



LAW OFFICERS OF THE CROWN

AFR Advocates
PO Box 688
Court Place
Rue du Manoir
St Peter Port
GY1 3XZ

22nd October, 2025

Your re: RB

By email only

Dear Sirs,

Your client: Sark Electricity Limited

I refer to recent emails from your client alleging that because the "legal levies" element of the latest bill has not been paid Chief Pleas' account with your client is now overdue, that "late fees" have been incurred (in what amount is not specified, which is obviously wholly unsatisfactory), threatening "Court proceedings", and threatening to seek an award of costs in those proceedings.

Please note that my client's position remains that the "legal levies" may not be lawfully charged. It is also remains my client's position that your client has no right to charge "late fees" on accounts, even if there is an element which is properly overdue for payment (which, for the avoidance of doubt, is not the case in respect of my client). Notably your client does not set out any authority or basis in law by reference to which it purports to levy the "late fees".

I also write to inform you that my client increasingly tends to the view that if your client continues to make such unreasonable and aggressive demands of my client - and more importantly, of others in the community, including those who are vulnerable and at risk - it could be said that it will risk committing the offence of harassment under section 1 of the Protection from Harassment (Bailiwick of Guernsey) Law, 2005. In this regard I note that it is an offence in England and Wales (under section 40 of the Administration of Justice Act 1970) to harass a person with demands for the payment of money claimed as a "debt due under a contract" in a manner calculated to subject the alleged debtor to "alarm, distress or humiliation" with the object of coercing the person to settle the debt. I also note that a

supplier of electricity, Norweb plc, was convicted of this offence in 1994 (though it is right that I also note that it successfully appealed the conviction on the particular facts of the case by way of case stated). My client continues to reserve its position in respect of all these matters.

In light of the public interest in this matter and the previous publication of related correspondence, I am instructed that my client will be publishing this letter.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jon McLellan', with a horizontal line underneath the name.

Crown Advocate Jon McLellan
Director of Legal Services