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Mr. Lennox Linton
Morne Daniel
Dominica

Dear Sir

Your letter to the Prime Minister has been referred to us with instructions to reply as follows:

Our client has emphatically instructed that he has absolutely no intention of resigning. Indeed, our client instructs that it would be a complete betrayal of his oath of office, and duties to the people of Dominica to resign on the basis of a smear campaign constructed on the salacious misinformation and scandalous lies manufactured or repeated and circulated by you, members of your political party, and a Mr. Gabriel Christian. As you well know you and your party are now aided by foreign agents who seem to share a common interest in manufacturing facts, and destroying the country. Alternatively, the misinformation and smears now being published by third parties are a direct result of your reckless and malicious utterances and actions, and those of members of your political party.

Our client further instructs that all of the allegations in your letter dated 30th January 2017, which you maliciously circulated to others who have no interest in your smear campaign, of alleged secrecy and corruption with the Economic Citizenship Program, and diplomatic passports are to your knowledge false. For example, it is a fact that:

- i. The CBI program is governed by laws, and all applicants are subject to stringent due diligence;
- ii. The Government has on publication of every Budget and Estimates disclosed the revenues from the citizenship programs;

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- iii. The accounts of the Government are laid before the Parliament and are audited by the Director of Audit;
- iv. The names of all persons granted citizenship up to and including those granted citizenship in the year 2016 have been published in the Official Gazette;
- v. In our client's last Budget Address he gave a detailed account of the expenditure of the CBI funds post Tropical Storm Erika;
- vi. The Governor of the Eastern Caribbean Central Bank commended the Government for, among others, iv above

Our client notes that as the Leader of the Opposition you are the Chairman of the Public Accounts Committee in the Parliament. Our client is aware that you have had meetings with the former Director of Audit and Financial Secretary to discuss the accounts and monies under the various citizenship programs. Also, the Public Accounts Committee has the authority to review the accounts, and make its findings available to the Parliament. You have to date failed to present any adverse findings or information to the Parliament.

Our client instructs that he frontally denies your outrageous and malicious allegation that the citizenship program has compromised global security as alleged or at all. Such a baseless allegation reflects your intentional misconduct or extreme recklessness with the truth, a fact already documented by the High Court and Privy Council in proceedings brought against you by Kieron Pinard Byrne. More specifically, your grave allegations concerning the alleged secrecy and sales of diplomatic passports 'under the table' are complete and utter fabrications, and our client has repeatedly denied these allegations.

In 2009 the Minister of Foreign Affairs disclosed the names of all persons appointed to diplomatic posts or as Goodwill Ambassadors holding passports from 2000 to 2009 in the House of Assembly. In 2012, our client disclosed the same from 2004 to 2012 to the House of Assembly.

Further, it is absolutely false to say that the majority of persons appointed to diplomatic positions were arrested for international crimes

while holding diplomatic passports. It is also false for you to allege that our client, the Prime Minister, has sold diplomatic passports 'under the table'. The Prime Minister has repeatedly denied that he has sold any diplomatic passport. In contrast, on every occasion whenever you were asked to produce the evidence, you failed miserably to do so. As a result, our client has in the past said to you to put up or shut up. You have failed to put up a shred of evidence; merely recycling and publishing your allegations and lies are not evidence of a fact.

Our client instructs that he specifically denies your allegations in relation to Ali Reza Ziba Halat Monfared. It is beyond question you are fully aware of the fact that due diligence was in fact conducted on Monfared and his family by Bishops Services Inc.

This was done as required by the Regulations which require due diligence before an application for citizenship can be granted. A report dated July 2014 was submitted to the Government by Bishops. That report disclosed nothing adverse or known against Monfared. As a result of this report, and other factors considered in accordance with the CBI Regulations and Programme, Mr Monfared became a citizen under the Citizenship by Investment Programme.

You are also aware that the circumstances of the grant of the diplomatic passport in March 2015, and its cancellation in January 2016, are fully set out in the Press Release of the Ministry of Foreign Affairs. This release was published by the local media. This followed the due diligence report. The aforementioned notwithstanding, you have alleged, or repeated the false allegation, and continue to allege and repeat, that no due diligence was done, and that the diplomatic passport was sold and unlawfully or improperly granted to Monfared in March 2015 knowing he was accused of alleged contraventions of the Iran Sanctions laws of the USA. No such information was disclosed by the due diligence report.

Your allegation has as its premise the indictments filed in the United States of America against one Zarrab in 2016. You have done so notwithstanding that the March 2016 Justice Department press release concerning the Zarrab Indictment and the 2016 Indictments made no mention of Monfared.

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We are instructed that our client also denies your allegation that on the cancellation of -Monfared's diplomatic passport in January 2016 he knew Monfared was wanted by Iran to face trial in Iran, and that Monfared was thereafter harboured, aided and abetted by the Government of Dominica. Monfared was at all material times a citizen of the Commonwealth of Dominica entitled to live in the Commonwealth of Dominica in accordance with and subject to the laws of the land.

Our client further instructs that allegations of the alleged contraventions of Iranian sanctions by Dominica's Ship Registry are also patently false. Dominica has never ever been mentioned or blacklisted as a country assisting the violation of sanctions laws of the USA through or by ships registered by it or at all. This story was fabricated by one of the members of your party Thomson Fontaine.

We are also instructed that on Thursday the 26th of January 2017 you publicly accused our client of 'stealing' money belonging to or allegedly derived from the sale of passports. This sensational allegation is manifestly and maliciously false, and a mere figment of your imagination.

Our client has noted that you or others in your political party have either supplied your falsehoods to third parties, and or have repeated them with impunity. This includes the outrageous lie that our client as the Prime Minister was under investigation by the Justice Department of the USA. This collaboration led to one Kenneth Rijock's baseless and contradictory story-telling on Q95 on Tuesday the 1st February 2017.

Our client has also noted you have copied your letter to a number of persons and the media. Your smear campaign, your political stunt with the wide publication, and your reckless and intentional conduct and/ or irresponsible behavior demands that our client institute proceedings against you.

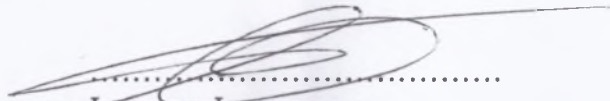
In the circumstances, we have been instructed to collate all of your reckless and dishonest statements and publications, and to proceed against you forthwith with whatever proceedings are considered necessary including civil proceedings on the footing of aggravated damages.

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Kindly be advised that you, and indeed others will be hearing from us soonest.

Respectfully



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Lennox Lawrence
Attorney-at-Law

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