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| **Attorney-General’s Chambers**  1 Upper Pickering Street  Singapore 058288 | **WITHOUT PREJUDICE**  **BY FAX (28 9000) & POST** |
| *Attn: Officer-in-charge* |  |

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| SENDER'S REF | | RECIPIENT'S REF | DATE | PAGE |
| AGQ/CRM/28/0006 | | - | 8 August 2016 | 1/3 |
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| **Public Prosecutor v Julian (Julian)**  *SC-28-28* | | | |

Dear Sirs,

1. We act for Julian (Julian) (“**Julian**”) in relation to the above matter.
2. **CHARGES**
3. On 28 July 2016, Julian was charged for one offence under Section 67(1)(b) of the Road Traffic Act (Cap 276). The charge is set out below:-
   1. “*That you, on the 28st day of May 2016, at about 4.35 p.m., at along Block 28 Penang Road towards Somerset Road, Singapore, when driving motor car, SJC28E, did have so much alcohol in your body that the proportion of it in your breath, to wit, not less than 48 microgrammes of alcohol in every 100 millilitres of breath, and you have thereby committed an offence punishable undersection 67(1)(b) of the Road Traffic Act, Chapter 276*

*And further, that you, before the committing of the said offence, that is to say that you, on the 28 April 2005 had been convicted at the Subordinate Courts of Singapore, for an offence of Drink Driving under Section 67(1)(b) of the Road Traffic Act, Chapter 276 vide DAC no.: DAC/16504/28, which conviction has not been set aside, and you shall be punished with enhanced punishment under 67(1), Road Traffic Act, Chapter 276.*

1. **MATERIAL BACKGROUND FACTS**
2. Julian is currently 31 years of age and he is married.
3. **MITIGATING FACTORS**
4. In light of the above, we humbly urge your good office to exercise compassion in withdrawing the Charge against our client in consideration of the following factors:-

1. Julian had not been drinking at the time of the alleged offence. His friends, who were in the car with him, can testify that he was the designated driver who was sending them home that day;
2. He was also under medication due to treatment for an injury which caused pain and swelling. This may have contributed to the alcohol content in his body;
3. Julian is deeply remorseful for his actions and apologizes for any inconvenience he may have caused anyone due to the current situation; and
4. Julian has been fully cooperative with the police in relation to the investigations herein and he is willing to cooperate with the necessary authorities for any further investigations.
5. In the alternative, we would be grateful if your good office would consider a non-custodial sentence for Julian and also and not to revoke his licence. He is trying to start a family with his young wife and hopes that he will be given a chance to do so.
6. **OTHER MATTERS**
7. The Officer in charge of this matter is DDT Lee of the Traffic Police. A copy of these representations has been forwarded to the aforesaid prosecuting agency.
8. In the course of making representations, Julian’ attention has been drawn to the provisions of Section 182 of the Penal Code.
9. Julian’ next mention is fixed for hearing on 1st September 2016.
10. We look forward to your favourable response to our representations.

Yours faithfully,

cc client