



Avonia E. Pinnock

Attorney-at-Law



December 19, 2024

EVERTON BROWN
DELVELAND DISTRICT
LITTLE LONDON P.O.
WESTMORELAND

RE: Notice to Cease and Desist - Interference with the Use of 'Empress Stacia' Boat Owned by Phillip Duff -Bearing Engine Serial Number 6C6L1040071, Year 2022 and Hull# JMWLE230021.

Reference is made to the captioned matter.

BACKGROUND

I act on behalf of Mr. Phillip Duff (hereinafter referred to as 'Mr. Duff') the legal and equitable owner of '**Empress Stacia**' Bearing Engine Serial Number 6C6L1040071, Year 2022 and Hull# JMWLE230021.

Mr. Duff purchased the boat '**Empress Stacia**' in good faith from the sole legal owner, Jamaica Dreamy Island Tours and Transfers LLC owned and operated solely by Ms. Stacia Nichole Pope, on November 29, 2024. (*A copy of the Bill of Sale is herein enclosed*).

Further documentation confirming the lawful transfer of ownership can be made available for your inspection at the local police station in Negril, Westmoreland upon your request or can be made available to a legal representative of your choosing, if necessary.

CEASE AND DESIST

Since the date of purchase, Mr. Duff and/or his authorized agents have been subjected to repeated acts of intimidation and threats of violence by you. These actions have unlawfully prevented my client and his agents from exercising their legal right to use and enjoy the boat. Such conduct is unacceptable, unlawful, and will not be tolerated.

PRINCIPAL ATTORNEY:

- AVONIA E. PINNOCK LLB (HONS), LEC

CONSULTANTS:

- ANDRE K. MOULTON B.A. (J.D)
- SHANAE K. FENTON LLB (HONS), LEC

120 GREAT GEORGES STREET. SHOP #16
SAVANNA-LA-MAR COMMERCIAL CENTRE
SAVANNA-LA-MAR, WESTMORELAND
TELEPHONE: 876-297-9220
EMAIL: AVONIAPNNCK@GMAIL.COM

It has been brought to my attention that at no material time were you the legal owner of the boat in question. Therefore, your actions lack any lawful basis and constitute harassment, interference with property rights, and potential criminal conduct.

Accordingly, I demand that you immediately:

1. Cease and desist from any further intimidation, harassment, or threats against my client or his agents.
2. Refrain from any actions that obstruct or interfere with my client's lawful use and enjoyment of the boat.

Failure to comply with this demand within **seven (7) days** of receipt of this letter will leave my client with no alternative but to pursue all available legal remedies. This includes, but is not limited to, seeking injunctive relief, filing a police report for harassment and threats, and initiating civil proceedings to recover any damages caused by your conduct, including legal fees and court costs.

Please be advised that this letter constitutes a formal notice of your misconduct. Any further unlawful interference or non-compliance will strengthen my client's case against you.

My client remains committed to resolving this matter amicably but will not hesitate to enforce his rights under the law if necessary.

Treat this matter with the urgency and seriousness it warrants.

Yours Respectfully,

Avonia E. Pinnock

Attorney-at-Law

Per: 

Avonia E. Pinnock-Myrie

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