



August 22, 2025

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By Email Only: ogbrowne@browneandassociatesskb.com

Dear Counsel,

Re: Unauthorized beach-bar operations at Friars Bay; Notice to Quit and Deliver up Possession

Your letter of June 11, 2025, sent on behalf of Messrs. Francis (dba "The Godfather Bar"), Stapleton (dba "The Discovery Bar") and Raman (dba "The Shipwreck Bar"), was brought to our attention by Counsel acting for Solidus Corp., the current owners of the Friars Bay Estate. In that letter you expressly confirmed that your clients are "all operating at Friars Bay," thereby acknowledging their continued occupation of the location in issue.

While the dispute over title and possession of the Friars Bay Estate lies between Solidus Corp. and your clients, the Government is separately concerned with your clients' asserted occupation of the beach, which is Crown land.

As your clients must be aware, all rights in and over any beach (including any area designated as "beach" at Friars Bay) are vested in the Crown. Section 28 of the National Conservation and Environment Protection Act ("NCEPA") further provides that the public only has the right to access and use or enjoy the beach for recreational activities and purposes. It does not authorize the construction or maintenance of huts, booths, sheds, stalls, bath-houses or shops on any beach without lawful permission.

The question posed in your letter, namely whether your clients' bars sit on Solidus Corp.'s private land or instead "upon the sand forming part of the beach...vested in the Crown" is immaterial:

1. If the structures are on private land within Friars Bay Estate, your clients are trespassers and must vacate; and
2. If the structures are on the "beach"/foreshore, their operations are plainly unlawful as the public's right does not extend to private commercial exploitation and no planning permission or other authorization was given by the Crown for such purposes.

Accordingly, and without prejudice to Friars Bay Estate owners' rights and remedies, we hereby demand that your clients immediately cease all operations on Friars Bay beach and vacate and yield up possession thereof in a clean, sanitary and cleared condition, ensuring to remove all structures, fixtures and items on the said beach by **no later than August 30, 2025**.



Should your clients fail to comply by the aforementioned deadline, the Government will, without further notice, exercise all lawful measures, including (as appropriate to the precise location of each structure):

1. Peaceable self-help removal of unauthorized structures consistent with the Crown's rights "in and over the beach"; and/or
2. Immediate and urgent proceedings for a mandatory injunction and possession (and such ancillary relief as the court deems just), together with recovery of costs.

In addition to your clients' ongoing breach of the NCEPA through unauthorized activities on the beach, we note that some of your clients also appear to be operating in clear violation of the Licences on Business and Occupations Act and the Unincorporated Business Tax Act. Such disregard of statutory requirements is a serious matter and exposes them to potential criminal liability. Should your clients comply with this demand and vacate the beach at Friars Bay by the stipulated deadline, no referral will be made to the Director of Public Prosecutions.

Kindly therefore confirm by return email that your clients will meet the August 30, 2025 deadline.

All rights are reserved.

Yours faithfully,

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Liska Hutchinson Rhyner
for and on behalf of
The Attorney General's Chambers
Government of Saint Christopher (St Kitts) and Nevis