

## Notice to Admit Facts

In the High court of Justice  
Queen's Bench Division  
Birmingham

Claim **B40BM021**  
Defendant 2 - Deutsche Bank

### Definitions:

Case 1:14-md-02573 U.S. District Court, Southern District of New York (Manhattan) - the '**NY lawsuit**'

a) The precious metal audit Deutsche Bank claimed via Reuters to have undertaken on June 19 2014 to which this URL refers: <http://uk.reuters.com/article/gold-fix-investigation/deutsche-bank-conducts-internal-probe-into-trading-on-gold-fix-idUKL5N00Y4VA20140619> - 'the '**Audit**'

b) David Llew, the individual referred to by Bloomberg article given by URL <https://www.bloomberg.com/news/articles/2017-06-05/chats-by-metals-trader-reveal-spoofing-tricks-from-the-master> - '**David Llew**'

c) The investigation Deutsche Bank claimed was undertaken and completed in two letters of correspondence to me and part of the email attachment *evidence.of.fake.gold.audit.pdf* that was delivered to the courts and the defendants when the claim was served - the '**Investigation**'

d) A market manipulation technique whereby a cartel offers delivery contracts for sale with the effect and intent of both lowering prices and forcing innocent clients of the cartel to sell on the price dip - according to contract or algorithm - '**Short Suppression**'

**I give Notice that you are requested to admit the following facts or part of case in this claim:**

1. In the NY lawsuit Deutsche Bank was sued for manipulating gold and silver prices.
2. In the NY lawsuit the claimants alleged systematic suppression of bullion prices from 1999 onwards.
3. In the NY lawsuit Deutsche Bank subsequently settled, paying claimants damages in excess of \$90 million.
4. In the NY lawsuit Deutsche Bank settled twice, once for silver price manipulation and once for gold price manipulation.
5. In the NY lawsuit Deutsche Bank disclosed materials that incriminated **itself** for rigging the price of precious metals..
6. In the NY lawsuit Deutsche Bank disclosed materials that incriminated **UBS** for rigging the price of precious metals.

7. In the NY lawsuit Deutsche Bank disclosed materials that incriminated **HSBC** for rigging the price of precious metals.
8. In the NY lawsuit Deutsche Bank disclosed materials that incriminated **Barclays** for rigging the price of precious metals.
9. In the NY lawsuit Deutsche Bank disclosed materials that showed the defendants used Short Suppression.
10. Barclays, UBS and HSBC are co-defendants with Deutsche Bank in B40BM021.
11. Deutsche Bank believes **Barclays** to be guilty of precious metal price manipulation.
12. Deutsche Bank believes **UBS** to be guilty of precious metal price manipulation.
13. Deutsche Bank believes **HSBC** to be guilty of precious metal price manipulation.
14. The defences of Barclays, UBS and HSBC in B40BM021 supported Deutsche Bank's witness statement signed by Emma Slatter that denied market rigging.
15. Deutsche Bank tried to have the NY lawsuit struck out as a nuisance action.
16. Barclays, UBS and HSBC all applied to have B40BM021 struck out on the basis it was vexatious, arguing it was totally without merit - a 'nuisance action'.
17. Systematic suppression of spot prices on the Comex lead to systematic suppression of spot prices globally.
18. Deutsche Bank's Short Suppression of the precious metal markets created a global depression in bullion prices.
19. David Llew was a former trader at Deutsche Bank.
20. David Llew submitted spoof trades in his role as trader at Deutsche Bank, having the effect of distorting prices by offering contracts for trade and then cancelling them before counterparties could accept them.
21. In a spoof trade the exchange would see a new price, but not have materials available for that price, but the price would still be public, thus became the exchange's last offer price, which would then contribute algorithmically to global market outlets linked electronically to the exchange feed.
22. Spoof trades appear in Deutsche Bank's precious metal trading logs.
23. Spoof trades can be detected algorithmically by comparing the timestamps on the offer of a contract with timestamps of the cancellation of the offer.
24. Spoof trading in Deutsche Bank's trading logs can be determined algorithmically.
25. When Deutsche Bank successfully used spoof trades to effect a dip in prices, by definition of a spoof trade, it never lost delivery contracts or materials as part of the offer.
26. When Deutsche Bank successfully used Short Suppression to effect a dip in prices, the cartel obtained delivery contracts from its own clients, increasing the cartel's delivery contract inventory.
27. Co-defendants have obtained bullion inventory by seizing

- their own clients' delivery contracts by use of Short Suppression.
28. Co-defendants effected global supply control of the precious metal market, depriving their own clients from acquiring bullion.
  29. Spoof trades caused prices to dip in more than 51% of cases.
  30. Evidence of Short Suppression appears in Deutsche Bank's trader chat logs.
  31. Deutsche Bank has paid fines to regulators for using Short Suppression techniques to manipulate Interbank lending rates.
  32. Deutsche Bank has paid fines to regulators for using Short Suppression techniques to manipulate FX rates.
  33. Deutsche Bank has **not** paid fines for using Short Suppression techniques to manipulate precious metal prices.
  34. Deutsche Bank has used Short Suppression techniques to unlawfully manipulate precious metal prices.
  35. During the BaFin gold rigging investigation 2013-2015, Deutsche Bank cancelled its chair at the London Bullion Market Association.
  36. Deutsche Bank practised silver manipulation on the Comex silver market.
  37. Deutsche Bank gold trading executives knew that prices were systematically suppressed prior to the NY lawsuit being served on Deutsche Bank.
  38. The board of Deutsche Bank ordered the corporate entity of Deutsche Bank to settle the NY lawsuit for the allegations of systematic price suppression of precious metal prices.
  39. The board of Deutsche Bank knew Deutsche Bank traders had suppressed precious metal prices prior to applying to have the NY lawsuit struck out as a nuisance action.
  40. BaFin understands Short Suppression techniques for manipulating financial instruments.
  41. An honest and competent audit process from **Deutsche Bank** would have identified spoofing and Short Suppression in Deutsche Bank's trading and chat logs.
  42. An honest and competent audit process from **BaFin** would have identified spoofing and Short Suppression in Deutsche Bank's trading and chat logs.
  43. The evidence disclosed in the NY lawsuit that incriminated co-defendants was never identified by BaFin during BaFin's own probes as either suspicious or incriminating.
  44. BaFin closed its gold rigging investigation against Deutsche Bank within 72 hours of Anshu Jain being served my lawsuit B40BM021.
  45. An executive at Deutsche Bank telephoned BaFin within Deutsche Bank within 72 hours of Anshu Jain being served my lawsuit B40BM021.
  46. Other than the press releases and the correspondence sent to me Deutsche Bank has never presented any material evidence its Audit was genuine.

47. When challenged on the veracity of the Audit in my lawsuit B40BM021 Deutsche Bank issued a bare denial.
48. Deutsche Bank has never stated to anyone the natural persons responsible for the Audit.
49. The Reuters article in the definition for *the Audit* at the top of this document never mentions who at Deutsche Bank liaised with Reuters to confirm the veracity of the article.
50. Deutsche Bank pay regular sums of money to Reuters and have done so from at least 1999.
51. Deutsche Bank never explained why it wrote to me to tell me the Investigation had concluded while telling Reuters' readers the Audit was ongoing in the same time period.
52. Deutsche Bank has never presented any material evidence to show the Investigation it said it had concluded was genuine other than the single conclusion in the correspondence sent to me.
53. Anshu Jain, former CEO of Deutsche Bank, was asked in an email from me to attend his own oral hearing in B40BM021 and he refused.
54. Nor did Emma Slatter, General Counsel of Deutsche Bank, attend the oral hearing. Nobody attended Jain's oral hearing who was in a position to provide oral evidence of the Audit or the Investigation.
55. As Co-CEOs of Deutsche Bank, Anshu Jain and Jürgen Fitschen would have been the two people most responsible for the veracity of the Audit.
56. When Fitschen was challenged in submissions to the court (32 C 1953 / 14 (72) Frankfurt Landgericht) why Deutsche Bank never explained why it wrote to me to tell me the Investigation had concluded while telling Reuters the Audit was underway - he never supplied any evidence or explanation.
57. The Audit was a fiction.
58. The Investigation was a fiction.
59. John Cryan, CEO of Deutsche Bank, knew that the Audit was a fiction from at the least the time of the settlement of Deutsche Bank in the NY lawsuit.
60. John Cryan, CEO of Deutsche Bank, was informed by me on the 8<sup>th</sup> of June 2016 that his bank had won a restraining order for B40BM021 against me on the basis my claims were vexatious, while he knew that the claim was meritorious. The email was sent to Cryan's Deutsche Bank email address so should appear in Deutsche Bank's email logs.
61. The board of Deutsche Bank, knew that Deutsche Bank's witness statement signed by Emma Slatter for B40BM021 was entirely dishonest and covered up ongoing precious metal rigging frauds.
62. From the time of settlement of the NY lawsuit the board of Deutsche Bank knew a restraining order was in effect that prevented me from obtaining legal redress on the basis of a testimony Deutsche Bank and Jain submitted that contradicted what Deutsche Bank had disclosed to the claimant and the court in the NY lawsuit.
63. Emma Slatter, as General Counsel for Deutsche Bank, was

- in an authoritative position at the bank, to know whether or not the Audit had substance.
64. The board of Deutsche Bank knew that bare denial invites summary judgement.
  65. The board of Deutsche Bank knew that Linklaters, as trained lawyers, know bare denial invites summary judgement.
  66. The board of Deutsche Bank knew that Linklaters were knowingly presenting a dishonest defence.
  67. Anshu Jain was incapable of defending the veracity of the precious metal audit in oral cross-examination.
  68. Emma Slatter, when acting as General Counsel for Deutsche Bank, knew the Audit to be a fiction.
  69. It is the represented party's duty to file the evidence bundle.
  70. Linklaters was delegated the responsibility for filing the evidence bundle as counsel for Deutsche Bank.
  71. When former judge Simon Brown allowed Deutsche Bank to get away with not filing the evidence that its audit was a fiction in the evidence bundle, no defendant, or their counsel, was surprised - it had been arranged in advance.
  72. When former judge Simon Brown allowed Emma Slatter and Anshu Jain to get away with bare denial and non-attendance of their own oral hearing, no defendant, or their counsel, was surprised - it had been agreed with Simon Brown in advance of the hearing.
  73. No defendant distanced itself from Deutsche Bank's refusal to provide evidence for its audit.
  74. No defendant distanced itself from Deutsche Bank, when Deutsche Bank's executive Anshu Jain refused to attend his own oral hearing.
  75. No defendant, or their counsel, distanced itself from Deutsche Bank's bare denial.
  76. When former judge Simon Brown called the lawsuit vexatious, Deutsche Bank knew the lawsuit to be meritorious, to have correctly identified fraud and correctly identified rigging of audits to cover up those frauds.
  77. When former judge Simon Brown agreed to signing a restraining order on the basis the lawsuit was vexatious, Deutsche Bank knew this to be a fraudulent libel.
  78. Former judge Simon Brown claimed the restraining order arose of his own volition, as is seen from his entries ticked on the restraining order.
  79. Deutsche Bank knew that HSBC had applied for the restraining order, since HSBC's signature appears on the application box in the top right of the restraining order document.
  80. The application date for the restraining order was prior to the date the lawsuit was served on all defendants and appears in the top right of the restraining order document.
  81. The restraining order protected defendants from being rightfully sued for fraudulent damage.
  82. Deutsche Bank knew Simon Brown was corrupted, and knew Linklaters knew Simon Brown was corrupted.

83. Deutsche Bank refused or stonewalled my demand to provide trading receipts to other defendants.
84. Deutsche Bank never admitted or denied trading with me.
85. Deutsche Bank bought precious metals from me Over-the-Counter, using my bank account with Deutsche Bank to pay me.
86. Deutsche Bank sold precious metals to me Over-the-Counter, using my bank account with Deutsche Bank to extract payment from me.
87. No defendant made an issue of Deutsche Bank refusing to admit or deny trading with me.
88. No defendant made an issue of Deutsche Bank stonewalling demands to supply trading receipts.
89. Deutsche Bank has destroyed Over-the-Counter trading receipts, contrary to Anti-Money-Laundering laws.
90. Deutsche Bank has shipped physical bullion bars to Russians.
91. Deutsche Bank paid fines to BaFin and the FCA for violating Anti-Money-Laundering 'AML' control laws in its Russian offices.
92. In the fine against Deutsche Bank for AML violations, the FCA accused Deutsche Bank of destroying materials to cover up the violations.
93. The estimate from the FCA of the sum of money laundered from Russia to London is \$10 billion.
94. The FCA could not identify a single recipient of the money laundered between Russia and London.
95. Deutsche Bank has shipped physical bullion bars to Saudi Arabia.
96. Deutsche Bank has shipped physical bullion bars to Qatar.
97. Qatar is known to have funded ISIS.
98. Deutsche Bank is part owned by Qatar.
99. Deutsche Bank destroyed some or all of its Over-the-Counter bullion trading receipts to Saudi Arabia and Qatar.
100. Anshu Jain and Jürgen Fitschen and John Cryan all knew that bullion trading receipts have been destroyed contrary to Anti-Money-Laundering laws.
101. Destruction of bullion trading receipts should have been covered by any honest audit into Deutsche Bank's precious metal trading activities.
102. There could not be an honest audit if it were known by the executive that bullion receipts had been destroyed to cover up money-laundering.

**I confirm that any admission of facts or part of case will only be used in this claim.**

**Signed  
Mark Anthony Taylor**

**10 September 2017**