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20 Sept 2017

In the Birmingham Mercantile Court
Re: **B40BM021** - Taylor vs Anshu Jain et. al.

Skeleton Argument for Hearing on 28th September 2017

Dear Judge Worster,

Please find here the thread of my argument. The first eight points may refresh your memory, but if you are comfortable with the facts of my case, points 9 and onwards will suffice.

1. In the first hearing of 2015 all defendants relied upon the same defence – a witness statement signed by Emma Slatter, on behalf of Deutsche Bank and Anshu Jain. The defence constitutes a bare denial - articulated verbatim – and was followed up by: a refusal to file evidence, obstruction and evasion at every stage and refusal of applicants to turn up for their own hearing.
2. In the second hearing in 2015, all defendants failed to deliver witness statements denying perjury when it was discovered UBS had confessed to the matters alleged to the US DoJ and incriminated bank. Deutsche Bank was named in the Bloomberg article in which the confession was reported.
3. Subsequently in the year 2016 Deutsche Bank confessed in a New York lawsuit to a number of matters alleged in the two hearings – systematic suppression of prices of gold and silver; and membership of a cartel, the members of which include some of the other defendants named in my lawsuit (UBS, Barclays and HSBC). It was part of Deutsche Bank's settlement terms to disclose materials incriminating other defendants.
4. Earlier this year, I applied for summary judgement on the basis that the disclosures released in 2016 incriminated defendants for fraud and perjury in my lawsuit.
5. The Court, under your direction, gave Deutsche Bank the opportunity to defend itself - the Court independently issued a court order to force such a submission against the allegations of perjury. I presume this was entirely of your own volition based on the materials I sent to you in the application for Summary Judgement. I had not asked you for such an order. I believe I understand the reasoning and can find no fault with your decision.
6. Under the right of variation, Deutsche Bank rejected the

opportunity you had given them, and applied for strike out of your court order, stonewalling the accusations of perjury, and insisting that previous court orders – alleged by me to have been won by perjury - must still apply.

7. The rationale provided by Linklaters, not signed by any Deutsche Bank staff member, consisted of an eclectic mess of irrelevant materials.
8. Martin McKenna accepted their application and issued another court order striking out your order. I filed a variation to strike-out his countermand – it is the hearing to this final application that this skeleton argument addresses.
9. McKenna's decision was issued without a hearing. It was also issued in a hurry – there are at least two serious typographic mistakes on the court order, and it entirely ignored Deutsche Bank's conduct that implicates it for perjury. McKenna entirely ignored Jeremy Lefroy's covering letter, in which Lefroy attested that I was no vexatious madman. I see no denial from the court that Lefroy's mail was received. I also see that Linklaters did not appear to take up my invitation to communicate with Mr Lefroy directly, as after they had challenged the authenticity of the letter.
10. McKenna addresses my application for Summary Judgement, whereas your order was of your own volition to determine whether defendants have a credible defence against the allegations of perjury. He does not seem to have considered the merits of your court order.
11. It is quite obvious that if Deutsche Bank have an honest and just answer of why they confess to the matters in one court they deny in another, then an appropriate surrender to your court order would bring that to my attention and that of the court, and so dissuade me from further litigation and dissuade the court from awarding summary judgement.
12. A defendant that applies to strike-out the demand that it defend itself is both vexatious and dishonest.
13. Deutsche Bank could just as well put their arguments for their application for variation in the witness statement you ordered them to file, alongside their explanation for their apparent duplicity, and saved the court an unnecessary hearing.
14. McKenna knew of Deutsche Bank's frauds back in Mid-2016. The email to him in that year was re-forwarded back to the court just prior to my application to vary McKenna's judgement and should be in your possession. McKenna had the opportunity to order a prosecution for perjury, but neglected to do so.
15. McKenna also refused to accept a letter on the grounds it did not refer to him as the *Designated Mercantile Judge*. My letter to him was not impolite, it used the title *Judge*, and such nitpicking was indicative of contempt for my circumstances and the injustices wrought by the defendants. It was a way of telling me he was biased from the outset and

would not give me fair consideration. I sent a letter of complaint to him and the Lord Chancellor, to which he provided no explanation or denial.

16. On the basis of those two points immediately above McKenna had personal reasons to issue a court order against me and I believe he ought to have recused himself from further involvement in the lawsuit.
17. I have issued **Notice to Admit Facts #4**, to the defendants, CCed to the court, which should be in your possession. I hope that the defendants file this at least a week before the hearing on the 28th. It will spare you from having to peruse a lot of reading material and will help shrink the evidence bundle.
18. From the **Notice to Admit Facts #4** you will see a progression of facts, that not only prove perjury, but also justify all the key points of my lawsuit, and provide a motivation for applicants to refuse to appear in court – Deutsche Bank executives are directly involved with its market rigging frauds are and orchestrating its fake audits.
19. If Deutsche Bank continue to stonewall or fail to deliver bullion trading receipts – in advance of the hearing – the court has every reason to judge that it is guilty of money laundering via bullion, and the greater part of faking audits was to cover up the destruction of bullion trading receipts on the orders of the executives.
20. At this point, I hope it should be obvious that Deutsche Bank did commit perjury, that it needed to confess as much in the witness statement you ordered it to file, and that it applied to eliminate the court order to further protect its executives from civil liabilities. The petition they made to vary your order was as dishonest as Emma Slatter's defence.
21. Now at this point the court may be interested in the means by which defendants have avoided scrutiny for the precious metal rigging, even as they confess in New York.
22. Jes Staley, CEO of Barclays Bank, was an executive of JP Morgan at the time the lawsuit was served in early 2015. Both Barclays and JP Morgan are major participants in the bullion market and any attempt to suppress prices would result in these two buying up materials at the reduced price - if they were honest.
23. Barclays and JP Morgan are co-defendants in my lawsuit, their defence supports: Deutsche Bank's bare denial, refusal to attend court, refusal to supply receipts and refusal to provide evidence of an audit that would potentially show Deutsche Bank was rigging the market in which every defendant was trading.
24. If the audit was genuine and honest then it would have revealed the spoofing and short suppression attacks. An honest defendant could have terminated litigation any time by providing proof to me and the court that the audit was authentic.

25. It should be obvious that if Deutsche Bank is guilty then Barclays and JP Morgan colluded to commit fraud and perjury – and they both had Jes Staley as an asset.
26. Parliament responded to a FOIA F17-296 from me, they make it clear that contrary to what the Daily Mail had claimed, the Treasury Select Committee never held an evidence session to quiz Staley over his appointment to Barclays.
27. I sent a letter to Mark Garnier MP and John Mann MP, the two MPs explicitly named by the Daily Mail article who claimed to have intended to hold Staley to account. The letter was CCed to the court and has an identifying credential: **CANCCXD7g99-L_yWJMWnT=KKcTV8ajfGuEHbfHr4mfgxmeHU_Sg@mail.gmail.com** This can be used to obtain the original from the court email server. I invited both these MPs to explain to myself and the courts this discrepancy. I believe nobody has received a reply.
28. The silence of Garnier and Mann in the face of that FOIA result implies Staley's appointment was both indefensible and politically embarrassing, and so whitewashed by the Treasury Committee – causing the Daily Mail and its readership to be misled.
29. Staley is listed in Jeffrey Epstein's Black Book page 84 (on the right hand side) – his entry is subtitled **JP Morgan.** This is consistent with the Daily Mail story in which it was claimed Epstein lobbied to have Staley personally appointed as CEO of Barclays and Epstein threatened Britain should his wishes not be fulfilled.
30. In a letter from me, addressed directly to Jes Staley, I informed him of Deutsche Bank's frauds and perjury, and that it would be expedient for Barclays to settle. Staley, via Barclays, wrote back to say he would have the restraining order against me extended and costs filed. The correspondence was served to the court by email bundled with the application to vary McKenna's judgement.
31. A few days after I had informed Linklaters of Staley's appointment, and the apparent conspiracies therein, Linklaters seems to have dropped Barclays as a client.
32. From Barclay's letter the court can infer that Staley is confident he will face no consequences for supporting a patently dishonest defence. He acts as if he is above the Law.
33. When Staley was discovered to have ordered his own security team to identify and block whistle-blowers from exposing the Barclays frauds to its own board Staley agreed to forfeit a bonus. Staley issued an apology *after* being caught. There is no public exposition of the nature of the whistle-blowing that was covered up. The FCA investigated, but refused to provide details, as shown in its response to FOIA request FOI5239.
34. I have sent the Treasury Select Committee a paper trail that

showed the FCA and the SFO knew of Deutsche Bank's fake audit back in 2014. The TSC did nothing to hold the FCA or SFO to account. Neither did the Justice Select Committee. Bob Neil MP wrote back to say he would be doing nothing It looks as if Staley and his operatives have compromised the FCA, the SFO, the TSC and the JSC.

35. Executives of Barclays are now under investigation for having lent money to Qatar to buy its own shares – share price rigging. One would expect Staley to have known of what was going on, even though he was appointed after the crime had been committed, as he was CEO for years in which the fraud was kept secret, but he appears to have got off scot free. If he did know, we can presume he kept it secret from his board.
36. Given that the Treasury Select Committee lied to the Daily Mail, then Staley is in a position to blackmail MPs, including the party whips who were responsible for appointing TSC members. He would have to have some seriously compromising materials on Parliamentarians to get away with being lobbied into his position by Jeffrey Epstein.
37. Many prominent UK MPs and UK royalty are listed in Epstein's Black Book. Epstein was prosecuted for soliciting minors, just about the most disgusting crime one can commit.
38. Bill Clinton was known to be a frequenter of Epstein's Island and Epstein's Private Jet – otherwise known as 'Lolita Express.'
39. It is unbelievable that someone of Staley's intelligence and knowledge would not know of Epstein's convictions, or Clinton's proclivities – as bank CEO he would have enormous information gathering resources. He would know that the man who lobbied him into power was supplying sex with under-age girls to politicians and other VIPs.
40. Even after revelations came out that the Clinton Foundation raised $2 billion for rebuilding Haiti, and hardly spent anything; and after it was revealed that Bill Clinton personally lobbied to have Haitian child kidnappers relieved from prosecution - Staley was using Barclay's money to fund the Clinton Foundation and the Clinton Global Initiative.
41. Staley appears to be an executive of the Robin Hood Foundation. I believe that it was the same foundation ran by Jeffrey Epstein - before his conviction - which claims to serve disadvantaged children. Needless to say when paedophiles and child traffickers such as Epstein run a children's charity, it is never for the benefit of the children.
42. I believe under the name Robin Hood Project, the Robin Hood Foundation funds US lawyers to help Haitian migrants gain citizenship to the USA. Presumably this creates Haitian orphans upon which child trafficking gangs can capitalize.
43. Staley's conduct, using a British bank to fund the Clintons, in their fraudulent operations in Haiti, together

with Staley now managing the Robin Hood foundation, should be enough for any jurist to suspect Staley of paedophilia.

44. The fact MPs clearly lied to the Daily Mail about Staley's appointment, together with Staley's friendship with Jeffrey Epstein naturally yields a conclusion that he has won his CEO as a result of blackmailing other members of the paedophile ring involved in UK politics.

45. The accusations against Tony Jenkins and his ex-wife, raised in Neon Nettle, that they were involved in paedophile parties, in which Qatar and Saudi princes participated, gives a reason why Qatar was behind the Barclays share buy-back fraud – Qatar were in a position to blackmail Jenkins. 'Give us the money to buy your company' is straight out the plot to Mission Impossible 2. In the Middle East sex with young children is not necessarily unlawful, where the age of consent is six years or so, which means the Qatar VIPs involved would not themselves be vulnerable to blackmail.

46. If the allegations against the Jenkins and Qatar are true, and it certainly seems consistent with recent events, we can understand that both Staley and Jenkins were involved in the same elite paedophile rings. It would seem a pre-condition for consideration of appointment to CEO of Barclays that the candidate is involved in such things.

47. Parliament, if it were honest, would surely want to scrutinize Staley's appointment - not tell lies about it.

48. Even if Staley were not himself a paedophile, he has certainly financed their operations, has benefited from their lobbying, and is able to blackmail members of the ring.

49. So we know that Staley, as CEO of Barclays, and executive of JP Morgan, would have been able to influence the hearings against Deutsche Bank and the other defendants by applying political pressure.

50. So the court now has knowledge of Deutsche Bank's settlement, its disclosures that incriminate other defendants, knowledge of the spoofing attacks confessed to by David Llew, that the court should be in no doubt that Emma Slatter, General Counsel of Deutsche Bank, Anshu Jain, Jürgen Fitschen, and John Cryan all conspired to produce a dishonest defence and fraudulently filedd a libellous restraining order.

51. The ICO confirms that neither Haddon-Cave, nor Burnett, the next Lord Chief Justice, had a transcript of hearing for Simon Staley Brown's hearing, and so neither man was in a position to dismiss over twenty counts of misconduct against him. Had they done so the High Court would have established the frauds identified by the New York courts and the Chicago traders two years ago.

Yours sincerely
Mark Anthony Taylor

I believe everything in this statement is true.