

Notice to Admit Facts

In the Birmingham Mercantile Court

For case B40BM021

Taylor vs Jain et al.

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 laundered money for Jeffrey Epstein's paedophile ring during the period in which Anshu Jain was a CEO of Deutsche Bank.
2. Deutsche Bank laundered money for the Russian Mafia by underwriting the Danske Estonia money laundering operation during the period in which Anshu Jain was a CEO of Deutsche Bank.
3. Deutsche Bank shipped bullions bars, directly or indirectly to Danske Estonia and records of these appear in Deutsche Bank's trading receipts.
4. Deutsche Bank shipped bullions bars, directly or indirectly to Danske Estonia and records of these are missing from Deutsche Bank's trading receipts.
5. Deutsche Bank liaised with third parties to supply bullion bars to Danske Estonia.
6. Deutsche Bank has refused to provide me with trading receipts to quantify damages in the lawsuit.
7. Deutsche Bank claimed that the claim should be struck out on the basis that I could not quantify damages.
8. Deutsche Bank has refused to provide me my bank statement, even when asked to do so by my constituency MP Jeremy Lefroy.
9. Anshu Jain had in his email box an email addressed from William Broeksmit, sent shortly before his death, that purported to apologize to Jain for Broeksmit's failure to address Libor manipulation.
10. BaFin's report, as laid out in the evidence bundle, laid more criticism against Jain for Libor manipulation than Broeksmit.
11. Broeksmit was not accused of criminality in the BaFin report.

12. Emma Slatter, former General Counsel for Deutsche Bank, advised Fiona Wilcox, Broeksmit's coroner, to not make public the content of Broeksmit's email.
13. Deutsche Bank were under investigation for Libor manipulation by BaFin during the period in which Deutsche Bank's lawyers were advising Fiona Wilcox on how to handle Broeksmit's inquest.
14. Anshu Jain telephoned Felix Hufeld, President of BaFin between 25th and 26th of January 2015.
15. Deutsche Bank has transferred more than \$1 million to Oleg Deripaska or his business empire in the past ten years. (Please say how much).
16. In the 2014-15 BaFin investigation for bullion price manipulation in Deutsche Bank, BaFin did not publish any evidence that incriminated Deutsche Bank for shipping money or bullion to Danske Estonia.
17. Deutsche Bank was laundering money to Danske Estonia before August of 2010.
18. The total of trades underwritten by Deutsche Bank to Dankse Estonia are in excess of \$100 billion. (Please say how much).
19. No CEO following Jain's departure has provided any evidence that Deutsche Bank's bullion audits are genuine.
20. No Deutsche Bank auditor raised a flag that its traders were rigging the bullion markets.
21. Deutsche Bank has been fined for its traders rigging the bullion markets.
22. No CEO of Deutsche Bank had made its audits public, or challenged auditors for their failings.

I confirm that any admission of fact(s) or part of case will only be used in this claim.

Mark Anthony Taylor – email credentials may be used to serve as an electronic signature when this letter was originally sent.

17th October 2021