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