



May 15, 2026

From: Orange Dolphin Tours, LTD
Alaska Dr.
Negril, Jamaica
Phillip Duff, Director
Dr. Reinaldo Ortiz, Director

To: Negril Police : Negril Police station
Negril Resort Police:
Melissa Powell Wright, Esq. and Client: Everton Brown

And To All Concerned.

I write in my capacity as a director and the majority shareholder of Orange Dolphin Tours, LTD ("Orange Dolphin"), a duly registered company in Jamaica.

At the outset, enclosed herewith are the following documents, which collectively and conclusively establish the facts surrounding the lawful transfer and present ownership of the subject vessel (Hull Identification No. JMWLE230021):

- (A) Bill of Sale
- (B) Prior Maritime Registration (2024)
- (C) Current Maritime Ownership Status (Carving Note) and Payment Receipt
- (D) Certificate of Incorporation – Orange Dolphin Tours, LTD

- (E) Corporate Registration Data Sheet – Orange Dolphin Tours, LTD
- (F) Cease and Desist Notice

These materials evidence a fully consummated, arms-length transaction whereby Dreamy Island Tours, LLC transferred all right, title, and interest in the vessel to Orange Dolphin Tours, LTD in November 2024. At the time of sale, Dreamy Island Tours, LLC held 64 of 64 shares in the vessel and was duly represented by Ms. Stacia Pope, a United States citizen, as reflected in the executed Bill of Sale.

Documentary Record

Attachment A reflects a properly executed Bill of Sale, signed and witnessed before Henry McCurdy, Esq., Justice of the Peace, in Montego Bay, St. James, on November 29, 2024. The transfer was promptly registered with Jamaica Maritime, accompanied by all required documentation and payment of all applicable fees.

Attachment B confirms the vessel's prior registration status, identifying Dreamy Tours, LLC as sole owner, with Everton Brown listed as registered agent and Lloyd Dowdie as the builder.

Attachment C establishes the current ownership status as recorded by Jamaica Maritime, which unequivocally identifies Orange Dolphin Tours, LTD as the owner. The issued Carving Note (No. JMWLE250002) further confirms this status pending final inspection and registration—delayed solely due to construction interruptions.

Attachments D and E substantiate the corporate existence and directorship of Orange Dolphin Tours, LTD.

Attachment F evidences that Mr. Brown was served with a cease and desist notice in November 2024, placing him on clear notice of Orange Dolphin's ownership rights.

Legal Position

The foregoing record is dispositive. Ownership of the vessel has been formally transferred, recorded, and recognized by the relevant

governmental authorities, including the Jamaica Ships Registry and Jamaica Maritime. These facts are not subject to legitimate dispute.

The Shipping Act, 1998 (specifically Section 20 of that Act) stipulates that a non-citizen of Jamaica is not eligible to own a Maritime vessel and therefore Mr. Brown's claim that this boat is marital property of Mr. Brown is preposterous. https://www.officialguidetoshipregistries.com/ogsr-ship-registries-database/jamaica?utm_source=chatgpt.com

Critically, the vessel was at all relevant times, an asset of Dreamy Tours, LLC—not of Ms. Pope individually—and therefore did not constitute marital property. Neither Ms. Pope nor Mr. Brown ever held personal ownership of the vessel. Mr. Brown, in particular, held no ownership interest whatsoever, as Dreamy Tours, LLC maintained full (64/64) share ownership prior to the sale.

Any suggestion to the contrary reflects either a fundamental misunderstanding of corporate asset ownership or a deliberate mischaracterization of the facts.

Allegations Concerning Mr. Brown

Mr. Brown's unauthorized taking of the vessel occurred after he had been served with formal notice of Orange Dolphin's ownership, including the Bill of Sale and supporting documentation. His actions cannot reasonably be characterized as mistaken or undertaken in good faith.

While criminal proceedings were initiated by the Crown, the matter was not adjudicated on its merits due, in substantial part, to my inability to appear and testify. I was, at that time, undergoing emergency medical treatment, including brain surgery, which was performed on March 19, 2025, at University of Florida Shands Hospital, immediately preceding the scheduled court date of March 22. The Crown's failure to properly present the available evidence does not alter the underlying facts.

Irrelevance of Divorce Proceedings

The divorce proceedings between Ms. Pope and Mr. Brown are entirely separate and legally irrelevant to the ownership of the vessel. Orange

Dolphin Tours, LTD, Mr. Duff, and any third parties are not participants in that matter. The jurisdiction of the Westmoreland Family Court extends solely to marital issues between those individuals.

Mr. Brown maintains that his divorce filing includes the boat ,when in fact is just states "a boat" as property of the marriage. There is no indication that as to what boat he refers to in the divorce filing and clearly does not include the description of the boat in question. His wife (Stacia Pope) is a US citizen and not a Jamaican citizen, so she could have never had an interest in a Jamaican boat.

The vessel, as a corporate asset of Dreamy Tours, LLC, was never subject to equitable distribution and remains outside the scope of any marital dispute.

Law Enforcement Determinations

Multiple officers of the Negril Police have independently reviewed the documentation and determined that Orange Dolphin Tours, LTD is the lawful owner of the vessel. These findings further reinforce what is already conclusively established by the documentary and registry record.

Conclusion and Demand

Any continued assertions that ownership of the vessel is "in dispute" are without factual or legal basis and have directly interfered with the LTD's lawful use and enjoyment of its property.

Accordingly, you are hereby placed on notice that:

1. Orange Dolphin Tours, LTD is the sole legal owner of the vessel.
2. No bona fide ownership dispute exists.
3. Any continued interference, including the propagation of unfounded claims, will be addressed through all available legal remedies.

Mr. Brown has had 17 months to conclude his divorce separation of property and/or file suits against myself or Orange Dolphin Tours, LTD and to date he has just threatened to do so and has filed nothing to confirm his claim of partial ownership. So I must assume he will not do so. His recent

lawyer has had more than 30 days to file an injunction or suit with the court and has not done so to date. I contacted the attorney and suggested she stand down or file a suit, and I have heard nothing from her to date, even though a court filing would be the only tactic left to Mr. Brown

Should Mr. Brown elect to initiate civil proceedings against Orange Dolphin Tours, LTD or myself arrangements will be made to accept service as I am out of the country seeking treatment for Stage 4 Cancer. Until such time, speculative threats of litigation are of no consequence and will not compel surrender of lawful property.

I intend to proceed without further obstruction in completing the vessel and commencing its commercial operations.

I insist that the local Negril Police immediately cease all suggestions and actions that the boat is in dispute and assist me to move the boat to a safer location to complete its restoration.

Nothing herein shall be deemed a waiver of any rights, claims, or remedies, all of which are expressly reserved.

Phillip Duff

Serve to Negril Police Station

Negril, Jamaica

Attention Station Commander

Attention DSP Charlene Gray-Morris

Attention Inspector Oneil Hines

Serve to Resort Police Division Negril

Negril, Jamaica

Attention SGT Dean Genius

Serve to Melissa Powell Wright , ESQ

Shop#6 Lewisville

Plaza 45 Lewis Street

Sav-La-Mar

CC: Maritime Authority of Jamaica registrar@jamaicaships.com

CC: Jamaica Ship Registry registrar@jamaicaships.com

CC; Minster of Tourism Hon. Edmund Bartlett,

CC; Westmoreland Family Court westmoreland.familycourt@rmc.gov.jm

CC; TDCPO Daryl Whyte-Wong Daryl.whyte-wong@tpdco.org

CC: Negril Chamber of Commerce info@negrilchamber.org

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