

Summary of Case

I assert that the FSA engineered a strategy to make my company Integrity Financial Solutions (Integrity) a scapegoat for the failures relating to reckless consumer lending conducted by Halifax Bank of Scotland (HBOS) and Newcastle Building Society (NBS). HBOS and NBS lent (to their retail customers) substantial amounts (circa £250m) to purchase a plan which HBOS and NBS controlled that the FSA has subsequently named GTEPs.

I assert that the FSA knew that the HBOS/NBS business model was deeply flawed. The FSA primarily protected HBOS from the failures of the GTEP plan by creating the perception that Integrity was the GTEP product provider, forced integrity's business to fail, struck a deal with a discredited liquidator which enabled the FSA to transfer compensation payments via the FSCS scheme.

After the liquidation of Integrity I assert that the FSA deliberately set me up to believe via their correspondence with me that I would have no difficulty in obtaining a regulatory licence. I assert that the FSA/FCA never had any intention of providing me with a licence.

I assert that the FCA deliberately frustrated all five of my licence applications, neither accepting them or rejecting them. My last licence application (an appointed representative application on the Stargate Capital Management) made in 2015 was straightaway, but in the FCA's non-routine team without any justification, the FCA then frustrated the application for 16 months by repeatedly asking the same questions and claiming that I had not completed the licence application correctly. I assert that the FCA breached their application time standards and ultimately forced me to withdraw the application via their intimidation of Stargate Capital Management individually Mr Paresh Shah. Stargate and Mr Shah were terrified of the consequences of their continued relationship with me.

A complaint to the FCA was made on my behalf by my MP Caroline Dinenage. I assert that the FSA/FCA deliberately perpetrated a strategy to create a perception that I had breached

the General Prohibition via speculation that I had been managing funds without a licence. The FCA Ignored comprehensive representations that were provided to them by a regulatory lawyer (Howard Kennedy) prior to the publication of a First Supervisory Notice against Stargate Capital Management. The representations evidenced that I had not breached the general prohibition. I assert that this deliberate perception deception ruined my reputation, businesses and ability to earn a living. I argue that these speculations made by the FCA are a breach of my Human Rights.

I assert that the FSA/FCA tipped off the media and encouraged them to write articles that supported the FSA/FCA agenda of protecting HBOS and NBS. These articles continued the perception deception about me. The effect of these articles ruined my reputation, businesses and ability to earn a living.

I assert that the FSA/FCA abused their powers by ignoring key evidence throughout the period 2009 to 2018 as my testimony did not fit their agenda.

I assert that the FSA/FCA via a deliberate illusory strategy led me to believe that I was never under any investigation and I was fit and proper. I, therefore, did not make complaints to the FCA until after the prescribed complaint timeframe had elapsed.

I assert that the FSA/FCA used Parliamentary exemptions relating to my third-party rights under the Stargate First Supervisory Notice to avoid an adverse (to the FCA) Upper Tribunal decision via the FCA's use of a Parliamentary immunity which afforded me no third-party rights and excluded me from justice.

I assert that the FSA/FCA abused their powers under the Freedom of Information Act which was deliberately perpetrated by the FSA/FCA to exclude me from access to my files. If I had had access to my records, I would have raised complaints about the FSA/FCA much earlier.

I assert that the FSA/FCA did two deals which were deliberately set up to take away my ability to complain or seek redress through the Upper Tribunal. The first deal was the discredited liquidator (Peter Yeldon). The agreement offered to Peter Yeldon enabled the

FSA to make Integrity a scapegoat to protect HBOS/NBS and enabled Peter Yeldon to defraud Integrity for his purposes. This deal was struck between Tom Spender (FCA) and Peter Yeldon, Mr Spender became head of legal at HBOS/Lloyds Bank. The second deal between the FCA and Mr Paresh Shah. Mr Shah was terrified of the FCA and agreed to drop his case against the FCA by withdrawing his Upper Tribunal appeal. Mr Shah executed this deal to end the period of stress that the FCA had put him through. The FCA having achieved this deal tried to strike out my Upper Tribunal hearing. I persisted and was granted a hearing. At the hearing I learned that I had no third-party rights.

I assert that the FCA Complaints Commissioner did not use his discretionary powers to investigate the first phase of my complaint, justifying his non-action on the basis that I have not complained in time. I had complained five times, firstly by my MP Mr George Hollingberry in 2010, secondly by my MP Caroline Dinanage in 2016 and thirdly by my own direct complaint in 2017, fourthly by my letters to the FCA RTC in 2017 and fifthly by my complaint to the FCA Complaints Commissioner and FCA in 2018.

I assert that the FCA Complaints Commissioner has deliberately frustrated the second phase of my complaint relating to the breach of my human rights relating to speculations that I had breached the General Prohibition.

I assert that the FSA/FCA has ruined my businesses:

- Integrity Financial Solutions
- The TEP Factory
- UK Innovative TI
- FX Perpetual
- The Pension Solution Collaboration
- Galaxy Administration Services

I assert that the FSA/FCA has excluded me from making a living by denying me licences which would enable me to employ my qualifications and vast experience in financial services business sector.

I assert that the FSA/FCA ruined my marriage, caused me to sell my assets to fund a divorce settlement and fund my businesses.

I assert that the FSA/FCA via their deliberate perception deception about my honesty has made it extremely difficult for me to raise capital for any business in any sector that I intended to develop.

My Judicial Review Justifications:

1. On the basis that the Complaints Commissioner has rejected my complaint on 21st December 2018 on the first phase of my matter re the Integrity's Final Notice and the series of failed licence applications made by me. I assert that I complained to the FCA Complaints Commissioner as soon as it was reasonably possible for me to know that this was my only course of action. I assert that the FCA Complaints Commissioner should have exercised discretion and investigated the matter. The catalogue of events that preceded my complaint

to the FCA Complaints Commissioner started within one year of the Integrity Final Notice in 2010. I had complained five times, firstly by my MP Mr George Hollingberry in 2010, secondly by my MP Caroline Dinanage in 2016 and thirdly by my own direct complaint in 2017, fourthly by my letters to the FCA RTC in 2017 and fifthly by my complaint to the FCA Complaints Commissioner and FCA in 2018.

2. The Integrity Final Notice, specifically how the FCA agreed on a deal with a discredited liquidator who accepted the FSA allegations. Why did Margaret Cole not want to review the Integrity Censure which only happened as Tom Spender had struck a deal with Peter Yeldon. Peter Yeldon agreed the deal with Tom Spender to avoid a fine that the FCA speculated was due to be paid by Integrity. There was no fine due to be paid as Integrity had never defended its position at the Upper Tribunal. I assert that Mr Yeldon agreed to the deal put to him by Mr Tom Spender to conceal his dishonesty and enable him to defraud Integrity, its shareholders and creditors. I want a review of why the FSA via Margaret Cole would not re-open the matter as the Censure is inept. The Censure of Integrity has in part destroyed my reputation and ability to earn a living.

3. The licence applications, especially the last one, was put in FCA non-routine team. Why, if as Margaret Cole had confirmed that I was never under investigation why was my application put into the nonroutine team.

4. Why, the FCA (after Caroline Dinnanage MP complained) re the 16 months of long grass excuses interrogated me for 4 ½ hours and kept on asking questions re Integrity and what I had learned.

5. Why the FCA ignored Howard Kennedy representations re UKITI which were submitted to the FCA prior to the issuance of the Stargate Supervisory notice. The FCA had extensive evidence and representations before the publication of the SCM Supervisory Notice that UKITI was providing an unregulated software and administration service to Stargate. I assert that the FCA backdated the Stargate First Supervisory Notice to one day before the comprehensive representations sent to them by Howard Kennedy. All

6. Why the FCA have never accused me directly of breaching the general prohibition and have done nothing to pursue this speculation against me either prior to or after the issuance

of the Stargate First Supervisory Notice. The FCA informed Judge Herrington at my UT hearing that they were not pursuing any case against me. I assert that the FCA never had a case against me. The FCA speculations against me and UKITI were deliberately framed to ruin my reputation and destroy my businesses. I assert that the FCA invented speculations about Stargate Capital Management which had no substance to cause the illusion that there may have been consumer detriment which justified the FCA into issuing a First Supervisory Notice against Stargate. If there had been any consumer detriment evidence why did the FCA ultimately strike a deal with Stargate in the spring of 2018 and never pursue any further investigations against Stargate.

7. How is it possible for the FCA to abuse their powers and breache my Human Rights via an exemption which excluded me from justice in my Upper Tribunal hearing, i.e. I had no third-party rights.

8. I assert that the FCA intimidation of Stargate was a deliberate strategy to ruin my reputation, businesses, income and capital. There was no evidence of any consumer detriment via the services that Stargate provided, and therefore no justification for the heavy-handed treatment that the FCA put Stargate through.

7. How it is reasonable that the deal the FCA struck with Stargate designed to exclude me from third-party rights also included a condition that Stargate were not permitted to ever work with me again. I assert that this deal is a breach of my Human Rights.

9. How is it reasonable that the excessive time (10 months) has passed for the Complaints Commissioner to decide on the damage that has been caused to me by the publication of the Stargate Supervisory Notice and breach of my rights of privacy under the Human Rights act.