

IN THE CIRCUIT COURT OF THE  
7th JUDICIAL CIRCUIT  
IN AND FOR ST. JOHNS COUNTY,  
FLORIDA

GENERAL JURISDICTION DIVISION

THE SOCIETY OF LLOYD'S

Case No. : CA 03-542 (55)

Plaintiff,

vs.

KARL ARONSON,

Defendant.

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**AFFIDAVIT OF SUZON FORSCEY-MOORE**

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I, Suzon Forscey-Moore, of 53 Abbey Road, Cambridge, England CB5 8HH, based upon my personal knowledge, hereby declare as follows:

**Introduction**

1. I am a citizen of the United States and a naturalized subject of the United Kingdom. I was born and grew up in Jamestown, New York and moved to the Los Angeles area where I lived for 25 years. I first came to England in 1976 while a student at Pitzer College in Claremont, California. Pitzer awarded me a BA in English in 1977. I moved to Cambridge, England in 1987. In 1992, I began to campaign for ministerial accountability. In 1996, I began campaigning for judicial reform. In January 2001 I was awarded a Master's degree in law by DeMontfort University in Leicester, England for my dissertation on The Prerogative of Summing Up in Miscarriages of Justice in the Crown Courts of England & Wales. I began work on a PhD on the English Civil Justice system at Anglia Ruskin University in Cambridge in September, 2002.

2. I make this affidavit at the request of Charles B. Lembcke, counsel for Karl Aronson. I have been advised that it will be submitted in response to the question posed by the Court at the hearing on Lloyd's Motion for Summary Judgment as to whether the English legal system offers fair and impartial tribunals.

3. The true nature of the English legal system should be properly established for the protection of past and future investors who are citizens of the United States and other jurisdictions as English courts are, despite their considerable reputation, neither fair nor impartial.

4. This affidavit contains material which may be outside of the norms of evidence. However, due to historical and cultural differences and in the context of the important issue to be decided, descriptive material is relevant and necessary if the Florida Court is to reach a well-founded and defensible decision.

5. Contemporary hearings in English courts may be best understood as traditional theatrical rituals in which agents dressed in ceremonial 18th century costume unselfconsciously honor their oath of loyalty to the Queen by dismissing and/or punishing unimportant people for their foolish insistence on justice and fair play. Courts in other jurisdictions should distance themselves from the perverse character of English law where unexamined belief in an hereditary system of privilege triumphs the fair application of principles of law.

6. It would be wrong for the Florida Court to turn a blind eye to a system in which the rights of the individual are sacrificed for a perceived but unjustifiable greater good, the protection of a privileged hereditary elite.

### **Jaffray v. Lloyd's in the Court of Appeal for England & Wales**

7. This case reveals, through its historical context and in the recent conduct of the English judiciary in Jaffray, that financial affairs and affairs of state in the United Kingdom, have been and continue to be decided by a secretive elite largely composed of and of mutual benefit to hereditary aristocrats.

8. Lloyd's of London, an international insurance underwriter, evolved from transactions between shipowners, merchants and insurers in the 1680's. It was given a unique status by Parliament in the Lloyd's Act of 1862. Lloyd's names were men of considerable wealth and influence.

9. Until greater suffrage was allowed in the 1830's, Parliament was openly run by the hereditary aristocracy, men who used their positions to pass laws for their own benefit, whether that was legitimising their bastards or raising the price of grain or deciding the most advantageous location of a new canal.

10. The aristocracy did not have to relinquish their power to continue to order things to their personal advantage. Every elected Member of Parliament (MP) has to swear allegiance to the Queen in order to be able to speak, to have an office and be paid.

11. The United Kingdom of which England is the dominant nation is self-described as a "constitutional monarchy" even though there is no constitution and no current plans to adopt one. The Royal Prerogative, a notion undefined in law and operating without parliamentary oversight, allows ministers, judges and other administrators unlimited and unrestrained use of power.

12. In 2004, the House Select Committee on Public Administration studied the Royal Prerogative. The result was that ministers proposed to entrench their secretive powers under the Royal Prerogative in the Legislative Regulatory and Reform Bill which opponents labeled the Abolition of Parliament Bill.

13. Crown immunity is the mechanism which enables the prerogative. It is accepted by those in power that anything which is “done in the name of the Crown”--every administrative, legislative and judicial action--is immune from prosecution. **The assumption is that those in power can do no wrong.**

14. The Royal Arms in the form of the Lion and Unicorn and a motto which proclaims *Dieu et mon droit* (French for God and my right) presided over the Court of Appeal in Jaffray, just as they hang behind the bench in English courtrooms and appear on the letterheads of the Queen’s government. This is no outdated and quaint symbol but a genuine emblem of the Queen’s overarching authority.

15. There is also a mostly hidden motto on the Royal Arms: *Honi soit qui mal y pense*, which is French for “Shame on whoever thinks evil of this”. Criticism of the Queen and the hereditary system she represents is pre-condemned.

16. Americans pledge their allegiance to a flag which represents a nation where the ideal is liberty and justice for all. In England everyone in a position of authority pledges their allegiance to the Queen, an individual who by accident of birth inherited unlimited powers of patronage. Neither Parliament nor the Judiciary have any restraining effect.

17. **When the interests of the Queen and any part of her elite government are at risk, only one outcome is acceptable. Legal proceedings in English courts are therefore driven to that outcome by fair means or foul.**

18. Criminal law (which is of little concern to the hereditary powers) is highly codified. Government at all levels, however, has "codes" and "guidelines" which can be breached freely. The conduct of the commoner is ruthlessly scrutinized while misconduct by their “betters” goes unpunished. **White collar crime, with very rare exceptions, goes untried and unpunished in English law.**

## **The Action**

19. In the civil action in England’s Court of Appeal in the matter of Jaffray v The Society of Lloyd’s, the court found that the Lloyd’s sales brochures used to attract investors had misrepresented their audits as “rigorous” and “true and fair”. The court found that these statements were both untrue and material. The court also found that Lloyd’s had “no audit at all”. Lloyd’s misled investors, creating financial ruin for tens of thousands. **The mental and physical trauma of this would lead to suicides and early graves, yet the Court of Appeal, in its great serenity, failed to hold Lloyds to account.**

20. In the Jaffray hearing, witnesses could not be cross-examined because of a perverse requirement that the cross-examiner accept the witness statement as true before cross-examination. This not only impedes the search for truth, but protects an unprincipled witness from the (however unlikely) risk of being prosecuted for perjury.

21. Litigants in person were not allowed to cross-examine witnesses at all, a clear demonstration of unequal treatment (in 1993-94, litigants in person had a

96% failure rate in the Court of Appeal).

22. Fraudulent concealment was not allowed to be at issue in Jaffray. The doctrines of fraudulent concealment and/or fraudulent non-disclosure are not recognised under English law.

23. The Jaffray appeal was not misconducted under English law (no such thing is possible given the English judge's unfettered discretion), but English law does not recognise the delivery of justice and remedy to those who have been defrauded as its duty. The English Court of Appeal accepted that it had a higher duty to uphold private legislation rubberstamped by Parliament.

### **Immunity**

24. Names who have suffered damage and loss have been denied compensation because Section 14 of the Lloyd's Act of 1982 grants Lloyd's immunity. Self-granted and undeserved immunity is an almost universal characteristic of English law. Immunity confers privilege and undeserved privilege is inequality.

25. Lloyd's had immunity for all acts except intentional fraud. The authors of the act would have known that intent is hard to prove and easy to deny.

26. Judges are covered by Crown immunity in all their actions. Barristers cannot be sued for negligence. Geoffrey Robertson QC, a barrister with 25 years experience stated in regard to this immunity (1999): "...[B]arristers are well paid and immune to actions for negligence...They cling to their immunity from actions for negligence - an unjustified privilege which protects incompetents from being sued."

27. Some barristers can earn as much as £3 million (over \$5 million) in a year. They may be highly skilled, but their main value to clients may be in the high fees they charge. English courts can and frequently do make the losing side pay some or all of the other side's costs. Parties will settle rather than face costs that could bankrupt them.

28. Combine the barrister's immunity with his wealthy client's power of financial intimidation and there is very little that can't be done to destroy the chances of any opposing party. **Money decides legal matters.**

### **Failure to Prosecute for Corruption**

29. Robertson said about corruption, "I meet colleagues from other countries who are 'special prosecutors', putting behind bars Mafia bosses and masters of the Wall Street universe, or who head commissions which catch by their white collars corrupt politicians and public servants and policemen. But in Britain, you still have to be pretty stupid to end up in prison".

## Conspiracy to Pervert the Course of Justice

30. Mr. Ian Hay Davison, the CEO of the Society of Lloyd's from 1983 through 1985, wrote a letter to a distressed Lloyd's name saying that:

Mr. John Taylor  
Holly Tree House  
Sotherton Wangford  
Beccles  
Suffolk NR34 8AL

3rd December 1997

Dear Mr. Taylor,

Thank you for your letter of 23rd November. During my time at Lloyd's and subsequently I had a series of lengthy interviews with the Serious Fraud Office concerning the various frauds. Regrettably, ***the Government, on policy grounds, decided not to prosecute any of those involved and no successful prosecutions were brought.*** (my emphasis) I was, and remain, extremely indignant and disappointed at this.

Yours sincerely

From Ian Hay Davison

31. When Hay Davison brought matters to the attention of the authorities, he did so in the hopes that they would prosecute and bring criminal proceedings, but no steps were taken. In a witness statement, he said,

"I continue to regard that as being **a major strategic mistake taken at the highest level of Government. It allowed Lloyd's to believe that it could operate effectively above and beyond the law** (my emphasis)". Such a cultural belief, whether true or not, can only lead to arrogance and a disregard of legal requirements. In my opinion that is precisely what has happened at Lloyd's since 1986."

32. He added, "**[T]here must be something wrong with a system of criminal justice in which a shoplifter goes to jail for petty theft and a City fraudster, who may have stolen millions, gets away scot free**" (my emphasis).

## Violation of Article VII of the Bill of Rights

33. In English civil law, the trial judge can deny trial by jury, as happened in Jaffray. US litigants unwillingly compelled to take their chances in English courts lost the protection guaranteed to them in Article VII of the Bill of Rights: "In Suits at common law, where the value in controversy shall exceed twenty dollars, the right to trial by jury shall be preserved". In Jaffray, US citizens were deprived of one of their most important constitutional rights, trial by jury. **On that ground alone, finding English courts equivalent to US courts would be wrong. The Founding**

## **Fathers wrote an unqualified protection of the individual into the US Constitution**

### **The Fiction of an Impartial and Independent Judiciary**

34. English judges have been drawn from what Americans would call the upper classes ("male, pale and stale"). Almost all High Court judges are graduates of Oxford and Cambridge, universities so elite that students are freed from lowly tasks like making their own beds and doing their laundry.

35. English judges are political appointees chosen by the Lord Chancellor by a "secret soundings" process (just recently to be replaced by a commission) who cannot be disciplined for misconduct. Circuit judges are given luxurious houses (and cooks, cars and drivers) as public hotel accommodation might somehow contaminate and compromise their independence.

36. However, five of the judges who presided over Jaffray and other Lloyd's litigation in the High Court and Appeal Court are on the Contributing Faculty of the London Law Shipping Centre of which Lloyd's is a sponsor.

37. In England, partnerships, memberships, societies and associations are much more important in public administration. Some official working partnerships are between local authorities (district and city councils), police and the courts. They work as one and not necessarily for the public good.

38. English legal practitioners--lawyers and judges--regularly dine together in the Inns of Court.

39. I have seen a judge refuse to recuse himself from hearing a case of "scandalisint the court" when he was one of the nine judges who had been accused of treason.

40. When the Birmingham Six, whose convictions for an IRA bombing were overturned after 17 years of wrongful imprisonment, sued the police, accusing them of assault, the then Head of the Civil Division of the Court of Appeal stopped the action saying, "If the six men win, it will mean that the police were guilty of perjury...and that the convictions were erroneous...this is such an appalling vista that every person in the land would say, 'It cannot be right that these actions should go any further'".

41. That is not much different from from the Court of Appeal refusing to follow the implications of Lloyd's criminal activities in Jaffray.

42. Eight years later (1988), the same judge followed up by saying about the Birmingham Six after the evidence of the injustice had been made clear, "It is better that some innocent men remain in jail than the integrity of the English judicial system be impugned".

43. That is not much different from the Court of Appeal effectively saying in Jaffray, "It is better that thousands of people are wrongly made destitute than the integrity of Lloyd's (and the government which should have deterred Lloyd's fraud)

be impugned".

44. The judge who made the comments above was the much revered Lord Denning, a decent, moral, intelligent and articulate man deemed "the people's judge" and "the judge of the 20th century". Denning's reputation and the system's reputation had become entwined. Finding fault with the system was beyond him. Individuals for whom the system works, will see no need to analyse it. It is the victims on whom that difficult burden falls.

45. Inquiries into possible government misconduct are placed into the hands of Law Lords who are usually Privy Councillors (q.v.) sitting in Parliament in the House of Lords. Their inquiries proceed along predictable lines: (1) a conveniently limited remit; (2) an investigation inside that remit; (3) a lengthy exposition of the evidence gathered; (4) some sharp words of rebuke, usually limited to minor points; and (5) an exoneration of the government. The reports published by Lord Butler (into the "sexed-up" dossier on Iraq and WMD's), Lord Hutton (on the death of Dr David Kelley) and Lord Justice Scott (on the Matrix-Churchill arms to Iraq scandal) all follow this pattern.

### **No Separation of Powers**

46. In the late 19th century, the constitutional authority Walter Bagehot declared the obvious, that there was no division between executive, legislative and judicial power. The English legal system is not significantly different than it was in 1850-51 when Dickens was writing about its destructive nature in *Bleak House*. The Lord Chancellor is still the head of the judiciary, a party politician, the most privileged member of the administration and an unelected member of Parliament in the House of Lords.

47. Bagehot wrote that "Just as the American is the type of composite Governments, in which the supreme power is divided between many bodies and functionaries, so **the English is the type of simple Constitutions, in which the ultimate power upon all questions is in the hands of the same persons** (my emphasis)".

### **The Privy Council....A Secret Government**

48. The government of the United Kingdom is like a parade float, carefully designed to be admired on the outside ("British justice is the best in the world"), with the driving mechanisms hidden and the driver unseen. The Privy Council, originally a secret group of advisors to the monarch, exists to this day, **uniting in common cause** the Law Lords, Appeal Court judges, Cabinet ministers and leaders of opposition parties with Princes, Dukes, Earls, Viscounts, Barons and Bishops from the Church of England.

49. Privy Councillors, including Appeal Court judges, swear an oath to place the interests of the Monarch above all else ("You will to your uttermost bear faith and allegiance to the Queen's Majesty") in direct contradiction to their judicial oath to adjudicate "without fear or favour". The oath also enshrines secrecy: "You will in all things to be moved, treated and debated in Council...keep secret all Matters

committed and revealed unto you, or that shall be treated secretly in Council”.

### **An Accommodating Press**

50. In 1979 on a BBC TV program, a prominent newspaper publisher was asked whether it was true that he had once said that if his reporters uncovered a Watergate type scandal in Britain he would have difficulties in allowing them to print the story. He replied, 'I believe in Britain first...If it would harm Britain, I would suppress it.'

### **Threat of Order to Pay the Other Side's Costs**

51. I chose not to go to law to complain of fraud (though the evidence was irrefutable) for the following reasons: (1) I have observed that it is almost always the party with higher status who wins; (2) I have observed that the police and Crown Prosecution Service cannot be relied upon to take action; (3) I have observed that judges split attempted class actions into individual complaints and then turn a blind eye to the aggregate loss and damage; and (4) I could be made to pay not only my own more predictable legal costs but also the other side's potentially ruinous legal costs. There is no limit to the costs that can accrue.

52. The threat of having to pay the legal costs of a party with very deep pockets is the factor which most deterred me from taking a dishonest person to court. I have been denied justice and--due to his status--he remains free to continue to corrupt my elected representatives and defraud other people.

53. Judges have even been known to require the winning party to pay all of the losing party's costs.

54. In a 1999 report on access to justice, the then Head of the Civil Division admitted that English civil law was “**too expensive, too slow, too unequal, too uncertain**, too fragmented and--to many--incomprehensible (my emphasis)”.

55. Any legal system which is too expensive, too slow, too unequal and too uncertain provides a strong temptation for all manner and forms of wrongdoing.

### **Attitudes Towards European Law**

56. When in November, 1996 the then Lord Chancellor journeyed to Strasbourg, France, to ask the European Court of Human Rights to respect the right of British courts to manage their own affairs “in full recognition of their national character, traditions, religious beliefs, and moral standards”, he echoed the journalist and MP, Edmund Burke who set out the case (1790) for accepting society as it is. Burke asserted that society could not be judged by rational standards and found wanting. This defence of the status quo is exactly what Tom Paine argued against in the Rights of Man. It's an admission from the highest source that the UK desires and intends to deviate from European Law.

57. When a senior Law Lord was acting as the Queen's Visitor (a Privy Councillor with powers to adjudicate in university disputes) he refused to allow an

open hearing with public and press on the grounds that he saw “no reason to do things any differently than we always have done” despite the student citing a European Court ruling (*Scarth v United Kingdom*) in which the government had given an undertaking to allow open hearings under most circumstances.

### **Secret Government Vetting of Jurors**

58. According to Robertson, between 1974 and 1978 no fewer than twenty-five cases involved secret vetting of the jury panel. This involved a secret prosecution application to the trial judge who would order court officials to hand to Special Branch (similar to the CIA) a list of the names and addresses and occupations of jurors on the panel for a particular trial, so that “checks” could be made with police and security records to see whether any juror was listed as having strong political views, or any hostility to the state (e.g., by making a complaint against the police). Prosecuting counsel could then challenge the reason given. Any information suggesting that the juror would be hostile to the defendant would never be supplied to the defense, because that would give the secret vetting game away.

59. The whole system had been kept quiet, in the hope that lawyers and MPs would never find out. [An official] claimed to have drawn up 'firm safeguards' to ensure that the system was not abused, but these too were of course secret, so no one could ever know whether they were firm, or even whether they had been followed.

60. William Pitt used specially vetted juries to convict for sedition defendants who sympathised with the French Revolution. Jeremy Bentham's Elements of Jury Packing (1821) condemned a vetting system "which is regular, quietly established and quietly suffered. Not only is the yoke already about our necks, but our neck is already fashioned for it."

### **Ex-parte Communications**

61. On 15 January 1997, I was contacted by Mr Geoffrey Scriven, an English businessman living in Manchester, England. He was a Litigant in Person who had been given “the restricted green papers” along with his bundle by a judge who told him, “Don’t look a gift horse in the mouth, Mr Scriven”.

62. While waiting to receive photocopies of Mr Scriven’s green papers, I recalled being told by another Litigant in Person, “We always lose...It’s decided in advance...Some people have papers to prove it.” Within two days I had obtained copies of green papers from Mr Dennis Gardner of Nottinghamshire, England and Mr Peter Pranker of Devon, England.

63. The green paper documents, identical in format, were headed Court of Appeal, Civil Division and bore the title SUMMARY in a distinctive typeface. The dates were 18 February 1991 (Gardner), 9 March 1992 (Pranker) and 8 July 1996 (Scriven). Each was stamped in red: IMPORTANT: THESE PAPERS ARE A PART OF THE COURT RECORD AND MUST BE HANDED TO THE ASSOCIATE [judge] AND NOT TO THE PARTIES.

64. Lord Woolf, Head of the Civil Division, in a Court of Appeal Practice Direction (TLR, 8 December 1998) admits that ex-parte communication were standard operating procedure when he stated that “Bench memoranda” (delivered as ex-parte communications) “normally consisted of the facts involved in a particular appeal, a history of the proceedings in the lower courts, an indication of the issues on the appeal and **any opinion which the judicial assistants had on the merits of the appeal** (my emphasis).”

65. When the then Lord Chancellor, Lord Mackay of Clashfern, gave his Hamlyn Lectures in November 1993, he said that any submission would be “put before a judge in accordance with the principles natural justice with an opportunity for them to be countered by any opposing party”. Yet his own department, the Lord Chancellor’s Department, had been disregarding that principle for at least two years.

66. It is my view that such documents, which have every attribute of a ruling drafted in advance, are not disclosed to the parties because of the possibility of disputable errors. It is the most important document in your case and you cannot see, and therefore cannot contest, its contents.

67. Another serious concern is that the government lawyers who prepare these documents also advise litigants in person on the status of their cases. The litigant thinks he or she is speaking off the record and informally, when they are effectively appearing before the bench. Unfortunate the litigant who somehow offends the summary writer.

68. These documents were prepared for the Court of Appeal, the same court where the wronged Lloyd’s Names sought justice in the Jaffray appeal.

### **No Requirement to Report or Investigate Perjury**

69. Perjury can be reasonably assumed to be commonplace in English courts as there is no legal obligation for authorities to report or investigate it. According to a recent criminal justice study by Susan S. M. Edwards (2002), when people are prosecuted and sentenced for perjury and conspiracy to pervert the course of justice, only about 1% receive a sentence of three years or more out of a maximum of four. Perjury is perhaps more likely to take place in civil cases because money and property are involved, but there has been very little research into the subject.

### **Transcripts Modified to Prejudice Appeals**

70. Transcripts are unreliable because they are edited by the judge before being “approved”. In or about 1997 I was shown a verbatim or unapproved transcript which was given by mistake to a litigant in a child custody case and the judge-approved and edited version. The only difference between them was that a section where the mother was shown to be reasonable and willing to compromise had been cut. There would have been no reason for the judge to do this except to prejudice her appeal.

## **Destruction of Evidence**

71. Evidence of serious unprosecuted crime can be destroyed. When in 1993 I found evidence in a Metropolitan Police Report in a Detective Chief Inspector's distinctive handwriting that he had committed perjury in sworn testimony which destroyed the defense case in a criminal trial, I made a request of the Official Court Stenographer at the Old Bailey to preserve the untranscribed notes because they contained evidence of a police conspiracy to pervert the course of justice, she refused, even though my MP had backed my request.

## **Grand Juries Abolished**

72. In 1933 the established order became entirely self-regulating when Parliament abolished grand juries. Ombudsmen tend to find for the complainant in 2-3% of cases.

## **Plea Bargaining Unknown**

73. Plea bargaining, an effective motivating factor in obtaining inside information from co-operating co-conspirators which enables prosecution for fraud, is unknown in English law. Whistleblowers are routinely harshly punished as the legislation which could protect them is ineffective because of lack of enforcement in the courts. Without plea bargaining, the co-conspirators close ranks so it is little wonder that almost all the large fraud trials have collapsed or ended in acquittal.

## **Empirical Evidence**

74. The most wide-ranging study ever conducted by an independent body or government agency (1999) produced empirical evidence that indicates that in England and Wales a substantial majority of people with non-trivial justiciable problems live unhappily with injustice in order to avoid going to court.

75. From face-to-face interviews with 1,134 individuals with non-trivial justiciable problems (out of a random sample of 4,125 adults), Professor Hazel Genn of University College London, found that, although almost all interviewees felt that they had a moral right to a fair resolution and had sought advice from a Citizens Advice Bureau, law center or solicitor, 80% took no legal action.

76. Genn concluded that "greater certainty about the enforcement of legal rights...in the civil context might have an impact on the behaviour of those who evade their responsibilities...when the likelihood of sanction seems remote". In less academic terms, if people could be brought to justice, there wouldn't be so much wrongdoing.

77. People avoid going to court because of the fundamental flaws (my term) that the head of the Civil Division of the Court of Appeal identified in 1999: "[It is] too expensive, too slow, **too unequal, too uncertain**, [my emphasis] too fragmented and, to many, incomprehensible."

## Some Recent Opinions

78. The Governor of the Bank of England, Mervyn King has a prestigious position in the English regulatory scheme, equivalent to Chairman of the US Federal Reserve System.

79. *The (London) Times* reported his remarks on or about 22 June, 2006 as follows:

“Mervyn King, Governor of the Bank of England, delivered a fierce attack on the commercial legal system at the Mansion House. Mr. King said the **adversarial system for settling civil legal disputes was in reality 'a profitable monopoly of lawyers'** and called for the Government to take steps to reform the law.”

80. In a recent *Times* interview, Robert Wardle, director of the Serious Fraud Office, warned that the police and prosecution authorities trying to combat fraud are struggling. In a letter to the Attorney-General, Lord Goldsmith, QC, Wardle said in his annual report: “There remains a gap between the incidence of fraud and the number of investigations, let alone prosecutions...I am not suggesting that the justice gap can be closed--merely narrowed.” At present, he told *The Times*, “**frauds are going uninvestigated and unprosecuted**” (my emphasis).

## Conclusion

81. It is my carefully considered opinion given with all due respect, based upon personal experience and knowledge, that English courts are not fair and impartial tribunals where things get put right. English courts are corrupt forums based on unwarranted privilege which perversely excuse and conceal the gravest misconduct.

Sworn this day the 11th of September 2006 in Cambridge, England

Sworn before me

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A SOLICITOR/ Commissioner for Oaths

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Suzon Forscey-Moore B.A., LL.M.

