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10 May 2017

CONFIDENTIAL

Anson Wong S.C.
Chairman
Standing Committee on Discipline
Hong Kong Bar Association
LG2, High Court
38 Queensway
Hong Kong

Dear Mr Wong,

**Re: Anonymous Complaints based on Newspaper Reports
in relation to Mr Edward Snowden**

Thank you for your letter of 26 April 2017, confirming a time extension to 10 May 2017 to file my reply to the Bar Council Standing Committee on Discipline.

Due to the anonymous source and nature of your complaint, the extraordinarily wide scope of questioning put to me in your list of questions, and the nature of such questions, I do hereby make specific requests to the Bar Council and Standing Committee on Discipline, to make the following disclosures to me at the earliest time.

Request for Disclosure

Please provide the following information, documentation, audio, etc.:-

Anonymous Complaint

- (1) Exact date of the “Anonymous” complaint and where and by whom it was received;
- (2) The Identity of the “Anonymous” Complainant;
- (3) The mode and/or form of that complaint i.e. oral, written, by fax, email, by hand, etc.;
- (4) A full copy of the “Anonymous” complaint document (s), including any envelope, etc.;
- (5) If the “Anonymous” complaint was verbal / oral, an audio of that complaint if it was recorded or delivered in a recorded audio format;
- (6) Notes and written statement(s) by the person who received that verbal /oral audio complaint;
- (7) Please provide a fully copy of all documentation contained in the Standing Committee on Discipline file Ref: “Discipline 01/2017”

Bar Council - Annual General Meeting held on Thursday 19 January 2017

- (8) Full minutes of the Bar Council - Annual General Meeting held on Thursday 19 January 2017 meeting;
- (9) Audio recording of that meeting; and
- (10) All other documents concerning discussions raised by the Bar Council about an unnamed “Canadian” national who is also a member of the Hong Kong Bar and the identity of that Canadian barrister.

At all material times up to present day, Mr Snowden’s case has involved the greatest sensitivity. In particular a fundamental and crucial part of my role as counsel has been to ensure that at all material times I have acted in his best interests and ensuring absolute trust and confidence is maintained. The present inquiry, with its “Anonymous” source and extraordinarily wide scope and many of your questions having no relation or rational connection to the 2 (two) anonymous complaints, raises very serious concerns about the identity of the “Anonymous” source and his/her/their motivations as it may relate to Mr Snowden himself.

Further Time Extension

It is clearly not in my client’s best interests for me to reply until after the requested disclosures have been made by the Bar Council and Standing Committee on Discipline, and only after I have obtained instructions from my client.

Under all the circumstances, I would hope that the requested disclosures be made to me within 1 (one) month from the date of this letter, namely on/or before 9 June 2017.

I will require further time to receive and consider such disclosures before making a reply. As of consequence I formally request an extension of time to reply of a minimum of 1 (one) month thereafter, to 10 July 2017.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Robert Tibbo', written in a cursive style.

Robert Tibbo