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2 May 2016

Dear Baron Thomas,

thank you for your previous mail. First I wish to inform your office that I mailed Mr Paul Kernaghan as directed, so that he can instigate an investigation. My previous emails to your office were CCed to JACO, which automatically responded to say there would be a reply after five days. However nothing has come of those emails. I hope that Mr Kernagan responds this time, and I would therefore ask you to make sure he does his lawful duty.

Now the second issue is to inform your office of an important press release from the Financial Times regarding FCA measures against Deutsche Bank for money laundering. Issues of Deutsche Bank's money laundering arose under the hearing held by Simon Brown QC, was further addressed in the application notice to Lord Haddon-Cave and in the appeal documents that were handled by Lord Burnett.

I copy the first three paragraphs of the appropriate article from the Financial Times online:

Deutsche Bank has “serious” and “systemic” failings in its controls against money laundering, terrorist financing and sanctions, according to confidential findings by the UK’s financial watchdog, which had already put the lender in supervisory “special measures”.

The Financial Conduct Authority conducted an in-depth review last year that found a catalogue of shortcomings at the bank, ranging from missing documents and a lack of transaction monitoring to inappropriate pressure put on staff to take on certain clients. The watchdog has now ordered a separate independent review, according to a recent letter sent by the FCA to Deutsche.

“Our overall conclusion was that DB UK had serious AML (anti-money laundering), terrorist financing and sanctions failings which were systemic in nature,” said the FCA’s letter, dated March 2. “Effective senior management engagement and leadership on financial crime had been lacking for a considerable period of time.”

I have underlined points of interest. They should concern your office because in my briefs to the court I accused Deutsche Bank of unreasonable reticence - it refusing to disclose its copy of my bullion trading receipts, some of which it had contested when I sued Jurgen Fitschen in the Frankfurt courts. I recently demanded it respond to a Notice to Admit Facts, appended to this document, to which it refused to reply in a probative manner. This was issued as it now is apparent, with the settlement in New York, that Deutsche Bank submitted fraudulent documents to the High Court and Court of Appeal.

I know enough of civil law to know that forcing a defendant to disclose its copy of receipts against which fraud is alleged is meant to be straight-forward. So when Simon Brown allowed defendants to get away without even having to admit having traded with me, I knew that any honest party would deem that damning – a collusion between counsel, defendants and the judge.

I had raised the possibility in the hearing sat by Simon Brown QC, that the reason DB had refused to disclose the receipts, and the reason the other defendants showed no interest in the receipts was for the possibility that it no longer had a copy of those receipts, that they had been destroyed as a result of Deutsche Bank's systemic destruction of its Over-The-Counter (OTC)

bullion history. This was presented as a possibility in Simon Brown's hearing when it became news that Deutsche Bank had helped Russia avoid sanctions by facilitating money laundering. Gold was trivial to buy OTC in Germany via DB, and the bullion can be shipped across borders and melted down and recast as new bullion bars. It is known that both Russia and ISIS trade in gold.

Simon Brown's refusal to force Deutsche Bank to disclose its receipts, as I had expressly demanded, Lord Haddon-Cave's refusal to recognize DB's obstruction, and Lord Burnett's whitewash of the matters as 'lack-of-particularization' is *prima facie* unreasonable. The matter would have been resolved without contention had Simon Brown forced DB to disclose the receipts. Had they refused a court order, Anshu Jain would have had to explain why. The court, by thus granting unexampled laxity to the defendants, to keep receipts a secret, without admission or explanation, aided DB to launder money. Such a vector could easily be used by ISIS via gold shipments from Germany through Turkey and then into Syria and Iraq. So without question three British judges have allowed defendants to get away with financing terrorists and financing crime syndicates for at least ten months.

There never was an honest explanation of why Deutsche Bank refused to disclose receipts, no honest explanation why the judges allowed them to get away with such a refusal, and no honest explanation why my demands for public information disclosure regarding the transcript of Simon Brown's hearing is stonewalled by the Court of Appeal.

I append a copy of the skeleton argument supplied to Lord Haddon-Cave. This was delivered to the Birmingham High Court by email, with Google timestamp Fri, 16 Oct 2015 14:49:11 +0100. Please note paragraph 6. Lord Haddon-Cave was instructed that DB refused to disclose receipts and the other defendants had no interest in seeing them. If you remember, Lord Haddon-Cave allowed all the defendants to get away with not having to submit witness statements before the hearing – without explanation – and then went on to refuse recusal – without explanation. He deemed the accusations against Simon Brown as 'scurrilous' – without having a copy of the transcript of Simon Brown's hearing.

Do you think it appropriate that the High Court or Court of Appeal judge in matters of terrorism and money laundering while its own officials conspire to keep a transcript secret that shows judges are guilty of these most despicable classes of crime? I hope you agree that such matters require investigation and such investigations require celerity, and so the next response from your office should take less than a month.

I formally demand that you force the Court of Appeal to release the transcript, which was made at public expense to Simon Brown's hearing - I should not have to ask three times.

Since the courts have been used to help DB and its CEOs unlawfully and unjustly avoid exposure for funding terrorism I will send a copy of the letter to a number of anti-terrorist organizations across the UK. Any further reticence in releasing the transcript exposes your office to accusations of complicity in these crimes. I send a copy to the FCA and remind the FCA that Simon Brown deems references to their DB reports as 'vexatious' when used in market manipulation lawsuits against DB.

Yours sincerely

Mark Anthony Taylor

Two appendices follow as stated above

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
BIRMINGHAM DISTRICT REGISTRY

Claim No. **B40BM021**

Date: 15th October 2015

BETWEEN:

MARK ANTHONY TAYLOR, The Claimant (Litigant-in-person)

-and-

- 1) ANSHU JAIN (FORMER CO-CEO OF DEUTSCHE BANK)
 - 2) DEUTSCHE BANK AG
 - 3) HSBC PLC
 - 4) BARCLAYS BANK PLC
 - 5) UBS AG
 - 6) JPMORGAN CHASE BANK, N.A.
 - 7) CITIBANK N.A., LONDON BRANCH
 - 8) ROYAL BANK OF SCOTLAND GROUP PLC
- The Defendants

**Skeleton Argument of Mark Anthony Taylor
For Set Aside of CRO, Costs & Other Matters
For Hearing on 21st October 2015.**

1. The hearing was announced at short notice, so I do not believe I have time to file an evidence bundle on all parties. The evidence has already been delivered by email to the defendants, in the form of the 11 page application notice dated 4th October 2015.
2. For expediency the judge need read only the following documents before the hearing: the Bloomberg report of UBS's confession to precious metal price manipulation and UBS's written defence.
3. An in depth study is quite involved, and would require study of all defendants' defences; replies to the defences; the three notices to admit facts; the FCA reports for FX and Libor manipulation against HSBC and Deutsche Bank; the BaFin report against Deutsche Bank and Anshu Jain for Libor manipulation; and the full body of the Particulars of Claim.
4. I believe it is the High Court's responsibility to set aside a verdict where it is found that defendants lied to pervert that verdict. From what I have studied, the Appeal court is mainly concerned with unlawful or unjust rulings, and - particularly in the case of civil litigation - is not so interested in new evidence. Thus an issue of *perjury discovered after the verdict is made* should be raised in the High Court and not in the Appeal Court. The Appeal procedure, using three Appeal judges is likely to be more expensive than a High Court hearing, and so would be a more costly remedy for all parties concerned.
5. As is seen in the evidence supplied to the court in the application dated 4th October 2015, Bloomberg reported that

UBS has admitted guilt to precious metal - 'PM' - price manipulation. The confession was made to the US Department of Justice - the 'DoJ' - and UBS 'blew the whistle' on a number of the other parties. This report was not contested by the defendants, either in the form of a libel lawsuit against Bloomberg, or a public announcement by UBS asserting the contrary, or even in the form of a positive denial to the High Court. As trier-of-fact, I think the court should therefore deem the Bloomberg allegations as factual. None of the other defendants have so far denied that UBS made such a confession, nor did they deny that UBS have exposed them.

6. Given that UBS and others are guilty of PM rigging, then their refusal to accept service, as is seen in their defence, while having obviously being served, as is also seen in their defence, is explained as evasion and dishonesty by a party that wishes to avoid criminal liability for perjury. HSBC's defence was very similar. The other defendants mirror Deutsche Bank's bare denial. Since UBS are whistle-blowing a cartel conspiracy involving Deutsche Bank, it is thus explained why defendants who are ostensibly separate competing businesses create a collusive defence that assumes Deutsche Bank's innocence in a market in which the competitors trade. No defendant has, for example, demanded to see Deutsche Bank's audit - the audit I claim to be insubstantial. No defendant has demanded to see Deutsche Bank's receipts - the receipts I suggested they may have destroyed as part of their Russian drugs money laundering activities. Given that UBS know that Deutsche Bank rig the PM prices, they would know that the PM audit had to be faked, as fake as the audits that involved Libor rates - audits under the control of Anshu Jain, the first defendant. Anshu Jain and his witness Emma Slatter refused to turn up for the July hearing. Given UBS's confession, we know why - none of them were prepared to answer questions to substantiate the audit, because there was no substance.
7. The dishonesty is consistent with the dishonesty in the defendants' communications to the regulators, as referenced in the *notices to admit facts*. The defendants have proven to be recidivist liars, not just towards regulators, but also to the High Court.
8. The defence of all defendants constitutes evasion and bare denial, with little to no factual matter. If the defendants had been honest and explained the details of their manipulation, we would be able to assess, for example, how supply to and from the UK was distorted, and so would be able to particularize transgressions against the 1998 Competition Act involving unlawful supply control. By hiding the facts, the defendants make it hard to assess which laws were broken - but we know at least one law that was broken - the Cartel Offence prohibition of the Enterprise Act of 2002. The defendants concealed the degree and range of frauds they perpetrate and thus should not be allowed to argue against standing.
9. Having identified market manipulation fraud, the fake audit

of that market participation, and the parties most responsible for that fraud, it is absurd to be labelled vexatious. I request that the CRO against me be annulled, the costs of the defence annulled, and my costs I presented in the July hearing be awarded to me.

10. The defendants are guilty of the key allegations made against them: the defendants have manipulated the price of precious metals and conspire to keep Deutsche Bank's insubstantial audit from the court's forensic scrutiny.
11. Materials were traded in a market Deutsche Bank's cartel rigged, then I, as an innocent counterparty, were subject to damage of market manipulation fraud, which is outlawed by anti-competition laws.
12. The defendants having issued a bare denial, together with their history of dishonesty, evasion and recidivism, have invited summary judgement.
13. The defendants failed to contest damage assessment in the July hearing that was argued via quantification of free market prices by comparison of metal abundance ratios to rigged price ratios. Since the damages were not legally contested, and no other party may provide a defence for the defendants, other than the defendants themselves, I believe there should be no mitigation of damages.
14. For stress, poverty and libel against me I also demand extra damages. The defendants conspired to ruin me to prevent my exposé of their crimes.

I, Mark Anthony Taylor, believe everything in his document is true.

If this document was served electronically by email, the email credentials may serve as a legal signature.

Signed _____ Mark Anthony Taylor
October 2015

Notice To Admit Facts

In the Court of Appeal no. A2/2015/2818
Claimant: Mark Anthony Taylor
Defendant: Deutsche Bank

I give notice that you are requested to admit the following facts or part of case in this claim:

1. Deutsche Bank are a defendant in US lawsuit London Silver Fixing Ltd Antritrust Litigation 14-MD-2573 under Judge Valerie E Caproni.
2. In that lawsuit Deutsche Bank were accused of manipulating the price of gold and silver.
3. Deutsche Bank have settled and paid money or promised to pay money to the claimants in that lawsuit..
4. Deutsche Bank have promised to expose its other collaborators in the cartel in that lawsuit.
5. If Deutsche Bank were manipulating the price of precious metals then its internal audit - as publicized by Reuters - had to be fake.
6. Anshu Jain and Emma Slatter and the board of Deutsche Bank have covered up a fake audit.
7. In the hearing under Simon Brown QC and in its defence documents Deutsche Bank pleaded that the audits were genuine.
8. No evidence that the audit was authentic was supplied to the court.
9. Deutsche Bank and Anshu Jain potentially misled Simon Brown QC, Lord Haddon-Cave and Lord Burnett and so falsely obtained a Civic Restraining Order against me and unjustly perverted the results of the two hearings and the application to get permission to appeal.
10. The cartel activity was a criminal conspiracy as outlawed by the Competition Act of 1998 and Enterprise Act of 2012.
11. Defendants and their counsel argued that the claim should be struck-out as a fanciful conspiracy theory when they were knowingly part of a conspiracy to commit fraud as stated in the allegations in the Particulars of Claim.
12. Deutsche Bank tried to get London Silver Fixing Ltd Antritrust Litigation 14-MD-2573 struck out on the basis it was a 'nuisance lawsuit'.
13. Settling one claim while having another struck out, while both make the same allegations constitutes duplicity and contempt of court.
14. Deutsche Bank traded precious metals with me through my current account with them and has a full set of receipts.
15. Defendants have tied up two years of life in litigation when they should have been honest and settled.
16. Counsel for the defence were in a position to know their own clients were committing frauds and perjury.
17. The other collaborators in the cartel include at least some of the co-defendants in A2/2015/2818.
 1. Defendant 3 is a collaborator in the cartel'
 2. Defendant 4 is a collaborator in the cartel'
 3. Defendant 5 is a collaborator in the cartel'
 4. Defendant 6 is a collaborator in the cartel'
 5. Defendant 7 is a collaborator in the cartel'
 6. Defendant 8 is a collaborator in the cartel'
18. The other collaborators in the cartel include all of the co-defendants in A2/2015/2818.
19. Deutsche Bank and Anshu Jain refused to issue witness statements to Judge Haddon-Cave's hearing to protect themselves from further accusations of perjury as the exposure of Deutsche Bank's cartel's manipulation of precious metal prices was inevitable.
20. The restraining order issued against me constitutes serious criminal libel, an abuse of process and is entirely absurd and unwarranted and should be revoked.

I confirm that any admission of facts or part of case will be used in this claim

Signed

Mark Anthony Taylor - 18 April 2016