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October 5, 2018

VIA EMAIL

Henley & Partners
Henley House
9 Hope Street
JE2 3NS
St Helier
Jersey

Re: False and Defamatory Articles Published on Caribbean News Now! Concerning Henley & Partners, Christopher Willis, and the Government of Grenada

Dear Henley & Partners:

You have asked us to summarize our investigation into the publications in 2017 by a news website, Caribbean News Now (“Caribbean News”) and a rogue blogger, that falsely accused Henley & Partners, Christopher Willis and the Government of Grenada of engaging in a scheme to obtain a diplomatic passport from a Caribbean nation on behalf of a purported Ukrainian businessman. You have advised that you may share this summary with third parties; accordingly, this letter includes background details for context regarding the Caribbean News website and its unreliable source, Kenneth Rijock.

Caribbean News purports to be a “leading voice for Caribbean regional news, information and opinion and is the successor to Caribbean Net News.”¹ It is owned by a company registered in the State of Texas and appears to be operated from the State of Florida.

In August, 2017, Caribbean News published an article that repeated, nearly verbatim, unsubstantiated reports by blogger and convicted felon, Kenneth Rijock. Rijock has a history of

¹ See <https://www.caribbeannewsnow.com/about-us/>

making false allegations based on fabricated information, and has issued retractions on multiple occasions.² He pleaded guilty to money laundering charges and served four years in prison.³

Recently, Rijock has operated a blog called “Kenneth Rijock’s Financial Crime Blog.” Beginning in August 2017, Rijock published several blog posts detailing a ruse that falsely implicated Henley & Partners and its former employee, Christopher Willis, in a “\$1 million scheme” to “obtain a diplomatic passport from a Caribbean nation” for a supposed Ukrainian businessman. Relying on Rijock’s reporting and probably other sources who also fed fictitious information to Rijock, Caribbean News in the article quoted from emails that were sent to and from government officials in Antigua and Grenada. The alleged businessman claimed that he was working with “Chris” from Henley & Partners – later identified by Rijock as Christopher Willis – and he inquired in the emails whether the government officials knew when and how he would receive his diplomatic passport. The article also contained a photo of a screen shot purportedly showing a \$1 million wire transfer to a Henley & Partners account at Wells Fargo Bank in Singapore.

While the government officials may have received the emails in question, the information posited in the emails is false and there is no evidence that there was a real Ukrainian businessman behind the emails. Henley & Partners has performed a search and review of its records and neither Mr. Willis nor any other employee of Henley & Partners emailed or had any communications with any Ukrainian businessman, let alone regarding the “purchase of a diplomatic passport.” To the extent emails between the Ukrainian and the governments of Antigua and Grenada exist, they falsely refer to involvement by Henley & Partners and Mr. Willis or are otherwise fabricated.

The screen shot of the bank transfer is a complete and undisputed fabrication: Henley & Partners has no such account at Wells Fargo in Singapore and never received any such payment, a fact that Wells Fargo has confirmed by email to us. On the contrary, the evidence suggests that Rijock and/or others fabricated a story and emailed their tale to government officials to elicit responses from them and thereby obtain a phony imprimatur of authenticity over the emails. They then forged the Wells Fargo document to provide purported corroboration. Caribbean News rehashed these false allegations with no due diligence.

The article also insinuates that the Government of Grenada participated in, or at least was aware of, the purported scheme to obtain a diplomatic passport. This is false. The purported emails from a Grenada member of parliament who attempted to respond to the requests for assistance do not evidence the government’s participation in, or knowledge of, any such scheme.

² See, e.g., <http://rijock.blogspot.com/2016/08/retraction-of-article-previously.html>. See also *Northland Wealth Management, Inc. v. Rijock*, Case No. 1:17-cv-21150 (S.D. Fla.) (complaint filed on March 28, 2017; order of default entered on April 20, 2017).

³ See “Confessions of a money launderer,” BBC News, May 20, 2007, <http://news.bbc.co.uk/2/hi/business/6668879.stm>

English solicitors on behalf of Henley & Partners and Mr. Willis contacted Caribbean News and demanded immediate removal of the August 21 article from the website. Caribbean News removed the article and published in its place a statement provided by Henley & Partners that detailed the falsity of the article. Just three days later, however, on August 24, 2017, Caribbean News republished the bogus claims from the original publication and then did so again on August 28, 2017. U.S. counsel sent further demand letters to Caribbean News, which has not republished the allegations since except on one occasion on October 20, 2017.

Legal counsels' letters to Caribbean News also threatened litigation for the false and defamatory publications. The defamation claims are still ripe and may be pursued by Henley & Partners, Mr. Willis and the Government of Grenada in a U.S. court or elsewhere. To the extent legal action is brought against Caribbean News in the U.S., Henley & Partners and the others would be able to overcome the high burden a libel plaintiff usually faces in the U.S because Caribbean News was, at a minimum, reckless in its reliance on Rijock, a wholly unreliable source, and likely other sources with specific motivation to harm Henley & Partners. Further, it republished the allegations after being notified of the bogus nature of the claims, including the proof from Wells Fargo that documents had been fabricated. This demonstrates that Caribbean News published the accusations with knowledge of their falsity. As such, not only would Henley & Partners and the others likely prevail in any legal action, they would be entitled to recover punitive damages against Caribbean News.

Sincerely,



Mark I. Bailen
Partner