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BY EMAIL

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2 (two) pages

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

Dear Mr Wong,

Re: Various Complaints Lodged against Robert Tibbo

Thank you for your letter dated 18 December 2017.

I do apologise for the delay in writing back to you, and the Standing Committee on Discipline ("SCD") in relation to more time being necessary to provide the SCD with full substantive replies to the various complaints that have been lodged against me, including an anonymous complaint in relation to Mr Edward Snowden (Discipline 15/2015, Discipline 01/2015 (8 March and 3 August complaints), and Discipline 03/2017).

This delay has been due to firstly, the Queen's Counsel requiring more time to provide legal advice to me (due significantly to his own full diary). Secondly concerning the 2 (two) Snowden Complaints (8 March and 3 August 2017) the requested disclosure requested of the SCD in my letter of 10 May 2017 has not been made in full and based on the SCD letter of 23 August 2017, further disclosure is requested (as set out below) and is required by Queen's Counsel before final advice is provided (Please refer to my letter of today Re: Snowden Complaint). Thirdly, due to extraordinary circumstances relating to the Snowden Refugee TCAB appeals, coupled with the arbitrary and obstructive conduct of the Director of Immigration, I have been overwhelmed by USM and TCAB filing dates confined to late August to early December 2017, which has exhausted my capacity to address numerous

complaints made by the Bar Council, the Bar Complaints also contributing to creating further strain and difficulty.

I emphasize that the above factors have had a very significant cumulative impact causing delay in my being able to address "All" complaints.

I would stress that the delays in no way reflect anything else other than the practical reality of Queen's Counsel having an extremely full diary, and secondly his requirement for full disclosure by the SCD. What is necessary is more time to address all complaints in light of the circumstances as set out above. I would seek to avoid having this matter addressed in a rush, without due consideration of the difficulties faced by Queen's Counsel and myself, resulting in an arbitrary and highly prejudicial procedures and decisions.

I am still awaiting final legal advice from Queen's Counsel on all complaints. That advice in significant part is contingent upon the SCD (and the Bar Council (current and past)) making full disclosure, as I had requested in my letter to the SCD dated 10 May 2017.

I have had 2 (two) deadlines today to reply to the Bar Association on 2 (two) matters (including the present matter) which I have responded to today. I have also replied to a further matter to the SCD today concerning the Snowden Complaint.

With the SCD deciding there would be no further extensions of time beyond 24 November 2017 for my substantive replies to the various complaints and with no capacity to address the various complaints which necessarily involved my communications with Queen's Counsel, there was simply nothing I could do to meet that final deadline. I do apologise for my failure to communicate earlier. I have simply been overwhelmed primarily due to extraordinary circumstances this year, and in particular over the past 4 (four) months as I have indicated above.

I have made all efforts possible and in good faith to respond promptly to the various complaints, and continue to do in context of the extraordinary set of circumstances explained above. As such I do not agree that I have breached paragraph 4.7 of the Bar Code. In light of the above, I do require further time to address the further complaints and ask that the SCD consider granting further extensions.

Yours sincerely



Robert Tibbo