

**ATTORNEY GENERAL'S CHAMBERS  
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**Hon. Attorney General & Minister of Legal Affairs, Mohabir Anil Nandlall, SC, MP,  
Notary Public, Commissioner Of Oaths To Affidavits & Justice Of The Peace**

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20<sup>th</sup> September, 2023

**Mr. Troy Humphrey**  
Lot 1212 Norton Street  
Georgetown

Dear Mr. Humphrey,

**Re: Motor vehicle accident at the intersection of Eccles to Mandela four lane road and Dumpsite Road, East Bank Demerara**

I act on behalf of the **Government of Guyana**.

On the 15<sup>th</sup> day of September, 2023 at about 21:40hrs at the intersection of the **Eccles to Mandela four Lane Road and Dumpsite Road East Bank Demerara (Roundabout)**, motor vehicle registration number **PAB 805**, owned and driven by you, collided into the Roundabout.

Reports from the Guyana Police Force investigation, including video footage of the said accident, incontrovertibly disclose that you drove motor vehicle registration number **PAB 805** recklessly, dangerously, negligently and at a fast rate of speed whilst proceeding south on the eastern carriageway of the **Eccles to Mandela four Lane Road**, and, upon approaching the intersection of **Eccles to Mandela four Lane Road and Dumpsite Road**, where a Roundabout and road markings are visibly placed to regulate the movement of traffic, you failed to stop or even apply any brakes whatsoever to your motor vehicle and continued further south and collided into the Roundabout.

As a result of your reckless, dangerous and negligent driving, as well as, your complete disregard for other road users, you caused damage to the Water Fountain and other parts of the Roundabout and injuries to yourself and passengers, namely, **Fulisa Burnette** and **Phillip Jeffery**, both of whom were rendered unconscious resulting from the impact of the collision of your motor vehicle **PAB 805** into the Roundabout.

In consequence, the Government of Guyana expended money to effect **emergency repair works** to the damages caused solely by you to the Water Fountain and other parts of the Roundabout, which was commissioned on the 3<sup>rd</sup> September, 2023, by **His Excellency President Mohamed Irfaan Ali**.

The **emergency repair works** cost a total of **two million one hundred thousand dollars (\$2,100,000)** and included mobilization and demobilisation; demolition of damaged sections and removal of debris from the site; replacement of stone pavers, repairs to the fountain rails inclusive of tiling; supply and installation of stone tiles to fountain exterior and mosaic tiles to fountain interior; draining of fountain, degreasing of fountain; cleaning of fountain of oil and other contaminants; replacement of jet, pump repairs and electrical works; replacement of fountain light; replacement of filter materials due to contamination; the supply distilled water to fill fountain and pressure washing, cleaning and clearing of the site.

In the circumstances, I hereby demand that you pay the sum of **two million one hundred thousand dollars (\$2,100,000)** **two million one hundred thousand dollars (\$2,100,000)** to the **Government of Guyana** within fourteen (14) days of receipt of the letter to set off the costs expended to effect **emergency repair works** to the damages caused solely by you at the Water Fountain and other parts of the Roundabout.

If you fail to do so, legal proceedings would be instituted against you for recovery of the aforesaid sum as special damages along with general damages, interests and costs.

Yours faithfully,



**Mohabir Anil Nandlall SC MP**  
**Attorney General and Minister of Legal Affairs**