



FIXED DATE CLAIM FORM

Form 2 [Rule 8.1(4)]

IN THE SUPREME COURT OF JUDICATURE OF JAMAICA

IN THE CIVIL DIVISION

CLAIM NO.

IN THE MATTER OF THE CONSTITUTION OF JAMAICA

AND

IN THE MATTER of an Application by **MAURICE ARNOLD TOMLINSON**, alleging a breach of his rights under sections 13(3)(a), 13(3)(c), 13(3)(g), 13(3)(i)(i), 13(3)(j)(ii), 13(3)(o), 13(3)(p), 13(3)(6) and 14 of the *Charter of Fundamental Rights and Freedoms (Constitutional Amendment) Act, 2011*

AND

IN THE MATTER of an Application by **MAURICE ARNOLD TOMLINSON** for constitutional redress pursuant to section 19(1) of said Charter

AND

IN THE MATTER of an Application made pursuant to Rule 56.9 of the Civil Procedure Rules, 2002 (CPR)

BETWEEN:

MAURICE ARNOLD TOMLINSON

CLAIMANT

AND

THE ATTORNEY GENERAL OF JAMAICA

DEFENDANT

The Claimant, **MAURICE ARNOLD TOMLINSON**, Attorney-at-law of 19 Angella Close, West Green, Montego Bay, in the parish of Saint James, claims against the Defendant **THE ATTORNEY GENERAL OF JAMAICA**, c/o the Attorney General’s Chambers, 2 Oxford Road, Kingston 5, in the parish of St. Andrew, for constitutional redress and seeks the following:

1. A declaration that, to the extent consensual sexual activities between persons age 16 or older, including persons of the same sex, are criminally prohibited and penalized under sections 76, 77 and 79 of the *Offences Against the Person Act, 1864* [“OAPA”], those sections contravene one or more of the following provisions of the *Charter of Fundamental Rights and Freedoms (Constitutional Amendment) Act, 2011* [“the Charter”] and are therefore, to that extent, of no force or effect:
 - a) the rights to liberty and to freedom of the person, guaranteed by sections 13(3)(a), 13(3)(p) and 14;
 - b) the right to security of the person, guaranteed by section 13(3)(a);
 - c) the right to freedom of expression, guaranteed by section 13(3)(c);

- d) the right to equality before the law, guaranteed by section 13(3)(g);
 - e) in the case of OAPA section 79, the right to freedom from discrimination on the ground of being male or female, guaranteed by section 13(3)(i)(i);
 - f) the right to respect for and protection of private and family life, and of privacy of the home, guaranteed by section 13(3)(j)(ii); and
 - g) the right to protection from inhuman or degrading punishment or other treatment, guaranteed by sections 13(3)(o) and 13(6);
2. An order that sections 76 and 77 of the OAPA will continue to apply to penalize non-consensual sexual activity, including with a person under the age of sixteen;
 3. An order that section 79 of the OAPA in its entirety is null, void, and of no force or effect;
 4. For greater clarity, a declaration that to the extent sections 76 and 77 of the OAPA do not apply to consensual sexual activities between any persons age 16 or older, including persons of the same sex, then such activities are also excluded from the operation of sections 2, 29, 30, 31, 32, 33, 34, 35 and the First Schedule of the *Sexual Offences Act, 2009* [“SOA”], and regulations 11, 16, 17, 18 and 21 of the *Sexual Offences (Registration of Sex Offenders) Regulations, 2012* [“SOA Regulations”];
 5. In light of the unconstitutionality of the impugned provisions and the remedies sought above, an order prohibiting the Jamaica Constabulary Force from laying charges under section 79 of the OAPA, and under sections 76 and 77 of the OAPA in relation to consensual sexual activities between persons above the age of sixteen, including persons of the same sex, and further prohibiting the Director of Public Prosecutions or its agents from prosecuting any person accordingly;

6. Such other declarations and orders and such directions as this Honourable Court may consider appropriate for the purpose of enforcing or securing the enforcement of the aforementioned declaration and orders; and
7. Such further and/or other relief as this Honourable Court may deem just.

The Claimant seeks the above-noted relief on the following grounds:

The Claimant

8. The Claimant is a gay man, an attorney-at-law and a citizen of Jamaica. He is also a well-known human rights activist, including for the human rights of lesbian, gay, bisexual, transgender and intersex (LGBTI) persons. As a result of his activism, he has been exposed to death threats in Jamaica (which an Assistant Commissioner of Police directly attributed to the existence of the laws that criminalize consenting adult male same-gender intimacy). In addition, the Claimant is legally married to another man under the laws of Canada and travels regularly between his homes in Jamaica and Canada.
9. He has a reasonable fear that his private acts of intimacy with his partner could invite criminal prosecution and/or harassment from police, any conviction for which could, under the impugned provisions in OAPA, as well as sections 2, 29, 30, 31, 32, 33, 34, 35 and the First Schedule of the SOA, and sections 16, 17, 18 and 21 of the SOA Regulations, result in years of imprisonment with hard labour, compulsory registration as a “sex offender,” and all the attendant reporting obligations and infringements of personal freedom attendant upon that, including the possibility of further penal sanction.

The Impugned Provisions

10. As it now stands, Jamaican law criminally prohibits and harshly penalizes virtually any consensual sexual activity or relations between men above the age of consent to sexual

relations otherwise specified in law (i.e., the age of sixteen, as set out in sections 4 and 8 of the SOA). This legal regime consists of several inter-related components, as described below.

11. First, OAPA section 76 makes it an offence for any man to engage in “buggery” – i.e., anal intercourse – with another man, imposing a maximum sentence of ten years’ imprisonment and hard labour:

Unnatural Offences

76. Whosoever shall be convicted of the abominable crime of buggery, committed either with mankind or with any animal, shall be liable to be imprisoned and kept to hard labour for a term not exceeding ten years.

12. Second, OAPA section 77 forbids a man from participating in sexual acts leading to the completion of anal intercourse with another man, and imposes a maximum sentence of seven years’ imprisonment with hard labour:

77. Whosoever shall attempt to commit the said abominable crime, or shall be guilty of any assault with intent to commit the same, or of any indecent assault upon any male person, shall be guilty of a misdemeanour, and being convicted thereof, shall be liable to be imprisoned for a term not exceeding seven years, with or without hard labour.

13. Third, OAPA section 79 prohibits any act of “gross indecency” by a man with another man, imposing a maximum sentence of two years’ imprisonment with hard labour:

Outrages on Decency

79. Any male person who, in public or private, commits, or is a party to the commission of, or procures or attempts to procure the commission by any male person of, any act of gross indecency with another male person, shall be guilty of a misdemeanour, and being convicted thereof shall be liable at the discretion of the court to be imprisoned for a term not exceeding two years, with or without hard labour.

14. Neither “indecent assault” (in s. 77 of the OAPA) nor “gross indecency” (in s. 79 of the OAPA) has been definitively interpreted by the Jamaican courts. However, the use of such terms in the law of the United Kingdom, from which the colonial-era OAPA provision is replicated, has been interpreted to include “any act involving sexual indecency between male persons,” including at least mutual masturbation, forms of intercrural contact, and oral-genital contact,¹ and historically the use of “indecency” offences to prosecute an even broader range of expression of physical affection and intimacy by gay men has been observed in the United Kingdom and other Commonwealth countries that inherited such law as former British colonies. There is little doubt, from the wording and history of the impugned provisions, and their presentation and placement within the OAPA, that these provisions are intended to criminally prohibit and penalize consensual sexual activity between men.
15. Furthermore, as a result of amendments to the law of Jamaica governing buggery and gross indecency between men — pursuant to both the SOA and the SOA Regulations — a conviction under any of sections 76, 77 or 79 of the OAPA would result in the Claimant, or other persons engaged in any of the consensual sexual activities captured by those sections, being mandatorily registered as a “sex offender” and subject to all the registration and reporting requirements, and potential additional penal sanctions, attaching thereto. Section 2 of the SOA designates offences found in the First Schedule of the SOA as “specified offences” to which reporting obligations under the SOA (Part VII) apply. The SOA’s First Schedule explicitly incorporates by reference sections 76, 77, and 79 of the OAPA as “specified offences.” As a result of these changes in the law, in effect as of 2011 and 2012, persons convicted of any of the offences of buggery, attempted buggery, or gross indecency between men (i.e., under any of OAPA sections 76, 77 and 79) are subject to the following

¹ *Dudgeon v. United Kingdom*, Application No. 7525/76, ECHR Series A, No. 45 (22 October 1981), para. 14 (per European Court of Human Rights, declaring the prohibition to be in breach of the UK’s obligations under the *International Covenant on Civil and Political Rights*, to which Jamaica is also a party and to which the reasoning of the Court in *Dudgeon* would equally apply).

additional elements of the regime criminalizing gay men and other men who have sex with men in Jamaica:

- a. Section 29 of the SOA provides for a Sex Offender Register to be maintained by a Sex Offender Registry and indicates that under section 30 persons convicted of any of these offences must be so registered therein.
- b. Sections 30 and 31 of the SOA provide for how information on the register shall be treated, including information about persons convicted of buggery, attempted buggery or gross indecency between men, as defined in the OAPA, as well as the length of time for registration as a sex offender (10 years with the possibility of further extension).
- c. Section 32 specifies that any person convicted of these offences must report to a Sex Offender Registry Registration Centre and be registered as a sex offender, and is further prohibited from leaving Jamaica before reporting to said Centre.
- d. Section 33 provides that any person convicted of buggery, attempted buggery or gross indecency between men, as defined in the OAPA, must report to the Centre within fourteen days if he changes his residence and/or name and must also report between eleven months and one year after he last reported to the Centre.
- e. Section 34 requires every person convicted under sections 76, 77 and/or 79 of the OAPA to advise the Centre, within fourteen days, of:
 - i. every address or location at which he stays or intends to stay, and of his actual or estimated dates of departure from, and return to, his main residence, or a secondary residence if he is in Jamaica but is absent from his main residence and every other residence for at least fourteen days;

- ii. his actual or estimated date of departure from his main residence and any secondary residence if he is outside of Jamaica for at least fourteen days; and
 - iii. his actual return to his main residence or any secondary residence after a departure referred to in (a) and (b) above.

- f. Section 35 of the SOA provides that if a person is convicted of any of the offences of buggery, attempted buggery or gross indecency between men under sections 76, 77 or 79 of the OAPA, and that person fails to satisfy the reporting requirements of Part VII of the SOA, the person has committed a criminal offence and is liable to a maximum sentence of twelve months' imprisonment and a fine of one million dollars.

- g. In addition, persons convicted of buggery, attempted buggery or gross indecency between men, as defined in OAPA sections 76, 77 and 79, are subject to additional infringements of rights under the SOA Regulations, adopted pursuant to the SOA. Regulation 11 provides that information regarding the person's designation as a sex offender, including the offence for which he was convicted, shall be available to, among others, prospective employers and employees of the person, as well as persons managing educational institutes at which the sex offender is enrolled or seeks to enrol – further revealing the person's sexual orientation to yet more people, with additional attendant risks to safety and further exposure to unjustified discrimination. Regulations 16 and 17 repeat the reporting requirements found in Part VII of the SOA for any person convicted under any of sections 76, 77 and 79 of the OAPA. Regulation 18 of the SOA Regulations also requires that a person convicted under any of sections 76, 77 and 79 of the OAPA must carry a "Certificate of Registration of Sex Offender" at all times when away from his main residence or face a maximum sentence of twelve months' imprisonment and a fine of one million dollars. Finally, Regulation 21 of the SOA Regulations further provides that any breach of any obligation imposed on a person under the regulations, in relation to which no penalty is otherwise specified in

the regulations, is liable upon summary conviction to a maximum penalty of twelve months' imprisonment and a fine of one million dollars.

Effects of the law on the Claimant and others similarly situated

16. Sections 76, 77 and 79 of the OAPA have numerous adverse consequences on the daily lives of the Claimant and other similarly situated gay men and other men who have sex with men (MSM).
17. These provisions place the Claimant, as a gay man, at risk of being arrested, prosecuted and convicted – and subjected to all the stigma and adverse physical consequences of a criminal provided for in Jamaican law regarding consensual sex between adult men. As a result the Claimant is forced to either deny his identity and his relationship or contravene the OAPA and risk criminal conviction and grossly harsh punishment.
18. The criminalization of consensual sexual conduct in which, by his sexual orientation, the Claimant is naturally inclined to engage, amounts to a direct and blatant denial of equality before the law for the Claimant and other gay men in Jamaica. This officially sanctioned stigmatization and discrimination by the state, via the harsh sanction of the criminal law, further invites and incites the public to subject the Claimant and other persons identified as, or perceived to be, engaging in same-sex sexual activity to unjustifiable discrimination in all spheres of life. This discrimination expresses itself through both actual acts of – and the ever-present risk or threat of – blackmail, harassment, violence, and reduced and unequal access to facilities and services, including such services as protection that should be provided by law enforcement.
19. The fear of criminal sanctions – and the related stigmatization and discrimination that it encourages – impedes the Claimant, and impedes some other gay men and MSM, from using public health facilities geared towards the treatment and prevention of sexually transmitted

infections, including HIV. Moreover, public health campaigns and facilities geared towards HIV prevention, treatment, care and support are impeded in effectively reaching and engaging gay men and other MSM because of these criminal laws, even though gay men and other MSM are identified as a “key population” disproportionately affected by HIV and in need of evidence-based prevention, care, treatment and support as a matter of good public health practice.

Constitutional rights affected by the impugned provisions

20. Pursuant sections 13(1) and 13(2) of the Charter, as a matter of “inherent dignity” of the person and as “citizens of a free and democratic society,” “all persons in Jamaica” are entitled to the fundamental rights and freedoms recognized in the Charter “to the extent that those rights and freedoms do not prejudice the rights and freedoms of others” and subject only to those limitations of said rights that “may be demonstrably justified in a free and democratic society.” In particular, the Constitution guarantees to the Claimant the following rights, which are infringed by the impugned provisions as described below:

- a. *Rights to liberty and freedom of the person, pursuant to sections 13(3)(a), 13(3)(p) and 14 of the Charter:* Through these inter-linked provisions, whose wording indicates they must be read together, the Charter guarantees the right of each person not to be deprived of their personal liberty through imprisonment except (1) in accordance with fair procedures established by law (s. 14), (2) in the execution of a court sentence following criminal conviction (s. 13(3)(a)); and (3) on reasonable grounds (s.14). These provisions protect an individual's freedom to act without unreasonable physical restraint, particularly by the state. Such rights include the power to make important personal choices, that cause no harm to others, without the threat or reality of deprivation of liberty by the state, including through imprisonment;

it touches the core of what it means to be an autonomous human being blessed with dignity and independence in matters that are fundamentally or inherently personal. Sections 76, 77 and 79 of the OAPA infringe the liberty and freedom of the person of consenting adults, and in particular gay men and other MSM, by criminally punishing them for their acts of consensual intimacy that harm no one. These cannot be considered “reasonable grounds” for deprivation of liberty and freedom of the person, as is required by section 13(3)(a), 13(3)(p) and 14 of the Charter, and cannot be demonstrably justified in a free and democratic society that values these constitutional rights.

- b. *Right to security of the person, pursuant to section 13(3)(a) of the Charter:* The right to security of the person is engaged when the state either violates the physical or psychological integrity of the individual, including by denying personal autonomy over one’s body, or damages or risks damaging the individual’s health. For reasons stated above, the existence of OAPA sections 76, 77 and 79, and the penalties that flow from them under the law of Jamaica (including the SOA and the SOA Regulations), violate the right to security of the person of any person engaging consensually in the prohibited activities, particularly for the Claimant and other gay men and MSM, in multiple ways. Prosecution and imprisonment for consensual sex denies the individual’s bodily autonomy in a manner that inherently and inevitably violates physical and psychological integrity. Such criminalization also impedes access to critical health services, including prevention, treatment, care and support vital to health and even life (e.g., in relation to HIV). Finally, these provisions invite and incite violence and discrimination that, directly and indirectly, seriously compromise physical and psychological integrity – in particular, in Jamaica, of gay men and other MSM who are the principal targets of this state-sanctioned persecution.

- c. *Right to freedom of expression, pursuant to section 13(3)(c) of the Charter:* This right guarantees everyone can manifest their thoughts, opinions, beliefs, indeed all expressions of the heart and mind, however unpopular, distasteful or contrary to the mainstream. Such protection is fundamental because a society cannot be free and democratic unless its members have the freedom to express a diversity of ideas and opinions. Expression encompasses both content and form, and the two can be inextricably connected. Activity is expressive if it conveys or attempts to convey meaning – including, for humans as social beings, the expression of intimacy and shared physical and/or emotional pleasure through sexual connection. Restrictions on this form of expression inherently deprive an individual of self-fulfilment. For reasons stated above, the existence of OAPA sections 76, 77 and 79 unreasonably and unjustifiably curtails the free expression of intimacy between consensual adults, and in particular gay men and other MSM, which is an exercise of personal autonomy that harms no one and expresses a core aspect of personal identity.
- d. *Right to equality before the law, pursuant to section 13(3)(g) of the Charter:* This right requires that no individual or group of individuals is to be treated, without objectively reasonable justification, more harshly than another under the law. An individual is denied equality before the law if it is made an offence punishable by law for that person to do something which others are free to do without having committed an offence or having been subjected to any penalty. For the reasons stated above, OAPA sections 76, 77 and 79 result in gay men and other MSM in particular being treated unequally under the law. OAPA section 79 specifically only applies to men who have sex with other men, criminalizing them and them alone; and while OAPA sections 76 and 77 appear facially neutral in that they theoretically criminalize any act of anal sex between any two people, *de facto* they are widely understood as targeting sex between men and certainly the criminalization of anal sex disproportionately

criminalizes gay men and other MSM for the expression of their sexuality with consenting partners.

- e. *Right to **freedom from discrimination** on the ground of being male or female, pursuant to section 13(3)(i)(i) of the Charter:* Section 79 of the OAPA specifically prohibits “any male person” from engaging in any “act of gross indecency with another male person.” [emphasis added] An act of gross indecency with a man is only a crime if the accused person is male; a woman who engages in the same or similar acts with a male partner commits no crime under OAPA s. 79. In other words, the provision specifically singles out gay men for criminal prosecution on the basis that their consensual sexual activity – and not just anal sex, but other sexual activity captured under the exceedingly broad term “gross indecency” – is with other men. This is an application of the criminal law that discriminates explicitly, on the face of the law, on the basis of being male or female.
- f. *Right to **privacy**, pursuant to section 13(3)(j)(ii) of the Charter:* The right to privacy or ‘the right to be left alone’ is not simply a negative right to occupy a private space free from intrusion by others (including the state), but also a right to get on with your life, express your personality and make fundamental decisions about your intimate relationships – which do not harm anyone else – without being penalized. In particular, s. 13(3)(j)(ii) guarantees “respect for the protection of private and family life, and privacy of the home.” It is difficult to imagine laws that infringe upon this more severely than prohibitions of intimate conduct between consenting adults, as is the case with OAPA sections 76, 77 and 79. The unjustifiable invasion of privacy inherent in the state penalizing such private personal conduct is further compounded for those convicted by the operation of the provisions of the SOA and the SOA Regulations. Furthermore, beyond this direct impact of the law, the criminalization of

gay men and other MSM invites and incites conduct by others in Jamaican society that infringes their privacy, including acts of discrimination and violence as noted above.

- g. *Right to protection from torture or inhuman or degrading punishment or other treatment, pursuant to sections 13(3)(o) and 13(6) of the Charter:* This right guarantees that persons are to be treated with dignity and respect as individual human beings. As confirmed in international law, this right is absolute and non-derogable. This provision includes protection from the infliction, particularly by the state or its officials (or with their acquiescence) of pain and suffering, whether physical or mental, that is either severe (“inhuman” treatment) or aimed at humiliating a person (“degrading” treatment). The continued existence in law of the provisions that criminalize and penalize consensual sex between men breaches this provision of the Charter in multiple ways. First, the state’s equation of consensual sex between gay men with bestiality is degrading *per se*. Second, the state’s imposition of years of imprisonment for consensual sexual conduct between adults (and with hard labour mandatory under OAPA s. 76 and possible under OAPA ss. 77 and 79, and mandatory registration as a sex offender as a consequence of a conviction under any of these provisions) is *per se* a grossly disproportionate punishment for conduct that causes no harm, rendering that punishment both inhuman and degrading. Finally, the state has an obligation to take steps to prevent inhuman or degrading punishment or other treatment, especially of vulnerable groups, including through taking legal measures – and failure on the part of the state to act with due diligence to protect individuals against widespread and well known conduct of such a sort also amounts to a breach of the protection against inhuman or degrading treatment. Attacks on the physical or mental integrity of a person, or a threat to perform any such act that is reasonably viewed as real and imminent, constitute a violation of the right. For reasons stated above, OAPA sections 76, 77 and 79 contribute to the vulnerable minority of gay men (and others perceived to be gay or to engage in conduct prohibited by OAPA) in

Jamaica being subjected to extreme (and sometimes murderous) violence at the hands of others, amounting to torture or other treatment that is inhuman and/or degrading. In the face of such well-documented, ongoing instances of torture and other ill-treatment, the state is in breach of its constitutional obligations in maintaining the impugned OAPA provisions that are a contributing factor to such abuses by non-state actors.

Savings clause does not bar application of Charter provisions to impugned OAPA provisions

21. The Charter of Fundamental Rights and Freedoms came into effect on April 8, 2011. Section 13(12) of the Charter is a “savings” clause, which immunizes from constitutional challenge certain laws in force before the Charter. Subsequent to the commencement of the Charter in 2011, the SOA and SOA Regulations have made significant changes to the criminal law applicable in Jamaica to buggery and gross indecency between men pursuant to the OAPA. The bulk of the SOA came into force on June 30, 2011, and Part VII of the Act specifically relating to the sex offender register only came into force even later, on October 11, 2011. The SOA Regulations were adopted in December 2012, coming into effect on December 20, 2012. Consequently, the law applicable to consensual sexual activity between men in Jamaica is no longer the “law in force immediately before the commencement of the Charter,” and the law must therefore comply with the rights protected by the Charter.

This Court should remedy the breaches of the Charter

22. Section 19(1) of the Charter gives the Claimant, as a citizen of Jamaica, whose rights have been, or are likely to be breached, the right to seek redress from this Court, which he does in light of the aforementioned violations of numerous provisions of the Charter.

23. The Claimant does not question the validity of the law criminally prohibiting and penalizing buggery or gross indecency insofar as it applies to non-consensual sexual activity, including with minors under the age of consent (defined as the age of 16 in the SOA, ss. 4, 8). However,

the scope of the impugned provisions as they stand far exceeds this and it is the role of this Honourable Court to correct this deficiency so as to guarantee the rights under the Charter to which all persons are entitled.

24. As guardians of the Constitution, the judiciary has a duty to interpret laws in a manner that gives full effect to constitutional values and principles.

25. Pursuant to section 19(3) of the Charter, the Court has the power to make such orders as it considers appropriate to vindicate the Claimant's rights pursuant to the Charter, and this is especially apposite since the Claimant has no other parallel legal remedy available to him. Section 4(1) of the Constitution states that laws passed prior to the enactment of the Constitution remain in effect but shall be construed "with such adaptations and modifications as may be necessary to bring them into conformity with the [Constitution's] provisions."

I certify that all facts set out in this Claim Form are true to the best of my knowledge, information and belief.

Dated the ___ day of November 2015

MAURICE ARNOLD TOMLINSON

NOTICE TO THE DEFENDANT

The first hearing of this claim will take place at the Supreme Court, Public Buildings, King Street, Kingston on the _____ day of _____ 201__ at _____ a.m.

If you do not attend at the hearing, judgment may be entered against you in accordance with the claim.

If you do attend, the judge may

- (a) deal with the claim or
- (b) give directions for the preparation of the case for a further hearing

A Particulars of Claim or an Affidavit giving full details of the Claimant's claim should be served on you with this Fixed Date Claim Form. If this has not been done and there is no order permitting the Claimant not to serve the Particulars of Claim or Affidavit, you should contact the court immediately.

You should complete the form of Acknowledgment of Service served on you with this Claim Form and deliver it to the registry (address below) so that they receive it within FOURTEEN days of service of this Fixed Date Claim Form on you. The form of Acknowledgement of Service may be completed by you or an Attorney-at-Law, acting for you. See Rules 9.3 (1) and 9.4(3) of the Civil Procedure Rules.

You should consider obtaining legal advice with regard to this claim. See notes in form 2A served with this Fixed Date Claim Form.

This Fixed Date Claim Form has no validity if it is not served within twelve (12) months of the date below unless it is accompanied by an order extending the same. See Rule 8.14 (1) of the Civil Procedure Rules.

[SEAL]

The Registry is at King Street, Kingston, telephone number (876) 922-8300; fax (876) 967-0669. The office is open between 9:00 a.m. and 4:00 p.m. Mondays to Fridays, except on Public Holidays.

Dated the _____ day of December 2015

The Claimant's address of service is that of his Attorney-at-law, ANIKA GRAY, of 43 Seville Meadows, Phase 3, St Johns Road, Spanish Town, St. Catherine whose telephone number is 504-2641.

PER:.....

ANIKA GRAY

Attorney-at-law

Filed by ANIKA GRAY of 43 Seville Meadows, Phase 3, St Johns Road, Spanish Town, St. Catherine whose telephone number is 504-2641, Attorney-at-law for and on behalf of the CLAIMANT.
