NEW CITY CHAMBERS

CHAMBER READING

ISSUE 3 • MARCH 2019

NEW CITY CHAMBERS NEWSLETTER

IN THIS ISSUE

THE THIRD EDITION

EDITED BY PETRA RICHARDS

New City Chambers is a boutique law chambers located in downtown Port-of-Spain, minutes walk away from the courts.

Welcome to the third edition of the Chamber's Newsletter, Chamber Reading.

NEW CITY CHAMBERS

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We aim to provide an easy to read yet informative short-newsletter which broadly covers some of the areas we have been active in, within recent times.

Chambers was formed in 2017 to provide a client focused, research driven approach to the practice of law. We have grown from strength to strength serving a broad range of clientele, which includes other professional service providers to lay persons in a variety of contentious and non-contentious areas.

We hope you enjoy our third edition of Chamber Reading.

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MAS CONFUSION

BY DR. EMIR CROWNE

One of the region's leading experts in Intellectual Property and Sports Law, Dr. Crowne is a Tenant at New City Chambers in Port-of-Spain, and the Founder of Crowne Sports Law, an international sports litigation practice.

He is a Barrister, Attorney-at-Law and Intellectual Property Agent with a wide-ranging and extensive practice in the following areas: Administrative Law, Complex Litigation & Dispute Resolution, Constitutional Law, Contracts (Drafting & Negotiation), Corporate/Commercial Law, Human Rights, Intellectual Property, International Trust Law, Labour Law (Union Side), Professional Discipline, Sports & Entertainment Law, Telecommunications Law and Technology Law.

Works of mas have come into the spotlight recently. In particular, the right to photograph, record or broadcast such works during Carnival. The Trinidad & Tobago Copyright Organisation (TTCO), the Collective Management Organisation (CMO) that claims responsibility for administering the copyright in "works of mas", has suggested that photography, videography and/or broadcasting of such works is illegal without authorization and anyone wishing to do same must first obtain permission from them or face claims of copyright infringement. That is partly true.

Trinidad & Tobago was the first jurisdiction to recognize "works of mas" as a copyright protected work. It is a meaningful way of protecting aspects of our culture that don't readily fall into the traditional copyright model and agenda promoted by European countries. Sometimes, as a nation, we don't give ourselves enough credit. This is a notable example. Under the Copyright Act a "work of mas" is defined under as:
"an original production intended to be performed by a person or a group of persons in which an artistic work in the form of an adornment or image presented by the person or persons is the primary element of the production, and in which such adornment or image may be accompanied by words, music, choreography or other works, regardless of whether the production is intended to be performed on stage, platform, street or other venue."

In other words, it is a derivative work that comprises all of the primary features of mas (i.e. the underlying artistic, dramatic and musical works). A notable example would be Peter Minshall's Tan Tan and Saga Boy. This is the type of work, and originality, that affording copyright protection to works of mas was intended to safeguard against misappropriation. Consider too that Minshall is credited with creating the "tube man" or "tall boy" – a familiar sight at events, car dealerships and the like – but failed to garner the international respect he deserves since the mechanics of it was patented by a later collaborator.

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On the flip side, however, are the non-original or utilitarian aspects of works of mas. Wining in a bikini covered in feathers and routine ornamentation is unlikely to attract protection as a "work of mas". Those aspects of Carnival are familiar to all bands. They are not 'owned' by anyone, nor should they be. Something beyond those utilitarian or commonplace aspects of mas is required. What precisely that is remains to be seen as the legal scope of a "work of mas" has not yet been tested in court.

Now it is true that the TTCO is the CMO responsible for administering and protecting "works of mas". It is also equally true that it can only administer and protect works of mas within their repertoire. In other words, if the creator of a work of mas has not contracted with the TTCO to enforce their rights, then the TTCO has no claim or jurisdiction to enforce the rights in that work of mas. The CMO regime is entirely voluntary. With that said, if there are works of mas that are within the TTCO's repertoire and an appropriate license has not been secured from them for the commercial use of that work, then yes, they can seek remedies and damages for that ostensible breach of copyright.

However, if a work of mas is outside of the TTCO's repertoire then they have no jurisdiction to allege copyright infringement. Furthermore, even if a work of mas is within the TTCO's repertoire, and the photograph or video is done purely for personal use, without commercial gain, then there is no liability under the Copyright Act. To suggest otherwise, even implicitly, is wrong and misleading. Furthermore, persons reporting on Carnival can reproduce or broadcast short excerpts of a work of mas if such reproduction or broadcasting is needed to help achieve the "informatory purpose" of the story.

In sum, the protections afforded to works of mas under the Copyright Actwere designed to safeguard creators against the unauthorized commercial exploitation of their works. They were not designed to discourage Carnival goers at large who, purely for personal purposes, seek to enjoy, photograph or otherwise memorialize their time at Carnival. Copyright law, like everything in life, is about balance.

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MONEY LAUNDERING AND THE PROCEEDS OF CRIME: BOWING TO INTERNATIONAL PRESSURE

BY MATTHEW GAYLE

Described as a "formidable advocate", Matthew's work encompasses a variety of civil litigation and some criminal defence.

While Matthew accepts work in a broad range of areas, many of Matthew's cases have a constitutional and/or administrative law dimension. He has appeared as counsel in a number of recent important cases including **Isioma Loveth Eze v The AG**

Markarchbald v the Trinidad and Tobago Defence Force
Jimdar Caterers v The BIR
Climate Control Limited v CG Construction Limited.

Introduction

The **Proceeds of Crime Act Chapter 11:27("POCA")** is open to abuse by prosecutors inappropriately charging persons for 'Money Laundering' when in fact the appropriate charge is a minor, less sensational offence. Unfortunately, perhaps in response to unreasonable political pressures, this has increasingly become the trend. Acts of theft, or even less obviously 'environmental crimes' may find one facing the overly draconian consequences of money laundering; 25 million fine and 15 years imprisonment.

Money Laundering: The Trinidad way

After coming under immense international pressure, Trinidad and Tobago's parliament passed the **POCA** in 2000, the legislative framework that underpins the Offence of Money Laundering and its associated offences. Despite being brought into law so recently, it has already been amended several times, in 2009, 2012, 2014 and 2015. Furthermore, it remains open to be criticized for being rushed and lacking in consistency.

It also remains largely untested by litigation, despite the considerable international pressure on the government of Trinidad and Tobago to both be seen to give effect to the new legislation, as well as to be seen as actively regulating the Listed Businesses as defined in the **POCA**.

This pressure to be seen to be carrying out prosecutions has manifested in the most unfortunate use of the prosecutor's powers. Throughout the successive amendments, the definition of "Money Laundering" has been left recklessly broad by the drafters of the legislation. This has mean that prosecutors, keen to bow to international pressures to be seen to be prosecuting money launders, are laying Money Laundering charges on top of less serious charges.

The underlying charge must be a 'schedule offence'; the schedule offences varying considerably in gravity, from the relatively minor to the most serious of offence.

Money Laundering is defined in section 45(1) ofPOCA:

A person who knows or has reasonable grounds to suspect that property is criminal property and who –
(a)Engages directly or indirectly, in a transaction that involves that criminal property; or
(b)Receives, possesses, conceals, disposes of, disguises, transfers, brings into, or sends out of Trinidad and Tobago, that criminal property; or
(c) Converts, transfers or removes from Trinidad and Tobago that criminal property
commits an offence of money laundering.

'Criminal Property' as set out in section 43of POCA, is property which constitutes the benefit to a person from criminal conduct. 'Criminal Conduct' in this sense is conduct which constitutes an offence in Trinidad and Tobago.

The offence of Money Laundering is triable only on indictment. If convicted the penalty may be up to $25 Million and 15 year's imprisonment. The underlying offence maybe one for which only a minor fine and or a prison sentence of say three months.

Benefits of charging with Money Laundering: The Restraint Order

POCAmakes provision for the 'freezing' of the assets of the subject of a Money Laundering, or of any offence to which the POCAapplies. The mechanism for doing so would be by way of a Restraint Order persection 19 of POCA. An Application would need to be made by the DPP to a High Court Judge in Chambers. These types of applications would almost certainly be made 'without notice', meaning that the first thing anyone subject to the Order would hear of it, would be a notice that the Order had already been made. There would then be an opportunity after a short time, perhaps in a day or two, to make representations to the Judge with respect to the continuation of that Order.

Section 18(a)through **(c)**of **POCA** sets out the pre-conditions under which the High Court may exercise its discretion to grant a Restraint Order:

- The prosecution has been instituted in this jurisdiction against any person for an offence to which **POCA**applies;
- The prosecution is ongoing; and,
- The Court has reasonable cause to believe that the proceedings may result (or have resulted in), or that the application is made in reference to, a conviction of the Defendant for a specified offence…

A Specified Offence under **POCA**is defined as:
an offence in any of the categories set out in the Second Schedule for which the constituent elements are more specifically provided for in any written law or under the common law and which is punishable upon conviction with a fine of not less than five thousand dollars or to imprisonment for not less than twelve months...

It is not consistent with the aims of **POCA** that one should be able to be subject to a Money Laundering prosecution, and even conviction, yet escape having one's assets frozen in the course of the criminal prosecution. That would allow the target of an ongoing prosecution to put their assets beyond the reach of the authorities either by hiding them or conveying them out of the jurisdiction which may make recovery difficult or overly onerous on the State, in the event of a successful prosecution.

There is a presumption that were the Court satisfied that the property in the possession of the entity or individual charged was not from a legitimate source, it is for that person to prove in the balance of probabilities that the property is not criminal property.

A Restraint Order (and therefore I suggest, any Freezing Order designed to achieve the same ends) ("Order") is aimed at prohibiting the target of the proceedingsfrom dealing with any realizable property, subject to conditions which will be set out in the order **[POCA section 19(1)]**. The definition of realizable property is wide, and includes any property held by the target of the proceedings; and any property held by a person to whom the target of the proceedings has directly or indirectly made a gift **[Section 2(1) POCA]**.

Exceptions may be made to the realizable property affected by the Order, however as prescribed by **section 19(2)** of **POCA**, they will generally include reasonable living expenses including, but not limited to: mortgage or rent payments; allowances for food, medicine and medical treatment; any payment due as a result of an order of the Court; provision for the reasonable living expenses including education expenses; and provisions for taxes, insurance premiums and public utilities. Allowance will be made to meet the cost of legal fees and the costs of trade/doing business.

From what has gone before, it should also be clear that **POCA** is sufficiently broad to impact not only the Defendants and proposed defendant, but also their family, friends and associates if it can be shown that they are directly or indirectly the recipient(s) of gifts from the target of the proceedings. It is clear that the effects of **POCA** cannot be defeated by simply gifting property, since it may still form the subject of a Freezing / Restraint Order.

CONCLUSION

The provisions of **POCA** are extremely draconian and intentionally so. They represent a necessary interference in the civil liberties and constitutionally protected rights of citizens. They are intended to both dissuade those intent on laundering money within this jurisdiction and being decidedly punitive to those who do.

The Act is however an unfortunately inconsistent quilted piecework and thus open to damning and justified criticism. Furthermore, the Act is open to be and is being misused by prosecutors who layer money laundering on top of less serious offences, therein defeating the ends of the underlying offences and exposing defendants to disproportionately severe sentences in the context of the actual underlying charge.

The definition of money laundering itself is extremely broad and permits stacking of criminal liability for money laundering onto offences that are quite plainly outside of the ordinary understanding. In this way an allegation which may be at the root of the matter being a summary offence punishable by $3,000.00 fine and 12 months imprisonment, is by the effect of **POCA** may now punishable by $25 million dollar fine and 15 years imprisonment without anything further.

The author is of the firm view that this aspect of the charging and/or the legislative framework is open to be challenged as it is wholly lacking in proportionality. It seems absurd that an offence triable summarily only, for example, should be able to be transposed without any apparent increase in severity or without any aggravation into an offence triable only on indictment

It appears to me that the position with respect to the Restraint/Freezing Order would be open to the same challenge i.e. while the primary offence is one which is relatively minor, the target of the proceedings ought not to be subject to the highly prejudicial effects of a Restraint or Freezing Order.

IMMIGRANTS HAVE CONSTITUTIONAL RIGHTS ALSO.

BY CRYSTAL PAUL

Crystal Paul is a recent graduate of Hugh Wooding Law School and winner of the 2018 Anand Ramlogan SC Prize for best performance by a student from Trinidad and Tobago.

She has appeared in a variety of Courts in Trinidad, from the Court of Appeal through to sports tribunals. The current holder of a Bachelor of Laws Degree (Hons) from the University of the West Indies, Crystal also graduated on the Principal's Roll of Honour from the Hugh Wooding Law School.

In 2014, it was reported that Trinidad and Tobago had over 100,000 undocumented migrants, which represents more than 10% of its entire population of some 1.4 million. The number of migrants has obviously increased in 2019 and is expected to continue to increase as immigrants flee from the socio-economic conditions, among other things, that exist in their respective countries.

Despite the number of illegal immigrants on our shores, many of whom can be classified as refugees, Trinidad and Tobago has not established any domestic legislation to adequately deal with the issue.

The **Immigration Act of Trinidad and Tobago, Chap. 18:01** is the legislation that governs the operations of the Immigration Division. This legislation empowers the Authority to arrest, detain and/or deport undesirable non-citizens who have committed a breach of the legislation, such as overstayers, illegal entrants and persons working without work permits.

While the legislation appears to set out a procedure that is fair and just, in reality, that is not always the case. Notably, there is a lacuna in the law in relation to the maximum length of time that an individual can be detained, which case law has attempted to remedy.

Chapter 1 of the Constitution of Trinidad and Tobago, Chap 1:01 declares the existence of certain fundamental human rights and freedoms. These enshrined rights do not only apply to citizens but also extend to individuals who are non-citizens or permanent residents.

Section 4(a) of the Constitution guarantees every individual the fundamental right to liberty and the right not to be deprived thereof except by due process of law.

Furthermore, Section 4(g) of the Constitution provides for freedom of movement. In the case of **Ferguson and Galbaransingh v the Attorney General of Trinidad and Tobago**, Kangaloo JA at paragraph 59 stated the following in relation to this right as follows:
"The right to freedom of movement set out in section 4(g) of the Constitution can be regarded as an essential component of the wider concept of liberty of man. To my mind it clearly includes the right to travel within, reside in and leave Trinidad and Tobago."

It is accepted that by virtue of section 15 of the Immigration Act, a police officer or immigration officer may arrest and detain an individual provided that one or more of the grounds referred to in section 9(4) exists.

When an immigrant is arrested and detained, his freedom is restricted. However, if the arrest and detention is proven to be lawful, there can be no claim that his enshrined rights have been infringed.

It must be noted however, that the purpose of the detention, as cited in the legislation is to hold an inquiry or for deportation. Pursuant to the case of **Naidike v.Ors v The Attorney General of Trinidad and Tobago** [2004] UKPC 49, whereas there is a general power of arrest under section 15, "unless the immigrant's detention is required for an inquiry to be held forthwith (or within a reasonable time) or for his removal to be effected pursuant to a deportation order already in force, there seems no sound reason for the power to be exercised".

Justice Devindra Rampersad in **Clinton Idaeho, Natalie Bailey v. The Attorney General of Trinidad and Tobago, Chief Immigration Officer CV2017-04548** goes further to say"…in circumstances where there is no such deportation order or where a Special Inquiry cannot be held within a reasonable time, the immigrant should be considered for conditional release or an order of supervision as contemplated by section 17(1) of the Act."

Therefore, while the legislation does not indicate the maximum length of time between a person's arrest and his right to a Special Inquiry (which is the commencement of deportation proceedings), case law suggests that it should be done within a reasonable time. The reasonableness of the length of the detention period will be determined based on the particular facts of the case.

Nonetheless, the period of time between an Immigrant's Arrest and his Special Inquiry is far too long in most cases. The current administrative process of setting a date for this Inquiry seems to be slow and cumbersome.

The draftsmen of the legislation seemed to have anticipated that an Inquiry would have been held forthwith or within a week following the arrest, similarly to when an individual is charged with a criminal offence and is expected to be brought promptly before the court which is a crucial aspect of due process.

However, today, it is highly probable to find an immigrant in detention for 3 months prior to being notified of his/her date for the Special Inquiry. What is the justification for this delay? Furthermore, it is not rare to find an immigrant being detained almost indefinitely pursuant to an Order of Detention.

This extended period of detention, which often times there is no reasonable explanation, coupled with the conditions suffered at the Immigration Detention Centres must be considered a breach of the immigrant's fundamental rights and freedoms as guaranteed by the Constitution of Trinidad and Tobago.

In the case of **Clinton Idaeho, Natalie Bailey, supra**, the court held that the Claimant's detention violated his enshrined rights to private and family life since such detention separated him from his wife who was six weeks pregnant at the time and who allegedly miscarried as a result of the hardship and depression resulting from the separation.

Apart from the unreasonable period of detention, the principle of fairness and natural justice seems to be absent in a lot of the hearings convened to determine whether or not to deport the immigrant.

As a matter of law, the Special Inquiry Officer has a discretion to determine which immigrant should be deported and which immigrant should be allowed to voluntarily depart the country.

It is uncertain as to what considerations the Inquiry Officer takes into account to make his decision. The legislation ought to expressly indicate that the Inquiry Officer should provide written reasons for his decision, and that such decision should be the subject of judicial review.

In **Naidike,** Baroness Hale was of the opinion that the court ought to balance the State's right to exclude or deport non-citizens against the impact such deportation would have upon the other family members who are nationals of the host country. Therefore, regard is had to the individual's constitutional right to private and family life.

Further, though the immigrant has a right to appeal the decision of the Special Inquiry Officer to the Minister, this appeal must be lodged within 24 hours. This 24-hour window is not sufficient time for an immigrant to understand the appeal process and what is required. Further, to retain and instruct an attorney-at-law at that juncture may prove to be challenging to an impecunious immigrant.

There are a number of cases involving Immigrants and the State alleging that there were breaches of constitutional rights which include but are not limited to: the right to life, liberty, security of the person and the enjoyment of property and the right not to be deprived thereof except by due process of the law as enshrined by section 4(a) of the Constitution; the right to private and family life as guaranteed by section 4(c) of the Constitution; right to counsel; right to equality before the law and the protection of the law guaranteed by section 4(b); right to a fair hearing as per section 5(2)(e) of the Constitution; right to be to retain and instruct without delay a legal adviser of his own choice and to hold communication with him; and the right to be brought promptly before an appropriate judicial authority.

However, these cases merely highlight a much deeper issue with the system and the way in which Immigrants are treated and dealt with. The Claimants that actually initiated legal action were in a position to retain and instruct legal counsel. However, there are many immigrants who have suffered grave injustice and are afraid to challenge the constitutionality of their arrest and/or detention; who are in abject poverty or who struggle to speak the English language to properly instruct an Attorney-at-law.

It must also be noted that the Immigration Division seems to take a very laissez-faire approach in dealing with issues raised by Attorneys representing immigrants. It is almost impossible to contact the relevant authority by telephone and even much more frustrating to await a response from the Chief Immigration Officer which can often take weeks and sometimes months or go unacknowledged altogether.

It must mean that there is a lack of personnel to adequately handle the relevant paperwork and/or answer queries or that the entire process needs to be reformed.

It is disappointing to say the least that in addition to all the challenges that Immigrants face, they have to 'fight' for their rights; they have to initiate legal action to compel the Authority to do what it is supposed to do and/or get redress for unlawful acts.

The courts have constantly tried to defend the rights of immigrants, chastise the Immigration Authorities for its shortcomings and where appropriate, granted the relief sought. However, despite the approach of the Court and its dicta in favour of the preservation of constitutional rights, there seems to be no change in the attitude of the Government to address these recurring breaches.

What is the purpose of having a right if it can be so easily trampled upon.

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ARCHIE V LATT: WHAT THE PRIVY SAID AND DIDN'T SAY

BY DR. EMIR CROWNE

One of the region's leading experts in Intellectual Property and Sports Law, Dr. Crowne is a Tenant at New City Chambers in Port-of-Spain, and the Founder of Crowne Sports Law, an international sports litigation practice.

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On August 16th, 2018 the Privy Council released their decision in Archie v The Law Association of Trinidad and Tobago, [2018] UKPC 23. The decision was widely reported in the local media, and is analyzed in depth below.

In late 2017 the Express published certain articles that, on their face, contained damming allegations against the Honourable Chief Justice. The articles "alleged that the Chief Justice had tried to influence Supreme Court Justices to change their state-provided personal security in favour of a private company

with which his close friend, Mr Dillian Johnson, a convicted felon" ([2018] UKPC 23 at para. 3) and that Mr Johnson was also among the list of 12 individuals recommended by the Honourable Chief Justice for HDC units ([2018] UKPC 23 at para. 3). The Honourable Chief Justice is also alleged to have communicated with a senior HDC official to fast track the applications for said units.

In November 2017, the Law Association determined that the allegations were "sufficiently grave" as to warrant further investigation, and an internal committee was struck for that purpose.

Between November 2017 and February 2018, there were intervening communications and meetings between the Honourable Chief Justice and senior members of the Law Association. Then on "21 February, a pre-action protocol letter asked the LATT to take no further steps until the court had pronounced upon the legal and constitutional propriety of its investigation. By letter dated 23 February, the LATT by its attorneys rejected that suggestion and stated that it had decided to proceed with its investigation…" ([2018] UKPC 23 at para. 12).

The Honourable Chief Justice then sought to judicially review the Law Association's actions and purported powers. At first instance, Justice Kangaloo held that the Law Association's decision to "continue the investigation was "illegal and/or ultra vires and/or unreasonable and/or irrational and/or contrary to the provisions of the Legal Profession Act" and quashed it" ([2018] UKPC 23 at para. 14).

On appeal to the Court of Appeal, a unanimous Court found for the Law Association. The Court disagreed that section 137 of Trinidad and Tobago's Constitution (discussed below) constrained the Law Association's ability to investigate the Honourable Chief Justice, nor was the Law Association's investigation ultra viresof its powers under the Legal Profession Act([2018] UKPC 23 at para. 15).

The Privy Council upheld the Court of Appeal's ruling.

Section 137 of Trinidad and Tobago's Constitution sets out the procedure to discipline and, if warranted, remove a judge or chief justice. Sub-section 137 (3) in particular provides that:

"Where the Prime Minister, in the case of the Chief Justice, or the Judicial and Legal Service Commission, in the case of a Judge other than the Chief Justice, represents to the President that the question of removing a Judge under this section ought to be investigated, then -

(a) the President shall appoint a tribunal which shall consist of a Chairman and not less than two other members, selected by the President acting in accordance with the advice of the Prime Minister in the case of the Chief Justice or the Prime Minister after consultation with the Judicial and Legal Service Commission in the case of a Judge, from among persons who hold or have held office as a Judge of a Court having unlimited jurisdiction in civil and criminal matters in some part of the Commonwealth or a Court having jurisdiction in appeals from any such Court;

(b) the tribunal shall enquire into the matter and report on the facts thereof to the President and recommend to the President whether he should refer the question of removal of that Judge from office to the Judicial Committee; and

(c) where the tribunal so recommends, the President shall refer the question accordingly."

Essentially the sub-section (and the entirety of section 137) ensures that judicial independence is safeguarded against an over zealous Government. In the words of Lady Hale:

"Judicial independence is secured in a number of ways, but principally by providing for security of tenure: in particular this requires that a judge may only be removed from office, or otherwise penalised, for inability or misbehaviour and not because the government does not like the decisions which he or she makes. it is also required that removal from office should be in accordance with a procedure which guarantees fairness and the independence of the decision-makers from government." ([2018] UKPC 23 at para. 18).

The Privy Council agreed with the Court of Appeal that the constitutional procedure set out in section 137 was certainly not the only way a judge could be investigated. Indeed, a judge may well be investigated by the media, individual citizens, or professional bodies like the Law Association with statutory mandates to "represent and protect the interests of the legal profession..." and to "promote

maintain and support the administration of justice and the rule of law" ([2018] UKPC 23 at paras. 27 – 31). However, any such investigation by the Law Association, while not governed by the "conventional rules of natural justice", must still be conducted "fairly" (the standards of which "vary enormously") ([2018] UKPC 23 at paras. 24, 38 and 39). That said, although the Law Association may be empowered to investigate the Honourable Chief Justice, it "is in no position to make findings of fact which are in any way binding upon the Chief Justice or upon any tribunal which might be established under section 137" ([2018] UKPC 23 at para. 24).

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LETTER-TO-THE-EDITOR:

Is my FEMININITY too much for the legal world, or is the legal world still to patriarchal to accept change and/or culture?

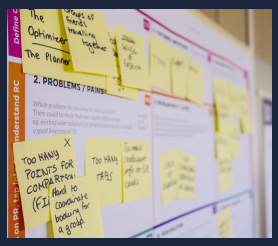
During the month of February, a contest was held requiring participants to showcase three (3) pictorial variations for the competition. Namely, a professional legal attire, a personality photo, and a photo depicting the theme of the contest.

The pictures depicting the theme of the contest, for the females, were interpreted as vulgar and apparently not of the standard accepted by the institution. However, these pictures were acceptable enough to be published in the newspapers. I have looked at past participants of this competition under differing themes and noticed similar or even "worse" pictures are still displayed on the Instagram Page, those being of females in bodysuits and stockings and guys in body paint as a shirt.

Gone are the days where the legal world is populated with "frat boys" who spend their time in law school, clothed in Polo's and plaid shorts with a golf club and cigar as their accessories. There are women who just like your mothers, aunts, and sisters are blessed with body parts that they did not ask for.

Do not punish the victims for being sexualized and ignore those who are sexualizing them. It is dependent on us to put an end to the patriarchal ways of the past.

NEW CITY CHAMBERS



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CHAMBERS ROUND-UP

- Matthew Gayle and Crystal Paul bring success as client gets charges dismissed
- Chambers Members in the Trinidad Guardian on Trinidad Cycling Conflict.
- Crowne successfully reverses Canadian Athlete's Doping Ban
- Crowne writes to United Nations over Trinidad and Tobago's Refugee Treatment
- Dr. Emir Crowne on Anti-Doping open hearings in Sports, "Jamaica could've been pioneers."
- Dr. Crowne discusses Lawyer advertising with T&T Express
- Crowne Appointed Assistant Chief Examiner, C.A.P.E. Law