

CRIMINAL COMPLAINT

Against

The University of Aberdeen and Others

(Defendants)

Lodged by:

Adrienne Gaye Thompson

5 Roehampton Circle

Kingston 19

Jamaica

(Complainant)

For the Express Attention of:

Mr. Tarique Ghaffur

Assistant Commissioner, Metropolitan Police

New Scotland Yard, Broadway, London SW1H OBG

England

6 January 2004

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

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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 1983¹, 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.

¹ I believe the stalking operation was instituted by Professor John Smith as early as the summer of 1980.

- 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 beneficiary², 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.

² See R v. Clowes [1994] 2 All ER 316.

- 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 accounted for as “achieved”.
 - d. To provide a false presence for Colin MacLean, by adducing falsified records and other false representations made or corroborated by Shell, as inferred from page 103 of the PhD Thesis [**Exhibit H 7**], placing MacLean on Shell’s Brent Bravo platform, conducting experiments with the adapted FORTRAN Program on 5 July 1982, 3 months before I began creation of the same.
4. At all material times, the defendants in Scotland, the External Examiners in England, and others knew and had a duty to know: of my authorship of the FORTRAN Program evidenced by the progressive trace of my account stored in the Honeywell backup tapes identified by user number uen4059 (recorded on all twelve pages ix - xx of Appendix II of the TEXT); that MacLean had no claim of right whatsoever; that the appropriation and the obtaining were dishonest; and that the degree of Bachelor of Science in Engineering, Second Class (Division 2) Honours, having been fraudulently awarded - was void ab initio.

FALSE ACCOUNTING and FALSE STATEMENTS by DIRECTORS

Contrary to: *Criminal Justice Act 1993, sections 1 (2) (a), and 1(3) (a); Theft Act 1968, section 17 (False Accounting) and section 19 (False Statements by Company Directors).*

External Law:

Scotland – *False Statements with intent to pervert and to conspire to pervert the course of justice at common law.*

Massachusetts, USA – *Title 18 USC section 1341 (mail fraud), 1343 (wire fraud), 371 (conspiracy) and 1962 (c) (d) (racketeering).*

Jamaica – *Larceny Act 1942 sections 27 (2) (b) (frauds by directors, etc.), 29 (ii) (b) (falsification of accounts), 57 (accessories and abettors).*

5. From about June 1983 to February 2003, the defendants in Scotland, Professor Stephen Reid and the External Examiners in England, the defendants in Massachusetts, and others known and unknown, in furtherance of the theft and obtaining by deception, and with a further view to gain by concealing the criminal conduct, unlawfully, wilfully, and maliciously, combined, conspired confederated and agreed
 - a. To disguise the theft by false accounts and false statements; that is, to conceal, falsify, and purport to destroy, records and documents made and required for accounting purposes, and to furnish false information producing and making use of the same, contrary to sections 17 and 19 of the Theft Act 1968. The records, accounts and other documents include:
 - i. All written statements, including records kept for accounting purposes, which record degree examination marks and/or achieved courses for past and present students registered in the Department of Engineering, especially those pertaining to the graduating class of 1983 – the marks for black/non-white students being bounded by an artificially and dishonestly constructed narrow II-2 to III bracket as secretly disclosed by former University Secretary Roderick Begg on 23 December 1983 – particularly those which conceal the theft of Honours theses or the obtaining of such property by deception.
 - ii. The false statement dated 21 October 1983 published by the University advising me of the “independent” assessment by the External Examiners, purporting that my Honours Thesis, having formed part of the final Honours assessment had been “achieved” [**Exhibit B 2**].
 - iii. The University’s reply to the CRE under section 65 (1) (b) of the Race Relations Act 1976 (RR651b), which was deceptive in the material omission of the status of my Honours Thesis as “not achieved”, which was false in the other material particulars, and which was defamatory, having included the fictitious incident reported by Professor James Penman. Copies of the CRE questionnaire served under section 65 1a of the Race Relations Act 1976 (RR651a), and RR651b are annexed hereto as Exhibits D 1 and D 2 respectively.
 - iv. The four documents executed as student transcripts and a statement of marks dated 12 January 1988 [**Exhibit E 1**], 15 May 1992 [**Exhibit E 2**], 24 April 2002 [**Exhibit E 3**], and 10 February 2003 [**Exhibit E 4**], which are a record of falsified and deceptive grades and marks having no relationship whatsoever to the examination scripts for which they purport to account; the marks for 2 of the examinations, Engineering Mathematics IVa (Algebra and Analysis), and Control

- Systems IVa (Modern Control Theory) having earned 100%; the marks for my entire Honours year examination being material elements of the *res gestae* of the theft – material falsehoods fabricated to conceal the theft of the Honours Thesis.
- v. Rice's letter of 29 January 1998 [**Exhibit F 2**], falsely claiming to have destroyed the examination papers and Honours Thesis, and wilfully disregarding the evidence of my authorship of the latter demonstrated by my C subroutines (submitted with my letter of 24 November 1997) replicating the core signal generating functions in the FORTRAN Program.
 - vi. Canon's letter of 21 June 2002 [**Exhibit G 2**] falsely claiming that my Honours Thesis was properly accounted for when the Degree was purportedly awarded.
 - vii. Cannon's letter of 10 July 2002 [**Exhibit G 3**] falsely claiming that the University was not in possession of the Printout, and concealing the Backups (from which reproductions of the Printout could be generated) contrary to section 20(1) of the Theft Act 1968.
 - viii. Webb's email 28 November 2002 [**Exhibit H 2**], falsely stating that the document dated 24 April 2002 executed as a student transcript was not a fraudulent document.
 - ix. Jones' letter 10 February 2003 [**Exhibit H 4**], falsely stating, *inter alia*, that the University no longer held records of my transactions with the library and Computer Centre, thereby concealing evidence of my use of research material evident in the Honours Thesis, and computer usage.
 - x. Cannon's letter of 21 February 2003 [**Exhibit H5**]:
 - Falsely reporting the outcome of the independent investigation commissioned by the University in response to my LOD and Reply [**Exhibit G 1**] [**Exhibit H 1**], by concealing the material finding of copyright infringement of my FORTRAN Program in the work submitted by MacLean to form his PhD Thesis,
 - Concealing the material fact that the investigation positively identified my entire FORTRAN Program by a process of reverse engineering of the object code submitted for the PhD Thesis, and therefore, that this FORTRAN Program - stored in the very backups under my computer account uen4059 - was the origin of the object code in MacLean's PhD Thesis.
 - Concealing the fact that MacLean's conduct - without claim, in his PhD Thesis itself, to have authored the FORTRAN programs, and without intent to deceive the examiners, the examiners themselves being co-conspirators - while not comporting with the University's definition of plagiarism under section 1.18 of the Code of Practice for Student Discipline, constituted offences under copyright law.
 - And concealing the University's decision to rescind the degree of Doctor of Philosophy conferred on Colin Sinclair MacLean, the continued recognition of such award being unlawful.

me to the PhD program in computer vision in anticipation of such application; to concur with his dishonest representations through Dean Milena Levak as agent, wilfully procuring such belief and trust [**Exhibit I 1**, pp 14-17] [**Exhibit J 1**, pp 14,15]; and to induce my application to a degree program co-supervised by Winston where, premised on my purported incapacity for independent work, Winston would himself benefit from any intellectual property I would create.

FORGERY and SUPPRESSION OF DOCUMENTS

Contrary to: *Criminal Justice Act 1993, sections 1 (2)(c), and 1(3) (a); Theft Act 1968, section 20(2) (Procuring Execution of Valuable Security by Deception); Forgery and Counterfeiting Act 1981 sections 1,2,3, and 4.*

External Law:

Scotland – *Common law of fraud and forgery. Forgery and Counterfeiting Act 1981, sections 1,2,3, and 4.*

8. In about January 1988, and May 1992, Principal and Vice-Chancellor Professor George P. McNicol, along with other defendants in Scotland, Professor Stephen Reid and the two External Examiners in England, unlawfully, wilfully, and maliciously, combined, conspired and agreed, to make and cause to be made, and to utter forged transcripts [**Exhibit E**] which purportedly certified the award of the Degree, that is:
 - a. To make and to utter false instruments purporting to recognise fulfilment of the requirements for the said degree purportedly awarded, when the Honours Thesis had in fact been fraudulently and maliciously awarded a mark of zero and accounted for as “not achieved”.
 - b. To, by the making and uttering of the said false transcripts, induce the belief that the latter were genuine, thereby preventing assertion of title to, and steps to recover my Honours Thesis, title to which the forged transcripts denied [**Exhibit E**].
9. In about April 2002, in response to my Letter of Demand dated 4 April 2002 [**Exhibit G 1**], Principal and Vice-Chancellor Professor C. Duncan Rice, along with University Secretary Steve Cannon, and Academic Registrar Dr. Trevor Webb, unlawfully, wilfully, and maliciously, combined, conspired and agreed to alter and to utter the aforesaid forged document dated 24 April 2002 [**Exhibit E 3**], fraudulently appending the title of my Honours Thesis while secretly retaining the mark of zero and status of “not achieved”:
 - a. To deceive me into believing that my Honours Thesis had been legitimately been “accounted for [**Exhibit G 2**]; that is, to falsely and maliciously represent the forged transcript as having been made in circumstances in which it was not in fact made or altered,
 - b. To induce me to accept the false transcript as genuine; that is, to procure, to my detriment, continued retention of the stolen property by MacLean, the University, and such others as Shell, who might be keeping and dealing with the property as owner or are otherwise in receipt of the trust property.
10. In about February 2003, in response to my Reply dated 7 October 2002 and subsequent emails [**Exhibit H**], Principal and Vice-Chancellor Professor C. Duncan Rice, along with University Secretary Steve Cannon, Academic Registrar Dr. Trevor Webb, and Data Protection Officer David M. Jones, unlawfully, wilfully, and maliciously, combined, conspired and agreed to alter and to utter a statement of fabricated marks dated 10 February 2003 [**Exhibit E 4**], falsified to

further disguise the theft, attaching a materially false and fictitious mark of 60% purportedly for the Honours Thesis to fraudulently account for the latter as “achieved”.

11. On 28 February 2003 [**Exhibit H 6**], Principal and Vice-Chancellor Professor C. Duncan Rice, along with University Secretary Steve Cannon, Academic Registrar Dr. Trevor Webb, and Data Protection Officer David M. Jones, unlawfully, wilfully, and maliciously combined, conspired and agreed to utter to the Massachusetts Institute of Technology, as genuine, the forged documents dated 24 April 2002 [**Exhibit E 3**], and 10 February 2003 [**Exhibit E 4**], purporting to be a transcript and correlated statement of marks, in order to:
 - a. Suppress the genuine transcripts; that is, to indorse the forged paper with the signature of the Academic Registrar (Webb) and the seal of the University, thereby executing the forgeries as valuable securities.
 - b. Attempt to obtain assigation by deception; that is, to attempt to deceive me into assigning the property to MacLean, the University and/or to Shell, through submission of the forgeries as a legitimate requirement of my application to MIT.
 - c. Counsel and attempt to procure my participation in the crime; that is, recognising my knowledge of the forgery (having given notice to the University in my email of 23 December 2002 [**Exhibit H 3**], to coerce me into participating in the forgery transaction, by inciting wilful submission of the forged documents [**Exhibit E 3**] [**Exhibit E 4**] to MIT as if they were genuine.
 - d. Further the racist sabotage of my application to the PhD programme in Electrical Engineering and Computer Science (Computer Vision) at MIT.

Also falsely stating, by letter dated 28 February 2003 [**Exhibit H 6**] that the forged “documents confirm that [I] passed [my] Honours Thesis and that [I was] awarded 60%”.

12. In the period following receipt of my Letter of Demand of 4 April 2002 [**Exhibit G 1**] and, significantly, subsequent to the material rescission of MacLean’s degree of Doctor of Philosophy in Engineering in March 2003, the defendants in Scotland, having failed to obtain any form of ratification or affirmance of, or acquiescence to the fraudulent transfer of the property, unlawfully, wilfully, and maliciously combined, conspired and agreed to continue to suppress the evidence of my authorship of the Honours Thesis:
 - a. By suppressing the Honours Thesis itself; that is, by executing the Text as if it were the Honours Thesis, concealing the Printout which, together with the Text, created my rights to the property, and being of itself a valuable security, evidenced the creation of rights in the Honours Thesis,
 - b. By suppressing the Backups; that is, by concealing the electronic files that are electronic snapshots of the progressive stages in the development of my FORTRAN Program in my original computer account identified by user number uen4059, which constitute a valuable security evidencing the creation of my rights to, in, and over the property which is the Honours Thesis,

in order to dishonestly continue to conceal, retain, and profit from the stolen property, whether through commercial exploitation or research.

BLACKMAIL

Contrary to: *Criminal Justice Act 1993, sections 1 (2) (a), and 1(3) (a); Theft Act 1968, section 21).*

External Law:

Scotland – *common law of extortion, and menaces by stalking and harassment in violation of the common law of breach of the peace, threats, malicious mischief and the Computer Misuse Act sections 1 2 and 3.*

Massachusetts, USA – *Massachusetts Law Chapter 265, section 25 (attempted extortion, bribery) ; Title 18 United States Code (USC) section 1951 (extortion); and menaces by stalking and harassment in violation of Massachusetts General Law (MGL) Chapter 265 section 43 (stalking), Title 18 United States Code sections 371 (conspiracy), 2261(stalking), 1341 (mail fraud), 1343 (wire fraud), and 1962 (c) (d) (racketeering).*

Jamaica – *Common law of extortion and bribery; Larceny Act 1942, section 43 (2) (a) (demanding with menaces) and 47 (corruptly taking a reward), and 57 (aiding and abetting); and threats by stalking and harassment in violation of, the Offences Against the Person Act 1864, section 20 (wounding with intent to do grievous bodily harm), section 22 (unlawful wounding)³, section 24 (administering drug with intent to commit indictable offence).*

13. In the course of the theft transaction, the defendants in Scotland, the defendants in Massachusetts, Professor Stephen Reid, the External Examiners in England, and others known and unknown, unlawfully, wilfully, and maliciously combined conspired confederated and agreed to impose the will of the criminal enterprise by extortion:

- a. To attempt to extort my title to the Honours Thesis through blackmail, bribery, false imprisonment, and coercion inflicting economic, psychological, bodily injury, and threats of the same; that is,
 - i. By blackmail, threatening to exclude me from employment if the purportedly awarded degree was not conferred, thereby deceptively attempting to procure abandonment of my title to the Honours Thesis with concomitant ratification or ostensible ratification of the theft and fraud as evidenced by the University's letters of:
 - 8 May 1996, from Professor J. Maxwell Irvine [**Exhibit B 3**]
 - 20 August 1996, from Professor J. Maxwell Irvine [**Exhibit B 4**]
 - 25 April 1991, signed by Executive Officer, Mrs. M. Park [**Exhibit B 5**]
 - ii. Concurring with the letter of 25 April 1991 [**Exhibit B 5**], by inducing prospective employers and others to explicitly advise, imply, or otherwise suggest that I could not be permanently employed unless the purportedly awarded degree was conferred, including: John Reymond of the British Broadcasting Corporation; G.W. Taylor of General Electric Industrial Controls; the General Electric Hirst Research Centre; Wilbert Tomlinson, Peter Doyle, and Patrick McIntosh of the Alcan Jamaica Company; and Claudette Stephens of the National Commercial Bank (Jamaica).
 - iii. By attempting to corroborate the false allegations of plagiarism, in combination with Paul Brown, former MIT Director of the Centre for Advanced Engineering Studies, in combination with former PhD candidate Lyman Hazelton who, in about September of 1990, invited me to develop material from the ongoing work for Hazelton's PhD thesis to constitute my project in the subject 1.123 (Building Knowledge-based Systems for Engineering Problem Solving), harassing me

³ See *R v Burstow* and *R v Ireland* [1997] 3WLR 534 (HL); *R v Constanza* [1997] Crim LR 576

when I declined. This scheme fell within Brown's overall plan to fraudulently retain control of my OAS tuition fees by forcing me into an independently funded Masters Program, and to obstruct all opportunity for research, which would have evidenced my ability to author the Honours Thesis [**Exhibit I 1**, pp 3,4] [**Exhibit J 1**, pp 8-13] .

- iv. By the aforesaid fraudulent appropriation of my OAS tuition fees, commissioned by Professor Patrick Winston and others known and unknown during the period September 1991 to May 1992, as evidenced by the OAS document dated 29 August 1991 [**Exhibit J 2**], and MIT Registrar Wiley's letter of 26 September 1994 [**Exhibit J 3**].
- v. By coercion, manipulating me into submitting the PhD application of September 1991 through false pretences, wilfully and maliciously using Dean Milena Levak to mislead me into believing that EECS had made a decision to admit me to the PhD program in computer vision, then rejecting my applications so as to inflict economic and psychological injury conducive to coercing abandonment of title to my Honours Thesis [**Exhibit I 1**, p 14] [**Exhibit J 2**, p. 15]
- vi. By bribery, commissioned by Professor Patrick Winston through his agent, and co-conspirator, MIT Equal Opportunity Officer Dr. Clarence Williams in March - April 1992, proposing admission to a Master's degree program in the non-computer science area of EECS to work with a fully tenured professor, provided that I first accept the degree from the University.

In attempting to procure the abandonment of title to my Honours thesis, Clarence Williams made further false representations (in March and April 1992) specifically advising that the coerced PhD application of September 1991 had been rejected because I had no degree, there being no conferral of the same.

- vii. By inciting and procuring breach of duty by Dr. Anibal Cortina and other officers of the OAS to, in furtherance of the fraud, to delay the mailing of documents, particularly the OAS document dated 29 August 1991 [**Exhibit J 2**] and to withhold advice on funding during the period June 1991 to March 1992, falsely representing that I was being paid by Professor Lawrence Evans, thereby inflicting further economic and psychological injury causing, inter alia, grievous bodily harm precipitating the onset of irritable bowel syndrome and fibrocystic disease - the latter requiring surgery performed on March 18, 1997, at the University Hospital of the West Indies by Dr. Derrick Mitchell [**Exhibit J 4**].
- viii. By causing and inflicting psychological injury and grievous bodily harm, and by entering false diagnoses declaring me to be mentally ill, with intent to falsely establish incapacity so as to vitiate all criminal and civil action against the defendants:
 - Commissioned in combination with psychiatrists, Dr. Aggrey Irons and Dr. George Leveridge as agents who: procured my false imprisonment in the psychiatric ward of St. Joseph hospital during the period August 10 - 17 1999, wilfully and maliciously entering false diagnoses representing my

complaints of stalking, nightmares, and being placed in fear of death from gunshots fired on 10 August 1999, as schizophrenic hallucinations; and maliciously administering the psychiatric drugs Chlorpromazine, Haloperidol, and Artane. Professor James Williams, aided by Irons, first incited my siblings to ambush me at home on 10 August, 1999, assault me by Chlorpromazine injection to effect paralysis, thereby abducted me for forced admission to the Hospital without prior evaluation and a medical certificate, contrary to the Lunacy Act, sections 20, 22, and 24 of the Offences Against the Person Act, and sections 43 (2) (a), 47 and 57 of the Larceny Act 1942.

Iron's overt actions, in furtherance of the theft transaction, included a further false statement made to me on 10 August 1999, suggesting that the issue of my Honours Thesis was a figment of my imagination.

- Commissioned in combination with psychiatrist Dr. Charles Thesiger as agent, who conspired with James Williams from 22 November 1999 to 3 January 2000, to threaten me with false imprisonment in a mental hospital if I did not agree to take medication for schizophrenia (Zyprexa, followed by Seroquel), contrary to section 43 (2) (a), 47 and 57 of the Larceny Act 1942 and sections 20, 22, and 24 of the Offences against the Person Act 1864.

Thesiger's overt actions, in furtherance of the extortion, included threats directing me to stop writing letters to recover my Honours Thesis, maliciously and falsely representing that the continued writing of letters could be viewed as a disorder.

On 19 October 2002, I commenced action against the siblings by Writ of Summons, filed in the Supreme Court of Judicature of Jamaica under case number C.L.T. 132/2000, which delineates the aforementioned offences commissioned by Irons, Leveridge, and Thesiger. Official copies of the Writ of Summons and Statement of Claim are annexed hereto as **Attachment 2**.

- b. To execute this extortion through stalking, harassment, and bribery, creating an environment of fear; that is,
 - i. By placing me in continuous fear of death through local operatives, in Scotland, England, Massachusetts, and Jamaica, employed to subject me to 24-hour surveillance utilising telephone eavesdropping, keeping watch on my home, following me, and tracking my movements, in the search for opportunity to eliminate prospective exposure and criminal prosecution of the defendants. I have recorded stalking activities in my reports to the Jamaican police dated 13 August 1998 [**Exhibit K 1**], 11 October 1999 [**Exhibit K 2**], 23 May 2000 [**Exhibit K 3**], and in my Statement to the MIT Corporation dated 2 July 2001 [**Exhibit J 1**, pp 20-34].
 - ii. By cyberstalking, using the internet,

- To spy on my computer files making contact with email recipients so as to disinform them and discourage any assistance towards remedy as can be inferred from the email messages dated 8 August 2003 from the Metropolitan Police, email address commissioner@met.police.uk, sent in reply to my queries concerning where to lodge this complaint [**Exhibit K 5**].
 - To modify computer files to generate for example, the error “IEXPLORE caused a general protection fault...” selectively acting only on my email message (and copies of the same) to Professor Eric Grimson dated 24 November 2002, and British Library web pages saved 27 November 2002, and 10 February 2003 – all of which recorded the results of searches for MacLean’s PhD Thesis in the British Library Public Catalogue at <http://blpc.bl.uk/>.
 - To later modify the aforementioned files so they “hung” on attempting to open them, the saved British Library web page files appearing empty, as witnessed by Gareth Webb during the week 3 to 9 June 2003, when the process of backing up my C drive was aborted by the first British Library web page file.
 - To obstruct browsing on the internet by generating the aforementioned “IEXPLORE” errors, thereby preventing access to selected web pages, for example the British Library Public Catalogue at <http://blpc.bl.uk/> on 28 February 2003, 19 March 2003, and 1 April 2003; or by causing the browser to “hang”, for instance on 21 June 2003, when I tried to download the updated SIS 620 driver (the earlier version of which purportedly caused the IEXPLORE error) from www.sis.com.
 - To modify files storing configuration details so as to prevent connection to the internet, or to block email traffic, for instance on 3 April 2003, 28 April 2003, and 1 July 2003: when the incoming and outgoing server information under mail properties had been altered to show visionat@jol.com.jm instead of “mail.jol.com.jm”; when the “remember password” box, which I maintain as not checked, had been checked; and when the “connection” checkbox under mail properties had been unchecked, respectively.
 - To infect my computer on 5 February 2002 with the virus W32.Sircam.Worm@mm, by sending a malicious email message purportedly from the email address holness@gci.net, thereby disabling all applications on my computer.
- iii. By inciting and procuring the sabotage of computers and diskette files,
- Commissioning the malicious destruction 4 computers in about August 1993, on the premises of the Jamaica Public Service Company Limited (JPS) headquarters at 6 Knutsford Boulevard Kingston 5, in combination

with unknown employees of JPS [**Exhibit K 2**]; the computers being part of a pilot network of which I was project manager.

- Commissioning the destruction of copies of the file “Abdn24_11_97” (my letter of demand to the University of Aberdeen dated 24 November 1997 [**Exhibit F 1**]) in January 1999 at the Institute of Computer Technology Limited (ICT), and in May 1999 at the Institute of Management and Production (IMP), Linnette Givens and Damien Gibbs having witnessed the sabotaged files at ICT and IMP respectively [**Exhibit J 1**, p 31].
 - Commissioning, in combination with known and unknown UWI servants or agents, unauthorised access to my C and LISP files at the Mona Institute of Business (MIOB), Mona, University of the West Indies, during the period March through May 1997; commissioning the modification of 2 MIOB computers to prevent further programming in C on March 30 and 31; and commissioning alterations of my network account at the Derek Gordon Data Bank, Institute of Social and Economic Research (ISER), UWI, on 22 January 1997, so that the name “KRISTIN” instead of “ADRIENNE” was recorded on the banner page of printouts, with intent to make it appear that I was not the author of the C programs stored in the account. I reported these incidents of tampering in my report of 17 April 1997 to to Mr. Cezley Sampson, Executive Director of MIOB [**Exhibit K 4**] [**Exhibit K 1**].
- iv. By deprivation of livelihood, using the stalking operation to promulgate the false accusations of plagiarism, asserting that eminent members of the academic community had so adjudged, and using this as the basis for:
- Persuading prospective employers not to employ me, including the Marconi Company, The Plessey Company, IBM (UK), IBM (Jamaica) the BBC, the Alcan Jamaica Company, Alcoa Minerals of Jamaica Inc. , and the General Electric Hirst Research Centre.
 - Undermining work progress, relationships with colleagues, salary negotiations and payments, and otherwise harassing me while on the job, at ITT World Directories, GEC Industrial Controls, Fiscal Services (EDP) Ltd., the Alcan Jamaica Company, Desnoes and Geddes Limited, the Jamaica Public Service Co. Ltd., CCS Jamaica Ltd (Illuminat), and the Ministry of Health/Supportive Management Systems.
 - Inciting and procuring breach of fiduciary duty by attorneys Rudolph Smellie and Dennis Daly of Daly Thwaites and Company, and Valerie Neita-Robertson, frustrating civil action against Derrick Webb/Supportive Management Systems - filed in 1994 in the Supreme Court of Jamaica by Neita-Robertson without service on Webb, as suit No C2 T122, and later filed by Daly Thwaites and Company on 28 April 1998 as suit No. CL1996/T-075 but effectively ignored.

- c. To attempt to extort my return to the University of Aberdeen or to the Massachusetts Institute of Technology, to be used to create, against my will and to my further detriment, more intellectual property to be dishonestly appropriated by Professor John Smith and/or his colleagues, or Professor Patrick Winston and/or his colleagues [Exhibit I 1] [Exhibit J 1]; that is,
- i. By deprivation of livelihood with concomitant harassment to pay debts, in combination with National Commercial Bank (Jamaica) credit card managers and MIT bursar Shirley Picard, who allowed bad debts to accrue interest contrary to banking and lending policies, the MIT loan having also been issued ultra vires and void ab initio, the criminal enterprise having induced the OAS to not approve the appropriated US \$17,488 tuition fees for study as a special student in the Department of Chemical Engineering [Exhibit J 1, p 15].

By thus preventing registration, to coerce me into either re-applying to the Masters program co-supervised by Winston, or to coerce me into employment with Professor Evans' company Aspen Technologies Inc. (where Evans had conspired to sabotage my engineering project registered under course 10.95). The criminal enterprise also stole (or otherwise subverted) Rowe fund application forms mailed to me in May 1992 by the OAS, in order to allow the interest on the US \$5,300 principal to accrue [Exhibit I 1, p 17].

- ii. By issuing, sometime in 1985, a written invitation to apply to the PhD program in Engineering at the University of Aberdeen, which stated that the University was impressed by my work.
- iii. By further threats, delivered,
- Through George Phillip who in about August 1992, stated, that I had not completed my engineering project that no one respected a dropout, that I would not obtain employment in Jamaica, and that I should return to MIT to complete the project or "apply to another area" even if they treated me "like a monkey" [Exhibit J 1, p 28].
 - Through Derrick Webb in about October 1992, who advised me that I would not have to repay my debts if I returned to MIT.
 - Through James Smiles, MIT appointed debt collector for the US \$5.300 loan, who on 8 September 1993, and 7 October 1993, telephoned suggesting that I should seek employment in the USA.

14. At all material times since 1992, James Williams acted, and continues to act, as the member of the criminal enterprise in charge of interfacing with the stalking operatives in Jamaica, actively communicating (in real time) by telephone and other wires - under colour of his office as professor at MIT- with, family, friends, colleagues, employers, prospective employers, banks, doctors, lawyers, the Jamaican Government, the British High Commission, the Delegation of the European Commission, and others, dismantling my support network, making promises, offering inducements and other forms of bribes, including promises of admission or appointments at MIT and other universities, making false and defamatory statements accusing

me of plagiarising the FORTRAN Program, creating suspicion, inciting and procuring frustration and harassment, in order to impair my health, destroy my reputation, decimate my livelihood, and debilitate all recourse for remedy. James Williams (who being black provided an ostensibly credible means of discrediting my allegations of racism) was positively identified by David Daway in April 1999, and by Andrea Blackwood-Harriott later that year [**Exhibit J 1**, p 19].

15. With respect to the violations of *18 U.S.C. 1343, 1951, and 1962*, Commerce includes the contracts between myself and MIT concerning study as a fellow in the MIT Centre for Advanced Engineering Study (CAES) in 1990-1991, and my subsequent payments of fees in consideration for the PhD applications process in the Department of Electrical Engineering and Computer Science (EECS). Foreign Commerce includes my transactions to recover the Honours Thesis (trust property arising under the student contract with the University of Aberdeen) as well as employment contracts, and contracts for funding study at the University of Aberdeen and MIT, to which the Jamaican Government was a contracting party joined by the European Economic Community and the Organisation of American States respectively. Foreign commerce also includes the exchange of educational services for tuition fees between overseas students and universities in the United Kingdom, the racist and fraudulent exploitation of which the criminal enterprise seeks to protect by suppressing this matter.

HANDLING STOLEN GOODS and CONSPIRACY to DEFRAUD

Contrary to: *Criminal Justice Act 1993, sections 1 (2) (a), 1(3) (a), and 1 (3) (b); Theft Act 1968, section 22.*

External Law:

Scotland – *Common law of reset, conspiracy to defraud at common law, conspiracy to defraud by copyright infringement contrary to sections 107 and 110 of the Copyright, Design and Patents Act 1988, conspiracy to defraud through breach of duty and procuring breach of duty.*

Massachusetts, USA – *Title 18 USC section 1341 (mail fraud), 1343 (wire fraud), 371 (conspiracy) and 1962 (c) (d) (racketeering).*

Jamaica – *Conspiracy to handle stolen goods, by procuring breach of duty by public officials contrary to Larceny Act 1942 sections 27 (2) (b), 29 (ii) (b), 35 (2) (a), 43 (2) (a), 46, 47 and 57; Conspiracy to defraud at common law; Conspiracy to defraud by copyright infringement contrary to section 46, Copyright Act 1993.*

16. All the defendants otherwise involved than in the course of the stealing, in England, in Scotland, in Massachusetts, and others known and unknown, by the above actions commissioning false accounting, false statements, procuring the execution of valuable securities by deception, and blackmail, wilfully and maliciously, combined, conspired, confederated and agreed to undertake or to assist the continued realisation of the degree of Doctor of Philosophy awarded to MacLean up to the rescission of the same in March 2003, and to assist the continued retention of the Honours Thesis; that is, conspired to handle the stolen goods contrary to sections 1 (2) (a), and 1 (3) (a) of the Criminal Justice Act 1993, and section 22 of the Theft Act 1968.

17. By the above actions, all the defendants, in England, in Scotland, in Massachusetts, and others known and unknown, unlawfully, wilfully, and maliciously, combined, confederated, agreed and - contrary to section 1(3) (b) of the Criminal Justice Act 1993 - conspired to defraud:

- a. By falsifying my examination marks to fraudulently award, to my detriment, the degree class of Second Class (Division 2) Honours, instead of the degree class of First Class Honours to which I am entitled.
- b. By falsifying the examination marks for the eight major papers in June 1983 to lie within an artificially constructed narrow II-2 to III band, falsely representing that the degree class was determined by the eight major papers – when, for example, two of the papers, Engineering Mathematics IVa (Algebra and Analysis), and Control Systems IVa (Modern Control Theory), merited 100% - in order to conceal the mark of zero awarded to the Honours Thesis, the theft and the obtaining of my property.
- c. By concealing the Printout and the Backups - valuable securities which created and evidenced the creation of my rights to, in and over the Honours Thesis and its proceeds, the degree of Doctor of Philosophy in Engineering - contrary to section 20(1) of the Theft Act 1968.
- d. By further falsifying examination marks for years 1 to 4 (1979 – 1983), as set out in the Statement of Marks dated 10 February 2003, and attaching a fictitious mark of 60% for the Honours Thesis.

- e. By falsifying examination marks and publishing the correspondingly false degree classes awarded to engineering students - the marks for the black/non-white students in the graduating class of 1983 being bounded by an artificially and dishonestly constructed narrow II-2 to III bracket, as secretly disclosed by former University Secretary Roderick Begg on 23 December 1983 - to the detriment of the black/non-white students, whether being loss of the degree classes to which they were entitled, or deprivation of (or injury to any proprietary right in) their theses, thereby prejudicing or imperilling their economic and other interests. In his letter of 10 May 1992, Gerry German, by reason of his professional competence as former CRE Principal Education Officer, established the presumption of racial discrimination on a balance of probabilities, and that the University had a prima facie case to answer [**Exhibit I 3**].
- f. By copyright infringement, obtaining the FORTRAN Program for adaptation to form the PhD Thesis, the continued distribution and use of infringing copies of the FORTRAN Program for commercial advantage and other gain, and possession of the hardware instrument used to make infringing copies, contrary to sections 21(4), 107 and 110 of the Copyright, Design and Patents Act 1988.
- g. By procuring the rejection of my MS/PhD proposal of 29 September 1994, to the University of Stanford which augmented the MS program in Mechanical Engineering to which I had already been offered entry, the proposal having accorded with the University of Stanford's provisions for interdepartmental study, adding only a research component in Computer Vision from the Department of Computer Science. The letters of acceptance and rejection dated 3 March 1994, and 15 March 1995 are annexed hereto as **Exhibit J 5**.
- h. By procuring: the rejection of my MIT special student and PhD applications for research in Computer Vision since 1992; my exclusion, in breach of contract, from the research project which formed the basis of my admission to the MIT Centre for Advanced Engineering Study in September 1990, and frustration of the same; and my absolute exclusion from all employment opportunities for research.
- i. By depriving me of livelihood.

In the defrauding of black/non-white students, Alexander W. Gray undertook the compiling of the falsified marks and merit certificate lists.

18. In commissioning the offences of conspiracy to handle stolen goods and conspiracy to defraud, the defendants wilfully and maliciously combined, conspired, confederated and agreed to incite and procure breach of duty of public officials; that is, to execute the aforementioned offences in combination with:
 - a. Jamaican Government officials. Irvine's letter of 20 August 1996 [Ex B 4], having established communication between the criminal enterprise and the Jamaican Government inferring: agreement to conceal all material facts which would lead to the recovery of my property, omission in breach of duty to make such

enquiries as a reasonable and honest man would make; wilful avoidance of the truth, and therefore constructive knowledge of the theft and fraud.

Mullings' actions in combination with his actual knowledge of the facts of the case **[Exhibit M]**, and his knowledge that the Police Department disregarded my complaints of the theft, the stalking and fear for my life, also inferred that the Jamaican government's wilful omissions were calculated not just to pervert the course of justice, imperilling my economic and proprietary interests, but were calculated to enable a climate conducive to extortion, blackmail, stalking, harassment, and amplification of my vulnerability as the targeted victim with foreseeable consequences of danger to my life itself.

- b. British Government officials. With full knowledge of the facts pertaining to the University's refusal to release my transcript subsequent to my discovery of the exclusion of my Honours Thesis from the schedule of achieved courses, the Right Honourable Henry McLeish MSP, former First Minister of Scotland, Mr. Kevin Fulton of the Department of Enterprise and Lifelong Learning, Jeff Rooker MP (as he was then), British High Commissioners Richard Thomas and Antony Smith, Deputy British High Commissioner Jim Malcolm, and European Delegation Head Jan Dubbeldam, all having actual knowledge of material facts constituting fraud and stalking, as well as constructive knowledge of the theft, concurred with the University to participate in the conspiracy of silence, despite the continued threat to my life imposed by the stalking operations. Letters from these British Public Officials are annexed hereto as **Exhibit K**.

In furtherance of the conspiracy, the Right Honourable Henry McLeish, in his letter of 20 April 2000 to the Right Honourable Stephen Timms MP **[Exhibit L 2]**, subverted discharge of the Scottish Executive's duties as principal to control its agent the University of Aberdeen. McLeish thereby, wilfully and maliciously ratified the University's criminal actions as agent, the fact of agency itself having been affirmed by the Further and Higher Education (Scotland) Act 1992.

By his letter of 19 July 2001 **[Exhibit L 3]**, in furtherance of the conspiracy, Kevin Fulton, also representing the Scottish Executive, ratified the execution of the forgery dated 24 April 2002, as if it were a valuable security, contrary to section 20(2) of the Theft Act 1968.

OTHER JURISDICTIONAL POWERS and PROVISIONS

19. The above conduct shall also be charged as falling within the proscription of any United Kingdom statutory provision, European, or international convention that makes it an offence to conspire in the United Kingdom to commit the afore-stated criminal offences (as well as related crimes including inchoate offences such as incitement and attempts) in Jamaica and the state of Massachusetts United States of America, particularly having regard to the use of stalking and harassment threatening, terrorising, and otherwise causing, violence against my person family and friends, or interference and disruption of my electronic/computer system, for the fundamental purpose of suppressing this matter so as to advance the cause of racial defraudment and subordination of black/non-white students.

Affidavit

I further depose and say, that:

1. I am a former engineering student of the University of Aberdeen, registered at the University throughout the period October 1979 to June 1983, and I fulfilled, in its entirety, the requirements for the award of Bachelor of Science in Engineering Honours.
2. I am sole author and owner of the Honours Thesis, "Interactive Computer Package Demonstrating Sampling Convolution and the FFT" and the FORTRAN Program therein.
3. In about June 1982, I asked Dr. A. Fraser Stronach to supervise my Honours thesis; Stronach agreed. In October 1982, Stronach informed me that Mr. Peter Lees would be co-supervising the project. Stronach and Lees presented me with a written one-page specification of the work to be done for the thesis. The thesis specification, Lees' idea, required that I create an interactive FORTRAN program to be used as a visual aid for teaching Signal Theory, demonstrating, inter alia, all nine properties of the Fourier Transform: linearity, translation, scaling, duality, modulation, differentiation, integration, convolution, and multiplication.
4. In retrospect it is clear that from the outset Lees intended, not only that I should be burdened with the project but, that I should not succeed in producing an Honours thesis – a scheme to which Stronach became party in the months that followed – Lees and Stronach having themselves offered no clue as to how to begin the project, and the specification having required an expenditure of time clearly well beyond the capacity of any one student in an Honours programme.
5. There is no doubt whatsoever in my mind that Smith masterminded the theft of my Honours Thesis, and that it was he who inserted Lees as co-supervisor of my Honours Thesis to defeat the project. From Dr. Christopher Cudworth's advice to me in early October 1982 [**Exhibit F 1**, p. 6], I believe that the original plan was to use my work to boost MacLean's PhD Thesis, with MacLean assuming full credit. The latter plan, however, would have been more difficult to execute and Smith apparently decided that I should not succeed in producing any work at all, inserting Lees to carry out the plan. Having against this opposition produced my FORTRAN Program, MacLean was merely used to claim authorship of the work – which he obviously did in June 1983, despite the fact that in the text of his PhD Thesis he does not explicitly so claim.
6. The subject of my Honours thesis is clearly recorded on my registration student record of October 4, 1982, as "Practical Applications of Fourier Transforms", and my designated supervisors indicated as "Dr. Stronach and Mr Lees" [**Exhibit D 2**, Annexure G]. I decided on the title "Interactive Computer Package Demonstrating Sampling Convolution and the FFT" in the 3rd term while I was writing the Text.
7. I conceived, created, authored, and programmed my Honours Thesis and its FORTRAN Program without any assistance whatsoever from any person, save that from Jim Mitchell, Brian Baine, Michael Grieves, Martin Stephenson, and Louise Coull [**Exhibit F 1**, pp 10 – 18].
8. Except for the periods when I was not developing the program (that is, in the middle of the Easter term 1983 and towards the end of the year while I was writing the Text) I submitted to Stronach and Lees, weekly printouts of the evolving FORTRAN Program, from October 1982 through April 1983. As a rule, I submitted these printouts by placing them in the shelf space assigned to Stronach as an internal mailbox, but I also delivered some in person, usually to Stronach. At the very start, in October 1982, I would meet with Lees and Stronach weekly. Each

time Lees would demean my work: the criticisms were of my developing FORTRAN Program which they reviewed using the printouts each week. We met for perhaps three or four weeks (possibly more) before I decided against continued meetings, as the work progressed and Lees appeared to be visibly exasperated, becoming increasingly acerbic in his unwarranted criticisms, and I recognised that his intent was to frustrate my thesis effort and destroy my self confidence in the bargain.

9. In about late December 1982 or early January 1983, I informed Stronach and Lees that having spent enough time programming, I intended to do no further development of the FORTRAN Program. Stronach then requested the password corresponding to my Honeywell account (user ID uen4059) and with this password ran my FORTRAN Program. In the ensuing confrontation, in the corridor Stronach, acknowledging his execution of my FORTRAN Program, belittled my algorithm representing the convolution integral, which assumed finite waveform sequences or pulses to emulate the process (a method corresponding to the graphical approach apparently used by professors in other universities to teach the fundamental concept). Stronach declared my FORTRAN Program to be a lot of rubbish, "a lot of foolishness ... a convolution goes on and on forever...", while Lees angrily announced that I would "not produce an Honours project", asserted that I had considerable work to do, left the scene and entered Professor Smith's office.
10. Mok, a student from Singapore who graduated in 1981, informed me himself, in my second year, that he wanted to do his graduate work at MIT, and that his project was absorbing too much of his time. I surmised that Mok - who had been top of his class every year, yet graduated with a II-2 - was being deliberately burdened with his project by his supervisors and it was this (along with Keir's repeated warnings about spending too much time on the project) which led to my announcement to my supervisors that I was doing no further work. However, in consequence of the afore-mentioned threat from Lees and Stronach, I then added, in the latter weeks of the Easter term, subroutines TRI and RECT which generated periodic triangular and rectangular waveforms typically used in Communications and Control systems. Stronach's subsequent manner clearly suggested that he was very pleased with my additions, and I mistakenly interpreted this as approval, not knowing that his apparent satisfaction accorded with the plan, hatched by Smith, to steal my work.
11. Former Vice-Principal Professor Hamish Keir, Mathematics lecturer Dr. Ian Crow, senior software engineer Mr. Jim Mitchell, and PhD student Brian Baine, all witnessed printouts of the developing FORTRAN Program, Keir having done so on almost a daily basis, and Crow having retained a copy for himself in May or June 1983.
12. In April or May 1983, I submitted my Honours Thesis to the main engineering office. I handed both the Text and the Printout to Ms. Heather Flett, Professor Smith's secretary. I recall clearly that Flett appeared to be apprehensive as I handed the Printout to her, and I instinctively signed it in her presence, explaining that it accompanied the Text. Ann Shipley, Professor Reid's secretary, witnessed the submission, apparently also ill at ease.
13. In October 1982, I was assigned the user Identification number (ID) "uen4059" corresponding to my account on the Honeywell. Dr. Wallace W. Bell who was in charge of such matters assigned the user number.
14. When I began the appeal procedures in June 1983, in light of Lees' threat that I would "not produce an Honours thesis", I consulted the University's Computer Centre (now part of the Directorate of Information Systems and Services) for information on my usage of computer

resources. I was assisted by a female member of staff, who advised me that I was the fourth largest user that year in engineering. The female staff member handed to me a listing of the first few user IDs in engineering and the corresponding usage statistics for each user. This evidence was not introduced in the appeal proceedings, Begg and Reid having falsely represented my eight major papers (each of which had been awarded a mark of mid-range II-2, that is, II-2 to III) as the determinant of the degree class.

15. Craw, who like Keir, also suggested that the Department of Engineering claimed that my Honours Thesis was a "lot of rubbish", advised me that the usage statistics, obtained from the Computer Centre, meant little since from his own work he knew that computing the Fast Fourier Transform was highly resource intensive. Craw also tried to focus my attention on the eight written papers, proposing that as a member of a certain University committee, and as someone I could trust, he could arrange for my papers to be assessed by someone at the Robert Gordon's Institute of Technology (now renamed Robert Gordon University) who could affirm that they were in fact II-2. I declined his offer.
16. I always knew that my FORTRAN Program was of value and never considered the program to be "rubbish". I felt at the time that having explored only convolution and multiplication of the nine Fourier Transform theorems specified, I had achieved much less than I would have had I been assisted by my supervisors. It was not until some years later that I realised that from the outset, Smith and Lees intended that I should produce no Honours thesis, and that the specification, which required an unachievable workload, reflected this intent.
17. The only computer programs stored in the Honeywell account corresponding to my user ID uen4059 are the FORTRAN Program, and a program which I recall naming "MAGLEV". I wrote MAGLEV to generate a plot of the closed loop frequency response for the design of a magnetic levitation train system for a report in fulfilment of my Honours design project. MAGLEV was no more than a one or two day coding and debugging effort, its size and usage therefore being insignificant compared with the FORTRAN Program. Brian Baine witnessed my creation of MAGLEV, since it was he who not only advised me of the location of the plotter, but also observed as I generated the graph. In the 3-person design team, one participant chose to graph the frequency plot manually, while the other accompanied me in the computer room while I debugged MAGLEV. I attached both the MAGLEV FORTRAN printout and the frequency response plot to my Honours design project report.
18. I visited Jim Mitchell early in the Easter term of 1983, to thank him for providing me in October with the sample FORTRAN subroutine demonstrating FORTRAN reading and writing functions with which I had built my FORTRAN Program's interactive capability. Mitchell's manner was commendatory in contrast with our previous meeting in October 1982, when he apparently did not wish to assist me further. In response to my concerns that my supervisors had indicated that my work was inadequate, Mitchell opined saying that he did not see what they were complaining about. It was clear that Mitchell had foreknowledge of the stage to which I had developed my FORTRAN Program, and I believe that out of interest, he availed himself of this knowledge in the course of his administrative duties in relation to the Honeywell, thereby witnessing firsthand my creation and development of the FORTRAN Program.
19. The Honeywell would have been backed up by the Computer Centre on a daily basis. The archives retained by DISS which store copies of the digital files saved under my account number uen4059 - being electronic snapshots of the progressive stages of development of my evolving FORTRAN Program (the Backups) - therefore constitute conclusive evidence of my

authorship, the date of creation in October 1982, coding errors and bug fixes establishing the Backups as a complete transcript of my creative process.

20. Bugs included: faulty sequencing of one of the waveforms in the convolution algorithm which I rectified the next day; a typing error of the number "0" instead of the letter "o", which I tried to debug on a Sunday but took me about 3 or 4 days to recognise; an error in coding the frequency response formula in MAGLEV that produced an undulating graph which I then corrected; and the occasional collapse to zero of the triangular and rectangular waveforms at the end of the graph. I had little time to investigate the latter, and consequently left redundant code in these subroutines during the debugging exercise towards the end of the year. These bugs and fixes are likely to have been recorded in the Backups.
21. All engineering students and staff engaged in computing were assigned accounts on the Honeywell. MacLean, whose work also involved Fast Fourier Transform computations as indicated by Cudworth, would also have held a Honeywell account. The University has, from the outset, known that the Backups also evidence the computing work done by MacLean in years 1-3 of his PhD program, and that no part of the FORTRAN Program was created in his account.
22. MacLean's PhD Thesis indicates that he developed his instrument software from FORTRAN Programs which "resided on disk on the Department's PDP11/34" [PhD Thesis Appendix a]. The PDP11/34 harddisk will show the date that my FORTRAN Program was copied to the disk, and will show that the FORTRAN Program was not created on the PDP. The rescission of MacLean's degree of Doctor of Philosophy in March 2003 was the consummation of an investigative process that identified the singular source of his software as my FORTRAN Program, archived in the Backups under my user ID uen4059. The University accordingly knows, beyond the shadow of a doubt, that there could be no other author of the FORTRAN Program.
23. I first met Colin Sinclair MacLean in my second year, when he and other PhD candidates acted as teaching assistants in our tutorial sessions. With the exception of Neil Fairweather, Brian Baine, Michael Grieves (and 2 other PhD candidates whose names I do not recall) I was generally despised by the PhD students. MacLean was no exception, proving reluctant to assist in one particular tutorial session.
24. I recall having one conversation with MacLean, concerning my Honours Thesis, in October 1982. I was on my way to the computer room when I encountered MacLean with other PhD students. I had just acquired the code for the Fast Fourier Transform (FFT) and was on my way to the computer room to convert it to the Inverse Fast Fourier Transform (IFFT). Recalling Cudworth's advice that MacLean's work involved Fourier Transforms, I briefly mentioned, to MacLean, that I was about to convert the FFT to its inverse and he, with reservation, agreed with what I proposed to do.
25. I did not have any other conversations with MacLean about my project, but I do recall two other conversations with him. One involved MacLean and one or two other PhD students at the end of my third year, when I was considering a project in smart devices, involving assembly language programming for the Intel microprocessor. MacLean cautioned that I might get a supervisor who didn't know anything about microprocessors. The second conversation took place while I was in discussion with the other two participants outside the lab in which Dr. Levy was about to begin our Honours design project. I mentioned to the other two participants that I had obtained, from the library, a technical paper on a control system design for a magnetic levitation train system, which used state space analysis. MacLean, directing his remarks to one

of the other students, implied that it was not necessary to know anything about the project before beginning. I do not recall any other conversations with MacLean, and I do not believe that I had any.

26. It would appear that MacLean became resentful of the fact that as an undergraduate (moreover, black undergraduate) I had created a FORTRAN Program of some value, whereas he had failed for 3 years as a PhD student to produce anything of worth. This information about my FORTRAN Program, was most likely to have come from Stronach who was also his supervisor. MacLean's act of locking me out of the tutorial room in the incident reported on pages 6-8 of my letter of demand dated 24 November 1997 [**Exhibit F 1**], might have been intended not only to discourage my continued use of the Department at nights, but also to provide access to my thesis materials (in accordance with Smith's plan) since the tutorial room adjoined the postgraduate area.
27. It is not likely that MacLean would have been able to copy the entire FORTRAN Program from any printout which might have been present on my desk in the tutorial room. The evidence shows that it is more likely that MacLean obtained the electronic copy of the source code of the entire FORTRAN Program "[residing on disk on the Department's PDP11/34]" through Stronach himself, who demanded, and to whom I consequently gave, the password for my Honeywell account prior to his disparagement of my convolution algorithm.
28. In my Notice of Forgery [**Exhibit A**, p 32] I indicated my belief that MacLean copied subroutines from a book, written by Kuo, which Stronach found in my possession. The library records which like the Backups are being concealed by the University, show when and by whom this book was borrowed. The records will show that it was I who borrowed the book during the academic year October 1982 to June 1983, and that any library loan of this book to MacLean, or to Stronach, took place only after I had submitted my Honours Thesis.
29. Throughout the Christmas term of 1982, Stronach repeatedly visited the computer room while I was there working, merely looking in from the doorway then leaving each time, apparently checking to see how much time I was spending on my project. Other engineering lecturers who witnessed me working at the computer included Drs. Peter Bellarby and Wallace Bell to whom I directed queries on at least one occasion early in the project; Bellarby suggesting (in Bell's presence) that I use the commands for cutting and pasting to edit. I remember this incident because Bell, who was my regent, appeared to be offended by my asking Bellarby, to whom I preferred to direct my question having personally witnessed the extent of Bell's racism in action, for instance, in humiliating one Oriental student who appeared to be unwell. Other lecturers apparently knew that I had been spending considerable time on my Honours Thesis, for Dr. George D. Matthew reminded me that "computing is addictive".
30. On the CRE green form dated 23 June 1983 [**Exhibit D 3**], I attested to discussions with Martin Stephenson and Dennis Bein, support staff in the Department of Engineering. I now recall that on 23 June 1983, Dennis Bein attempted to direct my attention to the fact that my Honours Thesis had been discredited, "If you are so sure...", that my marks were "eighty, eighty, eighty ... it must be the project then". I shook my head failing to discern the import of his message. Bein appeared to be amused, but emphasized that he had personally seen me doing a great deal of work on my project all year. Bein's efforts were in vain, for it would have seemed to me that while he was clearly able to recognise examination percentage marks, he was not competent to assess how the thesis could have impacted the Honours degree class when Begg himself, had concurred that the degree class was determined by my eight major papers each of

which had been allotted a mark of mid-range II-2. I had mentioned to Begg, when he placed the bound Text before me, that my supervisors had not helped me with my Honours Thesis. The possibility that McNicol, his prestigious External Examiners and Senate, could have conspired to steal my Thesis - never entered my mind. It should be evident that I omitted, from the Green form, Bein's comments concerning my Honours Thesis because at the time, deceived by the University, these clues appeared to be irrelevant to the facts at issue. Keir who had advised me that I placed first in the third year degree exams, and urged me to appeal to the Senate, was excluded from the Senate proceedings. His handwritten annotations (in red ink) to the draft of my letter of 29 July 1982 to Smith are annexed hereto as **Exhibit 8**].

31. Begg, unhappy with McNicol's handling of the matter, visited my flat (201 Forest Avenue) on 23 December 1983 to quietly advise me of the anomaly in the overseas students' marks. He confided that "all the overseas students' marks" were confined to a "narrow II-2 to III bracket", counselling me to have the CRE "demand this information from the University". Begg surmised that such a demand from the CRE would force the University to acknowledge that the marks had been fabricated. He also allowed law lecturer Vivian Ogston to identify the examination papers before they were sent to the two External Examiners, and he approved Keir's statement of 4 May 1988 testifying to my total fulfilment of the requirements for the Degree [**Exhibit 8**]. Ogston's Statement is annexed hereto as **Exhibit B 7**.
32. I chose a computing project partly because this eliminated the possibility of Departmental failure to provide necessary equipment, as for example in the case of Benjamin Nglube, a Zambian Student who graduated in 1980 with a III, who (according to Ugandan student Andrew Rugege) had been denied essential hardware for his Honours thesis until late in the year. Professor Smith himself specifically said to me that Nglube was "always walking into my office to tell me how bright he was... and I told him to prove it". Recognising that I needed little or no guidance in computing, and no equipment other than the Honeywell, I decided on a programming project.
33. Since my return to Jamaica in 1986, and prior to my receipt of a copy of the TEXT from the University in July 2002, I did not have in my possession any copy of the Honours Thesis or the FORTRAN Program, whether as a printout, or text, or in electronic form, or any notes containing information from the Honours Thesis and FORTRAN Program, and that the subroutines in C which I created at the University of the West Indies in November 1996 and January 1997 [**Exhibit F 1**, enclosure 2], were authored without benefit of any such copy or notes or information other than that residing in my mental faculties.
34. In January 1992, I became aware that professors at the Massachusetts Institute of Technology had evaluated the examination papers from the University, finding that my performance in the written papers merited first place in the graduating class – in a category all by itself. I am also aware that the findings indicated falsified marks across the year, and that the class boundaries declared by University Data Protection Officer David Jones' letter of 10 February 2003 [**Exhibit H 4**], do not apply and bear no relationship whatsoever to the 1983 Honours gradings, the authentic marks being evidence that the engineering Honours students were subject to poor teaching practices.
35. I commissioned no examination offences. The University fully understands that the FORTRAN Program residing in my computer account in the Backups, "[residing] on disk on the Department's PDP 11/34]", and adapted to derive MacLean's PhD Thesis – was not written by a ghost. The University would have also fully ascertained that my exceptional performance in the written papers, being sui generis, was the product of my abilities, ironically, the intense racial

scrutiny to which I was subjected, itself having confounded the University's extortionate and aspirant will to find opportunity to cheat.

36. I believe that from 1983 to 1992, Smith himself communicated, via the stalking operation, with my network of family, friends, employers, Government officials and so forth, but relinquished these criminal actions to James Williams who, being black (African-American), and acting under colour of his office at the prestigious MIT, could more effectively deliver disinformation countering and discrediting my allegations of racial discrimination and theft.
37. The criminal enterprise made further attempts to bribe me this year [**Exhibit J 1**, pp 37,38]. On about 15 February 2003, I was asked (through a friend who himself did not comprehend the criminality inherent in the matter) to name a figure for "compensation" when the matter had been resolved to my satisfaction.
38. My family's finances have also come under attack in combination with elements of the Jamaican Government. My father's pension was halved in January 2003, and in August 2003 he was suddenly served a Notice of Assessment demanding fees of J\$10,000 per year based on the maximum asset assessment of J\$10,000,000 for his company "Education Research and Promotions Limited, which had no assets (or liabilities) has never traded, and has been defunct since its incorporation on 17 February 1989.

In the same vein, my nephew Justin Barrow was made to suffer further injury at the hands of the criminal enterprise [**Exhibit J 1**, p 21]. Justin, who is a dual citizen of Belize and Jamaica, was admitted to the faculty of law at the UWI under the Belizean quota and subjected to a fee regime as a self-financing student without benefit of sponsorship. His appeals to the Jamaican Ministry of Education from 2 October 2001 were disregarded by former Minister of Education, Senator Burchell Whiteman, his successor, the Honourable Maxine Henry Wilson giving a decision in July 2003 only after Justin had completed his final examinations under duress imposed by the University to pay the outstanding fees. Justin, who is entitled to sponsorship under Jamaican Government policy which provides sponsorship for all Jamaican citizens registered in approved courses at the UWI, was deliberately denied the privileges and protections afforded him under the Jamaican Constitution. Minister Henry Wilson's letter of 8 July 2003, quoted the Attorney General's advice of 19 June 2003, which deliberately evaded the fact of Justin's rights in consequence of his Jamaican citizenship, and referred only to immutability of Justin's quota status – a fact which was never challenged in his claim, which in no way vitiates his Jamaican citizenship, and which is unequivocally independent of his rights to sponsorship under the Jamaican constitution.

It is a fact that Education officers Wesley Barrett and Philbert Dhyll reversed their statements of 15 April 2003, explicitly declaring Justin's entitlement to sponsorship as a Jamaican as independent of his quota status - after my discussion with Deputy UWI Registrar Joy Pilgrim on 25 and 29 April 2003, revealed clear evidence of communication with James Williams.

39. The theft of my Honours Thesis was a smooth operation conducted like a well-rehearsed exercise suggesting a not infrequent practice of theft or plagiarism of other black/non-white students' Honours theses. In addition to the Oriental students of the graduating class of 1983 - on behalf of whom Tang and Tam protested in their letter of 16 September 1983 [**Exhibit B 6**] - other overseas students quietly complained, while others exhibited Stockholm Syndrome-like behaviour, acquiescing to what amounted to supplying cheap labour to the Department of Engineering as Masters students, while their white peers were positioned in PhD programs.

40. I believe that the University and Shell are currently exploiting my FORTRAN Program both commercially and for research, and I have given Shell notice of the theft in my email of 20 August 2003 [**Exhibit H 7**].
41. I believe the criminal enterprise to be fully capable of murder and I fear for my life.
42. **Exhibits A, B 1, D 3, F 1, G 1, H 1, I 1, J 1, K, L 1**, and **Attachment 2** contain vital testimony, and are hereby repeated as if set forth fully in this affidavit.
43. **Exhibits A through M** and **Attachments 1 and 2**, are annexed hereto, and hereby made part of this Criminal Complaint and Affidavit. Originals and the numerous documents referred to by the exhibits are impracticable for inclusion herein, but shall be made available along with such other evidence as my computer harddrive which the court might require.

WHEREFORE, I request that my complaint be filed, as if against each and every defendant separately, process issued, and that the defendants be required to answer the charges made. I hereby make oath that the facts and information presented herein are true and correct to the best of my knowledge and belief.

.....
Adrienne Gaye Thompson

Complainant

Sworn and subscribed to at In the parish of Saint Andrew
 This day of January 2004, before me:

.....
Justice of the Peace

List of Exhibits

- A. **Exhibit A:** Notice of Forgery to the University of Aberdeen - 6 January 2004
- B. **Exhibit B:** Appeal To the University of Aberdeen and related letters
1. My letter of appeal to the University Senate (enclosing complaint of July 29, 1982) - June 29, 1983
 2. The University's decision on my appeal - 21 October 1983
 3. Letter from University Principal J. Maxwell Irvine - 8 May 1996
 4. Letter from University Principal J. Maxwell Irvine - 20 August 1996
 5. Letter from the University signed by M. Park - 25 April 1991
 6. Letter of protest signed by Tang and Tam – 16 September 1983
 7. Statement from Law Faculty lecturer, Vivien M P Ogston - 21 November 1985
 8. Vice-Principal Keir's annotations to 3rd year letter of protest (29 July 1982) and statement indicating total fulfilment of requirements for the Degree (original document) – 4 May 1988
- C. **Exhibit C:** University of Aberdeen Regulations

Code of Practice on Student Discipline, paragraphs 4.2 and 4.4.

D. **Exhibit D:** Commission for Racial Equality documents

1. Questionnaire served under section 65 1a of the Race Relations Act 1976 – 9 October 1983
2. University's reply to (1) under section 65 1a of the Race Relations Act 1976 – 11 November 1983
3. Green form – 23 June 1983
4. Letter from CRE chairman Peter Newsam to Robert Hughes MP - 22 May 1984

E. **Exhibit E:** The Forgeries (certified copies)

1. Student Transcript, 12 January 1988
2. Student Transcript, 15 May 1992
3. Student Transcript, 24 April 2002, and
4. Statement of marks, 10 February 2003

F. **Exhibit F:** First Letter of Demand

1. Letter of Demand, 24 November 1997
2. Letter from University Principal C. Duncan Rice - 29 January 1998

G. **Exhibit G:** Second Letter of Demand

1. Letter of Demand (LOD), 4 April 2002
2. Letter from University Secretary Cannon - 21 June 2002
3. Letter from University Secretary Cannon - 10 July 2002

H. **Exhibit H:** Reply to the University of Aberdeen and related documents

1. Reply - 7 October 2002
2. Email from University Registrar Dr. Trevor Webb - 28 November 2002
3. Email to University Registrar Dr. Trevor Webb - 23 December 2002
4. Letter from University Data Protection Officer David M. Jones - 10 February 2003
5. Letter from University Secretary Cannon - 21 February 2003
6. Letter from University Registrar Dr. Trevor Webb - 28 February 2003
7. Page 103 of MacLean's PhD Thesis and email to shell - 20 August 2003

I. **Exhibit I:** MIT Petition and related letters

1. MIT Petition - 24 January 1993
2. Letter from Provost, Professor Mark S. Wrighton - 5 May 1993
3. Letter from former CRE Principal Education Officer, Gerry German's to Wrighton - 10 May 1992

J. **Exhibit J:** Statement to the MIT Corporation and related documents

1. Statement – 2 July 2001
2. OAS Document, 29 August 1991
3. Wiley's letter of 26 September 1994
4. Lab Report, No. S/97/1296, Department of Pathology, UWI hospital - 19 March 1997
5. University of Stanford letters of acceptance and rejection - 3 March 1994 and 15 March 1995

K. **Exhibit K:** Reports to the Jamaican Police

1. Statement No. 1 - 13 August 1998
 2. Statement No. 2 - 11 October 1999
 3. Statement No. 3 - 23 May 2000
 4. Report: Computer Malfunction at the Mona Institute of Business - UWI, 17 April, 1997
 5. Email correspondence with the Metropolitan Police (commissioner@met.police.uk) - 8 August 2003
- L. **Exhibit L:** Documents concerning Recent Appeals to the British Government
1. Application to the Secretary of State, 5 May 1999
 2. Letter from former First Minister McLeish to Stephen Timms MP, 20 April 2000
 3. Letter from Kevin Fulton, Department of Enterprise and Lifelong Learning, Scottish Executive, 19 July 2002
 4. Letter from Deputy High Commissioner Jim Malcolm, 9 November 1998
 5. Letter from Lord Rooker, 7 October 1998
- M. **Exhibit M:** Some Correspondence with the Jamaican Government
1. Letter and Memo to Jamaican Foreign Minister, the Rt. Honourable Seymour Mullings, which received no reply - 2 May 1997, 30 May 1997
 2. Letter to Cabinet Secretary Carlton Davis which received no reply – 6 May 1997
 3. Letter from PIOJ Director General, Dr. Wesley Hughes – 20 March 2000

List of Attachments

1. **Attachment 1:** Addresses of Defendants.
2. **Attachment 2:** Official copies of Writ of Summons and Statement of Claim, in the matter of Thompson v Barrow, filed in the Supreme Court of Judicature of Jamaica, case number C.L.T. 132/2000, 18 October 2002.