

## Particulars of Claim A07YQ334

### Claimant:

Mark Anthony Taylor  
Kalamata, Billington Lane, Derrington, Stafford, ST18 9LR  
Email: [mark.anthony.taylor@gmail.com](mailto:mark.anthony.taylor@gmail.com)

### Defendants

1. Anshu Jain, Co-CEO of Deutsche Bank- 1 Great Winchester Street, EC2N 2DB, LONDON
2. Deutsche Bank AG - 1 Great Winchester Street, EC2N 2DB, LONDON
3. HSBC Plc, Retail Unit 8 Canary Wharf, Canada Place, London E14 5AH
4. Barclays Bank plc.1 Churchill Place, Canary Wharf, London, E14 5HP
5. UBS AG, 1 Finsbury Avenue, London, EC2M 2PP
6. JP Morgan Chase. 25 Bank Street, London, E14 5JP
7. Citigroup, 25 Canada Square, Canary Wharf, London E14 5LB
8. Royal Bank of Scotland Group Plc, Head Office, 250 Bishopsgate, London, EC2M 3AA

---

## Summary of the Claim

I, Mark Anthony Taylor, the claimant, sue the defendants, for the illegal and unjust cartel fraud of market manipulation, in violation of national and international competition laws, the effect on me, a competitor to the cartel, was to devalue my bullion sales and this caused me financial loss, poverty, stress and suffering.

### Abbreviations used Herein:

**HSBC** - The Hongkong and Shanghai Banking Corporation Plc.  
**RBS** - Royal Bank of Scotland Group Plc  
**DB** - Deutsche Bank AG  
**FCA** - Financial Conduct Authority, the UK regulator  
**UBS** - Union Bank of Switzerland  
**BaFin** - Bundesanstalt für Finanzdienstleistungsaufsicht, Germany's Federal Financial Supervisory Authority  
**CFTC** - US Commodity Futures Trading Commission, the US regulator.  
**FINMA** - Swiss Financial Market Supervisory Authority, the Swiss regulator  
**Forex** - Foreign Exchange - the exchange rates in currency pairs.  
**COMEX** - Commodity Exchange Inc. A division of New York Mercantile Exchange.  
**QE** - Quantitative Easing  
**LIBOR** - London Interbank Offered Rate  
**MBS** - Mortgage Backed Security, a contract that uses a mortgage book as its underlying asset.

### Terminology

**Contract** - investors generally want money, rather than materials, so the materials that are bought and sold on exchanges are done so as the assets underlying legal contracts. Trading occurs as exchanges of those contracts.

**Delivery** - contracts have a delivery date. The holder of a contract on the delivery date, can take delivery of the underlying asset of the contract.

**Short-selling** - The selling of what one does not own. Once a short sale is completed and a delivery is demanded the seller must buy from the market to deliver what was sold or be held liable for some kind of compensation to the buyer.

**Short-position** - The number of contracts for sale by means of short-selling.

**Open interest** - The number of contracts that are open for trade at any point in time.

**Frontrunning** - Intercepting an intent to transact at market prices and then changing the market price just before the transaction occurs. Particularly illegal when done against one's own clients without their knowledge.

**Margin Requirements** - The financial requirements that one needs with a broker or exchange in order to use their services in a market. An investor who finds his account fails to meet the requirements will typically be penalised by having his open interest turned into a cash position at market rates.

**Quantitative Easing** - Electronic credit deposited at a central bank in return for some poorly performing debt instruments, such as long-term government bonds, or sub-prime mortgage books.

### Points Of The Claim

1. **I, the plaintiff, bought gold bullion, silver bullion and platinum bullion from Deutsche Bank, and later sold the bullion during a time of hardship at market prices.**
2. **I allege that the directors of Deutsche Bank are lying to BaFin - the regulators investigating the bank for gold price manipulation. Also alleged is that they conspired to fake an internal gold manipulation audit and conspired to fake an investigation into my demand against them for such manipulation.**
  - a) A gold manipulation probe against Deutsche Bank was launched by BaFin mid January 2014.
  - b) I sent a demand by e-mail, January 2014, to Deutsche Bank, alleging precious metal price manipulation, requesting damages in Euros and restoration of my bullion sold to that date.
  - c) February 2014, Deutsche Bank confirms (in German) that it had received my demand and that it was investigating it.
  - d) June 2014, Deutsche Bank declares its own internal gold manipulation audit in response to BaFin.
  - e) July 2014, Deutsche Bank concludes its investigation of my demand, and claims (in German) that there is no case to answer, that my allegations are unfounded.
  - f) I see no news to surmise other than that the internal audit is still 'ongoing'.
  - g) The concerns of the audit and investigation overlap, and one set of people would be thus responsible for both cases. The responsible parties would thus not be in an honest position to dismiss my claim while running an authentic audit. That this obvious contradiction was made implies the responsible parties were only carrying out the audit superficially: the internal audit and the investigation of my demands were fake.
  - h) The fake audit and fake investigation would be instigated by the directors, since the directors were where my e-mails were directed, and it is the directors who would have declared a public audit, these naturally lead one to infer that the directors know that their own bank is guilty of faking the audit.
  - i) If the gold manipulation audit is fake - and considering that the directors are intelligent men with rational motivations - then it was faked to hide manipulation. A fake audit implies guilt of market manipulation.
  - j) Deutsche Bank has already fired and suspended traders for Forex manipulation when Forex manipulation was alleged. If the bank saw fit to suspend people for alleged Forex manipulation, but not dismiss traders when gold manipulation was alleged, this suggests that gold manipulation is orchestrated at a higher level in the bank than the level of those those who were dismissed following the Forex manipulation allegations. This again, is consistent with a conspiracy of the board. I deduce gold manipulation is not merely rogue traders skimming a profit.
  - k) The effect of faking the audit is to *conspire to pervert the course of justice* as other litigants against Deutsche Bank for precious metal price manipulation are missing key evidence that Deutsche Bank and its board should have admitted in court. Precious metal price manipulation is the fraud, but the fraud was compounded by the cover-up fake audit. The fake audit compromises BaFin's legal investigation.
  - l) Since the fake audit implies a serious criminal fraud, and its cover-up may have caused a corruption of court verdicts, we have the rationale for calling for Anshu Jain, Co-CEO of Deutsche Bank, as a defendant. I demand that Anshu Jain answer questions directly in court regarding this matter, and his absence be deemed proof of the claims against himself and the claims against Deutsche Bank of all the criminal activities and anti-competitive practices alleged in this document and also justify the level of damages for which I claim.

- m) Liabilities against Anshu Jain for the gold manipulation fraud, may be limited, due to his limited liability, if he were acting in the short-term interests of the bank in committing a fraud, but the subsequent cover-up creates aggravated damages in itself, and since the cover-up was not ultimately for the benefit of his bank, it only served to protect the conspirators (the directors) from facing dismissal from their banks for conduct that exposed their bank to liabilities that could bankrupt the bank.
  - n) The directors, in covering up their frauds, were not functioning as part of corporate gestalt, but acting in selfish interest and so take personal liability.
  - o) The proof that I give, of the fake audit, was sent to Deutsche Bank in different emails, as well as delivered to various investigative agencies, including Interpol, the FCA, the Serious Fraud Office, BaFin, the Frankfurt police and the Frankfurt courts. If Deutsche Bank are innocent, or the documents I give are a misrepresentation in any way, then why did Deutsche Bank not sue me for defamation or otherwise deny the relevance of the materials? They have received numerous opportunities to address the allegations, and have explained nothing. This is not the conduct of a responsible and honest party.
  - p) Jürgen Fitschen, the other Co-CEO of Deutsche Bank, as a Frankfurt resident, is not under the jurisdiction of the court for civil litigation and is not listed as a defendant. I have already brought civil litigation against Jürgen Fitschen, and I am aware that he is indicted for fraud and perjury by the Munich courts, which suggests to me that he will not be vulnerable to litigation in the near future. I have forwarded the proof of the fake audit to the Munich prosecutors for their consideration, who have in turn forwarded the proof to Frankfurt prosecutors. I feel I have done as much as I can to bring Herr Fitschen to justice.
3. **Given that gold is manipulated, we must deduce whether gold manipulation is a fraud of Deutsche Bank itself, or a fraud of the cartel to which the bank belongs.** We use the traits of Forex manipulation to deduce that gold manipulation is a cartel activity, and that gold manipulation by Deutsche Bank implies gold manipulation by the other leading market players.
- a) The FCA gives examples of the suppression of Forex rates as a result of cartel collusion using short selling, which is documented in its fine for Forex manipulation against HSBC.
  - b) When the FCA fines banks for Forex manipulation, it fines them in parallel, because the evidence is that of collusion, with collusion being the means and requirement of suppression manipulation.
  - c) The FCA gives examples of *frontrunning*, where a bank acts against the interest of its own clients by adjusting the market price used by a contract microseconds before executing that contract. Frontrunning does not necessary require substantial collusion.
  - d) To determine if frontrunning is Deutsche Bank's only form of manipulation in the precious metal markets....
    - i. We would expect the ratio of the turnovers to match the ratio of the liabilities.
    - ii. With Forex market turnover 30 times or so the turnover of the gold markets, precious metal manipulation liability would thus be only a small percentage of the Forex manipulation liabilities, and the cost of admitting such manipulation dwarfed by the costs of admitting Forex manipulation.
    - iii. With gold manipulation so dwarfed, a rational agency, when investigated for Forex manipulation, would ask the regulators to consider precious metals as part of the Foreign exchange system.
    - iv. With gold manipulation so dwarfed, and the nature of frontrunning limiting the degree of liability against my claim, there is no reason why a rational agency would attempt a cover up the details.

- v. Since the details were covered up, we deduce that manipulation is not merely frontrunning, adjusting prices microseconds before one's clients' transactions, but a conspiracy to create long term price displacements.
  - vi. We have deduced that manipulation is not limited to frontrunning and includes greater frauds. Only collusive frauds create the degree of liabilities that cause a bank to fake its own audits.
  - e) Manipulation of a market 30 times smaller than the Forex markets that needed to be covered up, indicates significant mispricing liabilities which in turns requires a sustained cartel activity to impact prices systematically and against the reaction of honest market participants.
  - f) The head of BaFin indicated the gold manipulation fraud could create liabilities of the order of the global derivative position (a thousand trillion of US dollars). This is not consistent with a minor frontrunning fraud creating only particular infringements.
  - g) I deduce that Deutsche Bank are part of a cartel of manipulators and their distortion of the market caused liabilities so great that they could not resolve the accusations simply by suspending traders, as they had when Forex irregularities were detected, and so created a fake internal audit. The number of conspirators at Deutsche Bank would be sufficient that no clear honest narrative can be published that could not be undone by whistle-blowers or elementary investigation. This is why it was asserting that a five month investigation concluded there was no wrongdoing, while at the same time telling the rest of the world that such wrongdoing was still and is still being determined.
- 4. Given that gold is manipulated, the next issue is whether that manipulation is up or down - or profiteering against fluctuations which create no general trend upwards or downwards.**
- a) The FCA's analysis of Forex suppression techniques tells us that when manipulation occurs, and the direction is downwards, the price is suppressed with collusive short selling of precious metal contracts.
  - b) A cartel agreement to short the market, with the other leading players agreeing not to buy up the shorts is consistent with the massive short positions of precious metals in the Comex.
  - c) The massive silver trading volume on the Comex, in which the mass equivalent of the entire world inventory of silver is cycled electronically every 3 of 4 days, indicates the Comex does not represent genuine dealers in physical silver, that is the vast majority of trades that go through the Comex is largely detached from industrial usage and physical bullion investment. The purpose, for the majority of transactions, is not to buy and sell materials.
  - d) With the requirement that all the major players collude to short sell to keep prices suppressed, and the massive volumes which do not reflect world inventory, and the huge short positions, we may infer that the Comex's primary function, with regard to trading precious metals, is to commit fraud.
  - e) If there is one major player on the Comex that does not manipulate, and it has the means to buy up bullion at suppressed prices, then it would rationally do so. A rational investor with sufficient resources will always buy up materials that are offered too cheaply. This naturally leads one to deduce there are no honest traders on the Comex with such resources, and that all the major banks that trade there must therefore be part of the manipulation cartel.
  - f) Comex's margin requirement hikes, timed at silver's 2011 peak of \$48 an ounce, along with its algorithmic trading stops that have been recently implemented, when prices rise too quickly, further indicate that Comex's primary function is to defraud. If the US dollar is not algorithmically prevented from rising too quickly, then why should precious

metals be so limited?

- g) The years over which the short positions are evident creates a long-term down trend in the precious metals and creates the impression that precious metals are not a worthy alternative to other financial instruments.
- h) A material that is sold at lower than free market rates creates problems satisfying demand and inventories are lost. Deliveries fail.
- i) Germany's request for USA to repatriate 700 of its 1500 tonnes of gold stored in the USA resulted in only 5 tonnes being delivered from the USA. This demonstrates a serious supply problem: a delivery failure. One can also infer that the USA is misreporting its bullion inventories.
- j) The US Federal Reserve refuses to allow an independent audit into its bullion reserves.
- k) US lawmakers block an independent audit of the US Federal Reserve.
- l) From the fake audit to the analogy between the Forex short sells and the Comex short sells I deduce that there is precious metal price manipulation and it is price suppression by the Comex cartel for an extended period of time that has caused inventory losses in national bullion reserves.
- m) With Germany, the Netherlands, Belgium, Austria and France (via Le Pen) demanding gold repatriation, it tells of a political class that understands that inventories in central banks have been squandered and illicitly dumped to protect the banking system.
- n) Individual Comex silver contracts are in the thousands of ounces, which effectively stops small time investors from collectively stripping the Comex of materials.
- o) Any major participant that tried to force delivery of all the outstanding short positions would certainly be met with a delivery failure. This would bankrupt the banks, and the participant would thus lose their money to an insolvent banking system. This explains why nation states, such as China, use the Comex to obtain silver, but not correct the market, which would terminate their bullion acquisition. The clever participant with sufficient resources, in this case, is a slow player, and buys only as much as can be supplied. The result for the West is depletion of precious metal assets.
- p) The assertion that *the Comex suppresses the price of precious metals, and that Deutsche Bank is a conspirator in its anti-competitive frauds* is naturally consistent with the correspondence of Deutsche Bank, BaFin's investigation, BaFin's estimates of the liabilities of such manipulation, the ad hoc and asymmetric changes on Comex trading rules and the opacity of US Federal Reserve with regard to its gold inventories. Assuming the contrary requires irrational contrivance and simplistic gullibility.

##### **5. Motivation for gold price suppression.**

- a) A systematic suppression of precious metal prices that exposes the manipulators to massive liabilities does not make sense unless there is rational gain elsewhere.
- b) Precious metals used to form the basis of currency worldwide.
- c) A currency system that is without the backing of precious metals is called fiat.
- d) Historically, fiat currency systems fail, with hyperinflation a principle threat. The mean lifespan of a fiat currency is 27 years and the longest lived is the British pound sterling.
- e) Governments historically create inflation by printing money to escape insurmountable debt problems.
- f) The world has insurmountable debt problems.
- g) A rational populace, cognizant of a long term policy to print a nation's debts, responds by buying materials as soon as currency is available and not holding currency, this causes inventory supply problems and prices rise. Governments respond by further printing of money and this is the classical economic narrative of hyperinflation.
- h) To prevent panic buying a rational government will therefore deny that there is inflation,

and will understate that its long term solutions to debt issues is to create inflation.

- i) When inflation is hard to suppress or hide, governments have historically issued price controls or used covert means to suppress price rises.
- j) Worldwide, the currency systems are all fiat.
- k) The natural trend, by following examples of history, is that modern currencies will be made worthless.
- l) Where governments have used precious metals coins, and have edicted to dilute precious metals content of coinage, the trend is always to reduce that content to zero. No normal currency of the European, US or British has significant silver or gold content. The smaller denomination coins of the British and the Europeans are steel coated with a thin layer of copper, so even copper is too valuable to be used as currency, other than providing the veneer of a currency.
- m) The pound sterling at one point represented one pound of weight of silver metal, and a silver penny one part of 240 of a pound in weight. Silver price suppression can be interpreted as a means by which modern coinage is given as payment, when in comparison to what the free market price of silver should be, such miserable coinage has no real value.
- n) The governments of the West created Quantitative Easing, which is a form of deferred money printing. It creates an electronic cash position, in which debts can be settled electronically, or paper instruments printed on demand, that is, it creates liquidity, but without paper debt bills having to be printed with each round of QE.
- o) Quantitative Easing, in deferring the issue of paper debt instruments, hides the governments' basic solution to debt, which is to print money.
- p) Hiding inflation is thus a rational motivation for suppressing the price of precious metals, as an increase in the price of precious metals indicates loss of confidence in paper currencies.
- q) Ostensibly, hiding inflation may be justified by a government, as part of the greater good, but the means chosen, the suppression of alternatives to fiat currencies, bullion, exposes a population to losing some or all of its bullion reserves.
- r) The purpose of bullion is to provide an alternative to a failed fiat currency. As currencies collapse, bullion prices are meant to rise and become the standard backing for a recovery. Without such bullion a nation may end up stuck with a failed currency and have no escape route.
- s) Governments and banks are not acting in the long term interests of its people, and are consolidating money printing in the hands of an elite, and exposing the liabilities of the fraud to the general taxpaying public, who are not profiting from the manipulation.
- t) As we saw with the Swiss Franc appreciation, banks use rescue funds to speculate, and not to make loans to small businesses, as was the justification for QE. With QE creating bad investments, it is no wonder QE is not generating a recovery, and only more losses. With QE being used to short suppress currencies and metals, then losses that follow a correction will be larger than the QE input, explaining the paradox of why a money printing solution results in more bad debt and deflation. Clearly there can be no fix until investment banking is quarantined from any stimulus. We are seeing a deflation of bank assets as a result of corrupt investment, and an inflation of currency in QE reserves and an inflation in the cost of living.
- u) Given the motivation for manipulation, outlined above, and the blatant market abuse on the Comex, we deduce that Comex is the system for banks and central banks to suppress the price of precious metals which in turn is to hide the inflation consequent of printing money to escape insurmountable debt problems. Such a collusion requires the conspiracy of the directors of the companies involved, which is consistent with the

earlier deduction that Deutsche Bank's fake audit was a conspiracy of the board.

v) No other theory, led by a posit for the motivation, fits the facts so well.

**6. Proof of the gold price suppression is thus far deduced, and we must apply more logic to determine the level of manipulation of silver and platinum.**

- a) Since precious metals are assets valued in relation to gold, it is assumed that any party guilty of gold price manipulation is thus guilty of manipulating prices of all precious metals.
- b) Since all precious metals can serve as a hedge against failure in the banking system, then the motivation to suppress is the common causal factor in the manipulation all the precious metal markets.
- c) If there is one metal that is allowed to serve as a hedge, then it would be the natural target for safe investment, thus *all* precious metals must be suppressed to prevent their function as a hedge.
- d) Silver and platinum manipulation are inferred to be more heavily manipulated than gold and thus create liabilities independently and in excess of gold price manipulation. In the event that no gold price manipulation is accepted by the court/jury, in of itself, outside of that caused by Forex manipulation, evidence still remains that silver and platinum are mispriced against gold, that I believe the ratio of the gold price to the silver and platinum prices does not reflect what the free market should be with the manipulation bent to suppress the price of silver and platinum against gold.
- e) The disparity between abundance of materials and their prices would suggest a free market correction of prices, so that abundance could better reflect prices. If we have determined gold price suppression this far, as a means to prevent its function as a hedge, then the parallel suppression of other precious metals effectively locks the price ratio of materials. So that silver, for example, in which above ground bullion is now the same order of abundance as gold bullion, is locked into a price ratio of 70-1 or higher. Silver bullion is 70 times cheaper than gold, yet, due to industrial consumption, is about as abundant as gold bullion. If it were to correct to parity, so that one kilogram of silver bullion were to have the same price as one kilogram of gold, it would draw of the order of a trillion US dollars from the banking system, which is exactly the kind of hedge and capital flight against which the cartel are working.

**7. Logic and Laws by which market manipulation creates standing.**

- a) As a seller of bullion, competing with a cartel of short sellers, I am, in effect, a sole trader and competitor. Not being part of the cartel, means I do not have the inside knowledge to buy and sell at the most advantageous points. If I knew that the cartel, for example, intended to drive the price down and hold it down from its 2011 highs, I would have sold on the highs, saved my money in cash, and bought on the lows.
- b) Deutsche Bank sold to me bullion as an 'investment' but did not tell me they were colluding with the other banks to destroy the short term value of that investment, so exposing me to poverty when my circumstances needed to redeem the value of the bullion at proper prices. Their anti-competitive practices caused me poverty.
- c) In particular the manipulation implies violation of *Article 101 of the Treaty on the Functioning of the European Union* which prohibits collusion and cartels (sections 1a and 1c).
- d) In particular the manipulation implies violation of *Competition Act 1998, Chapter 1 and Chapter 2*.
- e) May I remind the court of the Criminal Cartel Offence s.190 Enterprise Act 2002. In defence of this act, I would ask the court to ignore any denials from a defendant in which the signatures on the defence do not belong to a flesh and blood individual. The defendants have a history of fraud. Consider PPI misselling, agricultural commodity

manipulation, sub-prime misselling, et.al.

**8. Lifting the Corporate Veil**

- a) If we are to expect perjury, then the defendant's lawyers should be asked to prove that the defendants have authorized a defence, and this requires a flesh and blood responsible party, a natural person, or number of such, a paper trail that identifies the signees.
- b) Those defendants that do not volunteer to provide flesh and blood authority in their defence should be treated with suspicion. Even if the law cannot compel them to do so, the court does not have to treat a failure to volunteer as if it were inconsequential.
- c) A defendant's lawyer/representative that does not volunteer the names of those that authorize the defence is assumed to have authorized it from the CEOs of the party they represent and have a duty to inform the CEOs as much.

**9. How Quantitative Easing implies central banks must conspire with the precious metal manipulation cartel.**

- a) Central banks have issued negative and zero interest rates for an extended period.
- b) Under these rates pension schemes cannot function and current accounts tend to pay insignificant interest.
- c) When the interest rates rise, the bad debts exchanged into the QE programmes run into default, as they did in 2008, thus governments lock zero and negative interest rates, and have reason to lie about the rate of inflation.
- d) A high inflation rate in a regime of negative or zero interest rates creates demand for precious metal bullion as a hedge, which is thus the motivation for its price suppression, to prevent its function as a hedge and prevent capital flight.

**10. Why Quantitative Easing implies central banks conspire to commit Forex manipulation to significantly misprice currency.**

- a) Since QE accounts can be monetized, that is the electronic cash position can be turned into street currency, or other paper instruments, it has the potential to cause inflationary shocks.
- b) Quantitative Easing funds has driven a house price bubble in many parts of the world, even as wages were stagnant or diminishing. It does not take much imagination to see that the money directed into the stock market will create a bubble in stocks.
- c) The QE recipients who trade Forex and manipulate Forex, have the inside information to determine likely trends in the Forex rates should they plan to withdraw significant funds from their own QE accounts.
- d) Since rounds of QE bailouts will be determined by the demands of the bankers and their reports to the central banks, they will have the inside knowledge to know if or when such rounds appear. Any report of QE has the effect of bolstering stocks, since stocks are a QE driven bubble, and at the same time causes inflation, as each new round leads to currency leaking out of the bubbles. Thus the bankers, who have a track record of market manipulation and conspiring against their own clients, have critical inside information to know when to buy and sell. Private investment banking that is fuelled by central bank money printing is thus in itself patently corrupt and patently vulnerable to insider trading. Is it any wonder there is no social mobility? Information consolidation creates wealth consolidation.
- e) Thus Forex manipulation is part of the arsenal of the corrupt cartel to mask their long term plans, to keep a currency value high, while knowing their activities will devalue it at some future point.
- f) Since the QE account holder does not want devaluation to occur before the release of funds, that is, panic buying before the withdrawals, creating hyperinflation, the holder has a very strong motive to use Forex manipulation, not just to make profit on margins, but to completely corrupt the general trend of currencies.

- g) This is why central banks and regulators have been lax, and the fines for Forex manipulation are so tiny compared to the size of the market they have affected.
- h) Fines are in the hundreds of millions per fine but Forex trade is in the trillions per day.
- i) The short position of Deutsche Bank, Barclays Bank and Citibank of the Swiss Franc against the Euro, had the effect of assisting the Swiss National Bank (SNB) in keeping the Swiss Franc rising against the Euro, which was the objective of the SNB in the pegging of the Swiss Franc against the Euro. What were the executives doing, gambling with QE bailout funding and risking their creditors' money, bolstering Switzerland's economic policies?

**11. Potential but unquantifiable losses due to Forex manipulation are part of the damages.**

- a) As Deutsche Bank have not yet been found guilty of Forex manipulation, Deutsche Bank and its CEO should state whether or not they are probably guilty to determine their part in the liabilities due to Forex manipulation. Given that they admit to being probably guilty, admit to being guilty or are found guilty in the results of the ongoing Forex manipulation probes into their bank, then they should be held jointly liable with the known Forex manipulators amongst the defendants for their part in the damages arising from Forex manipulation. A denial of probable guilt, with the expectation of a fine from a regulator, is grounds for a prosecution for perjury. I ask that Deutsche Bank and/or the courts resolve this matter as early as possible in the proceedings to reduce the complexity in separating Forex liabilities from the independent precious metal price manipulation liabilities.
- b) Even though the FCA could not quantify the damages associated with the particular instances of collusive manipulation they proved, they still imposed particular fines, and some of the defendants have paid those fines. This is precedent for damages to be paid even in the case that quantification is impossible.
- c) In December 2014, Deutsche Bank and Barclays Bank have been probed for suspicious algorithmic trading of Forex instruments - that is automatic computerized manipulation. This is AFTER fines have been imposed and tells of an arrogant banking system in which regulators, criminal courts and civil courts have proven no deterrent against further fraud. It literally means systems are engineered for fraud.
- d) As of late, when the Swiss National Bank de-pegged the Swiss Franc from the Euro, it created a 30% correction in one day and exposed Polish and Austrian banks to tens of billions of Euros in bad mortgage debt. This is an example of a system in which fundamental insolvency is completely misrepresented by Forex abuse. This is the heart of why Forex liabilities are estimated in the hundreds of trillions of US dollars. In a free market the currencies will fail, along side the banks. It is why we need separation of investment banking speculation with retail banking, and why we need to protect our bullion reserves with a free market price correction.
- e) Systematic failures of HSBC, with regards to auditing and observance of regulations, were identified by the FCA in the report against HSBC that led to Forex manipulation. The cultural failings of HSBC, that allowed Libor manipulation, were not addressed, and this allowed Forex manipulation to occur even as Libor manipulation was being officially investigated. Together with PPI misselling and Mexican cartel narcotic money laundering tells of a corrupt bank, the principle investment business activities of which are fraud.
- f) HSBC has denied Forex manipulation in a previous lawsuit from me, even though it was under investigation at the time by the FCA and later found guilty by the FCA. The honest answer was to admit FCA's investigation and give an opinion on its expected outcome. If one projects this dishonesty into its markets, one can expect dishonest manipulation. The lessons in the FCA report have not been learned by HSBC and it

appears HSBC has no intention of learning them.

- g) Losses due to Forex mispricing of my silver and platinum bullion is part of the damages though is impossible to quantify objectively.
  - h) Forex manipulation can potentially create an artificial long term trend in a currency's exchange rate against other currencies, in this way, Forex manipulation can undermine or over-estimate a currency by orders of magnitude, resulting in significant mispricing liabilities.
  - i) Forex manipulation can sustain the illusion of a stable currency, thus acts as insider trading and encourages people to put money into junk investments, against their better interests. Forex manipulation, when used this way, is a direct fraud against what should be the wiser choice of precious metal investment.
  - j) With the Euro in free fall against the dollar, as of late, one can naturally interpret the correction as a merging between economic delusion and economic reality. The world is coming to understand that the European currency is a disaster and that the European economies have been mismanaged into insolvency. The correct price of the Euro is thus zero, and the value of precious metal against Euro, in a free market, is infinity. In other words, Forex manipulation of the Euro created the false impression that Europe was solvent and that thus the false impression that Euros, debt instruments of an insolvent system, are worth something, in the long term. This is precisely why damages are demanded to be paid in precious metals and why Forex manipulation in itself, in an environment of insolvent nation states, is sufficient to justify all damages.
  - k) The level of liabilities estimated by many experts for Forex manipulation in the hundreds of trillions of US dollars is consistent with the thesis that Forex manipulators' deepest fraud is to fake global solvency.
12. Damages arise due to obstructive procrastination by Deutsche Bank in its 5 month fallacious investigation into my claim, and the following 6 month of litigation against its board when it should have settled my first demand. This procrastination can be used by Deutsche Bank for future cases, to defend cases by misuse of the statute of limitations.  
(I would thus urge all subsequent litigators to sue against obstructive procrastination demonstrated herein, which by creating wrongful immunity in lawsuits, creates rightful standing against which to sue for the deserved damages).
13. Damage arise due to a restriction of investment opportunities arising from poverty, inflicted by the defendants. The period of such is May 2012 to the present day. I was forced to sell my bullion to pay for living expenses, and I had no significant assets elsewhere.
14. Defendants are not equally liable and the evidence is not equally distributed amongst the defendants, thus the division of damages is partially left to the judge's discretion. As the Forex manipulations scandal, was identified by FCA as a cartel activity, no defendant should be deemed entirely innocent, and all should pay something significant.
15. Anshu Jain, the CEO of Deutsche Bank is the principle cause of damage in this claim unless he can show why the fake audit and its repercussions was the responsibility of other members of Deutsche Bank's board. In any case, as director, a few months worth of his bonus would more than cover the claims, and the accusations levied against Deutsche Bank from myself and other parties should have resulted in a more responsible and transparent correction by the CEO and his partner, Jürgen Fitschen. Deutsche Bank, as a separate defendant from its CEO, should explain whether it feels that its CEO should lose his bonus in the case that the CEO's negligence or conspiracy exposes the bank to damaging litigation. In the event that Anshu Jain is no longer CEO of Deutsche Bank at any time during this litigation, he is still held responsible for his conduct, or lack thereof, during the time I was claiming damages.
16. All my sales were done at or near market prices, and those buyers who were not actively manipulating the price were buying from parties suppressing the price. As a seller who

- needs the money to pay his basic life expenses, I had no option but to compete with the manipulated suppressed price. For this reason it is sufficient for the defendants to have manipulated the market to be liable for fraudulent losses in that market. They do not need to be direct buyers or sellers of my bullion to misprice my bullion on the market.
17. The suppression of gold bullion gold was done with the collaboration of central banks, resulting in bullion reserve depletion. It was thus, not merely unlawful, but against the greater long term interests of the nation states whose bullion has been robbed. The cartel got rich by exposing innocent traders and their host nation states to destitution.
- a) The theft of Ukrainian bullion reserves  
<http://en.interfax.com.ua/news/general/237327.html> serves as an example of what happens to a nation's bullion when prosecutors refuse to investigate their own central bankers for too long.
18. **HSBC is disingenuous regarding Forex manipulation that I pursued in a European Small Claims Procedure (ESCP).**
- a) HSBC's Forex manipulation fine was diminished, because it admitted the charges to the FCA and received a discount.
- b) HSBC fraudulently denied Forex manipulation in correspondence with me regarding the ESCP conducted by the Royal Courts of London, and used that in its argument to have litigation dismissed. Yet at the same time it was under investigation by the FCA, and by admitting guilt to the FCA, received a discount on its fine. This is clearly two-faced, and show that HSBC is institutionally dishonest and that its legal representatives are equally mendacious.
- c) I made it especially clear that I wanted to know the names of the people who signed off the defence for the ESCP, as I suspected they were committing perjury. This has proved to be a meritorious and prescient demand, as there is no flesh and blood person responsible party for the perjury.
- d) If they are telling the FCA that they are guilty, they should be admitting as much, when accused of such, in a court of law.
- e) When they were ultimately found guilty by the FCA they did not notify the court that some of the grounds it used, to have the case struck out, was based on deceit. The bank and its lawyers are guilty of conspiracy to pervert the course of justice.
- f) It is consistent with litigation against the banks, in which banks deny the accusations, draw out the litigation, and then admit guilt or settle, without anyone having to be vulnerable to a charge of perjury. An individual who behaves this way would end up behind bars and would be likely to lose his livelihood. *Too big to perjure?*
19. **The banks have continued to short precious metals, to a degree that continues to suppress the prices, even as it is being publicly investigated by BaFin, even as my evidence of the fake audit has been openly sent to various legal prosecutors.**
- a) This tells of a banking system confident that it can continue to commit fraud and profit from fraud, even when such fraud is on the verge of becoming as publicly recognized as Libor fixing and Forex manipulation.
- b) Justice is not being done and punitive remedies are thus far insufficient.

## Statements of Fact

20. In the case *Taylor gegen Fitschen* 32C 1953/14 (72), at the Frankfurt Amtsgericht, I took Jürgen Fitschen, CEO of Deutsche Bank, to court for gold price manipulation resulting in damages arising due to losses in gold bullion value I bought and sold at Deutsche Bank. Herr Fitschen did not appear, but was represented by his lawyer. In this claim the case shall be referred to as *Taylor gegen Fitschen*.
- a) The result of that case was due on the 5<sup>th</sup> of December 2014. I will not use its verdict as

justification of any argument in this case, but I will use statements made in that case that were neither denied by the absent Fitschen, nor were denied by his lawyer.

- b) In neither the court room nor the defence's correspondence were there any denials of *conspiracy to suppress the price of gold*, and the defence seemed to rest entirely upon Fitschen denying that as a CEO of Deutsche Bank, he was in any way responsible for the gold manipulation activities of Deutsche Bank.
- c) If required, I can present the court or defendants with electronic copies of the defence, but I have no English translation, and I do not have the resources to translate it professionally.

**21. I, the plaintiff, bought 100 grams of gold, 44kg of silver and 150 grams of platinum from Deutsche Bank, Konstablewache Branch, Frankfurt.**

- a) In *Taylor gegen Fitschen*, the judge, with the acknowledgement of the defendant's lawyer, read out the inventory as listed above, and I confirmed the amounts specified.
- b) Thus, the sum is taken to be an established fact in a court of Law. Fitschen and Deutsche Bank had time to confirm that the quantities specified in the lawsuit matched that of their own records, and there was no discrepancy between our accounting.
- c) The metal was in the form of coins and bars. All the silver and platinum was of .999 quality.
- d) The defendants can also validate the purchases by studying my bullion purchases under Deutsche Bank account 50070024 213286800. I permit Deutsche Bank to share my account details with the other defendants for the purpose of establishing the purchases.

**22. I, the plaintiff, have sold all the gold, all the platinum and 40kg of the silver to pay for essential household expenses.**

- a) I had no choice, other than to sell as I was unemployed/self-employed for the last two and half years, due to ill health, and that was recorded in my exit interview with my former employer Crytek.
- b) The bullion was sold to a number of parties and sales receipts are available, on demand, but are not included here to save paperwork. (I ask to serve the paperwork electronically, if demanded, to save the hundreds of sheets of paper that would otherwise be needed to be printed. An email address is all I require to serve the documents).
- c) The buyers include Deutsche Bank, Frankfurter Sparkasse and Ebay users.

**23. Precious metals are US dollar denominated assets, and I bought and sold them in Euros, which logically implies a Forex conversion, thus the Forex manipulators exposed my bullion to exchange rates that were not determined by a free market.**

- a) This argument was presented in *Taylor gegen Fitschen*, to no objection from Fitschen's lawyer.
- b) HSBC, UBS, JP Morgan Chase, Citigroup and RBS have all been fined by UK and US regulators for Forex manipulation. Regulators confirmed that Forex manipulation was a cartel activity that relied upon collusion and the abuse of High Frequency Trading systems.
- c) The regulators proved that Forex manipulators colluded to refrain from buying against short selling manipulation events: when one manipulator was selling too cheaply, the others would agree not to buy at the lower price. <http://www.fca.org.uk/news/fca-fines-five-banks-for-fx-failings> and <http://www.fca.org.uk/your-fca/documents/final-notices/2014/hsbc-bank-plc> give a damning report into the Forex cartel's immoral practices, effectively stealing from their own clients and destabilizing the entire financial markets worldwide.
- d) Barclays Bank is still under investigation for its role in Forex manipulation by the FCA.
- e) According to Bloomberg, Deutsche Bank and Barclays Bank are accused of using algorithmic Forex manipulation. <http://www.bloomberg.com/news/2014-12-10/ny->

[regulator-said-to-probe-deutsche-bank-barclays-fx-algorithms.html](http://www.ft.com/cms/s/0/863a7b3c-813e-11e4-896c-00144feabdc0.html#axzz3Lv3VTurj). The same story is reported by the Financial Times. <http://www.ft.com/cms/s/0/863a7b3c-813e-11e4-896c-00144feabdc0.html#axzz3Lv3VTurj>

- f) Deutsche Bank is under investigation for Forex manipulation by BaFin and CFTC. As reported by Reuters, on the 29 Nov 2014. *"So far we have only found isolated cases but they are anything but reassuring. These are possibly criminal acts that could happen because checks failed,"* Barramundi Roeseler told the *Wirtschaftswoche* weekly in an advance copy ahead of publication. Since the FCA and FINMA have already found banks guilty of cartel manipulation of Forex rates, BaFin are patently late on the scene, and are only confirming that manipulation was carried out in Germany.
- g) UBS has been fined for Forex manipulation by FINMA.  
<http://www.finma.ch/e/aktuell/pages/mm-ubs-devisenhandel-20141112.aspx>
- 24. Barclays Bank has been fined for gold price manipulation by the FCA.  
<https://fca.org.uk/your-fca/documents/final-notice/2014/barclays-bank-plc>
- 25. UBS has been fined for attempted gold price manipulation by FINMA.  
<http://www.finma.ch/e/aktuell/pages/mm-ubs-devisenhandel-20141112.aspx>
- 26. The US Embassy cable from Beijing, 09BEIJING1134 indicated that gold price manipulation in the West was used to protect the US dollar and the Euro as reserve currencies. This is equivalent to the argument that suppression of precious metal prices is done to prevent the metals functioning as a hedge.
- 27. As reported by the Financial Times, around 12<sup>th</sup> January 2014 BaFin announced an investigation into Deutsche Bank for gold price manipulation.**
  - a) Deutsche Bank has not denied gold price manipulation.  
<http://www.ft.com/cms/s/0/70b0f3a8-f7a1-11e3-b2cf-00144feabdc0.html#axzz3KvkQcTSb>
- 28. I, the plaintiff, sent a demand for damages to Deutsche Bank executives in late January. Deutsche Bank claimed to investigate my demand between 10<sup>th</sup> of February 2014 to 10<sup>th</sup> July 2014 and concluded there was no case to answer. Copies of the paperwork are attached.
- 29. Around June 19<sup>th</sup> of 2014, as reported by Reuters, Deutsche Bank began a public gold manipulation audit into its own gold trading.
  - a) <http://uk.reuters.com/article/2014/06/19/gold-fix-investigation-idUKL5N0OY4VA20140619> provides a link, and the articles can also be found by a Google search for 'Reuters June 19 gold audit'
- 30. Libor manipulation is a misrepresentation of interbank lending rates.** Lending rates are a measure of default risk for a loan, a solvency metric for the borrower. Ergo Libor manipulation was solvency misrepresentation.
  - a) The defendants have been found guilty and fined for interest rate manipulation.  
<http://www.theguardian.com/business/2013/dec/04/banks-rate-rigging-libor-euribor-rbs-citigroup-jpmorgan>
  - b) <http://www.lbc.co.uk/the-barclays-libor-rigging-scandal-explained-56812>
  - c) <http://www.dailyrecord.co.uk/news/business-consumer/rbs-fined-325m-part-illegal-2888389>Those links above all record cartel manipulation.
- 31. Most/All the Libor manipulators were beneficiaries of Quantitative Easing and in particular Deutsche Bank received bailouts from the US Federal Reserve and benefited from the bailout of its debtors in the US bailouts. [http://www.washingtonpost.com/wp-dyn/content/article/2010/12/01/AR2010120106870\\_2.html?sid=ST2010120106876](http://www.washingtonpost.com/wp-dyn/content/article/2010/12/01/AR2010120106870_2.html?sid=ST2010120106876)
- 32. Quantitative Easing is the buying of bad or poorly performing debt instruments in return for an electronic cash position in a central bank or similar authority.
  - a) Ergo the solvency issues of the Libor manipulators were transferred to the nations

hosting Quantitative Easing. The Financial Times here records that MBS's were bought by the US Federal Reserve, which effectively put the bad debt issues of the subprime mortgages onto the government's QE liabilities: <http://www.ft.com/cms/s/0/69e8c92c-e758-11df-880d-00144feab49a.html>

33. Graphs showing precious metal price fluctuations day by day, month by month, year by year. The graphs justifies the assertion that silver and platinum are priced in terms of gold.
- <http://www.kitco.com/charts/livegold.html> and <http://www.kitco.com/charts/livesilver.html> and <http://www.kitco.com/charts/liveplatinum.html> demonstrate the correlation between price fluctuations of the precious metals and show show that the markets are not entirely independent.
  - Prices go up and down in parallel by degrees that are not matched in change in exchange rates. Exchange rates often remain static while these vertical changes occur, which indicates that the precious metal markets are valued in relation to each other and are not free to diverge.
- 34. The gold to platinum abundance vs price disparity.**
- Gold is mined in quantities about 2700 tonnes per year.
  - Platinum is mined in quantities of about 180 tonnes a year.
  - That is a ratio of 15:1.
  - Given that 50% of platinum is consumed by industry this results in a bullion supply ratio of 30:1.
  - Platinum prices have not differed by gold prices by more than about 20% in the last 5 years.
  - The disparity between abundance and price differential directly confirms price suppression.
  - The USGS 2012 Minerals Yearbook (Platinum-Group-Metals) states thus: *In 2012, world platinum mine production decreased by about 9%; South Africa produced 133,000 kg of platinum, a 10% decrease from that in 2011, and accounted for 73% of world production.*
  - The 2011 Minerals Yearbook by the USGS states thus: *An estimated 171,300 metric tons (t) of gold was mined historically through 2011, with 29,500 t held by central banks as official stocks, 33,000 t held privately as investment, 84,300 t held privately as jewellery, 20,800 t in other fabricated products, and the remaining 3,600 t unaccounted (Klapwijk and others, 2012, p. 59).*
- 35. The silver to gold abundance vs price disparity**
- An estimate of the above ground silver bullion is harder to come by, but multiple expert sources suggest 600 million to 1000 million ounces.
  - This is approximately 30,000 tonnes, or about the order of the amount of gold held by the central banks
  - The price differential between silver and gold is of the order of 70-1, yet the bullion availability is near parity.
- 36. Delivery Failure**
- In January 2013 Germany demanded repatriation of 700 tonnes of the 1500 tonnes of German gold bullion stored in the USA. By 2014 only 5 tonnes were shipped from the USA. Source: <http://www.mining.com/the-fed-only-gave-germany-back-5-tonnes-of-gold-in-over-a-year-82989/>
- 37. Misappropriated inventories**
- While Germany receives only 5 tonnes of its national gold reserves in 2014, perhaps over 2000 tonnes were shipped to China.
  - China Gold Yearbook 2014 states: *Chinese wholesale gold demand in 2013 was 2,199*

*tonnes; bullion import 1507 tonnes, doré import from overseas mines 17 tonnes and domestically mined gold accounted for 428 tonnes.*

- c) The exact amount of gold exported to China per year is not easy to quantify, as we must add jewellery sales to the above figures, and black market/unlisted trade in gold.
- d) When silver fell below \$16 an ounce in November of 2014, the US Mint sold 2 million Silver Eagles in 2 hours and then ran out of stock. A disparity between price and stock <http://www.bloomberg.com/news/2014-11-06/american-eagle-silver-coins-sold-out-as-demand-soars.html>
- e) <http://www.washingtontimes.com/news/2014/sep/17/house-approved-ron-pauls-audit-fed-bill/> The US government refuses an independent audit of the US Federal Reserve.

**38. HSBC deceitful in a court of law in related matter:**

- a) As can be seen in HSBC's defence to case A01CL878, the Royal Courts of Justice, point 6g, signed/credited by HSBC's Alexcia Knight: "This document makes serious allegations....and pending proper particularisation they are an abuse of process and are denied."
- b) <http://www.fca.org.uk/your-fca/documents/final-notice/2014/hsbc-bank-plc> demonstrates that HSBC was found guilty of Forex manipulation. Also in that document demonstrates that it did not learn the lessons from LIBOR and EURIBOR manipulation.
- c) After I sent a demand for reparations related to this claim, for the damages specified in this claim, I received an email from HSBC's Daniel Chumbley that claimed HSBC was guilty of no wrongdoing.
- d) The emails are not easy to represent on paper in an easy way, as they contain embedded documents, but the emails can be demonstrated in any court of law with the help of an Internet connection.
- e) They will be forwarded to the court using its email filing system when I have a suitable claim number.
- f) The claim clearly contradicts FCA's findings and could, in my opinion, be regarded as a *conspiracy to pervert the course of justice*, wrongfully indicating a state of innocence, when it has already been found guilty of the Forex manipulation and the Libor manipulation asserted, so attempting to dissuade me from litigating against it, when it is patently liable.
- g) HSBC was given a discount on their fine from the FCA for an early admission, indicating it was telling the FCA it was guilty at the same time it was telling the courts the Forex manipulation claims in A01CL878 were denied.
- h) The accusations in my claim A01CL878 specified that the defendants had likely committed Forex manipulation. The defendant HSBC thus was in no position to deny, in its defence in a court of law, the suggestions of Forex manipulation, and not use the *lack of particularisation of Forex manipulation* as grounds for abuse of process. In my opinion HSBC combined perjury with contempt of court.

**39. Expert Opinions**

- a) The head of BAFIN, Elke Koenig, indicated that gold price manipulation could be bigger than the LIBOR scandal. The LIBOR scandal was a fraud that impacted over \$350 trillion of assets. Elke Koenig is thus indicating the entire financial system is predicated on price suppression. <http://www.bloomberg.com/news/2014-01-16/metals-currency-rigging-worse-than-libor-bafin-s-koenig-says.html>
- b) According to Mark Branson, FINMA's CEO, *the behaviour patterns in precious metals were somewhat similar to the behaviour patterns in foreign exchange and clear attempts to manipulate fixes were made in the precious metals markets.* <http://ca.reuters.com/article/newsOne/idCAKCN0IW12Q20141112>
- c) In December of 2013, Ken Hoffman of Head of Bloomberg Metals and Mining Research

broadcast the following in Bloomberg news: *You could go into a vault in London a couple of years ago and they were packed to the rafters with gold. You can walk in those vaults today and they're virtually empty. All the gold has been transferred out of London. ... 26,000,000 ounces has gone to Switzerland where it's been recast into a higher grade and shipped off to Hong Kong and then into China, never to return. That gold is just not there anymore.* <http://www.silverdoctors.com/bloomberg-london-gold-vaults-are-virtually-empty-all-the-gold-has-been-transferred-to-hong-kong/#more-36240>

#### 41. Analysis of the Comex

- a) Consider the review of Deutsche Bank's gold shenanigans in this report. <http://seekingalpha.com/article/129128-did-the-ecb-save-comex-from-gold-default>. It tells directly that the ECB is bailing out Deutsche Bank's short selling by misappropriating European gold bullion, and has not been refuted by Deutsche Bank in the 5 years in which the story has been circulating. The important points are:
  - i. Deutsche Bank is a short seller on the COMEX for private profit.
  - ii. It colludes with the ECB to misappropriate European bullion.
  - iii. In the event that it faces a loss on the COMEX, the ECB and then the European citizen ends up paying the price. Private profits. Socialized losses.
- b). Consider the review of Comex's 2011 margin requirement hikes: <http://www.forbes.com/sites/afontevicchia/2011/08/24/margins-on-gold-hiked-27-as-it-tumbles-more-than-100-in-a-day/>.
- c) *CME's official response is always that margins are part of the tools used to provide neutral risk management services.* - When these margin hikes occur at times that are not known in advance they have exposed investors to losses, that is, the power to apply arbitrary ad hoc margins is itself a risk to the small investor, and a risk that was realized when such investors lost money on the hikes. If the CME were truly interested in risk management it would impose position limits on short selling, that is limit what could be sold in compared to what is held in the Comex vaults. CME is patently disingenuous.
- d) Consider <http://investmentresearchdynamics.com/tag/comex-fraud/> The article exposes the ratio of open interest to Comex inventory. Why is there never a good explanation from the Comex or the banks on the extraordinary disparity? An honest party does not leave allegations of corruption without refutation.
- e) The practice of suppressing a price with short selling is so well known, that it has been given its own term – *bear raid*. [http://en.wikipedia.org/wiki/Bear\\_raid](http://en.wikipedia.org/wiki/Bear_raid). In the Wikipedia definition, a means is documented that requires spreading false rumours, or mis-information. Clearly any participant that both short-sells contracts while forecasting a depression of price is creating a conflict of interest. The banks have no honest business holding massive short positions in the precious metals while publicizing negative forecasts on the price movements.
- f) **The defendants trade on the Comex via affiliates.**
  - i. Barclays Bank, through Barclays Capital Inc.
  - ii. Deutsche Bank, through Deutsche Bank Securities Inc.
  - iii. HSBC, through HSBC Securities (USA) Inc
  - iv. UBS, through UBS Securities LLC.
  - v. JP Morgan, through JP Morgan LLC
  - vi. RBS, through RBS Securities Inc.
  - vii. Citigroup, through Citigroup Global Markets Inc.
- g) The mass of silver underlying a Comex silver contract is 5000 ounces.
- h) Manipulating the price of precious metal contracts requires manipulation of other metrics for precious metal prices, primarily the Gold Fix and the Silver Fix. The LBMA

chairs, the committee that controls the Gold Fix, include JP Morgan Chase, HSBC and UBS.

i) When Deutsche Bank were investigated for gold price manipulation by BaFin they resigned their chair in the Gold Fix, without explanation. There was also no denial of gold price manipulation, and no denial that the Gold Fix was instrumental or otherwise in that manipulation. Deutsche Bank's systematic silence in the face of allegations is incriminating enough. Given its guilt, the other members of the Gold Fix should be deemed to use the Gold Fix as part of the manipulation machinery for the suppression of precious metals as a useful hedge against the banking system's insolvency.

### **Damages Demanded**

1. For stress resulting from obstructive procrastination, the unnecessary litigation which should have been settled on the first request, and the stress of living for two and half years of poverty, I demand aggravated damages of £500,000.
2. For assets mispriced by illegal Forex manipulation I demand damages of £250,000. This is punitive, and does not require quantification. If the defendants object to this sum, then those defendants that have been found guilty for Forex manipulation should have to demonstrate why their frauds did not create liabilities of this order. It is they who have the electronic records of Forex trading, and it is they who understand the dark pool trading systems well enough to evaluate the damages. The burden of proof should not depend on me.
3. For suppression of the price of silver and platinum by manipulation in the electronic currency markets, I demand damages of £250,000 which accounts for loss in investment opportunities due to the frauds leading to my extended period of poverty. These again, are considered aggravated damages.
4. Since all the defendants actions have potentially rendered our currencies worthless by destabilizing the nation states, and exposed their host nations to sovereign default risk and hyperinflation, I demand that payment of sterling damages is made in platinum bullion.
5. The current price of platinum, when this claim was first made, is about £24,000 per kg, the kilograms of platinum bullion owed to me in damages is thus the level in sterling damages divided by 24,000. £24,000 per kg shall be deemed the price of platinum in this assessment whether the price rises or falls by many orders of magnitude by the time of repayment.
6. For the losses in the 40kg of silver bullion and 150 grams of platinum bullion I was forced to sell at suppressed rates, I demand reparations of 40kg of silver bullion and 150 grams of platinum bullion in addition to the damages in platinum bullion computed above.
7. The defendants are responsible for paying whatever taxes and levies and delivery costs are due to the damages delivered in bullion, including future capital gains tax if applicable.
8. Delivery of bullion damages must be made to any locations of my choice within Western Europe, Canada, the USA, New Zealand and/or Australia in any partial quantities until the damages are completely delivered. Platinum bullion should be in 50 gram bars, while silver bullion should be in 500 gram or 1000 gram coins or bars. All materials should be .999 refinement or better. The defendants should validate the precious metal content of the damages, and in the event that the bullion is forged (less than .999 refinement of the metal specified on the bar), the defendants be liable to replace every forged bar with two genuine bars - ad infinitum.
9. If a government, by decree, forces me to sell my bullion to itself, or a third party, or otherwise confiscates it, and a defendant bank (or its creditors or its debtors or its shareholders or bondholders) profits from any of such government's finance schemes, e.g bail-in, bail-out, Quantitative Easing etc. the defendant bank is obliged to sell to me bullion in the quantities that I was forced to sell at the price at which I was forced to sell for a duration of up to 25 years after the sale date, and to commit such a sale in any nation of my

choice in which the defendant bank has a retail or investment outlet. In the event of government confiscation of bullion, without cash payment for the bullion, the sale price is deemed to be zero for the purposes of this calculation. The liability for VAT and other levies on such a reimbursement falls upon the defendant bank. Every defendant bank is subject to this option to buy. This is to protect my damages from banks that would repay me in bullion, only to have colluded with governments to seize that bullion. As the bullion vaults appear to have been emptied by such a collusion, I consider this a necessary clause, with a high chance of being used by me to redress confiscation.

10. If the level of damages appear to the court to be too arbitrary, or not of the creed that the court can order to be remedied, then the alternative is to assume that silver's price should have achieved parity with gold's price, resulting in damages that are of the order of those requested. With silver higher than \$2000 per ounce, and my total sales of 40kg, this yields a sum in excess of \$2.56 million, more than enough to cover the damages for which I ask.
11. With the evidence that Deutsche Bank and Barclays Bank are algorithmically distorting Forex rates, and HSBC is recalcitrant in its admission for its role in Forex manipulation, show that the FCA's fines have not had a restitutive effect. Restitutive damage and punitive damage would seem appropriate, in this and succeeding litigation, until the defendants show clear penitence, responsibility and transparency.
12. Any offers by the defendants to settle, in pounds sterling, should be divided by 24,000 to determine the number of kilograms of platinum repaid.
13. The share of any defendant unable to pay or who cannot be legally be made to pay, while being held indebted to pay by the court's decision, should fall equally upon the other defendants.
14. Any single defendant can be ordered to deliver any part of the bullion owed by the collective on demand, and it is the responsibility of all defendants so found against in the court to share and resolve the damage burden between themselves.

### **Notes on Exemplary/Restitutive Damage**

In the case that defendants deny the lawfulness of restitutive damage, I ask the court to consider the following:

1. Most of the defendants have not been fined for precious metal price manipulation, thus for such damages most of the defendants will not be penalized twice. Even those that have been fined for such, were only fined for particular infringements and I am not suing against those particulars.
2. The defendants have all been fined for particular infringements of market manipulation, allowing a permissive culture in which rogue traders can and do collude. They have not been fined for the charges levied here, that the banks as a whole, commanded by their executives, have used the Comex market to perpetrate a systematic gross fraud for an extended period of time. So again, restitutive damage for such activity has not been already imposed.
3. The involvement (or laxity) of the central banks, who are in a position to see the necessity of inside trading to prevent panic-buying before a QE withdrawal event, tells us that governments are involved with Forex manipulation and we can expect the regulators to impose no more than token fines.
4. Regulators have imposed no more than token fines, less than one part in a thousand of the daily turnover of Forex markets. The fines are not genuinely restitutive and the regulators are there to give the illusion of regulation and enforcement. The regulators are taking their wages and not doing the jobs they are paid to do by the taxpayer.
5. That government advise the masses to buy into private pensions, while running a Negative Interest Rate Policy, is demonstration enough that the government is conspiring to defraud its electorate, and conspires with the regulators, the central banks and the investment banks.

6. The fundamental issue of the Magna Carta, that no man, even the monarch, is above the law, is reason enough to find the government's conduct unlawful and fraudulent. Government is not above the law and its subterfuge that favours the banking elite, is not somehow justified by the power of its conspirators. Freedom to manipulate was never put into a manifesto.
7. Any liquidity issue from a fine can simply be resolved with a QE style bailout, the ultimate liability of which falls upon the taxpayer (since QE is technically an electronic government bond). Thus, as a taxpayer who put his life savings into bullion, I find the fines arising from the suppression of those savings could well be taken from *my* future earnings, and taken from the earnings of people whose pension schemes pay negative interest. This is patent lunatic corruption and explains in itself why we are in a deflationary collapse. It should be crystal clear why the fines are not restitutional when banks are *too big to fail*.
8. The fines against the defendants have clearly not had the effect of deterring the defendants from successive market manipulation. If one accepts precious metal manipulation, as alleged, then the Forex manipulation fines were clearly no deterrent against more serious frauds and the permissive culture has not changed. Such is the impotence and laxity of our regulators that it should be transparent that restitutional damage should principally be determined in civil litigation and paid to the victims of the banks' corrupt schemes. The result of regulators' investigations should form the basis for streamlined litigation to this end, and not, how it stands now, yielding little more than wrist-slapping token fines that serve to protect the banks from facing serious restitutional consequences for their frauds. Whistle-blowers only benefit should be that they pay less restitutional damage in civil cases (providing they behave as well in those cases as they do before the regulators). There is no reason to suppose other than that the regulators' principle function is to limit the banks liability to fraud in civil proceedings, and so cement institutional lawlessness into the foundations of our legal system.
9. To reiterate other points, current litigation laws, that require quantification of damage in an anti-trust lawsuit, to establish damages, leads to injustice, as the banks capitalize upon their own complexity and opacity. Such laws only helps perpetuate criminal activity, and the solution is exemplary damages to compensate.
10. That banks, whose money base is founded upon retail business, that is *deposits, personal loans and mortgages*, can use these assets to fraudulently short sell other markets and expose everything to unlimited losses, while using High Frequency Trading and Dark Pool secret transactions to obfuscate the level of exposure is certain to end in vertical catastrophe. Retail and investment banking should never have been allowed to merge. Restitutional damage can be the start of that separation, so that QE, a taxpayer liability, is limited to deposits, personal loans and mortgages of the people who are held liable and foot the bill, and not put into the hands of the lawless elite. The fake wealth built upon investment banking should be allowed to collapse, using the mechanics of civil litigation, and the natural recipients are those who have suffered the most serious frauds.
11. While the suppression of prices of a cartel may appear, ostensibly, as good for consumers, the required quantum to trade in a Comex contract, the predatory change in market rules (margin requirements) to trade on the Comex, and the opacity of the cartel regarding the length of time in which suppression is planned, ensures that many small traders and savers with day-to-day expenses will be exposed to losses, while the wealthy, who can afford to weather the period of suppression, receive the benefits. It does not benefit the general consumer. In the case of gold, where all the evidence tells of misappropriated bullion reserves, the wealthy will have clearly profited from treason, ergo the case for restitutional damages.

## Appendices

### **US Embassy admits gold manipulation reports that were not allowed to enter mainstream news. Evidence that politicians, diplomats and media cartels are colluding with the banks.**

US embassy cable – 09BEIJING1134.  
Article 3. CHINA'S GOLD RESERVES

"China increases its gold reserves in order to kill two birds with one stone"

*The China Radio International sponsored newspaper World News Journal (Shijie Xinwenbao)(04/28): "According to China's National Foreign Exchanges Administration China 's gold reserves have recently increased. Currently, the majority of its gold reserves have been located in the U.S. and European countries. The U.S. and Europe have always suppressed the rising price of gold. They intend to weaken gold's function as an international reserve currency. They don't want to see other countries turning to gold reserves instead of the U.S. dollar or Euro. Therefore, suppressing the price of gold is very beneficial for the U.S. in maintaining the U.S. dollar's role as the international reserve currency. China's increased gold reserves will thus act as a model and lead other countries towards reserving more gold. Large gold reserves are also beneficial in promoting the internationalization of the RMB.*

### **How The German Language Protects Deutsche Bank From Litigation And Leads to Systematic and Deliberate Discrimination Against Foreign Litigators by the German Courts.**

The matters here explain why I pursue justice in England, and not in Germany, which may be of relevance if jurisdictional issues are raised by Deutsche Bank.

In Germany, the cap for small claims is 5000 Euro, and for claims more than this limit one requires a lawyer. Thus any significant small claim litigation against Deutsche Bank by an individual, such as myself, is limited to this cap. All the discourse in court correspondence must be in German, which entails translation costs. It does not take much correspondence to run up translator bills that are of the order of the sum awarded, and these typically cannot be claimed back as costs. In comparison, the UK small claim limit is £10000, which is about three times larger than the German limit. Translations costs for small claims in the UK thus have less of a relative cost to the total that can be won.

In my correspondence with Deutsche Bank CEO Jürgen Fitschen's lawyers, asking for out-of-court settlement, I knew that the bank and the bank CEO all used English as the language of commerce, so to save costs I made requests to them in English. The lawyers always responded to the court by demanding a German translation. When I first approached Judge Frau Lorenz, as recorded below, she told me, as witnessed by my translator, that *foreign litigants are not expected to turn up* (and thus will surely lose litigation). For the judge to make such a comment, one would presume that the court institutionally discriminates against foreign litigants, to the effect that they can expect to lose, or not recover their translation costs.

Deutsche Bank and Frankfurt all enjoy the advantages of doing business in English, while limiting litigation to German, and capping small claims so that small claim judicial remedy is near off limits to the English. It is blatant systematic and institutional discrimination, putting nationalism before justice. I would like some of the costs of this discrimination, which I have suffered, trying to run an honest and appropriate claim against Herr Fitschen, considered in the damages against the defendants. If the court finds in my favour, Anshu Jain is invited to recover half the money awarded to me for this matter from Herr Fitschen in his own dealings with him.

At the time of writing this sentence, 22<sup>nd</sup> January 2015, I have still not heard from the Frankfurt courts the verdict of which was due on the 5<sup>th</sup> of December 2014. The two week periods between writing a response and posting that response, the issue which caused me to invoice the courts for obstructive procrastination, makes perfect sense if the system deliberately and systematically imposes delays so that litigators have reason to bribe officials for celerity. Not having made such a bribe, I have suffered such delays in almost every correspondence from the court. <http://justice4germans.com/2013/07/11/corruption-in-the-german-justice-system-exposed-a-former-judge-speaks-out/> is entirely consistent with this assertion. I thus consider the invoice against the court, which was not contested by the court, (nor were its delays causal to the allegations justified by the court), to still be in effect and currently unpaid and so outstanding. I also accused it of colluding with Jürgen Fitschen, which was later further justified by his lawyer's refusal to send me a copy of the court documents that were sent to his lawyer, informing them of the invoice directed to the court, which should not have been a matter for Fitschen's lawyers, but the court official's lawyers.

Consideration of all these points show why the courts of Germany, especially the Frankfurt courts, are not an appropriate places in which to conduct litigation against Deutsche Bank or its CEOs.

### **Wikipedia Entry For Central Banks Role in Libor Manipulation**

*The Governor of the Bank of England Mervyn King, by the end of 2008, described the Libor to the UK Parliament saying "It is in many ways the rate at which banks do not lend to each other, ...it is not a rate at which anyone is actually borrowing."*

*The New York Federal Reserve chose to take no action against them at that time. Minutes by the Bank of England similarly indicated that the bank and its deputy governor Paul Tucker were also aware as early as November 2007 of industry concerns that the Libor rate was being under-reported. In one 2008 document, a Barclays employee told a New York Fed analyst, "We know that we're not posting an honest Libor, and yet we are doing it, because if we didn't do it, it draws unwanted attention on ourselves."*

*The documents show that in early 2008, a memo written by then New York Fed President Tim Geithner to Bank of England chief Mervyn King looked into ways to "fix" Libor. While the released memos suggest that the New York Fed helped to identify problems related to Libor and press the relevant authorities in the UK to reform, there is no documentation that shows any evidence that Geithner's recommendations were acted upon or that the Fed tried to make sure that they were. In October 2008, several months after Geithner's memo to King, a Barclays employee told a New York Fed representative that Libor rates were still "absolute rubbish."*

### **Assessing the Correct Price of Silver Bullion**

Due to industrial consumption, there is now about a billion ounces of silver bullion on Earth. Given that the total hard asset value of the world is of the order of 200 trillion US dollars, then a 1% hedge of those assets into the silver market prices silver at \$2000 per ounce. The price rise we saw of silver in April of 2011 was over 20%. The price was hit after 7 margin requirement hikes from the Comex, which I deem part of the manipulation. Increasing margin requirements increased the cost and risks of investment with precious metals, which is why it depressed prices, by reducing demand. The only people left in the game had sufficient financial reserves to make margin requirements irrelevant – the largest banks. It was a policy that favoured the very people who were found guilty of Libor and Forex manipulation. If the market had been run honestly we can guess a 20% increase month by month, yielding over 800% gains in a year. We could have expected prices of silver in April of 2012 of \$400 an ounce and \$1000 an ounce by 2013. There is no reason with silver bullion abundance of the order of gold bullion abundance why silver prices could not have achieved parity with gold prices. With gold prices themselves correcting, then \$1000 or \$2000 may eventually be reviewed as bargain basement prices.

### **Petition for Jury Trial**

The cartel is accused of fraudulent criminal conspiracy, and so the civil litigation is for criminal damages. Proof is included that demonstrates severe criminal conspiracies by Deutsche Bank executives. The seriousness of the matters, and the political connections of the defendants make it likely that a judge acting alone will face unlawful political pressure. A jury trial would alleviate the pressures for a judge in this case. In the case that Deutsche Bank and its CEO do not give a reasonable explanation of their correspondence (that leads me to reasonably believe that their audit was fake: the basis of this litigation), I ask for immediate judgement against them. This seems to me consistent with section 69 of the Supreme Court Act 1981.

### **Financial Circumstances**

1. I have lost all my life savings to the defendants' suppression of what should have been a wise investment and though I am not significantly in debt at this time, I have almost no liquidity, so it is not impossible that if debts emerge in the next few months that I face bankruptcy. As the defendants are charged with inflicting my destitution, and the reparations would resolve all my financial issues, then I beg the court to not let any dire change in my financial circumstances throughout the course of the trial inhibit its progress in any way.
2. As the defendants have been found guilty of severe financial crimes I beg to the court to impose all costs on the defendants whatever the final outcome of the trial, including all the court fees. As I showed, the question of their guilt is not *whether* but *degree*.
3. I request that I be allowed to serve as much documentation as possible electronically, because my means are limited, and each set of paper documents delivered to the defendants creates significant postal expense. There is no reason, in the modern electronic age, why the defendants cannot supply email addresses for direct correspondence.
4. In the event a preliminary hearing finds against Deutsche Bank and its CEO from its apparently undefendable position, in faking its audit, then Deutsche Bank and its CEO should pay immediate interim damages paid to me of the amounts specified in the damages, to help me progress the case against the rest of the cartel.

### **Note On Pre-Action Protocols**

As Deutsche Bank have already been given almost a year to settle the demands, and, as I believe, they faked a gold manipulation audit, and faked their investigation of my demands, I see no reason why any more time should be given to them. It is in the public interest for a public jury trial to be seen to give its verdict on Deutsche Bank's conduct, and the conduct of the rest of the manipulation cartel. *Justice must be seen to be done*. The pre-action protocols would give more time to allow the cartel to manipulate precious metal prices and distort further an already broken market, and thus they are inappropriate and would result in further injustices. From the patterns we have seen, they have not stopped manipulating, and have not stopped lying. The short positions on the Comex are growing exponentially in time. Most the defendants are being sued for precious metal price manipulation, and there is no indication that any of them will settle out of court.

### **Notes on Individual Defendants For Determination of Damages**

Here I give some reasoning to the judge for determination of share of damages, in the case that the court finds against the defendants.

According to what I believe is UK Law, when one sues a cartel one can sue any member of the cartel, and one is not required to sue every member. The purpose of suing multiple parties is to

protect against the case that some of them becomes insolvent before damages are awarded. Suing multiple parties may also serve the public good by exposing guilty parties that have avoided criminal prosecution. Though not defendants in this litigation, it should be clear that most the regulators, the US Federal Reserve, the Bank of England, the Swiss National Bank and the European Central Bank are all complicit with interest rate manipulation, Forex manipulation and precious metal price suppression. That QE was deemed criminal and illegal by the German constitutional courts is entirely logical as demonstrated in this claim. It was never in the tax payers interests to bail out bad debts of investment banking while leaving the debt issues of retail banking untouched. Taxpayers are being made liable for the irresponsible gambling and egregious frauds of the insolvent banking system. Fines, rather than compensating the taxpayer, are made liable to the taxpayer. The fines themselves are part of the cartel activity and are an essential hedge of the fraudsters. The perfect crime is not that which leaves no evidence, nor that which leaves no suspicion, but that which is carried out in the name of the law.

1. Anshu Jain, as Co-CEO of Deutsche Bank needs to have provided a reasonable explanation for the inconsistencies of DB's correspondence to me with that of the public statements and policies it has made in response to the BaFin investigation. With lack of such, it should be natural for the court to come to the conclusion that BaFin's investigation is well justified and has identified a guilty party, and Anshu Jain incriminates himself by his lack of explanation. He is the one man in England with the greatest power to identify the chain of responsibility that led to Deutsche Bank's duplicity. Aggravated damages would best fall on he, the most responsible party. It is possible that Anshu Jain exposes his own board for corruption while pleading his own personal innocence. If this latter case is presented and believed by the court then I would wish all aggravated damages to fall upon Deutsche Bank.
2. If not upon the shoulders of the CEO, the conspiracy to fake a gold price audit, which caused me to expend the last of my life savings in litigation, falls upon the board of Deutsche Bank. For this Deutsche Bank must be first in line to pay for aggravated damages should the sum not be extractable from Anshu Jain.
3. HSBC is a major silver trader, that works with Reuters Thompson to set the new Silver Fix - in itself this is enough to identify the dominance of its trading position. As a major participant in electronic representations of gold and silver, its liabilities for silver price suppression is a given. One cannot form a successful cartel without the support of the leading market players.
4. Barclays Bank (along with Deutsche Bank), under investigation for short-selling manipulation collusion of Forex rates, loses tens of millions having its short position against the Swiss Franc (CHF) unfold when Switzerland decouple their currency from the Euro. With Barclays a QE recipient, it should have no business wasting UK taxpayer bailout money exposing its depositors and shareholders to possible unlimited losses. In the event that the Euro were to completely collapse, such shorts would destroy the bank. Clearly the traders and the board have not learned from the Forex fines. The UK taxpayer was fortunate that the decoupling was broken by the Swiss National Bank, in anticipation of European QE, and was not broken following QE's hyper-inflationary impulse. The 30% change in the CHF against the Euro in a single day demonstrates that the correction between free market rates and artificial rates is capable of bringing down institutions. The short positions, as a buffer against a rising Swiss Franc, could be interpreted as a way of hiding the weakness of the Euro, and so one can reasonably suspect Deutsche Bank and Barclays Bank of illicitly using UK taxpayer liabilities to prop up the failed European Union. It is not the job of the banks to support the political union, and one wonders what favours are returned to them from the European Central Bank. The conclusion is that Barclays Bank, though a limited player in the precious metal markets, has no virtuous reason to short materials, whether currencies or

metals, and that its very recent history of manipulation, flying in the face of the FCA reports, tells of a participant who will eagerly and systematically join any cartel in which it can profit, and suppress the natural free market trend for its own profit. This calls for more than token damages.

5. UBS, while being a small player, has already been found guilty of attempted Forex manipulation and attempted gold price manipulation. FINMA showed it has the technology and the cartel connections to elicit such manipulation, and it is unreasonable to assume that no manipulation has occurred outside of the particular manipulation event for which it was found guilty. It should pay at least a token in damages.
6. JP Morgan Chase, perhaps holding the greatest short positions, and having the most control of physical silver, acquired by short manipulation, should be a little more liable than HSBC and a little less liable than Deutsche Bank.
7. Citigroup's fine for Forex manipulation was \$400 million higher than that of HSBC. <http://www.bloomberg.com/news/2014-11-12/banks-to-pay-3-3-billion-in-fx-manipulation-probe.html>. This suggests that it was more responsible for Forex manipulation than HSBC. A quick Internet search for *Citigroup buy gold* and *Citigroup short gold* identifies that Citigroup is the cartel's propagandist to suppress the price of gold with misinformation. The predictions that the price would fall over 2014 are understood to be less prescient than they appear when one understands it has been found guilty of cartel suppression in associated markets. As a propagandist for the cartel it should be held as liable as HSBC or JP Morgan.
8. RBS
  - a) being 80% owned by the British taxpayer, should not be in the business of speculating on Forex rates, let alone manipulating them.
  - b) Look at the RBS Gold Bullion GBP Hedged Tracker: [http://ukmarkets.rbs.com/EN/MediaLibrary/Document/PDF/ProductDocuments/GB00B59N1890/GB00B59N1890\\_EN\\_Factsheet.pdf](http://ukmarkets.rbs.com/EN/MediaLibrary/Document/PDF/ProductDocuments/GB00B59N1890/GB00B59N1890_EN_Factsheet.pdf) Consider page 2, **Why Gold:** '*Assets such as shares and real estate tend to move together so although a portfolio may initially seem diversified, if one of these asset classes falls, it is quite likely that so too will the others. Gold on the other hand tends to be negatively correlated with these assets and as such, when they fall gold tends to rise. Investments referencing gold therefore bring more significant and meaningful diversification and in turn potentially create a more stable portfolio across business cycles. Gold can also protect investors' portfolios from inflation....*' Clearly, RBS understands the function of gold as a hedge.
    - i) With RBS understanding the gold as a hedge, then is it rational, such a player, which has been found guilty of cartel collusion, with all the major banks, in Forex manipulation, would not know that the gold price is suppressed? With the systematic suppression of the gold price, the Hedged Tracker would not likely generate profits for RBS unless they had the inside foreknowledge of price movements.
    - ii) RBS is a small player the main function of bringing it into the litigation is to expose that it should not be using the taxpayer bailout in any part of investment banking. A token of damages is all that is required to make that point.

#### **Disclosures by the Defendants Needed To Simplify Proceedings in a Preliminary Hearing**

The public investigations for interest rate fixing, exchange rate manipulation, and precious metal manipulation are not all at the same point of progression for all defendants. While HSBC admitted Forex manipulation to the FCA, for example, Barclays Bank denied the manipulation and FCA have not yet made a decision for that latter bank. This makes it difficult to group defendants for their part in the liabilities of the damages due. Clarification could be achieved by each defendant being asked to submit, under oath, a plea of innocence, or declaration of guilt of each of the important matters involved, and the banks with which they have colluded in order to effect manipulation. This will

have the side effect of allowing regulators and third parties to use such declarations in their ongoing investigation. In the case that defendants accept a fine from a regulator without contest for a particular class of fix/manipulation, but have denied that the bank is guilty of such kind of fix/manipulation in the hearings of this case, then the case of a *conspiracy to pervert the course of justice* is clear and all board members who authorize such a denial will be instrumental in that conspiracy, and so such a denial should be explicitly signed by real people, and not hide themselves through the veil of a corporate identity, i.e. the names and signatures of such responsible parties in the denials must those of flesh and blood natural persons. A bank that pays a fine is deemed guilty of the charges associated with that fine – it is no excuse to blame rogue traders. If rogue traders were the issue then the fine would be against them and not the bank itself.

Each defendant is asked to resolve the following questions to the court, in its own defence:

1. Whether their bank conspired to manipulate exchange rates.
2. Whether their bank conspired to manipulate interest rates.
3. Whether their bank conspired to manipulate precious metal prices.
4. Whether their bank suffered solvency or liquidity problems as a result of subprime misselling.
5. Whether their bank exchanged subprime debts to any central banks for access to an electronic cash balance, that is Quantitative Easing, QE.
6. The total value of the cash balance held in the defendant's QE accounts.
7. The open interest of the defendant bank on the Comex, regarding silver, platinum and gold contracts, and a graph of that open interest over time for the last 5 years.
8. Whether the members of any anti-competitive collusive activity for which it has been found guilty, or expects to be found guilty, includes central banks or the officials working at central banks.
9. Whether it finances any charity whose beneficiaries includes prosecutors, police chiefs, regulator officials or court officials who would be potentially or certainly involved in any criminal investigation against the banks. A beneficiary is someone who has received goods, services, money or expenses on a charity's account.
10. Whether it will receive a bail-in or bail-out to address solvency issues as a result of central banks defaulting on QE obligations. A bank that knows itself to be solvent should not be receiving bail-ins or bail-outs to address its financial issues. A bank that knows itself to be solvent should not depend on QE cash position that requires the bad debts purchased in QE to remain functional.
11. Whether the banks have conspired with central banks to misappropriate national bullion reserves.
12. Whether all answers are consistent with the information provided to regulators in any cases against the defendants, whether current, or historical.
13. Whether they are under investigation by a regulator or other legal authority for any activity that has not been publicly disclosed.
14. Whether in any associated lawsuit worldwide, for market manipulation, they have denied the accusations, but ended up settling the lawsuit.

**I, Mark Anthony Taylor, believe all statements in this claim to be true.**

**If this document was delivered unmolested in electronic form by e-mail, the e-mail credentials serves as a legal signature.**