

Chief Officer Liburd
HMP, Basseterre,
St Kitts, WI.

Tuesday 25th August 2015

Good morning Mr Liburd,

I thank you for informing me yesterday, that the lawyer, Denzil Hines, came to see me last week on Friday 21st August, and again yesterday 24th August, but that it was not convenient for the prison to allow him to see me, on either occasion. I write respectfully to be clear and fully transparent with respect to the position with Mr Hines.

Mr Hines came to see me at his own volition on Tuesday 18th August, wishing to know, if I needed assistance in any way with my case. I let him know that I was representing myself and would continue to do so. However, I showed him the 16 pages of 'due diligence' tasks, including expert witnesses and other evidence collation, which is essential and must be completed, before there can be a trial.

Mr Hines said that he would return to discuss the possibility of assisting, with due diligence.

Currently, my lack of access to persons and places is preventing me from undertaking much of the due diligence necessary to prepare my defence.

In my letter on Friday 21st August, I respectfully drew the attention of the prison to the fact that, under Article 10, Part 2 (c) of the constitution, I am entitled to be allowed the "facilities to prepare my own defence".

This facilitation has yet to be made available to me.

As stated in my aforesaid letter on Friday, I wish to undertake the necessary 'due diligence' and defence preparation, with the least inconvenience to your staff.

It would seem sensible and convivial to make arrangement to suit your own preference now, so that the necessary 'footwork' and 'access' to legal case documents can be facilitated without further delay. I would rather not be forced to ask the Court for a formal order, as this may be seen as adversarial by the prison.

However, I must do whatever is required of me, under the law, to facilitate proof of my innocence.

I request a mutually respectful, and progressful discussion, as to how the prison, with the least inconvenience to your staff can 'facilitate' the necessary access to persons and places, and to legal case documents, so that I may prepare my defence without further delay.

We might consider, thereupon, that if after I meet with Mr Hines, it seems that he is capable and willing to undertake some, 'footwork' on the due diligence items, then this will ease the burden and the responsibility that the law, puts on both myself and the prison in this matter.

Sincerely and respectfully,

Kevin Horstwood