OLA ENERGY HOLDINGS LTD & ORS v THE FINANCIAL INTELLIGENCE UNIT

2023 SCJ 326

Record No. JIC/314/2023

THE SUPREME COURT OF MAURITIUS

(BEFORE THE JUDGE IN CHAMBERS)

In the matter of:-

1. **OLA ENERGY HOLDINGS LTD**
2. **LIBYA AFRICA INVESTMENT PORTFOLIO**
3. **RASCOMSTAR-QAF**
4. **LIBYA OIL (EXPLORATION & PRODUCTION) LTD**

Applicants

v

THE FINANCIAL INTELLIGENCE UNIT

Respondent

In the presence of:

CAPITAL HORIZONS LTD

Third Party

JUDGMENT

Upon an application made by the Respondent, a Restriction Order dated the 28 February 2023, bearing Serial Number 261/2023 ("Restriction Order"), was granted by Mr. Justice N F Oh San-Bellepeau, directing that all money held in banks in Mauritius in the names of the abovenamed Applicants, amongst others, shall not be disposed of, or otherwise dealt with, by any person, except upon a Judge's Order (**Annex A** as per Respondent's written submissions).

On 7 March 2023, the Applicants, in the presence of the Third Party ("CHL"), lodged an application pursuant to **Section 31 of the Asset Recovery Act 2011 (The "ARA")** praying that the Restriction Order be rescinded quoad the Applicants.

On 17 April 2023, the Applicants have moved that the *"question as to whether the Restriction Order dated 28 February 2023 (the "Restriction Order") in the matter bearing Serial Number 261/2023 should be rescinded quoad the Applicants insofar as the Respondent has misapplied the provisions of the Asset Recovery Act 2011 ("the ARA") and usurped the specific powers, granted under Section 26 of United Nations (Financial Prohibitions, Arms Embargo and Travel Ban) Sanctions Act 2019 (the "Sanctions Act"), be determined as a preliminary issue before they are required to take any further step in these proceedings".*

It was subsequently agreed between the parties, for the sake of time efficiency, that all issues be thrashed out at the same time. Hence, the matter was fixed for hearing on the preliminary issue and on the merits of the application for rescission of the Restriction Order.

It is apposite to give a brief summary of the background of the parties involved in the present case as well as a chronology of the facts, as borne out in the affidavits and supporting documents filed by the respective parties.

The Parties

All the four Applicants were issued with a Global Business License by the Financial Service Commission (the "FSC").

Applicant No.1 operates within the OLA Energy Group, which conducts activities in 17 African countries, and had a turnover in excess of 5 billion euros for the financial year ending 2012. It is involved in *"Retail sale of automotive fuel (Filing Station)"* having as principal place of business Caudan Waterfront, Port Louis **(Annex A1).**

Applicant No.3's ("Ramcomstar") nature of business is described as *"Satellite telecommunications activities",* having as principal place of business Chaussée Street 85, 2nd floor, Medine Mews, Port Louis, Mauritius **(Annex C2)**. It provides a range of telecommunication services across Africa.

Applicant No.2 ("LAIP Mauritius") wholly owns Applicant No.1 and as far as Applicant No.4 ("Libya Oil") is concerned, a certificate of incumbency is on record, showing that its sole shareholder is Applicant no.1 **(Annex D).**

All the four Applicants are either, directly or indirectly, wholly or partially owned by Libya Africa Investment Portfolio ("LAIP Libya"). The latter is a wholly owned subsidiary of the Libya Investment Authority ("LIA"). Both the LAIP Libya and LIA are Libyan entities.

CHL is the management company, company secretary and/or registered agent of the Applicants.

The Respondent was established under **section 9 of the Financial Intelligence and Anti Money Laundering Act 2002** as amended **("FIAMLA")** and is the Enforcement Authority under **section 4 of the ARA**.

Chronology of facts

The undisputed facts on record are as follows:

In 2011, the United Nations (UN) imposed various sanctions against Libya through its Security Council Resolutions (UNSCRs) 1970 (2011) and 1973 (2011), as modified in UNSCR 2009 (2011) **(Annex E)**. The two Libyan entities – LIA and LAIP Libya, were both designated as listed entities by the UN and were subject to asset freeze restrictions under the UNSCRs ("UN sanctioned entities").

In Mauritius, the implementation of the UN instruments is through the **United Nations (Financial Prohibitions, Arms Embargo and Travel Ban) Sanctions Act 2019 ("UN Sanctions Act**") which allows the government of Mauritius to implement targeted sanctions and other measures as imposed by the UN Security Council ("UNSC") and to incorporate those sanctions into domestic law.

In March 2012, the UNSC issued an Implementation Assistance Notice No.1 ("IAN") to provide guidance and clarifications on the effects of the UNSCRs **(Annex F)**.

On 21 August 2020, guidance was sought by CHL from the National Sanctions Committee ("NSC") established under the UN Sanctions Act, as to the applicability of the IAN under domestic law **(Annex G**).

On 12 October 2020, the Applicants were informed by the FSC of an enquiry under **section 75 of the Financial Services Act 2007 ("FSA") (Annex I)** and on the same date, CHL received an investigation Order under **section 44 of the FSA** from the FSC **(Annex J**).

In August 2022, the Applicants lodged an application before the Supreme Court, bearing cause number SCR 5A/227/22 seeking for declarations *(i) in respect of the applicability of the IAN under Mauritian law and; (ii) to the effect that they were exempt from the UN sanctions imposed against Libya* **(Annex K).** The Supreme Court case is coming for Arguments on 11 September 2023.

On 5 October 2022, the UNSC Committee, established pursuant to resolution 1970 (2011) concerning Libya, issued further guidance to the Permanent Representative of Mauritius to the UN **(Annex H)**.

On 2 March 2023, the Respondent has applied and obtained a Restriction Order pursuant to **section 27 of the ARA.**

Now, it is the Applicants' contention that the Restriction Order should be rescinded in the interests of justice inasmuch as it was sought as a consequence of the Respondent's misapprehending the nature of its powers under the ARA 2011 as well as its functions in relation to the sanction and the asset freeze measure imposed by the UNSC through its Resolutions pertaining to LAIP Libya and LIA. Hence, the preliminary issue raised by the Applicants (as spelt out earlier) and which as per the Applicants' motion can dispose of the present application without the need to delve into other issues.

Analysis and determination of the preliminary issue

I have carefully analysed the affidavits and annexed documents filed by the respective parties and given due consideration to the written submissions of both learned Senior Counsel appearing for the Respondent and Applicant No.3 respectively, and learned Counsel appearing for Applicants Nos.1,2 and 4 as well as their oral submissions and authorities relied upon in support of the present matter.

It is the case for the Applicants that the Respondent has misapplied the provisions of the ARA by applying for a Restriction Order pursuant to **section 27 of the ARA** for matters falling within the purview of the UN Sanctions Act and in so doing, it has usurped the specific powers provided for under **section 26 of the UN Sanctions Act**.

Learned Senior Counsel appearing for Applicant No.3 relies essentially on the basic principle of law referred to as *"generalia specialibus non derogant*". In support of this principle

the following authorities were referred to: **Pabaroo D.T. v Varmah K.D. & Ors [2013 SCJ 197]; AAPCA (Mauritius) Ltd & Anor v Mauritius Revenue Authority [2020 SCJ 297]; A Jaufeerally Enterprise Ltd v Prakash Foolchund Contractor Ltd & Anor [2022 SCJ 183]; Vinos v Marks & Spencer plc [2001 3 All ER 784] at [27]; In re McE (Appellant) (Northern Ireland), In re M (Appellant) (Northern Ireland) and In re C (AP) and another (AP) (Appellants) (Northern Ireland) [2009 UKHL 15]**.

It was submitted that in the specific context of the UN Sanctions Act and terrorism financing, the matter must be dealt with under the UN Sanctions Act which is the specific legislation as intended by the legislator and parliament.

Learned Senior Counsel for Applicant No.3 submitted that the intention of the legislator in enacting the UN Sanctions Act was to create a specific piece of legislation to deal with matters relating to UN sanctions with a view to addressing the financing of terrorism amongst others. The Respondent cannot bypass the UN Sanctions Act, under which it has been given a limited role, and the NSC, to interpret and/or act upon any information as it deems fit. The Respondent ought to have followed the proper procedure to disseminate any relevant information to the NSC for appropriate action to be taken as provided under the UN Sanctions Act.

Learned Counsel appearing for Applicants Nos.1, 2 and 4 concurred with the submissions made by learned Senior Counsel appearing for Applicant No.3.

In relation to the above issue, learned Senior Counsel appearing for the Respondent expatiated on the purpose of the UN Sanctions Act as well as the scope of application of this legislation and submitted that besides adhering to international standards and implementing all UNSCRs and its sanctions, Mauritius has its own autonomous terrorist sanctions regimes under various domestic legislations which include among others the ARA 2011 and the UN Sanctions Act. Nothing would prevent the application of a Restriction Order either under the ARA or the UN Sanctions Act. Further, nothing would prevent the Respondent from making an application for a Restriction Order on a party though the latter has not been listed as a designated party.

I bear in mind that there is already a case pending before the Supreme Court (SCR 5A/227/22) which concerns in essence the applicability of the IAN (issued by the UNSC Committee pursuant to the sanctions imposed on the Libyan entities) to the Applicants and the exemption of the Applicants from the UN sanctions imposed against Libya.

The only issue to be determined by me at this stage, is in respect of the preliminary point of law raised by the Applicants, which as rightly pointed out by learned Senior Counsel appearing for Applicant No.3, will dispose of the present application.

Indeed, the preliminary issue as couched - namely whether it was open to the Respondent to apply for a Restriction Order under the ARA in relation to matters, which according to the Applicants, fall within the purview of the UN Sanctions Act, calls into question the legality of the basis upon which the Respondent sought and was granted the Restriction Order of the 28 February 2023.

I take due note of the submissions of learned Senior Counsel appearing for Applicant No.3 on the principle of "*generalia specialibus non derogant*" in support of the Applicants' contention that the UN Sanctions Act is the special law which caters for the type of situations upon which the Respondent has acted to apply for a Restriction Order against the Applicants. I will therefore address my mind as to the applicability of this principle to the preliminary issue to be determined in the present case.

"Generalia Specialibus Non Derogant" is a latin maxim used in the interpretation of statutes, which in more common terms means that general laws do not prevail over special laws, and which in effect means that if two laws govern the same factual situation, a law governing a specific subject matter overrides a law governing only general matters.

However, this principle finds its application when there is a conflict of interpretation of two statutes, more generally a conflict between an earlier and a later statute. In **Paw Chin Chiang Marie Desire Joe v Mrs Ramburn Basdeo [2003 MR 208]**, it was pertinently held that *"A special law should be preferred to a general law when there are contradictions……..."* Similarly in **Bank of Baroda v Koodaruth [2009 SCJ 292]**, where reference was made to the Supreme Court case of **G Chinien v The Queen [1989 MR 262],** the following extracts cited from **Maxwell on Interpretation of Statutes [12th Edition at page 193]** are of relevance:

"*If however, the provisions of a later enactment are so inconsistent with or repugnant to the provisions of an earlier one that the two cannot stand together, the earlier is abrogated by the later.*"

This principle of statutory interpretation is further aptly explained in the following passage from **Sullivan and Driedger [4th Edition (Butterworths 2002) at page 273]**, reproduced in the case of **Pabaroo D.T v Varmah K.D. & ORS [2013 SCJ 197]** as follows**:**

"when two provisions are in conflict and one of them deals specifically with the matter in question while the other is of more general application, the conflict may be avoided by applying the specific provision to the exclusion of the more general one. The specific prevails over the general; it does not matter which was enacted first. This strategy for resolution of conflict is usually referred to by the latin name generalia specialibus non derogant.*"*

(Emphasis added).

True, it is that the UN Sanctions Act was enacted later than the ARA but the Court is of considered view that the two legislations are not in direct conflict inasmuch as both legislations have their own specificity. To better understand the specificity of each Act, one must turn to the intention of the legislator when enacting the 2 legislations. The intention of the legislative body clearly defines the aim with which a particular act was enacted.

The nature and purport of the two legislations can be gleaned from the Parliamentary debates on each law as evidenced from the relevant extracts of Hansard as reproduced below.

As regards the ARA, the objective of the Act is clearly mentioned in the **Explanatory Memorandum of the Bill dated 25 March 2011** as follows:

"The main object of the Bill is to prescribe the procedure to enable the State to recover assets which are the proceeds or instrumentalities of crime or terrorist property, where a person has been convicted of an offence or where there has been no prosecution but it can be proved on a balance of probabilities that property represents proceeds or instrumentalities of an unlawful activity."

Equally of pertinence as to the intention of the legislator in enacting the ARA is the following extract from the **Parliamentary debates (Hansard) of 21 November 2011**:

> *"In the fight against drug trafficking……..it is universally recognized that one of the most effective tools is the seizure of the assets of those involved in drug trafficking. In April of this year, the Asset Recovery Act was passed by this august Assembly. This piece of legislation provides a comprehensive asset recovery framework and legal procedure for the recovery of assets in order to reinforce the fight against crime, including transnational crime and to recover the proceeds and instrumentalities of crime, that is, ill-gotten gains.*

The asset recovery mechanism will reinforce not only our criminal justice system, but also the whole justice system generally, in the sense that, in addition to the creation and prosecution of offences, the procedure of asset recovery will attack criminality at its main root, by discouraging people from committing crimes involving monetary gains given that whatever tainted property is acquired by them may be taken away from them even if there has been no prosecution……"

Furthermore, **section 3 of the ARA**, as amended, provides for the application of the Act as follows:

"3. Application of Act

(1) This Act shall apply with respect to any act, that constitutes an unlawful activity

(2) This Act shall apply to <u>any proceeds, benefit, instrumentality or terrorist property derived or used or intended to be used."</u>

As for the UN Sanctions Act, the rationale behind enacting the said Act as transpired from the **Parliamentary debates** (**Hansard) of 21 May 2019** is "*<u>to enable the Government of Mauritius to implement targeted sanctions, including financial prohibitions, arms embargo and travel ban and other measures imposed by the United Nations Security Council under Chapter VII of the Charter of the United Nations</u> with a view to addressing threats to international peace and security, including the financing of terrorism and proliferation of weapons of mass destruction."*

The scope and application of the Act is stipulated in **section 3 of the UN Sanctions Act** as follows:

"3. Application of Act

(1) This Act shall be <u>in addition to, and not in derogation from</u>, the Convention for the Suppressions of the Financing of Terrorism Act, the Prevention of Terrorism Act and the Prevention of Terrorism (International Obligations) Act."

(Underlining mine).

As can be seen above, the UN Sanctions Act establishes a sanction regime which encompasses a broad range of measures imposed by the UNSC under Chapter VII of the Charter of the United Nations, to be implemented by the Government of Mauritius in its fight against terrorism and related offences.

On the other hand, the ARA essentially establishes an asset recovery mechanism and hence its main purpose is to provide for a legal framework for the recovery of assets by the enforcement authority, the enforcement authority being the FIU by virtue of **section 9 of the FIAMLA**.

Hence, on a true construction of both legislations, it cannot be said that one overrides or supersedes the other as both legislations are to be considered as specific laws in their own context. I therefore hold that the principle of "*generalia specialibus non derogant*" does not find its application in the present case.

The next question to be determined is whether in the present case the facts relied upon by the Respondent to apply for a Restriction Order fall within the purview of **section 27 of the ARA,** or whether they fall within the purview of **section 26 of the UN Sanctions Act** so that it would be said "*that the Respondent has misapplied the provisions of the ARA and usurped the specific powers, granted under* ***section 26 of the UN Sanctions Act*****"** as contended by the Applicants. It is therefore apposite to reproduce the relevant provisions of the above sections of the law which will help to determine their respective field of application in respect to asset freeze measure.

The circumstances in which a Restriction Order would be issued pursuant to **section 27 (1) of the ARA as amended by Act No.24 of 2012** is explained in clear terms as follows:

> **"27. Restriction Order**
>
> *(1)(a) Where property is reasonably believed by the Enforcement Authority to be recoverable under Sub-Part B of this Part and to be proceeds, a benefit or an instrumentality or terrorist property, it may apply to a Judge for a Restriction Order in respect of that property.*
>
> *(b) It shall be sufficient for the purposes of paragraph (a) for the Enforcement Authority to show that the property is proceeds, a benefit or an instrumentality or terrorist property, without having to show that the property was derived directly or indirectly from a particular offence or that any person has been charged in relation to such an offence.*

(c) (…….);

(d) (…….).

(2) The Judge shall, where he is satisfied that there are reasonable grounds to believe that the property referred to in the application is proceeds, a benefit or an instrumentality or terrorist property, make a Restriction Order….."

Now, **section 26 of the UN Sanctions Act,** under Sub-Part C, which is in relation to "*Freezing Order of Funds or Other Assets of Designated Party"* provides as follows:

"26. Application for freezing order

(1) (a) Where the Secretary for Home Affairs declares a party as a designated party, he shall, within a reasonable time of that declaration, make an ex parte application to the Designated Judge for a freezing order of the funds or other assets of the designated party.

(b) Where the Designated Judge is satisfied, on a balance of probabilities, that the designated party qualifies to be declared as such under this Act, he shall grant a freezing order which shall remain in force as long as the party is a designated party.

(2) Where a freezing order is in force, nothing shall prevent any interest which may accrue, or other earnings due, on the frozen accounts of the designated party, or payments due under contracts, agreements or obligations that arose prior to the date on which those accounts became subject to the freezing order, provided that any such interest, earnings and payments continue to be subject to the freezing order."

(Underlining mine)

A careful analysis of the Respondent's affidavit dated 9 May 2023 illustrates the basis of the Respondent's application for a Restriction Order against the Applicants.

Paragraphs 19 – 27 recites the facts upon which the Respondent rests its application for a Restriction Order, which in a gist is as follows: Following an intelligence report submitted by the Financial Intelligence Analysis Division ("FIAD") of the Respondent to its Asset

Recovery Division ("ARID") on entities including the Applicants, in respect of activities relating to financing of terrorism, the ARID initiated an investigation in the matter which revealed several suspicious connections nationally and internationally. Having "*reasonable grounds to believe that property involved may be recoverable under section 27 (1) (a) of the ARA"*, and *"given the international ramification of the ongoing enquiry"* coupled with the "*high risk of Assets being dissipated",* the Respondent made its application for a Restriction Order, wherein mention was made of its suspicion that "*there might be diversion of funds from Libya to the local bank accounts of Global Businesses."*

It is the Respondent's contention that, in line with the Financial Action Task Force (FATF) recommendations 29 and 30 **(Annex C)** for international standards on combating money laundering and the financing of terrorism and its proliferation, it acted expeditiously *"by identifying, tracing and initiating actions to freeze and seize property that is, or may become, subject to confiscation, or is suspected of being proceeds of crime."*

(Emphasis added)

The question which now arises is whether the above matters relied upon by the Respondent, fall exclusively within the purview of the UN Sanctions Act, as contended by the Applicants, to the extent to say that the FIU (Respondent) has usurped the powers of the NSC under the UN Sanctions Act.

A careful reading of the relevant sections of the specific legislations as reproduced above, clearly shows that those matters as spelt out in the Respondent's affidavit dated 9 May 2023 did fall squarely within the purview of **section 27 of the ARA**. On the other hand, the sanction mechanism under **section 26 of the UN Sanctions Act** can only be activated when the party against whom a freezing order is applied for, is already declared by the Secretary for Home Affairs as a designated party. In the instant case, ex facie the affidavits and annexed documents, it transpires that at this stage, none of the Applicants have been declared by the Secretary for Home Affairs as designated parties.

I do take note of the averments made in the Respondent's affidavit dated 4 July 2023, namely at paragraph 19 that *"since the Applicants are corporate emanations of the State of Libya, it is not established in the accounts and finances of the Applicants whether any outflows may have ultimately been routed back to Libya for the very purposes which have been sanctioned by the UN Security Council in the first place".*

Further, I do bear in mind the statement of learned Senior Counsel appearing for Applicant No.3 that it is not the Applicants' contention that there is an absolute prohibition for the Respondent to apply for a Restriction Order under the ARA for terrorism financing. His contention was that in the present context, it is not a matter of *"terrorism financing simpliciter"* inasmuch as the primary facts triggering the impugned application relate to the implementation of targeted sanctions and that the Respondent's suspicion is based on the fact that the applicants may have dealt with funds controlled by listed entities or may be making funds available to those listed entities. This is what would constitute specific offences under the Sanctions Act.

It was therefore submitted that the correct course of action would have been for the Respondent to disseminate any relevant information to the NSC for the appropriate action to be taken, namely under **section 26 of the UN Sanctions Act** which already provides for asset freeze measures.

However, as already elaborated above, and as matters stand at this stage, I am of the considered view that those averments made by the Respondent cannot, in any manner, be interpreted to suggest that the Respondent, as Enforcement Authority, cannot take any action it deems fit, as it is empowered to do under the ARA, when it has "*reasonable grounds to believe that property involved may be recoverable under section 27 (1) (a) of the ARA*." As aptly explained in the case of **Assets Recovery Agency (Ex-parte) (Jamaica) [2015 UKPC 1],** *"Reasonable grounds for believing a primary fact, such as that the person under investigation has benefited from his criminal conduct, or has committed a money laundering offence, do not involve proving that he has done such a thing, whether to the criminal or civil standard of proof. The test is concerned not with proof but the existence of grounds (reasons) for believing (thinking) something, and with the reasonableness of those grounds."*

Furthermore, pursuant to **section 10 of the FIAMLA** which provides for the functions of the FIU, it is to be noted that over and above its functions (as stipulated in **subsection 1**) of "*receiving, requesting, analysing and disseminating to the investigatory and supervisory authorities, the Counterterrorism Unit and Registrars disclosures of information-*

(a) concerning suspected proceeds of crime and alleged money laundering offences;

(b) required by or under any enactment in order to counter money laundering; or

(c) concerning the financing of any activities or transactions related to terrorism."

the FIU shall also, as per **subsection 2** –

"(a) collect, process, analyse and interpret all information disclosed to it and obtained by it under the relevant enactments;

(b) inform, advise and co-operate with the investigatory and supervisory authorities, the Counterterrorism Unit and Registrars;

……

……

(h) "perform such other functions as are conferred on it under the Asset Recovery Act."

Hence, in its due process of gathering of intelligence and information against transactions which the Respondent reasonably believed to be suspicious, it was perfectly legitimate for the Respondent, as Enforcement Authority, to take the necessary action it deems fit under the ARA, pending the ongoing investigation and enquiry.

The *"national interest"* issue invoked by the Respondent, and contended by the learned Senior Counsel for Applicant No.3, to be a *"pretext"* to bypass the NSC and undermine the rule of law, is a matter best known to the Respondent, which in its capacity as Enforcement Authority, is to all intents and purposes, apprised of matters of highly confidential nature.

Finally, it was submitted that contrary to the ARA, safeguards are provided under the UN Sanctions Act before a freezing order is granted. The prejudice suffered by the Applicants was also stressed upon by learned Counsel for Applicants Nos.1,2 and 4.

However, it is significant to point out that the ARA does provide for safeguards in allowing any *"affected person"* to apply for variation orders, so that statutory and necessary payments can be made to minimize any prejudice which a Restriction Order may cause (**sections 28 and 31 of the ARA**). Further, needless to point out the temporary nature of a Restriction Order, which has a duration of only 12 months after the date on which it was made, and which may be extended to a period not exceeding 3 years only *"on good cause shown"* and if the *"Judge thinks fit to do in the interests of justice"* **(section 33 of ARA).**

In light of all the above, I am of the considered view that the Respondent (**FIU**) as the Enforcement Authority, did act in compliance within the statutory powers conferred upon it under the ARA in applying for a Restriction Order under **section 27 of the ARA**. In so doing, the Respondent has neither bypassed the UN Sanctions Act nor has it usurped the powers conferred to the NSC under the UN Sanctions Act.

Additionally, ex facie the affidavits and supporting documents on record, and taking into account all the above considerations, I am of the view that the Restriction Order applied for and granted to the Respondent, is at this stage, justified in the circumstances of the present case.

I consequently set aside the preliminary issue raised by the Applicants, and accordingly dismiss the present application for the rescission of the Restriction Order dated the 28 February 2023 granted to the Respondent against the Applicants. With costs.

I certify as to Counsel.

K. Bissoonauth
Judge

18 August, 2023

For Applicants Nos 1, 2 and 4	**:**	**Mr S. Mardemootoo, Attorney-at-Law**
	:	**Mrs P. Balgobin-Bhoyrul, of Counsel**
For Applicant No 3	**:**	**Mr S. Mardemootoo, Attorney-at-Law**
	:	**Mr H. Duval, Senior Counsel**
For Respondent	**:**	**Mr N. Ramasawmy, Attorney-at-Law**
		Mr R. Chetty, Senior Counsel
For Third Party	**:**	**Mr S. Jankee, Attorney-at-law**