

## **Legal Notice**

Demand for action in Parliament against bankers, law firms and a corrupt judiciary  
for  
conspiracy to pervert the course of justice, market manipulation and money  
laundering

### **Preamble**

The Parliamentarians to which the responsibility of this document is directed are charged with negotiating terms for the British Exit from the EU. Information herein may put them in a strong position, as they will be able to repudiate any contention of a share of debt from the ECB proposed by the other EU members.

European, British and US banks (Deutsche Bank in particular) conspired to undermine the integrity of the British judicial system – giving themselves unlawful civic immunity from liability for theft from UK investors via market manipulation fraud, and unlawful criminal immunity from the funding of ISIS via money laundering.

Highly incriminating violations of appeal procedure prove that both the Lord Chief Justice and Mr Paul Kernaghan of the *Judicial Appointments and Conduct Ombudsman* were principle offenders - they have facilitated the perversion of court verdicts from the Court of Appeal and from the High Court of Birmingham contrary to the duties of their office.

The Lord Chief Justice, Baron Thomas, has a key position in the *European Law Institute*, a role that should be assessed when it clear he was lax when faced with defendants whose conduct made a mockery of Article 101 of TFEU – European Competition Law. He knew defendants had perverted the verdicts in the Court of Appeal by perjury - perjury that none of the defendants denied. He, along with the other members of the judiciary stated below, knew that German State has given license to Deutsche Bank to defraud the citizens of Europe. He has put the EU agenda ahead of the Rule of Law and ahead of the interests of the British public. Had he done his duty and helped expose Deutsche Bank then the EU and the *European Law Institute* would have been finished and Brexit would not be the patsy for banking solvency issues that were always ready to explode.

To:

**Group 1 – Guilty of bribery, market manipulation and money laundering**

- a) Deutsche Bank,
- b) HSBC
- c) Barclays Bank
- d) UBS
- e) RBS
- f) JP Morgan
- g) Citibank/Citigroup
- h) Linklaters LLC

**Group 2 – Guilty of conspiracy to pervert the course of justice and misconduct in public office.**

- a) Baron Roger John Laugharne Thomas, Lord Chief Justice
- b) Mr Paul Kernaghan of Judicial Appointments and Conduct Ombudsman
- c) Judge Ian Duncan Burnett of the Court of Appeal
- d) Simon Brown QC of the Commercial Court, Birmingham
- e) Lord Charles Haddon-Cave of the Commercial Court, Birmingham
- f) Mr Nicholas Rose of Judicial Appointments and Conduct Ombudsman
- g) Mrs Sarah Murrell of Judicial Complaints Investigation Office
- h) Steve Tai of the Court of Appeal

**Group 3 - Members of Parliament from whom action is requested**

- a) Lord Chancellor Rt Hon Michael Grove
- b) Rt Hon Boris Johnson
- c) Rt Hon Chris Grayling
- d) Rt Hon John Whittingdale
- e) Rt Hon Theresa Villiers
- f) Rt Hon Theresa May
- g) Rt Hon Jeremy Lefroy

From:

I, the claimant, Mark Anthony Taylor of Kalamata, Billington Lane, Derrington, Stafford, Staffordshire, ST18 9LR. Email: [mark.anthony.taylor@gmail.com](mailto:mark.anthony.taylor@gmail.com).

### **Summary of Claim**

1. All members of Group 1 did conspire to pervert the course of justice by (i) perjury in their submissions to the courts in their defences to accusations of precious metal price manipulation and money laundering, and (ii) bribing, or otherwise compromising the office of the court officials who comprise group 2. Linklaters, as primary lawyers for the guilty parties were clearly in a position to understand that their clients had unlawful advantage in the courts and that the verdicts were perverted by judicial misconduct.
2. All members of Group 2 did conspire to pervert the course of justice by (i) egregious violations of human rights to a fair trial on multiple counts, (ii) dishonest misrepresentation of evidence, (iii) conspiracy to suppress the transcript in which judicial misconduct was evident, (iv) deliberate failure to follow the correct appeal procedure with the aim and function of perverting the appeal verdict, v) deliberate misrepresentation of law, ignoring the Enterprise Act of 2002 and Competition Act of 1998. It is entirely a false and fraudulent narrative that market manipulation is legal and carries no liabilities in UK law. It is clearly unlawful, unjust, fraudulent and injurious to counterparties and should yield compensation to everyone damaged. Suppression of the court transcript was also a violation of the Freedom of Information Act 2000.

### **Basis of the Claim**

Defendants were accused of market manipulation and of destroying Over-The-Counter precious metal trading receipts in lawsuit *B40BM021 Taylor vs Jain et al.* filed in the first half of 2015 and heard by Simon Brown QC on 16 July 2015. Recent events have vindicated the key claims in the lawsuit that was denied by all the defendants. The transcript of that lawsuit is being suppressed by Baron Thomas and Mr Kernaghan without explanation. Since Judges Haddon-Cave and Judge Barnett gave verdicts on the appeals to Simon Brown's hearing without having a copy of the transcript, when the allegations in the appeal are of judicial misconduct, then they failed to properly follow appeals procedure - in which transcripts must be filed before appeals can proceed. Since Barnett and Haddon-Cave had conspired to suppress the transcript and act without it in advance of their hearings they do not qualify for judicial immunity to the matters alleged. Simon Brown's refusal to answer letters from me in advance of the hearing, in which I demanded to cross-examine applicants to an oral hearing is misfeasance before the hearing with the aim of sabotaging the lawsuit.

### **How to determine who is corrupt with one question.**

It is a litmus test of misconduct in public office for anyone with the authority to force issue of the transcript to *B40BM021* to be asked to issue it. To refuse to do so, or refuse to discuss the matter is clear indication of corruption. It is the means by which we can follow the trail of conspiracy from Simon Brown to the office of the Lord Chief Justice. By applying that test we can identify which parties in the British government conspire with the defendants to manipulate precious metal prices, against the interests of British investors, and to facilitate the funding of ISIS.

### **Latest press releases prove perjury by the defendants in Group 1**

Consider the Reuters news articles, in which Deutsche Bank have paid a fine for money laundering:

1. <http://www.reuters.com/article/us-deutsche-bank-bafin-idUSKCN0ZA1YG>
2. <http://www.reuters.com/article/us-deutsche-bank-fca-idUSKCN0XS1JX>

The facts of these two articles are not denied by Deutsche Bank, so it can be taken that not only had they lax controls against money laundering, but they had actively destroyed transaction logs for such laundering and, as the FCA asserts, such laundering has enriched terrorist

organizations - almost certainly ISIS.

Deutsche Bank are also guilty of precious metal price manipulation, by their own admission (<http://www.bloomberg.com/news/articles/2016-04-13/deutsche-bank-settles-silver-price-fixing-claims-lawyers-say>) having settled in New York in lawsuit *London Silver Fixing Ltd. Antitrust Litigation, 1:14-md-02573*. In response to that lawsuit they tried, unsuccessfully, to have the claim dismissed on the grounds it was a nuisance action. The strike-out attempt was entirely dishonest and vexatious – as proven by their settlement to the claimants in the lawsuit – in which they not only admitted guilt, but exposed the co-defendants in the conspiracy.

### **New York Settlement Implies Fitschen of Deutsche Bank Committed Perjury**

The New York settlement is contrary to the submissions of Jürgen Fitschen of Deutsche Bank in Frankfurt Landgericht court case *Taylor gegen Fitschen 32C 1953/14 (72)* and explains why Fitschen refused to attend court, and refused to confirm or deny the bullion trading receipts issued to that court. Judge Lorenz's refusal to consider the evidence that Deutsche Bank's 19 June 2014 audit was fake is enough for any jurist to find Fitschen guilty of having bribed the German courts. If Lorenz had forced disclosure of evidence for the audit then we would not have had to wait till 2016 to discover Deutsche Bank's manipulation. Fitschen had to have known that the issue was being litigated in Britain, and so helped pervert two court cases. The facts that led to the contest of the audit were also forwarded to BaFin, Frankfurt and Munich prosecutors who appear to have ignored all allegations without explanation. Given that Deutsche Bank were under investigation by BaFin for gold price manipulation at the same time I was alleging its audits were fake, and backed up the allegations with correspondence from Deutsche Bank that contradicted their public disclosures, one would have expected a pro-active response. Copies of the letters sent to the German authorities were sent to the FCA and to the SFO among other parties. So there can be no question that the German State helped Deutsche Bank fake its gold manipulation audit and kept Deutsche Bank's precious metal price manipulation secret. There can be no question that the two heads of BaFin over the period of manipulation conspired to undermine their field agent's investigations. On the morning that Deutsche Bank were served with the lawsuit in London, BaFin closed the gold manipulation investigation against the bank. Any law agency should be interested in the timings of the email in which the claim was served against the phone records to BaFin from the executive of Deutsche Bank on the same day. It is highly likely that BaFin closed the investigation immediately after such a phone call from Fitschen or Anshu Jain (Jain being the other co-executive of Deutsche Bank).

### **Simon Brown's Hearing And the Case of the Missing Transcript I**

Money laundering was brought to the attention of the Commercial Court in the hearing under Simon Brown QC for claim B40BM021 held on 16 July 2015. Deutsche Bank had refused to submit receipts for precious metal price transactions, even though such were the basis of litigation against them. The other defendants, the banks in Group 1, saw no issue in a defendant that neither denied that it had traded bullion or provide receipts for such transactions while denying receipts were adequately particularized. The judge, rather than admit the obvious, that defendants had produced a collusive and unbelievable bare denial, dismissed the collusion and non-admission without explanation. Accountancy fraud – yielding money laundering fraud - was articulated in part 9 of the *Common Elements in the Replies to All Defendants* document supplied to the court and to the defendants before the hearing. When the FCA accuse Deutsche Bank of destroying receipts to avoid liability for money laundering, and Deutsche Bank refuse to issue receipts for the bullion traded that I had alleged in my lawsuit, it becomes an inescapable conclusion that the receipts were almost certainly destroyed as part of the money laundering accountancy fraud. That the co-defendants accepted Deutsche Bank's reticence, in a lawsuit that could result in extreme liabilities against all defendants, is proof that they are part of the cartel. No innocent defendant would put its faith in a defence provided by an independent party that is so deficient to the point of not even admitting it has traded with the claimant.

The attempts of the Lord Chief Justice and the head of JACO to bury the transcript of Simon Brown's hearing is corruption at the highest level for the benefit of the banking cartel. It implies that Simon Brown had Baron Thomas' consent to rig the hearing in advance. Had the Court of Appeal been allowed to do an honest job, back in September 2015, when Master Bankroft Rimmer agreed to procure the transcript at public expense, we would have been made aware that Deutsche Bank had laundered bullion to terrorists, and we may have had the intelligence to intercept the Parisian bombers before they had attacked. Whatever the details of the corruption, Simon Brown has blood on his hands and the transcript that proves him guilty of misconduct is suppressed by the Lord Chief Justice himself.

### **Charles Haddon-Cave's Hearing and the Case of the Missing Transcript Part II**

In a set-aside hearing sat by Charles Haddon-Cave, on the 21<sup>st</sup> of October, in the Commercial Court of Birmingham, the issue of money laundering was raised again. This is seen in part 6 of the skeleton argument supplied to Haddon-Cave. The basis of that hearing was that UBS, one of the defendants, had confessed to the US Department of Justice that they had manipulated the prices of precious metals and had blown the whistle on the other defendants in return for immunity. This amounted to perjury, as they had denied such manipulation in their submissions to Simon Brown's hearing. None of the defendants turned up for court with a witness statement.

When I protested this to the judge, he kept interrupting me, even though he had given me leave to open the hearing with the first submission, and my first submission was merely to point out that counsel were not arguing for anything their clients had pleaded. His interruptions led to me to demand his recusal, which he refused without explanation.

Later in the hearing, Charles Haddon-Cave had deemed my allegations against Simon Brown as scurrilous, even though no transcript had been filed by me, or the defendants. Thus he made a biased judgement with no factual reference. He also claimed that UBS's confession was submitted as part of Simon Brown's hearing. The transcript would show otherwise, and the confession was delivered to the court via a Bloomberg article that post-dated Simon Brown's hearing. Thus Haddon-Cave's stance was counter factual – dishonest, and his refusal to force UBS to disclose the content of its confession was obstructive, the aim and function was to protect UBS from liabilities for perjury. Again, if Haddon-Cave had done the job he is paid to do, the Parisian bombings may have been averted – and we would have known that Deutsche Bank and others were manipulating markets in the Autumn of 2015 rather than the Spring of 2016.

### **Ian Burnett and Case of the Missing Transcript Part III**

On the 18 February 2016 08:44 I sent an email to Steve Tai of the Court of Appeal, asking for a copy of the transcript to Simon Brown's hearing. I had been waiting since September 2015 for the transcript, after Steve Tai had asked me to submit a request to the Court for the transcript to be commissioned at public expense. On the very afternoon that the Court of Appeal received the email Lord Ian Burnett refused me permission to appeal to the hearings of Simon Brown and Haddon-Cave, and refused an oral appeal to his own court orders. He had ignored every point in the Grounds for Appeal for both appeals. He made absolutely no reference to the transcript of either hearing. Why was the transcript commissioned at public expense if it was irrelevant. Why did the Court of Appeal insist that the transcript has to be filed before the appeal can advance and then go on to advance it the moment that transcript is requested for filing. The answer is plain – Lord Burnett knew that the transcript had to be suppressed – that the record of Simon Brown's hearing had to be kept secret from me to protect Deutsche Bank from its liabilities. Thus Lord Burnett implicated himself in conspiracy.

### **JACO, JCIO and the Missing Transcript Part IV**

Mrs Sarah Murrell was tasked to handle a complaint against Simon Brown for judicial misconduct – since he had shown complete bias and numerous violations of the Litigants-In-Person Equal Treatment Bench Book. She refused to study the transcript of the hearing for proof of bias, ruling it as inappropriate to judge bias to study the transcript in which such bias is verified. She also explicitly stated that she refused to follow the complaint on what she 'imagined' was in the body of the complaint. She had refused to read the complaint in full and ruled in favour of Simon Brown.

Nicholas Rose was tasked by the former ombudsman of the JCIO to investigate Mrs Sarah Murrell for negligence. After three months of 'investigations' he concluded there was no case to answer, and he likewise also refused to consider the transcripts.

### **The Lord Chief Justice, JACO and the Missing Transcript Part V**

In five separate letters to the Lord Chief Justice, I demanded the transcript of Simon Brown's hearing. I had informed the Lord Chief Justice of the events that had transpired after Lord Burnett's appeal judgement – including Deutsche Bank having settled the allegations I made against them in the New York lawsuit, and the issue of money laundering that had been discovered by the FCA. While he said that he had listened to my accusations and taken them into consideration he completely stonewalled my demands to see the transcript – instead advising me to talk to JACO. JACO had been Cced on my correspondence to the Lord Chief Justice, and never bothered to reply to my emails. In the end I sent a join letter to both the Lord Chief Justice and Paul Kernaghan of JACO, showing Mr Kernaghan that the Lord Chief Justice had instructed me to go to JACO. Mr Kernaghan's reply was to say that he would ignore my allegations, to instruct me that he would be ignoring future correspondence, and also to make no issue of the transcript. He would not say whether or not it existed. I copied the reply to the Lord Chief Justice, Paul Kernaghan, and a number of independent recipients, challenging JACO and the Lord Chief Justice as collusive and corrupt, and explicitly stating that the transcript was suppressed by their collusion. There was no denial. There is no response from any member of the Court of Appeal.. There is no denial that Lord Burnett's court orders were entirely unlawful, unjust and immaterial. Nobody is willing to stand in defence of Lord Burnett or his so-called 'court orders.'

### **Range of the Conspiracy**

The restraining order the defendants won against me constitutes libel and is a severe restriction of my civil rights. All of the boards of the defendant banks were in a position to know that their counsels were supplying dishonest pleadings, when they signed off the briefs. All of the counsel were likewise collaborators, because nobody with any legal knowledge would believe a judge who declares demands to cross-examine applicants to an oral hearing as vexatious. Linklaters, the law firm who organized the defence, had to understand judges were compromised when Haddon-Cave allowed them to argue without having submitted written witness statements before the hearing – that is - argue without liability. The larger part of the conspiracy had to occur before the hearings, thus no party has judicial immunity as a defence.

### **Damages & Remedy**

1. Since not a single board member of any of the banks involved would contest the libel against me, or expose the corruption of the judges involved, then all are guilty of libel, and all conspired to pervert the course of justice. Thus conspiracy to manipulate precious metal prices is a fraud of all members of all the boards of the banks involved in the litigation. I demand 40kg of platinum bullion from each of the members of Group 1. Should any of Group 1 go insolvent, then I shall be perusing all board members involved for their share of the damages. For every month that I am denied compensation another 10kg of platinum in debt should be added as interest. Bullion is chosen as a means of payment because all defendants have undermined the value of currency in their extensive market manipulation frauds.

2. All of the office holders in Group 2 need to resign at the very least.

3. All court orders and verdicts against me should be annulled as 'scurrilous, unlawful, counter-factual and unjust.'

4. The law that allows litigants to be deemed vexatious needs to be changed, so that such a restraint needs a majority from a jury to effect.

5. Banks have proven themselves to have issued a restraining order maliciously and fraudulently, and this should be deemed vexatious behaviour, and reason to outlaw all future applications for strike-out of market manipulation lawsuits against them.

### **Further Evidence**

This document was completed with haste in response to the result of the Brexit referendum, and I understand that the MPs involved will be busy and have other duties and be unwilling to read a full set of legal documents that constitute the evidence for the claims above. For expediency, it should be enough for any responsible authority to demand from the Lord Chief Justice a transcript to *B40BM021* and gauge his response. Alternatively one could contact Simon Brown directly and ask him why a restraining order stands against me for suing Deutsche Bank for silver price manipulation when the bank has confessed to such manipulation in another lawsuit. Why was Anshu Jain allowed to get away with refusing to attend the oral hearing for which he applied. Ask Deutsche Bank for proof that the audit they published via Reuters on 19 June 2014 was substantial. Ask them for a copy of the bullion trading receipts with me. Ask Haddon-Cave and Burnett why they dismissed my claims of misconduct against Simon Brown without a copy of the transcript of Simon Brown's hearing. There is no excuse for any authority not to ask these basic questions of the individuals involved. It is no wonder Burnett refused me an oral hearing – he had no honest answers. The government needs to know the full details of the confessions of Deutsche Bank and UBS regarding silver price manipulation and the full extent of Deutsche Bank's money laundering and the subsequent cover up. The information needs to be made public.

Signed

Mark Anthony Taylor - 27 June 2016.