

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

**Witness Statement of Mark Anthony Taylor
In Support of Set Aside of CRO, Costs & Other Matters
For Hearing on 21st October 2015.**

1. I, Mark Anthony Taylor, the claimant, am a former employee of Crytek GMBH of Germany. My first job was working at the Atomic Weapon Establishment, for which I required Top Secret security clearance. This clearance is not given to candidates who have a history of mental instability or corruption.
2. My research into market manipulation following the July 16th hearing uncovered a news article in which Bloomberg alleged that UBS confessed to precious metal price manipulation to the US Department of Justice and blew the whistle on other members of the cartel including Deutsche Bank, HSBC and Barclays Bank.
3. I have not seen anything from UBS or the other defendants to believe that Bloomberg were in error and so I believe Bloomberg's allegations are matters of fact. UBS and their counsel are aware that these allegations may be instrumental in the set aside application, as can be seen in the CC entries of the email records that were delivered to the court for the 4th October application notice. UBS and the other defendants have in no way denied the allegations in response to that application notice. They are also aware that following these allegations, were allegations by me of dishonesty in their defence and dishonesty in the July hearing, and I have seen no denial of dishonesty thus far.
4. I am in the process of seeking permission from the Court of Appeal to appeal the verdict from the July hearing


heard by Judge Simon Brown QC. Most of the grounds for the appeal are those that derive from judicial misconduct. There is also a JCIO investigation into the hearing that is ongoing. That the investigation is ongoing was related to me by email on 16th October from the JCIO. UBS's confession emerged after the appeal documents and JCIO complaint were filed. The set aside application to the High Court was initiated on the advice of officials from the Court of Appeal, in order to stay costs, which is standard procedure in the appeal process. As news of UBS's confession emerged, I believed it was appropriate and efficient to vary the application to set aside the costs to include the evidence of the confession, which in itself I believe is not just reason to stay the costs, but to set aside the entire verdict and court orders that emerged from the July hearing.

5. Given summary judgement, then for the purposes of evaluating damages, I will assert the following:
 - a) Receipts for bullion purchases and sales were given to the Frankfurt court in my lawsuit against Juergen Fitschen, former CEO of Deutsche Bank. In that lawsuit, he denied the validity of a receipt on the basis it had no signature. I thus gave permission in this Claim **B40BM021** for Deutsche Bank to supply its own copy of the receipts to the other defendants, so this objection would be irrelevant. There was no denial from Deutsche Bank that the materials I said that I bought and sold were anything other than what I claimed. Having supplied my bank account details via which bullion was traded, there is no good excuse for Deutsche Bank to contest the amount of materials traded, or find issue with the particularization of those materials. It knows the particulars.
 - b) No defendant has asked Deutsche Bank for its copy of the receipts.
 - c) Given that bullion traded was quantified, and the defendants have not accused me of fraud, and have the means to validate the quantities asserted, there is no legal contest against the quantities asserted in the Particulars of Claim.
 - d) In the Particulars of Claim, damages were assessed by evaluating the free market price of precious metals in terms of the relative abundance of metals. The argument was not contested by the defendants, and so there is no legal challenge against the level of damages for which I argued.
 - e) The defendants conduct has caused me stress and poverty, and the CRO filed against me equates to damaging libel in a public document won by the defendants' fraudulent dishonesty. I believe extra damages are appropriate, otherwise the defendants face no deterrent for repeating the same dishonest behaviour in future court cases. The level of these damages should be enough that exact quantification of bullion sale losses is irrelevant.
 - f) The defendants, with their costs, intended to bankrupt me, and together with the CRO, thus ruin me.

g) I attach the appeal documents in the email to the court, in which this witness statement was delivered, in case the court needs them for evaluation of the merits of the application.

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
16 October 2015