

**Presentation for**

**Damian Hinds**

**Minister of State for Security & Borders**

**“Mind the Gap”**

**The reality gap between**

**(i) the impression the NCA creates for Ministers, MPs etc, and**

**(ii) the public’s experience of attempting to report to the NCA**

**alleged serious organised crime by banks against the public**

**Julian Watts**

**Bank Signature Forgery Campaign**

**16<sup>th</sup> February 2022**

*This presentation follows on from, and assumes prior reading of, the public presentation of the Campaign’s Interim Conclusions 3 November 2021 available at:*

<https://www.transparencytaskforce.org/wp-content/uploads/2021/11/Julian-Watts-Slides.pdf>

[https://www.youtube.com/watch?v=ES\\_D7JDHySA](https://www.youtube.com/watch?v=ES_D7JDHySA)

# Protecting the public from crime is a foundational requirement of any nation state

*“The first duty of Government is to uphold the law”*

Margaret Thatcher 10 October 1975

*“What has happened to us? When did we stop caring about honesty and integrity?”*

“Ted Hastings” Line of Duty Series 6 Episode 4

**The UK is in a state of lawlessness**

**as there is no genuine law enforcement against serious organised crime against the public**

**– when the perpetrators are banks**

*This is a foundational issue of justice, the rule of law, and nation state Government*

# As the Campaign's Interim Conclusions presentation documented, the NCA has failed for over 2 years to investigate serious organised crime by banks against the public

## *Initial evidence so far*

- 703 formal crime reports and 26 files of evidence, including from customers, bank senior manager whistleblowers, external bank advisors, internal bank documents, and admissions & omissions by bank executives
- Earliest alleged forged signature & document from 1975
- 1990+ banks alleged systemic forging signatures, fabricating evidence & concealing evidence
- Prudent view: at least 1 million customer victims over 30 years; loss to customers £ Billions
- Media picked up story including BBC News, Times, Telegraph, Guardian, Independent, Mail etc



## *Investigation requested*

8 July 2019  
Treasury Select Committee asked the then Director General of the NCA to engage directly with Campaign and investigate allegations



## *Results*

- Still no investigation by the NCA after 2 years
- Minimal direct engagement by the then Director General
  - never met Campaign
  - no direct response to 12 letters from the Campaign since Sep 2019
- Chose not to ask NCA Director of Investigations to investigate
- Instead passed to person whose:
  - job was to create an anti-Fraud Community with banks
  - co-sponsored an NCA initiative with a bank

*The contrast between US action and UK inaction / "hostility, opposition and obfuscation" could not be more stark, especially for a "history level" event*

# The 700+ crime reports and 26 files of evidence form a coherent and integrated set, with reports of industrial-scale systemic crime, for example, systematic signature forgery...

30-6-2020,

Dear Mr Watts,

Just to make you aware for your Campaign that [REDACTED] can confirm that your concerns regarding systematic bank signature forgery are completely valid. [REDACTED] is connected with more than 50 whistle-blowers who are current bank employees or who were previously bank employees and are aware of signature forgery by banks.

The reality is that signature forgery by banks is so commonplace that it is even taught to staff on training courses.

For example, a whistle-blower known to [REDACTED], was trained how to forge signatures as part of his induction training in his first few weeks as a Manager [REDACTED]. The trainer instructed that there was a simple solution to forging customer signatures on bank documents such as loan agreements or guarantees, which could be deployed before the documents were submitted to be scanned into the bank's central files. This was to:

- 1 Extract the customer's signature from the Individual Signature Verification (ISV) section of the customer's central file records
- 2 Take a copy of the document where the signature was missing and then place this over the version from the ISV system against a window. With the light shining through, the original could then be traced (forged) onto the necessary document
- 3 Next, to obscure the image somewhat, the document should be run through the photocopier several times, including some slightly out of line versions, and after altering the density settings
- 4 Once the document looked suitably close to the original signature, they could then just scan the photocopied version into the system. This meant that the original "wet ink" forged version would never be available on file for ink date testing in case of a dispute

## ... corroborating crime reports by individual customers

**The signatures on a genuine agreement... ... were cut and pasted by the bank onto a fabricated agreement  
ie signatures are identical on 2 different agreements**

variety of currency and recognised at the same time as  
amended to the extent the Bank determines is necessary

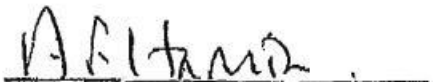
Signed for and on behalf of the Bank



Date 28/7/09

The Customer hereby accepts the above terms and conditions.

Signed for and on behalf of the Customer



Date 28/7/09

13/10/2009 10:43

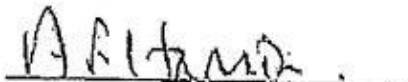
Signed for and on behalf of the Bank



Date 28/7/09

The Customer hereby accepts the above terms and conditions.

Signed for and on behalf of the Customer



Date 28/7/09

**The bank took the customer to Court based on the fabricated agreement**

# In addition to forging customer signatures, the signatures on the signed Statements of Truth on bank Court documents have also been forged, resulting in families being evicted

**Signatures in the name of “K” .... ...and in the name of “Natalie”... ...and in the name of “H”**

Statement of Truth

~~\* I believe that the facts stated in this checklist are true.~~  
~~\* I am duly authorised by the claimant to sign this statement.~~

Signed \_\_\_\_\_

Full name K

Statement of Truth

~~\* I believe that the facts stated in this checklist are true.~~  
~~\* I am duly authorised by the claimant to sign this statement.~~

Signed \_\_\_\_\_

Full name K

④ that the facts sta

Ms Natalie

\_\_\_\_\_

⑤ that the facts of

Ms Natalie

\_\_\_\_\_

⑥ Ms Natalie

\_\_\_\_\_

⑦ Ms Natalie

\_\_\_\_\_

H

H

H

H

**This is a crime - in a non-bank case in September 2021 a person was jailed for 8 months for forging a signature on a Witness Statement, which the prosecution stated “strikes right at the heart of justice”**

# The Treasury Select Committee wrote to Lynne Owens, then DG of the NCA, on 8 July 2019 asking her to (i) “engage directly” and (ii) “investigate”

## TSC letter to Lynne Owens 8 July 2019

## “The Committee requests ... that you...”



“engage directly with the Bank Signature Forgery Campaign”

“...and investigate”

**It appears that on receipt of the TSC letter in July 2019 Ms Owens took the decision that she would NOT engage directly or investigate bank signature forgery in defiance of the Treasury Committee**

## Lynne Owens responded to the TSC request to “engage directly” by refusing to meet with the Campaign and cancelling 4 times her meeting with the Campaign

Lynne Owens cancelled 4 times a meeting the Campaign had arranged to “engage directly” with her in accordance with the TSC letter

***“I am not aware of anyone else who has ever refused three times in writing a formal request from the Treasury Committee”***

Kevin Hollinrake MP’s letter to Lynne Owens

- 31 July 2019 Campaign founder called and arranged meeting with Lynne Owens
- 6 August 2019 Campaign founder letter to Lynne Owens confirmed meeting

- Lynne Owens cancelled meeting for 1<sup>st</sup> time

- 8 Aug 2019 Kevin Hollinrake MP letter to Lynne Owens confirmed meeting

- Lynne Owens letter to KH MP 9 Aug 2019 cancelled meeting for 2<sup>nd</sup> time

- 12 Aug 2019 Campaign founder letter to Lynne Owens confirmed meeting
- 14 Aug 2019 KH MP letter to Lynne Owens confirmed meeting

- Lynne Owens letters to Campaign & KH MP 14 & 15 Aug 2019 cancelled meeting for 3<sup>rd</sup> time

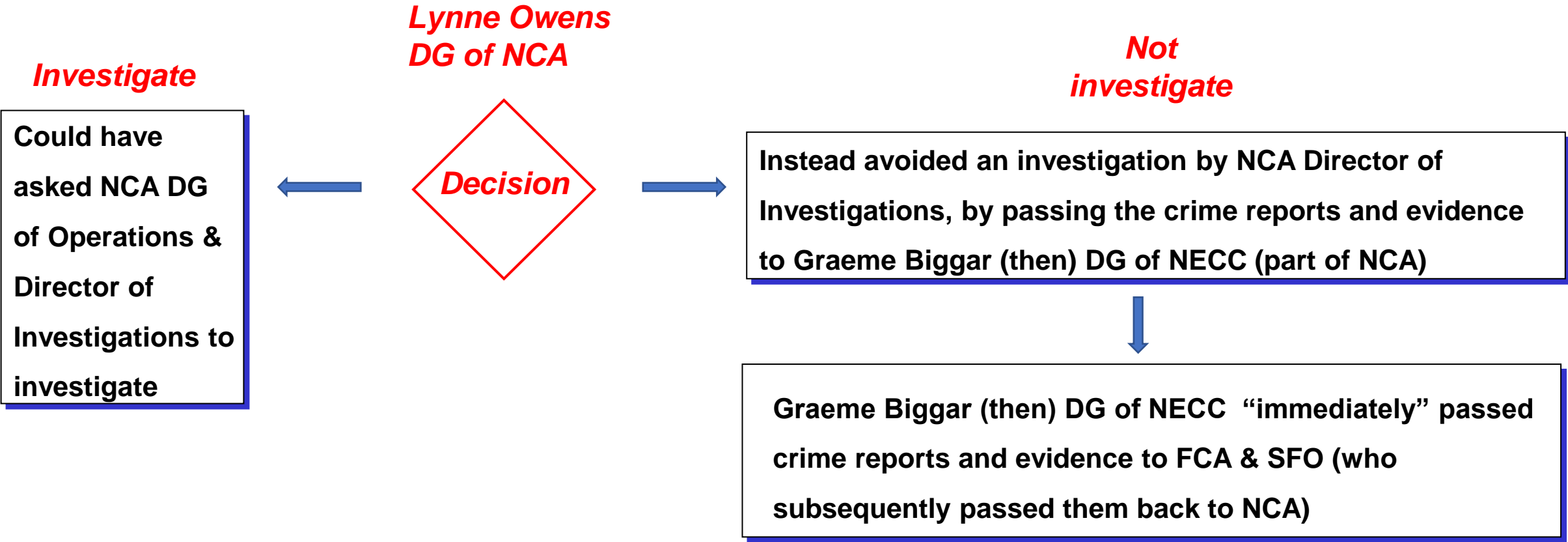
- 19 Aug 2019 Campaign & KH MP letters to Lynne Owens confirmed meeting

- Lynne Owens letter to KH MP 21 Aug 2019 cancelled meeting for 4<sup>th</sup> time

***Lynne Owens refused 4 times to meet with the Campaign and never met with the Campaign, which appears to confirm she had already taken the decision not to investigate bank signature forgery***



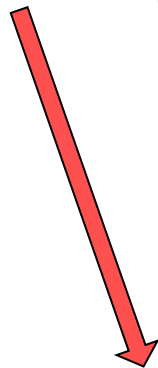
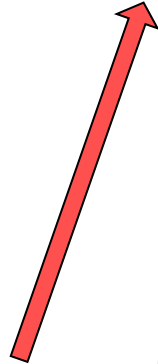
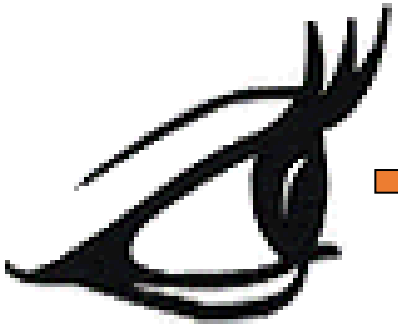
**Lynne Owens and now Graeme Biggar (current Interim DG of NCA) responded to the TSC request to *investigate* by failing for over 2½ years to investigate**



**Lynne Owens took the decision to pass the crime reports to Graeme Biggar whose job was to build an anti-Fraud Community with banks and who personally co-sponsored an NCA initiative with a bank**

# In February 2021 Graeme Biggar asked to meet with the Campaign to update on the NCA's "progress"

NCA "wilful blindness" to any systemic crime



NCA had found no collusion between banks to forge signatures

- ie an obfuscation technique called a "strawman" – deny something the other party has never alleged in order to deflect what the other party had actually alleged
- NB: The crime reports are for industrial scale systemic signature forgery by individual banks against that bank's own customers

NCA "Wilful Blindness":

not able to "see" crime reports and evidence of systemic serious organised crime by banks which clearly stated:

- *"Bank signature forgery was systematic"*
- *"Document tampering and fabrication by banks is so commonplace that it is even taught to staff on training courses"*
- *"banks concealing evidence from customers and the Courts is endemic"*

To make it look like the NCA had done something, the NCA would find a few individual examples and pass them to the local Police (or Action Fraud) in full knowledge that no local Police would investigate a major bank about 1 customer

*What the meeting actually did was expose the NCA's strategy and tactics for avoiding any investigation including the NCA's refusal to see any evidence of systemic crime by banks*

# A year later in January 2022 (still with no NCA investigation) Anthony Stansfeld wrote to the Home Secretary and 7 days later the NCA wrote to the Campaign and some victims

## **NCA letter to customer victim 19 January 2022 ...**

Your details were provided within the BSFC material submitted to support these allegations. Please be advised there is currently no formal NECC or NCA investigation relating to the wider allegations of the Campaign or your own personal matters, but we would like to make contact to obtain further details regarding your own matter. Any information supplied by you will be incorporated into the triage of the Campaign allegations.

As part of the NECC assessment of the Campaign's material, we would like to confirm the following:

1. Did you submit material to the Campaign Group BSFC?
2. Do you consider yourself to be a victim of signature fraud by a UK Financial Institution?
3. If so, have you ever reported your allegations to Action Fraud and / or the Police?
4. If an Action Fraud / Police report has been made please provide the Action Fraud or crime reference details, the Police Force's name and the outcome?
5. Are you willing to speak with an NCA Officer?

**... confirmed that after 2½ years there was still no NCA investigation ...**

*“there is currently no formal NECC or NCA investigation”*

**... and also confirmed the NCA's tactics to avoid any NCA investigation**

*By attempting to deflect individual cases to local Police Force or Action Fraud*

**Very pointedly, the NCA did NOT write to or ask to meet with the whistle-blowers who provided crime reports relating to industrial-scale systemic crime ie continued NCA “wilful blindness” to systemic crime**

## The NCA's *"hostility, opposition and obfuscation"* regarding the Campaign succeeded in deterring the Treasury Committee from inquiring into this matter further

### *Graeme Biggar NCA letter to Treasury Committee...*

Quote from letter dated 30 Oct 2020:

*"The Serious Fraud Office invited Mr Watts to meet to discuss further their understanding of his specific allegations, but he did not respond to the invitation."*

### *...which omitted to mention to the Treasury Committee*

- The Campaign wrote to the SFO 6 times asking for a meeting with Lisa Osofsky which was refused or ignored 6 times (20 May, 23 Sep, 14 Oct, 7 Nov, 2 Dec 2019, 8 Jan 2020)
- In the Campaign letter dated 7 Nov 2019 Mr Watts also offered to meet with SFO junior staff
- SFO letter dated 18 Nov 2019 in reply stated  
*"I am therefore pleased to note that you have accepted our invitation to meet... I am copying this letter... to Graeme Biggar"*
- SFO subsequently stated in an email 27 Nov 2019 *"I do not see the merit in meeting Mr Watts"* and no meeting occurred

### *Impact on Treasury Committee's view of Campaign & Campaign founder – absorb & repeat*

Treasury Committee email 1 Sep 2021 to customer victim asking for an update:

- *"The Serious Fraud Office then contacted Mr Watts ... but Mr Watts did not respond to the invitation"*
- *"The Committee has not engaged in any further correspondence on the matter."*

The NCA's "hostility, opposition and obfuscation" also included re-writing history in order to provide an alternative documentation trail for any subsequent external reviewer

### Campaign slide handed by Campaign founder to Graeme Biggar in meeting on 23 August 2019

Customers will not agree to their evidence being provided to the FCA or for any FCA involvement in the criminal investigation as they have no confidence in the FCA

FCA conduct / action		Impact on customers view of FCA
<ul style="list-style-type: none"><li>Revealed name of whistleblower to bank</li></ul>	→	<ul style="list-style-type: none"><li>FCA cannot be trusted with confidential information by customers</li></ul>
<ul style="list-style-type: none"><li>No action taken regarding RBS GRG treatment of SMEs despite evidence of "systemic and widespread mistreatment"</li></ul>	→	<ul style="list-style-type: none"><li>No confidence FCA will take action against the banks for misconduct against customers</li></ul>
<ul style="list-style-type: none"><li>16 years of limited action regarding HFC (despite whistleblower having personal meeting with Andrew Bailey)</li></ul>	→	<ul style="list-style-type: none"><li>Office of the Complaints Commissioner found the FCA was "farcical", "negligent", "defensive"</li></ul>

There is a clear view amongst customers that the FCA consistently acts to protect the banks from customers rather than protecting the customers from the banks misconduct

### Graeme Biggar letter 18 Sep 2019 stated

I ... passed the material ... to ... the FCA ...  
We had not spotted that footnote before passing on the information

### What actually & factually happened

- Campaign founder read slide out loud to Graeme Biggar in meeting
- Campaign founder discussed slide with Graeme Biggar in meeting
- Campaign founder personally handed slide to Graeme Biggar in meeting
- Cover letter with first batch of crime reports included similar statement
- Each 31 pages of Index for first batch of crime reports included similar statement

- ie any subsequent external reviewer would be misled into believing it was just a clerical error – "not spotted that footnote"
- Factual reality – deliberate refusal to honour customer victims clearly & repeatedly stated wishes / requirement

As the NCA is prepared to re-write history to make themselves look better, the likelihood of Ministers being misled during briefings by the NCA regarding the Campaign appears to be very high

The NCA's *"hostility, opposition and obfuscation"* was grotesquely confirmed by the public spectacle of the NCA touting for new investigation work from the Treasury ...

## Treasury told crime agency to 'butt out' of Covid fraud inquiry

By Edward Malnick

TREASURY officials have been accused of rebuffing an attempt by the National Crime Agency, known as Britain's FBI, to launch a sweeping investigation into fraudulent use of taxpayer-funded Covid-19 handouts.

The NCA is said to have outlined its investigative capabilities and "what we can do to help", but a source said: "The Treasury effectively said, 'butt out of

this". Another source said they believed that the move was designed to prevent "embarrassment" about the scale of fraud involving public funds.

In the absence of a wide-ranging NCA investigation, the body has instead been involved ad hoc in specific cases and provided "specialist capability" to support work by the National Investigation Service (Natis), which is said to only be able to investigate 200 cases per year. Last night a Treasury spokesman

said that officials "don't recognise these claims". The spokesman did not respond when invited to deny that the NCA approach was rebuffed. The NCA declined to comment.

The claims follow the resignation at the Lords despatch box of Lord Agnew, a Cabinet Office minister, over the Government's "lamentable track record" tackling fraud relating to the multi-billion-pound Bounce Back Loan Scheme.

Fraud linked to the scheme is

expected to cost the taxpayer as much as £5 billion. Lord Agnew said the Treasury appeared to have "no knowledge of, or little interest in, the consequences of fraud to our economy or society".

The intervention prompted Rishi Sunak, the Chancellor, to state: "I'm not ignoring it, and I'm definitely not 'writing it off'." However, a source told *The Sunday Telegraph* that the NCA had previously approached Mr Sunak's officials to outline its investigative powers and

offer "to help", but was "rebuffed by the Treasury".

Speaking in the Lords, Lord Agnew described a "failure by Treasury or [Department for Business, Energy & Industrial Strategy] officials to understand the complete disjunction between the level of criminality - probably hundreds of thousands of pounds - and enforcement capability. For example, Natis, a specialist agency, can handle around 200 cases a year; local police

forces might double that." The Treasury spokesman said: "We already work with the NCA on Bounce Back Loan Scheme fraud, who take on the most serious cases.

"Fraud is unacceptable, and we're taking action on multiple fronts to crack down on anyone who has sought to exploit our schemes.

"Our Covid support schemes were to protect millions of jobs and businesses at a time when families needed it most."

Telegraph 30 January 2022

- *"an attempt by the National Crime Agency ... to launch a sweeping investigation"*
- *"The NCA is said to have outlined its investigative capabilities and 'what we can do to help' "*
- *" a wide ranging NCA investigation"*
- *"The NCA had previously approached [the Treasury] to outline its investigative powers and offer "to help" "*

*... at precisely the same time as the NCA has been doing everything possible for 2½ years to avoid investigating serious organised crime against the public – simply because the perpetrators are banks*

# So Ministers need to “Mind the Gap” between (i) the impression created by the NCA to Ministers and (ii) the factual reality for customers reporting crime by banks to the NCA

## *Impression created by NCA...*

## *MIND THE GAP*

## *... the factual reality*

*There is nothing to see here*



*Largest fraud against consumers in American history is also happening in the UK as well ie largest fraud against consumers / the public in British history*

*NCA doing a “thorough assessment”*



*NCA: did not even read crime reports, evidence, cover letter & index table of first batch before “immediately” deflecting to FCA / SFO; never contacted whistle-blowers*

*Evidence is just pp-ing signatures*



*Forging signatures on signed Statements of Truth on Court documents “strikes right at the heart of justice” and results in 8 month prison sentence*

*No systemic crime*



*Overwhelming evidence of industrial-scale systemic serious organised crime by individual banks including forging signatures, fabricating & concealing evidence*

*NCA just needs to pass isolated individual cases to local Police / Action Fraud*



*No isolated individual cases – 700+ crime reports are a coherent set with reports of systemic crime corroborating & integrated with individual customer crime reports*

**So what can be done to fix this issue? ... as “a Government that is absolutely committed to doing the right thing for the people of this country”**

***“The first duty of Government is to uphold the law”***

Margaret Thatcher 10 October 1975

***“a Government that is absolutely committed to doing the right thing for the people of this country”***

Prime Minister Boris Johnson PMQs 9 February 2022

**The UK is in a state of lawlessness**

**as there is no genuine law enforcement against serious organised crime against the public**

**– when the perpetrators are banks**

***The 1<sup>st</sup> step is for Anthony Stansfeld & the founder of the Campaign to meet the Home Secretary personally to brief her fully and answer any questions she may have***



# The 2<sup>nd</sup> step is for the Home Secretary to immediately announce that investigating serious organised crime by banks against the public is a “*strategic priority*” for the NCA

## “*Revised Framework document for the National Crime Agency May 2015*”

### Home Secretary

- 4.1 The Home Secretary is charged with safeguarding the public, preventing crime and protecting the UK's borders and national security. The Home Secretary will have a legal duty to determine the 'strategic priorities' for the NCA, in consultation with the Director General and with the NCA's strategic partners.<sup>4</sup> The Home Secretary will hold the Director General to account for the discharge of the 'NCA functions' while also respecting the Director General's operational independence (as explained at paragraph 4.2b) and, where appropriate, the Home Secretary will account to Parliament. The Home Secretary will also select and appoint the Director General<sup>5</sup> and will designate the Director General with operational powers as required.<sup>6</sup>

### *Immediate practical steps to fix this now*

- Home Secretary can take & publicly announce the decision to determine that systemic bank signature forgery and related serious organised crimes by banks against the public is a 'strategic priority' for the NCA

... as the Home Secretary has “a legal duty to determine the ‘strategic priorities’ for the NCA”<sup>17</sup>

# The 3<sup>rd</sup> step is to replace the current Interim DG of the NCA Graeme Biggar with someone who personally genuinely wants to investigate crimes by banks against the public

## **“Revised Framework document for the National Crime Agency May 2015”**

### *Home Secretary*

4.1 The Home Secretary is charged with safeguarding the public, preventing crime and protecting the UK's borders and national security. The Home Secretary will have a legal duty to determine the 'strategic priorities' for the NCA, in consultation with the Director General and with the NCA's strategic partners.<sup>4</sup> The Home Secretary will hold the Director General to account for the discharge of the 'NCA functions' while also respecting the Director General's operational independence (as explained at paragraph 4.2b) and, where appropriate, the Home Secretary will account to Parliament. The Home Secretary will also select and appoint the Director General<sup>5</sup> and will designate the Director General with operational powers as required.<sup>6</sup>

### *NCA Director General*

4.2 The NCA will be under the direction and control of the Director General. As the head of the NCA, the Director General will:

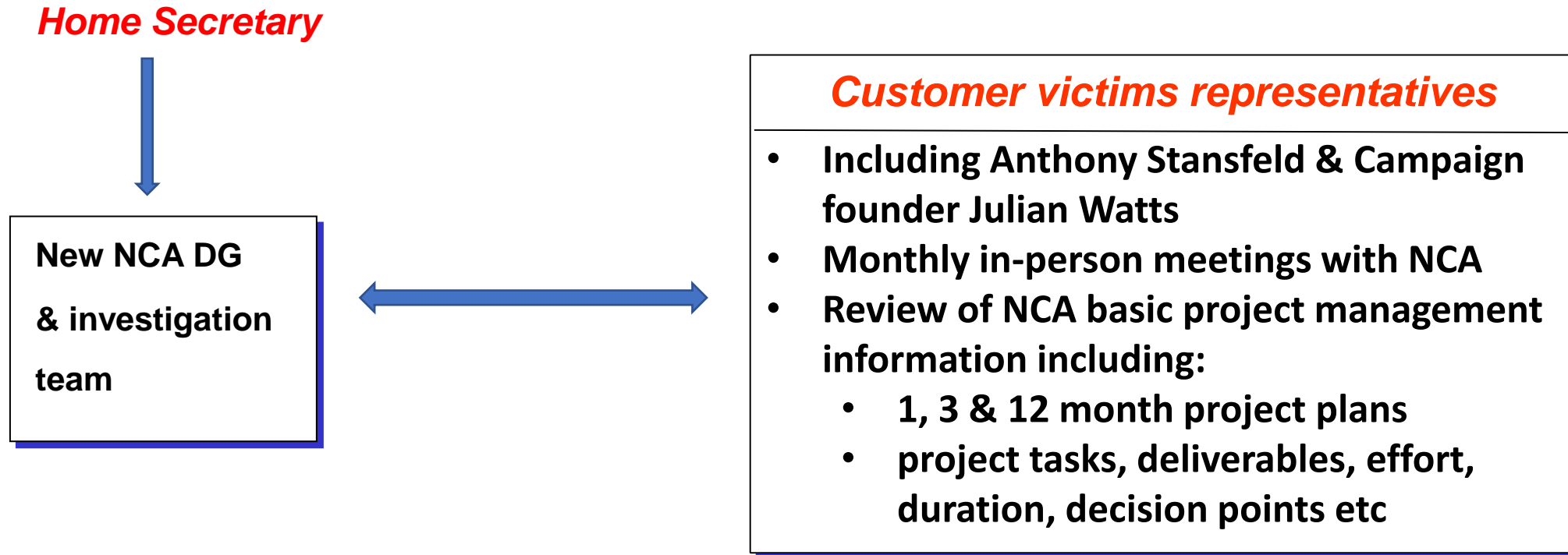
- determine 'operational priorities' for the NCA,<sup>7</sup> in line with the 'strategic priorities' set by the Home Secretary;
- be responsible (including through a senior NCA officer acting on his or her behalf) for all decisions about which operations to conduct and how they should be conducted.<sup>8</sup> This would include, for example, decisions about whether to continue or stop a criminal investigation;

## **Immediate practical steps to fix this now**

- Home Secretary can take & publicly announce the decision to determine that systemic bank signature forgery and related serious organised crimes by banks against the public is a 'strategic priority' for the NCA
- The DG of NCA will determine that in line with the 'strategic priorities', systemic bank signature forgery and related serious organised crimes by banks against the public is an operational priority for the NCA
- The DG of NCA will decide to conduct an immediate NCA operation / investigation by the NCA itself into systemic bank signature forgery and related serious organised crimes by banks against the public

**“in line with the ‘strategic priorities’ set by the Home Secretary” the new DG of the NCA “will determine ‘operational priorities’ for the NCA” and decide to “conduct” an immediate genuine, committed & comprehensive operation / investigation by the NCA itself into crimes by banks against the public**

Given the NCA's continuous *“hostility, opposition and obfuscation”*, representatives of customer victims will need to partner with the NCA in monthly NCA progress meetings



(essential to avoid another embarrassing and NCA-credibility-destroying black hole and repeat of the NCA's failure after almost 3 years to find any evidence of crime regarding Lloyds HBOS Reading fraud)

*The 4<sup>th</sup> step is to establish the customer victims representatives, including at least Anthony Stansfeld & the Campaign founder, to liaise with the new NCA DG and investigation team*

# The 5<sup>th</sup> step is to address the self-evident failure of the NCA's own corporate governance structure which has enabled the NCA to fail to protect the public for 2½ years

## *“Revised Framework document for the National Crime Agency May 2015”*

- 6.2 The Director General will establish and chair a Management Board ('the Board'). The Board's functions will be both **advisory** – setting overall direction for the Agency within the scope of the Home Secretary's strategic priorities; and **supervisory** – scrutinising performance and challenging the Agency on delivery. In line with Government best practice as set out in the Cabinet Office's 'Corporate governance in central government departments; Code of good practice 2011' ('the 2011 Code'), the responsibility of the Board includes the following areas:
- 6.3 The Board's membership will consist of the Director General as Chair; up to ten senior operational leaders of the NCA; and no fewer than three senior non-executive members. Non-executive members' skills and experience will enable them to provide constructive challenge and advice to the executive leadership.<sup>24</sup> The members of the Board will be appointed by the Director General. Before appointing a non-executive member to the Board, the Director General will consult the Home Secretary.<sup>25</sup>

- NCA DG:
  - chairs the NCA Board  
ie the NCA DG combines the roles of:
    - Chair of NCA Board &
    - CEO / DG of the NCA
  - selects / appoints NCA Board members including Non-Execs
- NCA DG and his/her selected Board are responsible for scrutinising the performance of:  
NCA DG

*This will involve appointing an independent Non-Exec Chairman of the NCA Board, who will select 3 further Non-Execs for “scrutinising performance and challenging the Agency on delivery”*