

Dear Sir,

Request for an investigation into the Management of the Ministry of Legal
Affairs and the Conduct of the Minister of Legal Affairs and Attorney-
General

We wish you to bring the contents of this letter to his Excellency President Granger, members of cabinet and the members of the executive council of A Partnership for National Unity and the Alliance of Change. This problem is one of national importance and can cause this government grave embarrassment.

It is no secret that almost the entire advice and litigation department at the Ministry of Legal Affairs has resigned as a direct result of the conduct, behaviour and grave incompetence of the Minister Williams.

Since Mr. Williams has taken up the post of Attorney General and Minister of Legal Affairs the following lawyers have resigned from the Ministry.

1. Sita Ramlall
2. Adrian Smith
3. Steven Roberts
4. Rajendra Jaigobin
5. Prithima Kissoon
6. Esther Sam
7. Damon Younge
8. Renee Mc Donald
9. Arianne McClean
10. Buelah Williams
11. Leslyn Noble
12. Judy Stuart-Adonis
13. Oneka Archer
14. Kim Kyte-Thomas
15. Joann Edghill-Stuart
16. Tracy Marks
17. Tiffany Castello

18. Utieka John
19. Collene Liverpool-Corbin

Only four (4) lawyers will remain in the advice and litigation department of the Attorney General's Chambers at the end of December, 2018. Two of them were only admitted to the bar in October 2018 and only remain because they are on government scholarships and have no choice. The other two commenced working this year and lack public law and constitutional law knowledge and experience.

Mr. Williams' conduct ranges from sexual, verbal, emotional, mental and physiological abuse of the staff of that Ministry. His abusive conduct has all been targeted mainly to the female staff of the Ministry. All the staff who have resigned within this year all have similar stories of harassment, sexual misconduct and verbal abuse.

It should be noted that those who have been affected by Mr. Williams' conduct are all willing and able to give statements and credible evidence which can be corroborated. Persons are weary and scared of coming out individually since the last person to do so Ms. Prithima Kissoon was attacked by him and vilified in the press. No one even investigated her complaints and reports about his conduct and his behaviour has continued unabated.

After Ms. Leslyn Noble, Ms. Nicola Prince and Ms. Alleyne all wrote letters of complaints, Mr. Williams returned with the purported letters and waved them in meetings with the staff and stated that the President is behind him and further than no one can touch him or do him anything. He has repeatedly made statements that he is the next leader and President of this country and is untouchable.

These statements have caused many members of the staff to become scared and concerned for the security of their jobs. Those who found Mr. Williams' conduct unbearable have had no choice but to tender their resignations. It can be argued that they have been constructively dismissed since he has created and operates a hostile, toxic work environment. He has breached several ethical and professional codes and the laws of Guyana.

Sexual Misconduct

Mr. Williams has directly solicited sexual favours from female staff and on their refusal, commenced a campaign to ruin their professional reputations, mentally frustrate and abuse those staff. On work assignments overseas and locally Mr. Williams has made unwanted sexual advances towards female attorneys-at-law. This behaviour includes exposing his genitals to staff, attempting to kiss staff and banging down hotel doors to

In the Bharat Jagdeo original appeal Mr. Williams instructed the former Solicitor General Ms. Sita Ramlall to place the Attorney General as the Appellant, although the Attorney General who represents that the State, was never an original party to the action. This matter was as such correctly struck out by the Court of Appeal. Ms. Ramlall specifically in a meeting told him he was wrong but he persisted. Ms. Ramlall and Ms. Kissoon were then blamed for his incompetence.

Derogatory Statements and Expletives about Colleagues Ministers, Judges and Lawyers

Mr. Williams' unprofessional conduct knows no bounds. He has abused members of staff from the drafting unit on multiple occasions. One such situation occurred in Barticia where Mr. Williams verbally abused the staff by shouting and screams at them for visiting "blood money Harmon place" and that the vehicle which they were traveling in should have overturned and killed them. These statements were made on the road in full view and hearing of members of the public. Those who encountered this specific incident were traumatized and cried as a result.

Mr. Williams constantly claims in meetings that his colleague ministers are corrupt and takes bribes. He also claims that Ms. Lawrence is also corrupt and incompetent and cannot run the party. Mr. Williams has openly claimed that "Harmon paid persons twenty-five thousand dollars" each to vote for him and that the Chairmanship election was corrupt.

In the Balwant Singh matter involving Minister Lawrence he expressly asked how this matter has not reached the press. Shortly after the press covered the same case.

As it regards members of the bar and the bench, Mr. Williams constantly refers to Judges as stupid and his abuse of the Chancellor and Chief Justice knows no bounds. In fact he uses expletives in the presence of staff when referring to them. His staff are fed up since these are all senior respectable officials in government and judges who they have to practice before.

Almost every senior lawyer is corrupt according to Mr. Williams from Stephen Fraser, Roysdale Forde, Timothy Jonas, Nigel Hughes, and the list goes on. He has specifically referred to Mr. Nigel Hughes "a big fat lump of corruption".

His resigned staff have now all joined the list of corrupt lawyers. He has commenced a lethal attack on their character and has withheld their salaries claiming they resigned to spite him. They have all resigned because they cannot work with Mr. Williams in a toxic hostile work environment festered by him. Most are vulnerable women who have been

attorneys. The record will show that all the attorneys who have left the Ministry resigned and were not terminated by Mr. Williams for any of the blatant lies he is now spreading.

Gross Incompetence

Mr. Williams' performance before the courts leaves much to be desired. His main applications are for matters to be struck out on the basis of jurisdiction. In the Gecom chair matter, the Bibi Shaddick matter, he managed to embarrass himself and by extension the chambers by filing and arguing baseless points which were all over ruled by the courts. His staff specifically advised him against these senseless arguments but he persisted nevertheless. An on-going matter Azad Meerza again against the advised the staff to pursue another jurisdictional point which was also dismissed. This was despite the advice from senior lawyers in the Ministry. The staff are all embarrassed to appear with him to be told by the courts what they already know the results would be. What is even more grave is that a senior counsel and Attorney General would take these baseless points. These occurrences have tainted the image of the Attorney General's Chambers and raises serious questions about his competence to be in this position.

It is no secret he dispenses bad advice to the government which results in the state having to pay out millions of dollars. Donna Sulker's matter in which the Police killed a young man during the difficult period in Guyana's history he kept defending although his staff and the DPP pleaded with him to settle same. Donna Sulker was prepared to accept the sum of \$7,000,000.00. There is documentary proof of this. The court awarded in excess of twenty million dollars after a full trial was concluded.

In the Shonetta Adams matter, another Police shooting, the litigant and her lawyer was invited to discuss a settlement. Mr. Williams absented himself from the Ministry and instead allowed the discussion to be conducted by a junior lawyer. He is prestly defending the matter still.

The same level of incompetence was displayed in the matter concerning Ambassador Naubath. The contract was not properly terminated and the Ambassador was prepared to accept approximately \$7,000,000.00 which represented his gratuity and other benefits. On Mr. Williams' bad advice the State has been ordered by the Court to pay in excess of twenty million in this case.

The same is the case of the MMA lease matters. Mr. Williams has demonstrated that he does not understand basic concepts like the type of interest a lease creates. This has resulted in serious public embarrassment to the State and the payment of millions of dollars.

In the Dipcon matter Mr. Williams is solely responsible for filing the incorrect application before the Court of Appeal. When caught he tried to blame staff and called the Police in to frighten and intimidate staff. He personally corrected the documents and his hand writing can be found on the documents editing. Further, he personally signed the summons and initialed each page of the affidavit in support. Instead of admitting he erred he started by sending the Police to Ester Sam and Judy Stuart alleging they forged his signature on the summons and had the Police harassing these young professionals.

Since the former Solicitor General's resignation he has included her in this alleged forgery of his signature, alleging that she joined with Judy Stuart to forge his signature. The former Solicitor General was not employed at the Ministry when these events took place. Despite this, he continues to defame her and attack the quality of work she produced during her tenure at the Ministry, although several successful high profiles were under her control and conduct.

In the Dipcon matter one of the issues of concern for the Court was the length of time it took Mr. Williams to file this simple application for extension of time. The staff all confirm who were in the employ of the Ministry at the time that the staff prepared it and gave it to him and it was kept on his desk for weeks. This has cost the country millions of dollars and Mr. Williams has not taken responsibility but instead blames staff members even those who were not working in the chambers at the time. Ms. Sam and Ms. Stuart have already provided the Police with statements on this matter.

In matter of Tulsie Persaud in which the court ordered the state to pay millions of dollars Mr. Williams lied when he said he had no knowledge of this matter. There is documentary evidence refuting his statements. He was apprised of it and that Mr. Chase had conduct of same when he took office.

Mr. Williams' lies extend to personal issues concerning staff. He fabricates stories about staff members and openly repeats these lies at various forums, such as staff meetings and meetings with persons from outside. These fabrications are malicious, in most cases, ludicrous and ridiculous and are designed to tarnish the reputation of staff members. One such ridiculous example, is a rumor started by Mr. Williams that Ms. Deborah Kumar faked and forced the delivery of her baby so as to avoid dealing with certain Court matters. These statements have been made repeatedly in open meetings. Mr. Williams also makes lies openly, that former attorneys of the Chambers have been involved in corrupt practices such as taking bribes and as such he has had to weed out those

gain entry for sex. He has openly stated that "he cannot trust a woman unless she sleeping with me". When this type of behaviour is repelled by staff, Mr. Williams launches verbal assaults which leads to staff becoming severely depressed and in specifically two cases, has almost resulted in mental breakdowns.

Verbal, Emotional and Mental Abuse

Mr. Williams constantly abuses members of staff at all levels, even the Permanent Secretaries of the Ministry of Legal Affairs both past and present. Mr. Fung-at-Fat, Chief Parliamentary Counsel and Mrs. Kyte-Thomas, former Solicitor General, were not immune from this type of abuse. His many verbal abuses are and were done in the presence of all staff at several meetings. In fact many female staff have cried and have had to leave meetings on account of his verbal, emotional and mental abuse. There is one senior staff who felt threatened for her life when he sprang up from his chair and lunged towards her. He also boasts about the fact that he is a firearm holder and could draw quickly, and one occasion he produced his weapon on his desk. This has left many staff very fearful for their lives. Some have problems sleeping, anxiety attacks and other mental health issues as a direct result of the abuse which they have endured at the hands of Mr. Williams. These issues have even affected their family life and have caused them to be unable to function properly in their homes. There are a few staff members who have had to seek professional help to recover and are still in recovery mode.

We wish to bring to your attention the specific case of Ms. Tracy Marks who was verbally abused, humiliated and chased from a meeting and subsequently the Ministry by Mr. Williams. Mr. Williams also allows Ms. Andrea Marks to bully and verbally abuse lawyers and other staff at the Ministry.

Blatant Lies

Mr. Williams has lied to the members of the public, cabinet, the court and the President in the judicial review matter. He was immediately apprised by the staff about the order and the date of commencement ordered by the court. The lawyer who had conduct of the matter gave him a memo stating clearly the commencement date. Further in several meetings he abused the judge in the matter and made several press statements about same. He lied openly and in court documents when he said his staff did not tell him about the commencement date. Mr. Williams was also apprised about the temporary stay personally by Ms. Kumar and also by email. There is documentary proof to support all of this.

left unprotected and suffered at the hands of an Attorney General who was appointed by this Government. They have several causes of action against him and by extension the State and this is a call for an investigation into Mr. Williams' deplorable unprofessional and unlawful actions against these women who should be protected by this Government. These women who have been forced out of their daily bread and jobs which they loved and are now forced to seek employment elsewhere.

This Government should not be part or linked to any agenda which operates to abuse, humiliate and frustrate professional women who want to contribute and can contribute to the growth and development of this Guyana.

In light of the above it is recommended that an urgent investigation be launched into Mr. Williams' conduct. The lawyers and many members of staff are prepared to give their statements.