Kalamata,

Billington Lane,

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Stafford,

ST18 9LR

11 Oct 2021

To the Birmingham Mercantile Court

Application for Court Order in the case B40BM021 and summary of the evidence.

Taylor vs Jain

I request that defendants be ordered by the court to respond to all the Notices to Admit Facts issued to them.

1. In late 2014 I began litigation against Anshu Jain, former CEO of Deutsche Bank, and his co-defendants (Deutsche Bank, JP Morgan, Barclays, HSBC, UBS, RBS and Citigroup. This was struck out in 2015, after petition from all defendants on the basis that the claim of gold price manipulation was 'a fanciful conspiracy theory' and 'totally without merit'.
2. Subsequently in 2017 I made a request to re-open the case, as new evidence emerged in the press. When I did this, the CEO of Barclays Bank, Jes Staley, made threats to shut down my litigation. Subsequently I discovered materials leaked to the Daily Mail from the Treasury Select Committee that showed Staley had won his position at the bank by having his friend, Jeffrey Epstein, blackmail Parliament. I had a FOIA response from Parliament in the same time period that showed that Parliament and the Daily Mail had misled its readers, presenting a false narrative of the TSC intending to hold Staley accountable.
3. To this day the TSC has **not** challenged Staley, contrary to the quotes in the DM's article from John Mann and Mark Garnier. Both Mann and Garnier refused to comment to either myself or my former constituency MP, Jeremy Lefroy. Mel Stride MP, chair of the TSC, refuses to release the blackmail material. I think an honest judge would issue a court order to Stride to issue the material to the court, or make it public domain.
4. Judge Worster of the Birmingham Court ordered that the defendants file a witness statement in their defence, as evidence I provided showed they had misled the court in 2015. This order was countermanded by Judge Martin McKenna, but a court hearing did take place, without the banks having to file anything in their defence. I was not instructed what the hearing was for until it was almost over. Having only an hour to put my case, I did expound that Staley was obviously corrupt, and had corrupted officials to get where he was – but I was not given time to cross examine the defence counsel, nor was I given time to criticize the defence documents on a forensic basis. Worster did not find in my favour. I contested the legality of the costs, which were awarded to third parties, to be collected by

Anshu Jain, treating the hearing as some kind of improvised, and unlawful substitute for a proper libel case – I thus demanded the recording of hearing. Worster refused. Within a week all defendants dropped the costs.

5. In 2019 John Leo Farry, General Counsel for Deutsche Bank, applied to Judge Worster for a restraining order to prevent further court action. This was without a hearing or giving me any time for a written defence. Worster granted it for two years. Immediately after signing off on the court order my email address was put on the courts' blocked list. This was after Worster claimed I could re-open the litigation if new evidence emerged.
6. In the years between 2015 and the current date enough information has materialized to demonstrate that all defendants lied their way throughout the court case and unquestionably judges were corrupted to get their court orders signed off. We will see how this links to Anshu Jain corrupting the inquest for the death of William Broeksmit, and it is also likely that co-defendants and associated parties were quite possibly involved with the murder of Gareth Williams – 'The Spy in the Sports Bag'. Jain seems to have incriminated himself quite severely.
7. At the very least the defendants and corrupt judges have done their best to hide disclosure of materials that could have been crucial in resolving the case of Gareth Williams, since Deutsche Bank's materials should have shown who was on the receiving end in Estonia, date and times of shipments and so forth. This could be compared by security services with materials in William's research domain.
8. Here I summarize the new evidence – some of it predates the court case by a number of years, but the defendants and the press did their best to make sure it was not disclosed to the court and hidden deep from public view:
    a. As reported by Reuters in January 2021 Deutsche Bank was found guilty of spoofing the precious metal market by the US DoJ. In the same court action they were also fined for bribing foreign officials.
    b. Former Judge Simon Staley Brown QC, was found against in three separate appeal hearings for misconduct and perverse judgements. In the final appeal three judges more or less implied he had taken bribes from the richer party to sabotage the case against an indigent counterparty. This was exactly the pattern I alleged against him in my appeal documents. He was known to the press as the 'Copy and Paste Judge' for he would take a wealthy party's statement, and paste it as his own conclusion, giving such a party exactly what they wanted without compromise. The final appeal came after Lord Burnett had claimed my allegations again Brown were scurrilous. If Burnett had taken my allegations seriously and Brown removed from office, he would not have been in a position to further deliver perverse verdicts against innocent and destitute people. Brown's pathology indicates predatory sadism.
    c. In case 1:2014cv05682 of the US District Court for the Southern District of New York Deutsche bank admitted that it teamed up with the Bank of Nova Scotia and HSBC to rig precious metal markets. They settled out of court for over $100 million, and the litigation accused them of systematic suppression of prices since 1999.
    d. In May 2014 Barclays Bank was fined £26 million by the FCA for rigging the gold market.
    e. The CFTC in September of 2020 fined JP Morgan Chase more than $920 million for rigging the bullion markets, JPM having admitted wrongdoing. The DoJ described it a as a 'Criminal Enterprise.' Note well that JPM in my lawsuit took sides with Deutsche Bank, finding no fault at all with DB when DB refused to validate its gold audits while trading in the same gold market alongside DB. JPM clearly knew the value in making

sure no litigant could force discovery of gold trading audits - it was on the hook itself for manipulating the market. It should be noted that JPM's legal defence was ultimately managed and signed off by its CEO Jamie Dimon. There can be no honest reason for Dimon not to want to see DB's audits, given that BaFin were investigating them for rigging the gold market. We can conclude that Dimon was orchestrating the market manipulation for JPM and that DB was part of the cartel. By the same reasoning we can conclude that all defendants had no interest in seeing DB's books because they were part of the rigging cartel. An honest trader would want to know if he has been fleeced.

f. In 2019 and 2020 the press covered reports that Staley had been a close friend of Jeffrey Epstein, not only before Epstein's prison term in 2015, but also during the incarceration – indeed Staley had visited Epstein in the prison, taken passage on his yacht and visited his island after the sentence was over. Given that Staley had played down this friendship in 2015 when it came to light Epstein had been lobbying for Staley's appointment, one must look very gravely at the reports that Staley overrode auditors at JP Morgan who had flagged Epstein's bank account for money laundering. Again we have another CEO who would not want audits published, particularly when they incriminate himself. Not one executive at Barclays finds fault with a CEO on their board who override auditors to cover up money laundering for a VIP paedophile ring.
g. I had contacted the FCA in 2017 with concerns that Staley had blackmailed Parliament, and was not fit to be CEO of Barclays, according to the laws of good character that the FCA and other parties are charged to defend. Andrew Bailey of the FCA, now Governor of the Bank of England stonewalled the results of the FOIA, and the TSC refused to hold Staley accountable. In Feb 2020 the FCA, after much pressure from the mainstream media, announced a probe into Staley. Subsequently we have heard nothing. Given that the FCA has a 99% disapproval rating on many review websites, which the TSC is too well aware, any rational man would conclude that Epstein blackmail materials are still in use, the FCA investigation is a farce and Bailey was not fit to run the FCA, let alone the BoE. Given that Parliament is blackmailed by Epstein's gang, then all the regulators in which it has oversight, including the FCA, allowed Staley to get away with whatever he wants, including having a court case quashed that clearly was full of merit.
h. In 2020 the press covered the fact that Deutsche Bank, under Anshu Jain and his successors, was laundering money for Epstein – and transferring large payoffs to silence his victims. The General Counsel for Deutshe Bank, John Leo Farry, aware of the materials incriminating the Epstein gang that were presented in my 2017 hearing, thus knowingly filed a restraining order that would hinder public disclosure of the gang's wrongdoings. When Worster signed off on the 2019 order, in which I had no opportunity to put a case – it was done and dusted 24 hours after the application – he and Farry made sure that Staley would get away with blackmail and Deutsche Bank would not have to come under scrutiny for its dealings with Epstein.
i. It should also be noted that Farry is married to Brooke Alison Masters, Chief Editor of the Financial Times business section. The FT seems perfectly happy that Masters will not report on any DB wrongdoing, particularly with regard to gold rigging, money laundering and Farry's role in covering up the truth.
j. It also emerged that Deutsche Bank were laundering money to the Russian Mafia, and this was independently of the fines it paid to the FCA c.2016. It has acted as the

underwriter to Danske in the Estonia money laundering operations that saw trillions of Euros passed into Russian oligarchs hands. It has been shown that Danske was laundering unsealed bullion bars without paperwork. As the underwriter this would mean Deutsche Bank's bullion audits were a total hoax. The central premise of my lawsuit was that Deutsche Bank rigged its audits and could not explain contradictory statements it made to me, and its director and lawyers refused to provide any materials whatsoever that the audits were genuine. Anshu Jain was CEO of DB while the Danske operation was underwritten. He had to be responsible, just as he was CEO in the key period that DB was laundering money for Epstein. Given that Epstein's ring was used for blackmail, and only a fool would think otherwise, then Jain has effectively bought into the blackmail operation. If Jain had been targeted for his role in laundering to the Russian Mafia, he would have had the same materials Staley would have, and so corrupt any investigation from the very top. Epstein would be even more strongly motivated to protect Jain than he would to promote Staley.

k. It should be noted the foremost and wealthiest oligarch from Estonia is none other than Oleg Deripaska. Given all of the money laundering operations run for Estonia it would beggar belief for Deripaska not to be on the receiving end of Deutsche Bank's paperless and electron-free gold audits.
l. On the 27 of September 2012, Deripaska settled a $1 billion lawsuit with Michael Cherney. This was handled by the Court of Appeal in the Royal Courts of Justice when Baron Thomas was President of the Queen's Bench. It was patently a money laundering operation. Cherney had been banished from Switzerland on suspicion of murder and being part of an armed criminal gang. Deripaska was also a money launderer, and the court case was a clear abuse of process to rubber stamp a transfer of many hundreds of millions in USD to Cherney, hiding out in Israel. This effectively compromised Thomas, since were it to become known – as it is now – that Deripaska was on the receiving end of laundered money, then Thomas been instrumental in Deripaska's illegal operations.
m. Thomas received documents from me in 2015 that asserted very directly that Deutsche Bank was laundering money for the Russian Mafia, and the likelihood was that this would include bullion. This was before the Danske-Estonia operation became public domain. So you can figure that Thomas had before him a paper trail that would ultimately show him complicit in a major financial scandal. Money laundered by Deutsche Bank through to Deripaska and thence to Cherney, all curtesy of Thomas.
n. Now it turns out that DB, Thomas and the CoA were not the only parties in this case laundering money for Deripaska. In April 2018 DB's hand-picked lawyers Linklaters, helped float EN+, which is now on the US sanctions list, alongside its own Deripaska. EN+ owns Rusal, that is the centre of Deripaska's money laundering empire. Citigroup, another co-defendant here, also have profited from that floatation. Linklaters would not have gone ahead with that without the consent of its director Gideon Moore. Moore knew that Linklaters had signed off the court applications demanding restraining orders against me – and he knew a key allegation was that DB's audit was fake and that bullion was quite likely shipped to Russian oligarchs off the books, creating a black hole in bullion inventories. We now know that Rusal and Deripaska was most likely a recipient of DB's bullion. We know that Linklaters have profited from having all analysis of those audits quashed. Had it been in the public

domain that Rusal profited from DB's bullion, that had been acquired at cheap rates by rigging the market, Linklaters would not have had Deripaska as a revenue stream.

o. In 2014, no more than 48 hours after I had served Anshu Jain with the lawsuit, Felix Hufeld, CEO of BaFin, terminated BaFin's gold audit against Deutsche Bank, that began around January 2014. Neither Hufeld nor BaFin identified that hundreds of billions of USD of DB's trades that had gone through to Estonia. Nor did BaFin address Deutsche Bank laundering money for Jeffrey Epstein – unlike JP Morgan's auditors who seem to have done a proper job. Nor did BaFin uncover any signs of gold price manipulation. Contrast with the NY lawsuit, which forced disclosure from DB's archives which showed DB had colluded with HSBC to rig the markets. Hufeld was obviously paid off to cover up DB's many crimes.
p. In 2015 BaFin field agents provided a wealth of materials that incriminated Jain for Libor manipulation, but Hufeld, without reference to any of the evidence, dismissed it all, getting Jain off the hook – as Hufeld's underlings had accused Jain of being the Libor kingpin in Europe – and deliberately misrepresenting interest rates to the Bundesbank.
q. The issue of Jain rigging the Libor rates is key, because the key evidence in the William Broeksmit death was that Broeksmit left an apparent suicide note in which he claimed Jain was innocent, and he himself was culpable. But if Jain was kingpin, then that note has to be fake. The note itself looks a complete fabrication. The wording of a man about to commit suicide, who makes no apology to his wife or son. And sure enough, Jain sends in Emma Slatter, the General Counsel for DB at that time, to instruct the coroner Fiona Wilcox, to withdraw that apparent suicide note from the inquest's findings. Broeskmit's son Val, refuses to accept his father committed suicide and insists he was murdered.
r. Emma Slatter was also the lady who claimed allegations of gold rigging were 'totally without merit' and a 'fanciful conspiracy theory.' She also did her best to make sure DB's gold audits would never come under scrutiny – the evidence is in DB's defence document in 2015. Both she and Jain refused to turn up for court to address cross-examination on the matters in their gold audits. How often does an applicant of an oral hearing refuse to appear in advance, and then win the court case. Given the Estonia-sized hole in those audits we can figure Slatter had blackmailed or bribed someone high up the courts to get away with an obvious abuse of process.
s. In 2013 Anshu Jain employed Lynn Forester de Rothschild and Peter Mandelson to be trustees of the Herrhausen Society, which ostensibly is to promote German trading interest worldwide. Both LF de R and Mandelson were close friends of Jeffrey Epstein, with Mandelson having visited Little St James. Mandelson was also close friends with Nathaniel Rothschild and Oleg Deripaska, and met both alongside George Osborne on Rothschild's yacht. Nathaniel Rothschild and NM Rothschild Bank both have significant investments in Rusal.
t. It is unthinkable that Mandelson could both know Deripaska and Epstein, without Anshu Jain knowing they had a mutual friend, and it is obvious that two friends of Epstein employed at Herrhausen, and employed by Epstein's chief money launderer, is one friend too much of a coincidence. This all corroborates the simple conclusion that Jain used Mandelson's knowledge and Epstein's blackmail material to ensure that his illegal Russian Mafia dealings would never come to prosecution or be exposed in litigation.

u. George Osborne has been publicly accused of trying to solicit a donation to the Conservative Party from Deripaska in that meeting on the yacht. Mandelson, being part of that meeting, and a confidant of both Epstein and Jain, would be in a position to blackmail the Conservative Party and ensure that the Attorney General, the Lord Chancellor and every other key member, would do their best to block any discovery in Deutsche Bank's fake audits.
v. Jain would be in a position to know that if he was held accountable for faking audits, then Hufeld's conclusions would be publicly undermined, and that means he would take the fall for the Libor rigging, and thence be exposed for faking Broeksmit's suicide note, raising the very possibility of an investigation for murder – just as Cherney was a suspect in murder. Baron Thomas the Lord Chief Justice was the boss of Fiona Wilcox when she accepted Slatter's guidance, and so he would thus come under scrutiny in his dealings with Jain and DB.
w. Thomas rejected Tom Hayes' appeal for his conviction for Libor manipulation. Hayes claimed he was only a pawn, with the executives above him ultimately responsible. Things have turned full circle when we can now see Thomas' role in covering up a murder for a Libor manipulation witness – or at the very least allowing a fake suicide note to be hidden away from public disclosure.
x. When Thomas sees a document from Slatter that threatens to expose Deutsche Bank's audits both he and Jain understood the danger to themselves too well. In effect Slatter's name was enough to blackmail Thomas into quashing the appeal.
y. Ergo when the appeal is handled it was given to a man Thomas had to know was corrupt. Thomas handed the case to Sir Ian Burnett. And Burnett's reward was to be the succeeding Lord Chief Justice, forever in Deutsche Bank's debt.
z. Judge Terence Etherton said of Burnett – 'The only club to which our Lord Chief Justice belongs to is the Pizza Express club.' Consider that Etherton is gay, and his partner is gay, then the reference to 'Pizza' is quite possibly a refence in gay slang – which means 'boy lover.' It is quite clear how Mandelson and Epstein figure in the blackmail of the judiciary, and how Thomas chose his successor.
aa. It is undeniable that Burnett's court orders are no longer tenable by any sane man. The claim that allegations of gold rigging are 'totally without merit' is the Epitaph of an idiot who refused to recognize that a Criminal Enterprise rigged the market and was fined for it, confessed to it, and found guilty of it. The claim that a lawsuit against banks for rigging the markets is a 'collateral attack on the banking system' is something only a quisling would agree with. Any lawsuit against a bank for fraud is an attack on the bank. Banks are not granted immunity to litigation. Burnett's court orders were key to Deutsche Bank and its co-defendants avoid liability in the UK, while litigants abroad reaped in the due remedy, and ultimately we can see it was driven by the Epstein blackmail operation.

9. Considering the now overwhelming evidence that defendants colluded together and colluded with corrupt members of the judiciary and corrupt politicians to quash the lawsuit, we now have reason to overturn all court orders in our case.
10. It is plain that every lawyer who was involved in this case knew that the defence documents were entirely deficient to such a degree that they are tantamount to bragging. They brag of the defendants' control of the judiciary. Counsel were gloating all the way through Worster's hearing, just as they were gloating in their submissions to the court. Worster was smirking as he gave his verdict. This was not a man faced by some dire dilemma who grudgingly threw a legitimate claim, but a man enthralled by his own villainy who enjoyed

every minute of it. This is the trait of a psychopath who preys upon the vulnerable, and our attention is drawn to the parallels in Epstein's fantasy life made real. If Jain and his Epstein friends wanted someone to throw a verdict, they would recognize one of their own in Worster's character.

11. In the hearing in late 2015 heard by Judge Haddon-Cave, in which I attempted to re-open the case on the basis that UBS had admitted the allegations I made against it to the US DoJ, UBS refused to file a witness statement. Haddon-Cave allowed their counsel to argue for their case without the counsel knowing whether their client had admitted the allegations or not. When I challenged Haddon-Cave to explain why UBS can get away with non-admission he provided no answer and closed the hearing. Haddon-Cave later sent me a smiley ';-D' in a Twitter tweet when I published a summary of his conduct on that website. Subsequently he has made no effort at all to hold defendants accountable for lying in his hearing. It appears his reward for protecting Baron Thomas was a promotion to the Court of Appeal.
12. The conduct of all defendants constitutes a conspiracy to pervert the course of justice and also serious libel against me. The title 'vexatious litigant' signed off by the courts is not a positive endorsement. I have also had to endure a decade of poverty as a result of their outright lies.
13. All of the judges that heard my case, Judge Lorence of Frankfurt, Judge Simon Brown QC, Judge Charles Haddon-Cave, Judge David Worster, Judge Martin McKenna, Baron Thomas and Lord Ian Burnett have clearly acted corruptly, covering up the Epstein-Jain-Staley paedophile and blackmail ring, covering up the murder of William Broeksmit, covering Jain's role rigging both Libor and precious metal markets, and covering up audit frauds associated with bullion and cash laundered by Deutsche Bank to Estonia. Thomas gave Burnett and Haddon-Cave promotions, one wonders what Burnett gave McKenna and Worster.
14. Judges are not immune to prosecution or litigation for conduct outside their court rooms, and all judges had the moral and legal duty to correct court orders that are known to be factually incorrect, particularly when new evidence enters the public domain. This no judge offered to do and constitutes misconduct in office, outside the court room. I believe this gives me legitimate reason to add their names to the list of defendants in this case, as they collaborated with defendants to rig markets and defraud me out of my due remedy.
15. JACO head Paul Kernaghan who was tasked to look into the corruption closed the investigation and said 'he could not believe Deutsche Bank would launder money for the Russian Mafia.' At the same time his counterpart in the judiciary, Baron Thomas, had done exactly that. JACO's investigation was wholly superficial – as superficial as the Court of Appeal process to consider the conduct of Brown and Haddon-Cave. Paul Kernaghan is known to have covered up paedophile rings in Hampshire when he was Superintendent there. He is also named in Jane Coleman's RAINS list, along with Peter Mandelson, Cyril Smith and Ted Heath, for his involvement with VIP paedophiles. Given the reach of Epstein's ring and his mischievous findings this has to be counted as corroborative evidence that he is the thing that he was accused of being in the RAINS list. It takes a paedophile to cover for another paedophile.
16. I note that each time there is a court hearing, defendants have not provided any useful witness statements, anything they submit is fact free. I also note that they serve documents at the very last minute, including skeleton arguments, contrary to the main guidelines and rules in the CPRs. They get away with doing this over and over again. Instead of being treated as a litigant and the defendants required to put a defence, I am treated as a defendant and no facts can be contested, because there are none offered from their side. For this reason I refuse to attend any hearing unless they first submit witness statements

and answer all of the *Notices for Admission of Facts* issued to them thus far, as it is patent that no fair hearing can take place in which defendants are allowed to get away with non-disclosure when public domain information shows they are guilty without question.

17. The ICO, which, like the FCA, and the SFO, also has a 99% disapproval rating, was tasked by me to force Deutsche Bank to disclose my bullion trading receipts so that I could quantify losses. The ICO obstructed the data request and gave DB 18 months grace, whence DB used a clause in the GDPR that only Germany can exploit, to the effect of denying me receipts. They also denied me a bank statement. Since when does a bank deny its client a bank statement. Only in a British Court - after it accused the litigant of not being able to quantify damages. They get away with this obviously because the head of the ICO, Elizabeth Denham, was corrupted by the Epstein ring. According to the ICO's website companies have 30 days to answer an subject access request. The ICO refused to hold DB accountable at any stage – and of course if DB scrubbed its bullion trading receipts as a result of a damage limitation exercise with all its illicit trading to Estonia, the last thing they need is the ICO forcing admission that the receipts are gone. It would therefore be essential for Jain to corrupt the ICO's investigation. According German law, once a bank has been investigated by the authorities for fraud, it has the legal obligation to keep all receipts forever.
18. Christian Sewing and John Cryan are subject to a third party lawsuit for their role in the Epstein money laundering operation, but Jain's name is not on the list, and yet Jain was laundering money for Epstein before both of them appeared on the scene. This suggests that Jain is in a position to blackmail the US Judiciary and US law firms to ensure he is not exposed to the litigation that bedevils his peers.
19. Jain appears to have been given the presidency of Cantor Fitzgerald by Epstein's neighbours in New York. His role is to oversee Libor rates.
20. The documents have been served electronically – and can resized, respaced and reformatted as desired. It is noted that defendants have used the fact that a document was sent with incorrect format to justify striking out the claim. The fact that judges allowed this to happen is proof that judges were not simply misled by dishonest materials, and but were actively gaslighting the truth and is tantamount to bragging they had too much power for anyone to do anything about it. One wonders how the families of Brokesmit and Williams feel about a judiciary that uses 'bad font' as an excuse to allow murderers to walk free.

I believe everything in this statement is true.

Mark Anthony Taylor – 9th October 2021.

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