

IFCC COMPLAINT REFERRAL REPORT

Complaint Number: I05013115364847

The following information was provided by the victim and will be forwarded to the appropriate law enforcement or regulatory agency.

Credit/Debit Cards

Date of Complaint: 1/31/2005 3:36:23 PM

Victim Information

Name: Adrienne Gaye Thompson
DOB: 10/24/1955
Gender: F
Phone #: 8769240800
Email: visionat@mail.infochan.com
Address: 5 Roehampton Circle
Kingston, KGN 19
Live in city limits: Yes
County:
Country: Jamaica

Do you have pertinent documents in paper form? Yes

Please indicate who your local law enforcement agency is:
The Jamaica Police Department
101-103 Old Hope Road
Kingston 6
Jamaica

Please List the easiest way and most convenient time to contact you:
You may contact me at any reasonable hour at my home address above.

Information about the Individual that victimized you.

Name: James H. Williams
Gender: U
Phone #: 617-253-2221
Current Email: jhwill@mit.edu
Address: 77 Massachusetts Avenue
Suite/Apt/Mail Stop: Department of Mechanical Engineering 3 360
Cambridge, MA MA 02139 4307
Country: USA

Contact between you and the Person/company that victimized you.

Type of Contact: Web Page
Date of Contact: 04/22/2004
Total money lost on contact date: \$0.00

Type of Contact: Web Page
Date of Contact: 12/30/1999
Total money lost on contact date: \$0.00

Type of Contact: Web Page
Date of Contact: 12/30/1999
Total money lost on contact date: \$0.00

Money lost in total: \$0.00

Contact Information:

The following is an excerpt from my letter of 4 May 2004 to the Independent Police Complaints Commission in Britain, in which I reported, inter alia, the Mastercard fraud.

Complaint to the Independent Police Complaints Commission:

Criminal Misconduct by Commissioner Sir John Stevens and Assistant Commissioner Tarique Ghaffur, Metropolitan Police Service.

Submitted to the Independent Police Complaints Commission at
enquiries@ipcc.gsi.gov.uk
4 May 2004

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4 May 2004

Police Complaint Authority Reference: D2004/306/100168.

Complaint: Criminal Misconduct by Commissioner Sir John Stevens and Assistant Commissioner Tarique Ghaffur, Metropolitan Police Service.

In the matter of the Criminal Complaint

against The University of Aberdeen and Others (Defendants)

Lodged by Adrienne Gaye Thompson (Complainant)

6 January 2004, for the Express Attention of:

Tarique Ghaffur, Assistant Commissioner, Metropolitan Police

Reported to the Serious Fraud Office 11 February 2004.

Violations of the Criminal Justice Act 1993, section 1.

Submitted to the IPCC at enquiries@ipcc.gsi.gov.uk, 4 May 2004.

Urgent, Private and Confidential

For the Express Attention of:

Mr. Nick Hardwick

Chair, Independent Police Complaints Commission

90 High Holborn,

London WC1V 6BH

England

I. Preamble

I hereby file a complaint against Commissioner Sir John Stevens and Assistant Commissioner Tarique Ghaffur, of the Metropolitan Police force, in respect of criminal misconduct in the mishandling of the above-captioned Criminal Complaint (the Criminal Complaint), attached hereto as Attachment 1, against the University of Aberdeen and others (the Defendants) lodged 12 January 2004 for the express attention of Mr. Ghaffur. For 4 months Ghaffur has failed to discharge his duties prescribed by the code of practice provided under section 23 of the Criminal Procedure and Investigations Act 1996. This failure to initiate prosecution, in light of evidence beyond reasonable doubt submitted in the Criminal Complaint, is patently inconsistent with any intent to bring the Defendants to justice. My 3 complaints submitted to the PCA are dated 20 January 2004, 10 February 2004, and 12 February 2004, attached hereto as Attachment 2, were referred by the PCA to Commissioner Sir John Stevens as the appropriate authority.

From the evidence, Commissioner Sir John Stevens and Assistant Commissioner Tarique Ghaffur, are participants in the criminal enterprise; their manufacture of an allegation of plagiarism to misrepresent the criminal offences commissioned by the Defendants, being consonant with the Defendant's strategy evidenced by the Criminal Complaint [Exhibit H 1, pars 4, 21; H2; H5] and my email of 7 March 2003 to Professor Rice (attached hereto as Attachment 3 (a)) The evidence also shows that Serious

Fraud Office (SFO) officers Peter Kiernan and Michael Jackson also supported this deception in their replies of 27 February and 22 March 2004. My correspondence with the SFO and complaints to the Law Officers, are attached hereto as Attachments 4 and 5 respectively.

In my complaint of 3 March 2004 to Director Robert Wardle, I pointed out that the offences commissioned are incapable of founding an offence of plagiarism under the applicable University of Aberdeen regulations.

The Criminal Complaint amply presents the facts, the evidence, and the law, pertaining to the theft and related offences in respect of the trust property - the Honours Thesis ¿Interactive Computer Package Demonstrating Sampling, Convolution and the FFT¿, and its substitute valued as the degree of Doctor of Philosophy. The systematic fraud against black/non-white engineering students at the University of Aberdeen, in the demotion of degree classes, and award of bogus degrees, constitutes persecution under Article 7 of the Rome Statute of the International Criminal Court, and extrapolates, on the facts, to an organised policy in universities throughout the United Kingdom.

II. Criminal Charges

I hereby charge as follows:

Criminal Offences Contrary to: The Criminal Law Act 1977 section 1; The Accessories and Abettors Act 1861; The Criminal Law Act 1967 section 4; The Computer Misuse Act 1990; Conspiracy to Pervert the Course of Justice, and Perversion of the Course of Justice at Common Law.

The Criminal Justice Act 1993, sections 1 (2) (a), (c), and 1(3) (a), (b) in respect of: The Theft Act 1968, sections 20 (Suppression etc of Documents), 21 (Blackmail), 22 (Handling Stolen Goods); The Forgery and Counterfeiting Act 1981 sections 2 and 4; Conspiracy to commit the latter offences, and Conspiracy to Defraud.

1. Conspiracy

1) From about 12 January 2004 (and sometime prior to that date) having actual knowledge of the continuing theft and fraud transaction commissioned and being commissioned by the Defendants, by reason of evidence beyond all reasonable doubt presented by the Criminal Complaint, Commissioner Sir John Stevens, Assistant Commissioner Tarique Ghaffur and the Defendants, unlawfully, wilfully and maliciously conspired, combined confederated and agreed:

a) To pervert the course of justice by aborting criminal procedures against the Defendants which would lead to their prosecution, so as to shelter them from conviction and evasion of their criminal responsibilities;

b) To, contrary to section 4 of the Criminal Law Act 1967, otherwise assist the defendants in evading prosecution, knowing them to be guilty of

the arrestable offences charged in the Criminal Complaint;

c) To, by aborting criminal procedures assist, contrary to the Criminal Justice Act 1993 sections 1(2) (a), (c), and 1(3) (a), (b) -

i. The execution, as valuable securities, of the copies of forged paper purporting to be my student transcript and statement of marks on 16 January 2004, to purportedly satisfy contractual obligations in accordance with the Data Protection Act, in respect of my application for admission to the PhD program at the Massachusetts Institute of Technology,

ii. Handling of the stolen property, my Honours Thesis ¿Interactive Computer Package Demonstrating Sampling Convolution and the FFT¿, and its substitute valued as the degree of Doctor of Philosophy in Engineering,

iii. Blackmail, designed to put me in fear of death, and to coerce abandonment of the property and all remedy in respect of the fraud,

iv. The continued wholesale defrauding of black/non-white students in respect of the demotion of degree classes, theft/obtaining by deception of their Honours theses, and the award of bogus degrees.

2. Overt Acts

In furtherance of the conspiracy and to effect the objects thereof, the Metropolitan Police committed the following acts:

1) Commissioner Sir John Stevens, and Assistant Commissioner Tarique Ghaffur, relegated investigation of the Criminal Complaint to junior detectives, Detective Chief Inspector Matthew Horne, followed by Detective Chief Inspector Vas Gopinathan -

a) To ensure that the Criminal Complaint, which charges offences according with the definition of serious and complex fraud (as defined by the SFO) would not be competently handled;

b) As can be inferred, to ensure that complaints to the Independent Police Complaints Commission (the IPCC) would not be referred to the Metropolitan Police Authority or independently investigated by the IPCC, but would be handled by Commissioner Sir John Stevens as the ¿appropriate authority¿ (or some officer appointed by him) as provided for under the Police Reform Act 2002 section 29 (1).

2) From 13 January to 16 January 2004, Detective Matthew Horne engaged in a series of deceptive manoeuvres by email, and by telephone on 19 January 2004, designed to delay, obstruct and pervert the criminal procedures -

a) Supplying me with a false telephone number ¿0044 207 230 6040¿ so as to incur delay and frustrate processing of the Criminal Complaint;

b) Disregarding the Criminal Justice Act 1993 under which the charges were brought, attempting to deceive me into consenting to a transfer of the matter to the Police in Scotland, where agents of the Scottish Executive have accessory liability in commissioning and concealing the crimes.

I have detailed Horne's misconduct and the pertinent email correspondence in my complaint of 20 January 2004 to the PCA, attached hereto as Attachment 2 (a).

3) From 20 January 2004 to 6 February 2004, Detective Chief Inspector Vas Gopinathan continued the strategy to incur delay, obstruct, and pervert the criminal procedures. Gopinathan -

a) Deceived me on 20 January 2004, falsely advising that his rank was 'Detective Chief Superintendent';

b) Fabricated an allegation of 'plagiarism' to misrepresent the Defendants' theft and obtaining by deception, and to misdirect me towards civil action, with intent to subvert the State's requirement for prosecution.

I have detailed Gopinathan's misconduct, and the evidence of our email correspondence in my complaint of 10 February 2004 to the PCA, attached hereto as Attachment 2 (b).

4) On 15 March 2004, Detective Superintendent Hunt telephoned me on 876.924.0800, continuing the strategy of deception. Hunt -

a) Attempted to persuade me that the false telephone number supplied by Horne was a mistake, and not an act of deception;

b) Informed me that Detective Gopinathan, along with an officer from the fraud squad, had concluded that the Criminal Complaint 'does not substantiate criminal offences', that Assistant Commissioner Ghaffur had accepted this assessment and would be writing to me accordingly.

5) Under the control of 'the appropriate authority' (Police Act 1996 section 65, Police Reform Act 2002, section 29), Commissioner Sir John Stevens, the Metropolitan Police -

a) Diverted my complaint of 20 January 2004 to the Child Protection Unit at Scotland Yard;

b) Failed to record my complaint of 10 February 2004, which invoked provisions for supervised investigation into Gopinathan's misconduct under section 72 of the Police Act 1996.

Images of Detective Howell's letter of 9 February, the PCA notification of 25 February, and a copy of my further complaint to the PCA of 12 February 2004, are attached hereto as Attachment 2 (c) (e) (f). Notwithstanding Detective Hunt's telephone call of 15 March, it is unclear as to whether my complaint about Horne's misconduct was recorded as required by law.

It can be inferred that at all material times, detectives Horne, Gopinathan, and Hunt, acted with the knowledge and approval of the senior officers, Commissioner Sir John Stevens, and Assistant Commissioner Tarique Ghaffur.

3. Obstruction of Justice and Accessory Liability

1) From about 12 January 2004, having actual knowledge that the Defendants are guilty of the crimes charged by the Criminal Complaint, by reason of evidence beyond reasonable doubt, Commissioner Sir John Stevens and Assistant Commissioner Ghaffur, contrary to the offence of perverting the course of public justice at common law, wilfully and maliciously:

- a) Failed to initiate prosecution pursuant to the common design, shared with the Defendants, to evade arrest;
- b) As may be inferred, allowed or instructed detectives Horne, Gopinathan and Hunt, whether directly or indirectly (by the Defendants or their agents), to engage the dilatory, evasive, and deceptive manoeuvres outlined above, with intent to frustrate me into abandoning the matter;
- c) By manufacturing an allegation of ‘plagiarism’ in combination with the false representations denying the offences charged as crimes, corroborated by the SFO strategy, attempted to misdirect me to seek civil

Description of how you were defrauded:

Continued from previous window

c) By manufacturing an allegation of ‘plagiarism’ in combination with the false representations denying the offences charged as crimes, corroborated by the SFO strategy, attempted to misdirect me to seek civil remedy - when such remedy is unavailable, the civil courts having consistently disclaimed jurisdiction in such matters - to further the Defendants’ attempts at bribery.

2) By agreeing to suppress the criminal procedures, Commissioner Sir John Stevens and Assistant Commissioner Ghaffur wilfully supported the crimes being commissioned (allowing the Defendants to further their criminal purposes) contrary to the Accessories and Abettors Act 1861, section 8:

‘‘‘.

- a) Aided abetted and procured the continued attempts at blackmail/extortion, contrary to the Criminal Justice Act section 1 (2) (a) (Theft Act 1968 section 21), executing menaces by -
 - i. The unauthorised visit to my home on 16 March 2004 by two armed guards employed to King Alarm Systems, whose service was discontinued because of the threat to my life posed by the Defendants’ apparent ability to penetrate and influence the Company by means of the surveillance operations [see Criminal Complaint] coordinated by Professor James Williams of MIT;
 - ii. Hacking into my computer on April 18, 22, and 23 2004, to obstruct renewal of my Norton AntiVirus 2002 subscription and

purchase of the Norton AntiVirus 2004 upgrade, with intent to later infect my computer with a virus or worm; interfering with my two telephone calls to Norton ((541) 335 7000) on 23 April so that the call was locked on 'hold' each time; hacking into the MasterCard account used for the online purchase, fraudulently inserting a US\$638.90 debit instead of the US\$29.99 paid to Symantec Corporation for order number 927842375 purchased 23 April 2004; and coercing Ms. Tameka Brown of RBTT Bank Jamaica Limited (Credit Card Centre) to conceal evidence of the fraud so commissioned, contrary to the Computer Misuse Act 1990 sections 2 and 3. My email correspondence with Symantec and RBTT are attached hereto as Attachment 6.

d) Aiding, abetting, and procuring, the continued systematic commercial fraud against black/non-white students (falsification of examination marks, fraudulent demotion of degree classes, copyright infringement, theft/obtaining by deception of theses, and award of bogus degrees, contrary to all applicable law against fraud and deception) by protecting the fraud from exposure by prosecution;

2) Additionally 'without diminishing, in any way, the appropriateness of the provisions at common law for the grave perversion of the course of justice commissioned - Commissioner Sir John Stevens and Assistant Commissioner Tarique Ghaffur, knowing the Defendants to be guilty of the arrestable offences charged by the Criminal Complaint, wilfully assisted the Defendants in evading arrest contrary to the Criminal Law Act 1677 section 4, thereby encouraging the intimidation accomplished by the above-mentioned menaces, contrary to all legislation pertaining to harassment, cybercrime and terror.

III. Supporting Evidence

1. King Alarm

It shall be specifically noted that I met with Managing Director of King Alarm Systems, John Azar, on 30 May 2003 to discuss, inter alia, the threat to my life posed by the possibility where a security guard, contracted by the Defendants, could aim and discharge his firearm with me as the intended target, with intent to commission murder, while purportedly aiming at an intruder.

Against Azar's advice, we discontinued the King Alarm service by letter dated 3 December 2003. Armed guards continued to check our residence at 5 Roehampton Circle although the Company removed its equipment on 10 December 2003. On 5 March 2004, the security guards again visited, and on complaining to General manager Warren Sherman, he confirmed that he had checked the client lists, from which the guards made routine visits, and assured me that 5 Roehampton Circle

had been removed. Sherman suggested that the guards might have checked the residence because the King Alarm sign had not been removed from the gate when the equipment was disconnected. I removed the sign the following day, 6 March 2004.

On 15 March, during the telephone conversation with Detective Hunt of Scotland Yard, I emphasised that Scotland Yard was working in concert with the defendants to pervert the course of justice. On 16 March two armed guards from King Alarm again visited. One of the guards informed me that they had noticed that the sign had been removed from the gate, but that their list included 5 Roehampton Circle. I checked again that day with Sherman, who again assured me that we had been removed from the lists.

On 23 April, Azar appeared to be unwilling to provide me with the names of the two guards who had visited on 16 March, also indicating that the Company was not easily penetrated and that the guards must have been operating from a list. On 26 April, Sherman again confirmed the removal from the lists. I believe that Sherman was correct, having repeatedly looked into the matter himself, and that Williams had orchestrated the unauthorised visits from the security guards with the intent that the visits would remind me of the threat of death.

2. Computer Misuse

The Defendants (or their agents) continue to hack into my computer on a daily basis despite the installation of the firewall „Sygate“. On 19 April 2004, I attempted to renew my Norton AntiVirus subscription (from the Norton AntiVirus 2002 installation on my computer) but was unable to because the relevant files had been modified so that instead of allowing access to the subscription billing form, the Symantec Renewal Centre dialogue box indicated that a subscription key was required. Subscription keys are obtained by telephoning Symantec Corporation, and are required only when the Norton AntiVirus subscription has expired. My subscription had not expired, the date of expiry being 23 April 2004.

I was able to access a billing form for subscription priced at US\$19.95, generated by the Symantec Virtual Agent on the Symantec website at <https://rigel.symantec.com/cgi-bin/esd1.pl?sku=07-12-00014&segment=electronic&subsite=us&promocode=ECSALES&VENICE=x>. On 22

April, I found that the defendants had reversed their modifications on my computer so that I could again access the subscription billing form directly from my Norton 2002 installation. By this route, the subscription renewal was priced at US\$29.95.

On 22 and 23 April, I made repeated attempts to purchase the Norton 2002 Subscription, accessing the subscription billing form from both

my 2002 installation and the latter URL, linked to the Symantec Virtual Agent at <http://nh5.nohold.net>. On discovering on 23 April that the Norton AntiVirus 2004 upgrade purchase price was equal to the price of the Norton AntiVirus 2002 subscription renewal, US\$29.95, I also made repeated attempts to purchase the 2004 upgrade. For each of these attempts, except for the last, I obtained a web page entitled "payment Information" indicating that the credit card was invalid. Each time, the web page stated:

"We take additional steps to ensure your security. Our online credit card authorization is not recognizing your card as valid. Please check that your billing address matches your credit card billing address.

Images of one instance of the web page are included in Attachment 6 (b). I apparently printed from the URL <https://rigel.symantec.com/cgi-bin/eds.pl> in portrait mode instead of landscape mode, so that part of the sentence was omitted, but the second image is a print from WORD, where I had pasted the selected text intending to save other information pertaining to the transaction.

I eventually succeeded in purchasing the Norton AntiVirus 2004 upgrade in the afternoon of 23 April. The email proof of purchase for order number 927842375, is attached hereto as Attachment 7(f). My uncle, Mr. M. G. Porter, is the holder of the MasterCard account used throughout the transactions. On 29 April Mr. Porter's bank, RBTT Bank Jamaica Limited, advised him through their servant (employee), Ms. Tameka Brown, that transactions amounting to \$638.90 had been applied to his credit card and that, consequently, credit was no longer available.

Symantec replied to my email of 23 April (submitted by form at <http://www.symantecstore.com/cs>) confirming that order number 927842375 amounting to US\$29.95, was the sole transaction applied to the MasterCard account (Attachment 6 (c)). The multiple transactions applied to the MasterCard account are therefore the result of hacking directly into the MasterCard account, and were not caused by the repeated attempts to make the purchase.

On 23 April, I warned Ms. Brown that the Defendants were responsible for the hacking, and that one of them, Professor James Williams was likely to telephone with intent to disinform her and to dissuade her from providing evidence of the fraud. Ms. Brown informed me on the morning of 30 April, by telephone, that the transactions that appeared on the MasterCard account were \$19.99 and \$29.99 sums amounting to the \$638.90 figure, and that Symantec had requested payment for only one \$29.99 transaction. Ms. Brown also agreed to have RBTT issue an official document disclosing all transactions and other information pertaining to the MasterCard account, but excluding the account number - which Mr. Porter did not want disclosed. Ms. Brown indicated that the bank would issue this document on receiving

written authorisation from Mr. Porter.

Later that day, I again telephoned Ms. Brown. She reneged on the agreement insisting that:

- 1) The bank could not issue such a document without disclosing the account number,
- 2) The application of the sums amounting to \$638.90 (less \$29.99) was *not* fraud,
- 3) The repeated rejection of the MasterCard, and the apparent application of multiple transactions, were generated by a difference in response times between the Symantec and MasterCard databases, and not by hacking.

Ms. Brown prefaced her assertions earlier that day with the suggestion that I had executed the transaction (and attempts) through MIT. She also contradicted her notice to Mr. Porter about the MasterCard account being in excess of the credit limit and the consequent unavailability of further credit, claiming that the transactions amounting to \$638.90 had not been applied to his account. Ms. Brown also declined to reply to my email.

The inference is that Williams advised Ms. Brown that MIT was engaged in the Symantec transactions, in order to provide an explanation for his knowledge of the matter. It can also be inferred that knowing that Mr. Porter did not wish to have his MasterCard account number disclosed, Williams coerced Ms. Brown into reversing her position concerning non-disclosure of the number on the official document requested, thereby suppressing evidence of the fraud.

Wherefore, I demand that Commissioner Sir John Stevens and Assistant Commissioner Ghaffur be made to answer the charges made, and I state that the facts and information presented herein are true and correct to the best of my knowledge and belief.

Adrienne Gaye Thompson, Complainant
4 May 2004

VI. List of Attachments:

6. Attachment 6: Symantec & RBTT Email
 - (a) Symantec Proof of Purchase, Order #927842375.eml
 - (b) RBTT 1, 29.04.2004
 - (c) Symantec Confirmation 29.04.2004.eml

(d) RBTT 2, 29.04.2004

Information about Witnesses:

Mr. Manzie G. Porter
6 Worthington Avenue
Kingston 5, Jamaica

Telephone: 8769267800

Ms. Tameka Brown
RBTT Bank Jamaica Limited (Credit Card Centre)
17 Dominica Drive
Kingston 5

Contact With Law Enforcement Or Another Government Agency:
Reported by email to opakgn@pd.state.gov, Embassy of the United States of America, Kingston, Jamaica; for transmission to the Federal Bureau of Investigation, as advised at <http://www.fbi.gov/contact/legat/legat.htm>; copied to Interpol cp@interpol.int.

31 January 2005
C/o Mr. Michael Limpantsis
Regional Security Officer
Embassy of the United States
2 Oxford Road
Kingston 5

Telephone 8769294850

Reported to Mr. Nick Hardwick, Chairman
enquiries@ipcc.gsi.gov.uk, 4 May 2004.

Reference Number D2004/100168

Independent Police Complaints Commission
90 High Holborn
London WC1V 6BH

Telephone 020 7166 3000

Reported to Prosecutor Luis Moreno-Ocampo, 14 July 2004
Reference Number OTP-CR-313/04

International Criminal Court
PO Box 19519
2500 CM, The Hague
The Netherlands

email pio@icc-cpi.int

Additional Information:

The Symantec Order Number was 927842375, for the purchase of 1 Norton AntiVirus Upgrade for \$29.95.

The following is an excerpt from the Criminal Complaint filed with Scotland Yard and the ICC:

To be delivered by Federal Express air waybill number 8425 0950 2429

For the Express Attention of:

Mr. Tarique Ghaffur, Assistant Commissioner, Metropolitan Police
New Scotland Yard, Broadway, London SW1H OBG, England

CRIMINAL COMPLAINT

Against The University of Aberdeen and Others (Defendants)
Lodged by Adrienne Gaye Thompson (Complainant)

Violations of the Criminal Justice Act 1993, section 1.

Sworn on 9 January 2004.

Exhibits are numbered A through M and listed on the back page.

I, Adrienne Gaye Thompson, an Electrical Engineer and Computer Scientist of 5 Roehampton Circle, Kingston 19 Jamaica, being duly sworn, depose and lodge this criminal complaint against the following defendants:

DEFENDANTS

In Scotland:

The University of Aberdeen; Professor George P. McNicol; Professor John R. Smith; Professor Stephen R. Reid; Professor James Penman; Mr.

Alexander W. Gray; Dr. A. Fraser Stronach; Mr. Peter Lees; Mr. Colin S. MacLean; Professor C. Duncan Rice; Professor J. Maxwell Irvine; Mr. Steve Cannon; Dr. Trevor Webb; Mr. David Jones; un-known Internal Examiners who recommended or oversaw examination arrangements for the award of the degree of Doctor of Philosophy in Engineering to Colin S. MacLean; and others known and unknown.

In England:

Professor Stephen R. Reid; Sir Peter Newsam; two un-known professors who in 1983 were External Examiners (to the University of Aberdeen) for my Engineering Honours examination and appeal to the Senate; un-known External Examiners who recommended the award of the degree of Doctor of Philosophy to Colin S. MacLean; the Royal Dutch Petroleum Company and Shell Transport and Trading Company P.L.C. (Shell); un-known directors or other agents or servants who acting on behalf of Shell sponsored the project by Colin Sinclair MacLean, or participated in the transaction, whether by hosting his experiments on Shell's Brent Bravo Platform, or by acting as Internal Examiners, or by dealing with the intellectual property as owners or licencees or through such other fraudulent activity; others known and unknown.

In the State of Massachusetts, United States of America:

Professor Patrick H. Winston, Professor James H. Williams Jr., Dr. Clarence G. Williams, Professor Lawrence B. Evans.

Addresses of the defendants are listed in Attachment 1 Notice shall be taken of any deceased defendants.

PREAMBLE

The above-named defendants, the University of Aberdeen (the University) its agents and co-conspirators, constitute a criminal enterprise whose primary object is a racially motivated theft transaction which began in about April 1983, continuing to the present time, and which symbolises a significantly networked racketeering activity concerned with systematic racial discrimination and fraud against black/non-white students. It is a fact that the University of Aberdeen and its External Examiners, have over the years systematically conspired to defraud black/non-white engineering students by falsifying their Honours examination marks and corresponding degree classes.

The theft pertains to the dishonest appropriation and obtaining of my thesis, 'Interactive Computer Package Demonstrating Sampling Convolution and the FFT', (the Honours Thesis), submitted in April 1983 in partial fulfilment of the degree of Bachelor of Science in Engineering, Honours, and its conversion to the thesis 'Development of a Microprocessor-Based Signal Analyser for Machine Condition

Monitoring (the PhD Thesis) submitted in fulfilment of the degree of Doctor of Philosophy in Engineering, conferred on Colin Sinclair MacLean in July 1985. The University continues to conceal the rescission, in March 2003, of the latter degree, wilfully retaining the stolen property. In consequence of the fraud, the degree of Bachelor of Science in Engineering, Second Class (Division 2) Honours (the Degree) awarded to me - is void, a fact which the University, and their solicitors Paul and Williamsons, knew ab initio.

The term 'Honours Thesis' herein denotes both the intellectual property entitled 'Interactive Computer Package Demonstrating Sampling, Convolution and the FFT' as well as its chose in action - property which is a contractual obligation akin to a debt owed by the University, representing my right to recover credit as sole author and owner of the work, and which is also subject to a trust. The substance of the Honours Thesis is a computer program referred to herein as the 'FORTRAN Program'. The typewritten representation describing the creation and development of the FORTRAN Program (hereinafter termed the 'Text'), and the signed computer-generated hardcopy representation of the source code constituting the FORTRAN Program (hereinafter termed the 'Printout'), together comprised the Honours Thesis submitted.

I created, wrote, programmed, and developed the FORTRAN Program on the University's Honeywell mainframe computer (the Honeywell) in the period October 1982 through March or April 1983; the Honeywell backup tapes (the Backups) evidencing my sole authorship and ownership of the work stored in my assigned computer account identified by user number uen4059.

In about October 1996, having been alerted to the absolute exclusion of my Honours Thesis from the schedule of achieved courses comprising my student record (by Professor Elsa Leo-Rhynie, Pro Vice-Chancellor, University of the West Indies) I immediately wrote to Professor J. Maxwell Irvine, the then Principal and Vice-Chancellor of the University, alleging wilfully concealed plagiarism. I later formed a suspicion that the offence was in fact theft, using the term 'theft' in correspondence, but analysing it as such in 2002 only after discovering the applicable law, and also that pertaining to criminal offences introduced by the Copyright, Design and Patents Act 1988 (the CDPA).

The covert activities of the criminal enterprise have effectively extinguished all means to a livelihood, and being the subject of continuous stalking since 1983, I fear that my life (and those of my family members) is in danger. The Jamaican Police Department has disregarded my 3 reports to them dated 13 August 1998, 11 October 1999, 23 May 2000, complaining about the theft, the stalking, and the threat to my life.

From the evidence it is clear that the offences comprising the

criminal transaction could not have been commissioned but for the actions of the unknown External Examiners and Professor Stephen Reid (former University of Aberdeen Engineering Head of Department 1982 - 1984) in England which, together with those of Shell Exploration and Production, agents of the Royal Dutch/Shell Group (and who are controlled by them) with headquarters in London, and the wilful omissions of former Commission for Racial Equality (CRE) chairman Sir Peter Newsam, form ¿relevant events¿ constituting central and essential parts of the acta rea - bringing the criminal activity within the proscription of the Criminal Justice Act 1993 (England and Wales).

I hereby charge as follows:

THEFT and OBTAINING by DECEPTION

Contrary to: Criminal Justice Act 1993, sections 1 (2)(a), and 1(3) (a); Theft Act 1968, section 1 (Theft) and section 15 (Obtaining Property by Deception).

External Law:

Scotland ¿ Common law of theft and fraud.

1. In or about April 1983, Professor John R. Smith, Dr. A. F. Stronach, Mr. Peter Lees, Colin Sinclair MacLean ¿ principals in the first degree ¿ along with Shell, the first two unknown External Examiners in England, and others known and unknown, unlawfully, wilfully, and maliciously combined conspired and agreed:

a. To commission the theft of the Honours Thesis of which I am sole author; that is, to dishonestly appropriate my Honours Thesis and the FORTRAN Program therein so as to permanently deprive me of it, by making covert deceitful and false representations claiming that the property was authored by Colin Sinclair MacLean, and that I had plagiarised the work, thereby fraudulently converting the property, according it a mark of zero, designating the course as ¿not achieved¿ and effecting denial of title to my Honours Thesis.

b. To obtain by deception, my Honours Thesis and the FORTRAN Program therein; that is, to deceive me into believing that my Honours Thesis was credited as ¿achieved¿, by purportedly awarding to me, in violation of University regulations [Exhibit C 1] the degree of Bachelor of Science in Engineering, Second Class (Division 2) Honours; thereby obtaining control of the Honours Thesis by pre-empting assertion of my ownership, so as to permanently deprive me of the property.

c. To obtain by deception, substitute property realised as the PhD Thesis for submission by Colin Sinclair MacLean in fulfilment of the requirements for the degree of Doctor of Philosophy in Engineering; that is, to transfer possession of the chose in action

representing my Honours Thesis, adapting the FORTRAN Program to form the PhD Thesis, by making an infringing copy converting the source code to object code, by making a hardware instrument specifically designed to make such copies contrary to copyright law, and by falsely representing the derivative work as a PhD thesis authored by Colin Sinclair MacLean in order to permanently deprive me of the property and its proceeds.

2. The Honours Thesis and its product, the PhD Thesis, constitute property subject to a trust of which I am sole beneficiary, the University being fiduciaries, and also constructive trustees. The document 'Notice of Forgery', dated 6 January 2004, analyses the trust [Exhibit A].

3. From about July through October of 1983, subsequent to my letter dated 29 June 1983 to the University Senate which appealed for an independent reassessment of my examination papers against the degree class awarded [Exhibit B 1], the Senate Committee headed by Principal and Vice-Chancellor Professor George P. McNicol, along with Engineering Head of Department Professor Stephen R. Reid, the first two unknown External Examiners in England, unknown agents of Shell, Smith, Stronach, Lees, MacLean, and others known and unknown, unlawfully, wilfully, and maliciously, combined, conspired, confederated and agreed, in furtherance of the theft and obtaining by deception:

a. To conceal the appropriation and obtaining of the Honours Thesis; that is, rather than advise me of the allegations against my Honours Thesis and provide me with the opportunity to defend myself as is required by law, and as is enshrined in the University's own regulations, the Senate, on appeal, confirmed the purported award of the Degree of Bachelor of Science in Engineering, Second Class (Division 2) Honours, by letter dated 21 October 1983 [Exhibit B 2] stating that my 'performance merited the Honours classification' awarded, of a Second Class Honours degree.

b. To effect the objects of fraud and deception by making materially false representations; that is, to act in deliberate violation of University regulations which require that any student who has been judged to have cheated in a prescribed degree assessment shall be awarded a Pass degree if the student cheated in 1 course, or no degree if the cheating involved more than 1 course. Paragraphs 4.2 and 4.4 of the University's Code of Practice on Student Discipline are listed in Exhibit C 1. Given that the marks allocated to the Honours thesis comprised 2/7 of the total mark 'four times the mark for any one of the remaining 10 courses' the Senate, on appeal, so as to effect the fraud and deception, acted in breach of regulations which prescribed a no award for plagiarism in the Honours Thesis.

c. To, by the above deceptive actions, pre-empt action to recover the stolen property by inducing the false belief that the

Honours Thesis had been accoun