



Submitted Date:13/12/2024 17:20

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- Affidavit filed on behalf of the Deponent, Jonathan Lehrer
- Initials and Surname of deponent: R.J; Joseph
- Affidavit #: 2
- Exhibit reference: "RJ1" - "RJ2"
- Date Sworn:13th December, 2024
- Date Filed:13th December, 2024

Fees Paid:22.00

IN THE EASTERN CARIBBEAN SUPREME COURT
IN THE HIGH COURT OF JUSTICE
COMMONWEALTH OF DOMINICA

DOMHCV 0213 OF 2024

IN THE MATTER OF THE BAIL ACT # 20 OF 2020, SECTION 4(3), (4) AND
SECTION 7(1)(2)

AND

IN THE MATTER OF AN APPLICATION BY JONATHAN LEHRER THAT BAIL BE
GRANTED HIM WITH OR WITHOUT CONDITION

BETWEEN

JONATHAN LEHRER

CLAIMANT

AND

CHIEF OF POLICE

FIRST DEFENDANT

DIRECTOR OF PUBLIC PROSECUTIONS

SECOND DEFENDANT

AFFIDAVIT OF RHODA JOSEPH

I Rhoda Joseph of Canefield East, parish of St. Paul, Commonwealth of
Dominica make oath and say as follows:

1. I am the deponent herein.

2. The facts stated in this Affidavit are true and correct and within my personal knowledge save and except where I swear to information and belief, in which event I also verily believe the same to be true.
3. I know the Mr. Jonathan Lehrer, the Claimant/Applicant herein for fifteen (15) years. Throughout these years I became a defacto member of the Claimant's family. I assisted in the upbringing of the three minor children of the family namely, Ethan Lehrer, Benjamin Lehrer and Emma Lehrer up till they all attained the age of majority.
4. In my capacity as a defacto family member of the Applicant's family I developed a very strong familial relationship with him and the other members of his family, such as qualified me to have significant influence over him to ensure that he abides by the conditions of his bail.
5. I know that the Applicant has been arrested and charged with the offense of murder contrary to law.
6. On the 26th November, 2024 bail was offered to the Applicant with one surety in the like sum of EC\$1,000,000.00 and subject to conditions as are contained in the Order After Judgment issued by the Honourable Justice Collin Williams.
7. I am now the sole shareholder of BC North Inc. company bearing registration number 2023/C0088. A true copy of share certificate #002 confirming that I am the owner of the entire shareholding in the company is produced, exhibited and marked "**RJ1**".
8. BC North Inc. is the registered proprietor of a portion of land at the Bois Cotlette Estate containing 13.2 acres and registered in the Register Book

X21 Folio 75. That property was purchased for the sum of \$1,350,000.00 as is evident from the assurance funds noted on the said certificate of title for the sum of \$13,500.00 being 1% of the purchase price.

9. The Certificate of Title in the name of my company, BC North Inc., is not incumbered save and except for a caveat filed by Insight Inc. on the 4th January, 2024. I am informed by the Director of Insight Inc. and verily believe that an order for the removal of the said caveat has been issued so that the title may be unencumbered for the purposes of the bail conditions.
10. In my capacity as shareholder and director of BC North Inc., I have voluntarily agreed to pledge that Certificate of Title as recognizance for the grant of bail in the sum of \$1,000,000.00 to satisfy that condition in the Order After Judgment by the Honourable Collin Williams.
11. In my further capacity as shareholder BC North Inc. I obtained a valuation of that portion of land at the Bois Cotlette Estate containing 13.2 acres and registered in the Register Book X21 Folio 75. The property was valued by Kevin Seaman, Licensed Surveyor, in the sum of \$1,254,000.00 and is therefore of sufficient value to satisfy the \$1,000,000.00 surety. A copy of the Title and valuation are produced, exhibited and marked **"RJ2"**.
12. I repeat paragraphs 3 and 4 above and I say that I have sufficient influence and control over the Applicant to ensure his attendance at Court for every day of the trial and also to ensure that he shall comply with his bail conditions prior to trial.
13. That the responsibilities of a surety have been explained to me. I understand that it is my responsibility to ensure that the Applicant, Jonathan Lehrer, complies with all the conditions of bail and attends his trial until the final hearing and determination at the High Court.

14. It has also been explained to me that should the Applicant breach any conditions of his bail or if he is charged with any offense anywhere which had a prescribed penalty of 2 years imprisonment then his recognizance becomes liable to be forfeited and his bail may be revoked.

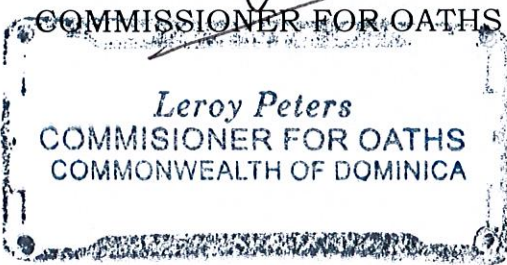
15. I say that in the circumstances I hereby freely and voluntarily propose to be the surety for the Applicant's bail and to pledge the property referred to at paragraph 8 to 11 above as recognizance for the said bail. I undertake the obligations of surety freely and voluntarily.

Sworn at the Registry, Roseau,)
in the parish of St. George)
this 13th day of December, 2024)

Rhoda Joseph
.....
RHODA JOSEPH
DC # 011235-00935289

Before me:

Leroy Peters



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.....
LENNOX LAWRENCE
PLATINUMLAW CHAMBERS
SOLICITORS FOR THE CLAIMANT