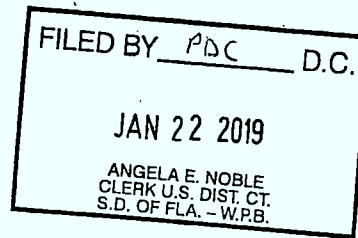


UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

Case No. 17-81370-cv-MIDDLEBROOKS/Brannon

ANDREW HODGES, individually,
VLADIMIR COOD, individually;
GAUTAM DESAI, individually;
JODY POWELL, individually;
JEFFREY HEBERLING (deceased), individually;
SHAMMI NABUKUMAR, individually;
ANTHONY SAJEWICZ, individually;



PLAINTIFFS,

vs.

MONKEY CAPITAL, LLC, a Delaware limited liability company;
MONKEY CAPITAL, INC., a foreign corporation;
DANIEL HARRISON, an individual;

DEFENDANTS.

**MOTION TO ORDER IMMEDIATE AND URGENT SUBPOENA OF
POTENTIALLY CONNECTED PARTIES TO THE PLAINTIFFS AND THEIR
ATTORNEYS**

1. In the document titled **MOTION TO OPPOSE SUMMARY & TO ORDER PLAINTIFFS TO PROVIDE FULL DISCLOSURE OF PARTIES, RELATIONSHIPS & TRANSCRIPTS** there is substantial evidence provided of interference on the part of HMRC, IPG Mediabrands and others in this court case
2. The DEFENDANT is being targeted for fraud via the US civil courts where the burden of proof is lower than the burden of proof for UK civil or criminal law. This is an abuse of the US court system.
3. There is evidence of this already with respect to the liquidator Louise Brittain, in conjunction with HMRC, having used a similar method to extort penalty on another innocent DEFENDANT in the past in a separate case but in the exact same manner as is being claimed here. This evidence is most eloquently summed up in a speech given in Parliament by the Right Hon. Robert Neil:

The concerns stem from an understandable change of policy through which HMRC has, over a number of years, used civil proceedings to pursue allegations of evasion of

duty against individuals and corporate bodies. The proceedings frequently involve allegations of fraud that are thought to be more advantageous to pursue through the civil courts, where of course the burden of proof is lower—the balance of probabilities—than for proceedings in the criminal courts, where the Revenue would have to prove the matter to the criminal standard ... Civil proceedings were used to pursue what might have been criminal matters, and two matters of concern arose. The first is the extraordinary conduct of the liquidator, as I have discussed already, and the second is the cynical conduct of HMRC in hiding behind the liquidator when things went wrong. That is exactly what it did. It might be legitimate to use such a device to deal with fraudsters, but my constituents were not fraudsters and were found not to be by the courts. Great care must be taken with the governance of this procedure, as HMRC can end up as judge, jury and executioner. In this case, the claim was brought in due course on 30 July 2010, nearly a year or so later, before Mr Justice Lewison—now, I think, Lord Justice Lewison—in the High Court. The judge in the High Court dismissed the claims against the former directors in their entirety and said—one might have hoped that this would have sunken in with the Revenue, but it clearly did not—that the liquidator's case had “crumbled to dust”. That is a very striking phrase. The case was not just thrown out on a technicality; it fell apart at the seams.

4. Further a timeline prepared by the DEFENDANT reveals all the HMRC cases that journalist Adam Luck has written about since 2012. As can be seen clearly from the chart (Evidence A) Adam Luck had not written a single article about HMRC in 3 years until the DEFENDANT made a bid for Absolute Living Developments, after which point in time he began to get heavily involved in the subject matter, always reappearing at the exact same moments that the DEFENDANT was being pursued, either in terms of this lawsuit or otherwise.

5. With this in mind the defendant asks the court for an IMMEDIATE ORDER for the following Gsubpoenas to be sent out so that the persons responsible can be brought to question to ascertain their involvement or non-involvement as may be the case

6. The defendant believes that given the extremely low probability of Louise Brittain and Adam Luck and HMRC being related for a third time via pure coincidence via Monkey Capital and this lawsuit, that the court has the right to determine the full nature of this lawsuit if there is sufficient evidence presented that it may concern issues which have not been disclosed at all, or if it is being brought about by a subversive agenda and not in the interests of the PLAINTIFFS winning material rewards but to somehow stimulate a further HMRC investigation.

7. The DEFENDANT asks for an order for SUBPOENA from all the following individuals to ask them about the nature of their knowledge and involvement with the PLAINTIFFS and their attorneys, with the DEFENDANT and with this case in general:

- **Interpublic Group of Companies (IPG)**
- **Adam Luck, an individual**
- **Louise Brittain, an individual**
- **Wilkins & Kennedy LLP, a company**
- **UK HMRC**
- **Ken Beardsley, an individual**
- **Sean Gleason, an individual**
- **Official Receiver for ALD**
- **Absolute Living Developments, a company**
- **Alan Ma, an individual**
- **George Leong, an individual**
- **News Corporation**
- **Goldseek.com, a company**
- **Peter Spina, an individual**
- **Chris Waltzeg, an individual**
- **Benjamin Greenmaiden, an individual**
- **Associated Press News, a company**
- **Coindesk.com, a company**
- **Digital Currency Group, a company**
- **Stanley Higgings, an individual**
- **Peter Rizzo, an individual (editor. Coindesk)**
- **Nicolas Dy, reporter, an individual**
- **Vahram Harutyunyan**
- **Rachel Howson (Kent Police Dept.)**
- **Mark Cananur (Kent Police Dept.)**
- **Carl Latchford, an individual**
- **Jason Coombs, an individual**
- **Doug Greene, an individual**
- **Keneth Kapner, an individual**
- **Craig Vallis, an individual**
- **Joshua Hawley, an individual**

8. It is further requested that in the case of each of these individuals and companies that the responses be given in writing under Oath to this court.

9. In the case of individuals who have not been named yet in this document or the document that preceded this one then it is the case that these connected parties have all held senior, influential, substantial, or management positions within the Monkey Capital project at some point in time.

10. In particular, it is required that each party disclose the nature and the details of their relationships to one another including any material discussions they have had at any point in time either with or about the PLAINTIFFS and their attorneys.

I hereby submit that this statement under Oath.

Respectfully Submitted,



Daniel Mark Harrison
London, U.K.



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was posted by mail with the Clerk of Court on this day of Friday 18th January 2019 and by e-mail to Judge Middlebrooks and to **DAVID C. SILVER** at DSilver@SilverMillerLaw.com.

EVIDENCE A

Nothing to declare? To catch a smuggler: On the frontline with customs officers at Gatwick Airport By ADA M LUCK FOR MAIL ONLINE / UPDATES: 22:00, 16 July 2011 <https://www.dam>

'You have a tax rebate': No you don't - it's an email phishing scam by fraudster pretending to be HMRC By ADA M LUCK FOR MAIL ONLINE PUBLISHED: 22:29, 15 December 2012 | UPDATES: 11:00, 16

Luckhead of reprise

RBS sued for £145m over its alleged role in huge carbon trading VAT fraud By ADA M LUCK FOR THE MAIL ONLINE SUNDAY PUBLISHED: 22:16, 4 June 2016 | UPDATES: 12:30, 5 June 2016

Former Eton pupil named as mastermind behind alleged multi-million pound property development scam By ADA M LUCK FOR THE MAIL ONLINE SUNDAY PUBLISHED: 0

Daniel Harrison accused of \$30m crypto fraud Adam Luck February 11 2018, 12:01am The Sunday Times <https://www.thetimes.co.uk/article/daniel-harrison-accused-of-30m>

Gone Girl star Rosamund Pike's partner is disqualified as company boss for four years after owing nearly £200,000 in tax By ADA M LUCK FOR MAIL ONLINE / PUBLISHED: 10:21, 11 May 2018 | UPDATES: 00:57

Former property billionaire who went bust Simon Halabi facing tax inquiry By ADA M LUCK FOR THE MAIL ONLINE SUNDAY / PUBLISHED: 23:01, 9 June 2018 | UPDATES: 10:27, 10 June 2018

TAX CAMPAIGN FOR HMRC, REPRISÉ CANADA <https://ip.a.co.uk/knowledge/case-studies/coi-hm-revenue-customs-self-assessment-change-without-chaos/24-10-2018>

Adam Luck emails to write about ALD / Jan 2019

DMH&CO Founded, Oct 20, 2015

ALD liquidated, April 2016

ICO, July 2017

Lawsuit, Dec 2018

Arrest, Jan 2018

Despatch Pack CP72
 From: Name and Address of Sender Nom et Adresse d'expéditeur
 PFW PARCELFORCE WORLDWIDE,
 D HAMMLOU
 Postcode NW6 4BT
 VAT No / Exporters reference (optional)

A barcoded service label must also be affixed to
 Name and Address of Addressee Nom et Adresse du destinataire
To: PAUL G. ROBERTS SRP
 201 CLEMENTS ST
 WEST PALM BEACH FL 33401
 Town and Postcode 33401
 Country US
 Importers reference (if any) (tax code/VAT No/importer code) (optional)

CN23 Customs Declaration (Itemised description of all goods)

ORIGIN ID: XVCA 07389188114
 PFW PARCELFORCE WORLDWIDE
 WEST WOOD PARK TRADING ESTATE
 CONCORD ROAD
 LONDON, LO W30TH
 UNITED KINGDOM, GB

SHIP DATE: 21 JAN 19
 ACTN/WT: 0.70 KG
 CAD: 100892065/WSX12300

ORIGIN ID: XVCA 07389188114
 PFW PARCELFORCE WORLDWIDE
 WEST WOOD PARK TRADING ESTATE
 CONCORD ROAD
 LONDON, LO W30TH
 UNITED KINGDOM, GB

TO 201 CLEMENTS STREET
 ROOM 202
 WEST PALM BEACH
 FLORIDA, FL 33401
 UNITED STATES, US

FedEx
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 AWB

XH PBIA
 PKG-YOUR PKG

TRK# 7850 4867 1296
 Form 0430

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 DESC2:
 DESC3:
 DESC4:

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XH PBIA

COUNTRY MFG: GB
 CARRIAGE VALUE:
 CUSTOMS VALUE: 1.00 LKL

SIGN: T/C: S D/T: R

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globalexpress

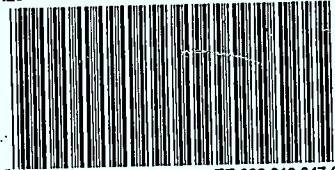


Date of Despatch 21/01/19

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