

18 November, 2023

Mr. Phillippe Martinez,
Fortlands,
Basseterre,
St. Kitts

In the Matter of an Intended Action Between Dr Timothy Sylvester Harris v You

Dear Sir,

We act for Dr. the Hon Timothy Sylvester Harris, of Tabernacle Village, St. Kitts.

On Friday, 17th November, 2023, you published a letter addressed to our client under the name "Mr. Timothy Harris", and others.

Your letter contains the following words which are defamatory of our client in his capacity of former Prime Minister of the Federation and in his personal capacity:

1. "The result of this investigation (into the 'finance and discounting schemes' in the CBI programme that occurred under your administration and management) has revealed numerous potential violations of United States Laws including fraud, money laundering, tax evasion, and corruption."
2. "On November 15, 2023, Mark Brantley, a member of your Government at the time we are referring to, stated in his radio/video broadcast that ... your actions were illegal."
3. "You have misrepresented the legal value of the CBI shares to MSR Media and American investors, ... while establishing a fraudulent network to sell shares of other projects at a fraction of their legal price, especially concerning the jail project"
4. "MSR Media has ...evidence of your fraudulent activities..."

These words mean, and were understood to mean, that our client is guilty of various fraudulent and illegal activities, including fraud, money laundering, tax evasion, and corruption, in the course of his administration and management of the Government of St. Kitts and Nevis, as its Prime Minister.

All the allegations made against him are entirely false and the attack on him is unjustified. He has not engaged in any of the fraudulent or illegal activities alleged. Under his leadership the CBI program was highly regarded. The approval of your MSN Media SKN project was made in compliance with the law and principles of integrity and good governance.



Mr. Brantley, your apparent witness, himself approved the CBI programme as a member of the same Government. In addition, we are instructed that as Premier of Nevis, Mr. Brantley asked our client to give the Nevis Island Administration more of the money being earned from the said CBI programme.

Your charges amount to a very serious libel to our client and has caused him considerable distress and embarrassment. Your intention to damage our client's reputation is evidenced by the number and nature of persons and institutions stated to have been copied to it, including representatives of the political, official, legal and commercial establishment of the State, and the international media with the implied invitation for them to republish it widely. We have included them in this letter to inform them that the contents of your publication are false and defamatory and that they should not republish it.

In the circumstances, our client requires from you, as a matter of urgency, a full and unequivocal public retraction and apology in terms to be approved by us, a statement in court and an undertaking not to repeat these allegations.

You are also advised that our client is entitled to substantial compensation for the injury to his reputation and feelings, as to which we invite your proposals. Our client will also require payment by you of all the legal costs he has incurred in this matter.

We look forward to hearing from you without delay. If we have not received a satisfactory reply by Tuesday 21st November, 2023, our instructions are to issue a claim form.

In the meantime, our client reserves all his rights.

Yours faithfully,
FOSTERS
per



Renee T. St. Rose
Partner

cc.

William P. Barry, Miller Chevalier

Sandy Prasanna, Miller Chevalier

Mark Brantley, Premier of Nevis

Garth Wilkin, Attorney General of St. Kitts and Nevis

Paul Singh and Catherine Coup, CS Global

Ms Ying Jin, CEO, Caribbean Galaxy Real Estate Corporation

Damian Kelsick, Attorney at Law

Dwyer Astaphan, Attorney at Law



Daisy Randal, Attorney at Law

Sylvester Anthony, CIU

Farron Lawrence, Carib Trust Ltd

Dorietta Fraites, SKIPA

Lee Beasley, MSR Media

MSR Media SKN Ltd

Terrence A. Crossman, St. Kitts Nevis Anguilla National Bank