied that the Claimant has proved express malice on a balance of probabilities. The defence of qualified privilege succeeds.

20 The action is therefore dismissed. I will hear the parties on costs.

Evans Ng
District Judge

Chishty Syed Ahmed Jamal (A C Syed & Partners) for the claimant;
Clarence Lun Yaodong (Fervent Chambers LLC) for the defendant.

[19] NE, 1 July 2026, 48/9-12.