

**SENT BY POST AND EMAIL TO ALL INDIVIDUALS AND AT ALL POSTAL & EMAIL ADDRESSES DETAILED BELOW:**

**Mr Jason Earl, 33 Rothwell Road, Newcastle, NE3 1TY**

[jason.earl@thejetgroup.co.uk](mailto:jason.earl@thejetgroup.co.uk); [jason.earl@ransquawk.com](mailto:jason.earl@ransquawk.com); [jase@virtualfunction.net](mailto:jase@virtualfunction.net); [jaseearl@gmail.com](mailto:jaseearl@gmail.com); [jaseearl@googlemail.com](mailto:jaseearl@googlemail.com)

**Mr Jonathan Waters, [jw@helix-law.com](mailto:jw@helix-law.com), (Mr Earl's advised Legal Representative)**

Brighton Office, Helix Law 1 Frederick Terrace, Frederick Place, Brighton, BN1 1AX

**Mr Jonathan Waters, [jw@helix-law.com](mailto:jw@helix-law.com), (Mr Earl's advised Legal Representative)**

Eastbourne Office, Helix Law Ground Floor, West Wing, Ivy House, Ivy Terrace, Eastbourne, BN21 4QU

**ALSO SENT AND COPIED (VIA EMAIL) TO FOLLOWING RELEVANT PARTIES AND PROFESSIONAL ADVISORS DETAILED BELOW:**

Mr A Voce, Mrs C Busfield, Miss D Shtereva, Mr G Busfield, Mr N Ost, Mr E Janes, Mr A Turner (VERSA Accountants),

Mr R Rones (ThorntonRones), Mr D Bailey (Healys LLP) and Mr Brain O'Neill QC.

**URGENT & STRICTLY CONFIDENTIAL**

3<sup>rd</sup> August 2019

Dear Mr Earl,

- RE: 1) DEMAND FOR IMMEDIATE TRANSFER OF FULL CONTROL AND OWNERSHIP OF ALL SPECIFIED TRUST(S) ASSETS, AND ALL NET INCOME(S) AND PROFIT(S) DULY DERIVED THEREFROM, TOGETHER WITH ALL ASSOCIATED LEGAL RIGHTS & INFORMATION INHERENT THERETO.**
- 2) WHEREBY THE SAID DEMAND IS FOR THE DUE TRANSFER(S) FROM YOURSELF (MR J EARL) AS TRUSTEE, TO MYSELF (MR I DIMITROV) AS IS MY 'ABSOLUTE ENTITLEMENT' AS THE ADULT BENEFICIARY, AND WHEREAS YOU HAVE NO DISCRETION AND ARE OBLIGED TO COMPLY WITH**

I hereby demand, as is my lawful "absolute entitlement", and whereas you as trustee of the below specified bare trust(s) have no discretion but only to comply with, such that you are now immediately legally obliged to transfer full control and ownership of all assets, together with all net income and profits duly derived therefrom, absolutely, as have been held under trust(s) by yourself as Trustee, to myself (Mr I Dimitrov) for the following trust(s) as are specified below as follows:

1. The bare trust(s) as were made on the 24<sup>th</sup> day of August 2016, between yourself Mr Jason Earl ("JE") of 33 Rothwell Road, Newcastle. NE3 1TY and myself Mr I Dimitrov ("ID") of 40 Rodwell Road, London, SE22 9LF, whereby it was thereby principally and specifically declared that:
  - a. JE holds 76% of all 1000 Ordinary Shares in J EARL TRADING LIMITED (*As was renamed on 10-05-17 as THE JET GROUP SERVICES LIMITED "JETS"*), (Company Number 10283570 as registered at Companies House), together with all net income and profits duly derived therefrom, as trustee(s), upon trust for myself ID absolutely as the adult beneficiary.
  - b. JE holds 76% of all 1000 Ordinary Shares in THE JET GROUP LIMITED "JET", (Company Number 10344336 as registered at Companies House), together with all net income and profits duly derived therefrom, as trustee(s), upon trust for myself ID absolutely as the adult beneficiary.
  - c. JE warranted therein that he shall not sell any shares in either of the Companies specified in "a" or "b" above without the express written agreement of myself ID.

As you are likely aware, in accordance with relevant UK Trust Law as is applicable to these matters and the trusts specified herein, I reiterate that you as the trustee to the above specified bare trust(s), noting my aforesaid 'absolute entitlement' as the adult beneficiary respectively, have absolutely no discretion as to whether to comply with this demand, or indeed any of the additional associated lawful requests and rights as are stipulated and lawfully transferred to myself respectively and as detailed further herein below or otherwise.

Furthermore, it is to be noted that this demand by myself, (*and any such said subsequent related lawful requests as I further include below*), is hereby reiteratively requested by myself at the date of this correspondence and/or as otherwise, is duly and appropriately hereby communicated & served upon you as at the date this correspondence is sent to you and your legal advisors via email (*as per the details you have provided and/or as are specified above, and noting this correspondence is also to be sent to all postal addresses for yourself and such parties as also detailed at the outset of this correspondence*).

In any event, regardless of the above, but pursuant to my demand as I have hereby relay to yourself, and again, as in accordance with the relevant UK Law aforementioned and/or otherwise, I hereby formally acknowledge and adopt with immediate effect, as is my 'absolute entitlement', my lawful full control and ownership of all assets, together with all net income and profits duly derived therefrom, absolutely, as have been held under trust(s) by yourself as Trustee, for myself (Mr I Dimitrov) by the trust(s) as are specified herein above.

For the avoidance of doubt, albeit again as you are likely already aware, given the circumstances, trusts, and my 'absolute entitlement(s)' as the adult beneficiary, UK Law defines that immediately upon a demand such as I hereby provide (regarding the said specified trusts herein), I am immediately, fully and absolutely and lawfully entitled to adopt and take full control and ownership of all relevant trusts' assets, with all net income and profits duly derived therefrom, together with all resultant legal rights as are inherent to such assets and ownership(s) – via my lawful resultant majority ownership(s) of The Jet Group Limited ("JET") and/or The Jet Group Services Limited ("JETS") or otherwise. This is my absolute entitlement and is indisputable under the Law of England and Wales.

Respectively, and such as is important for yourself to now further note, you as Mr Earl, as a Director of JET and/or as the 'historic' trustee of the Trusts specifically addressed herein, are now legally obliged and duty bound to enable, facilitate, support and undertake actions such as to ensure that the said completion of the transfer of ownership and full control for all the relevant specified trusts' assets, together with all net income and profits duly derived therefrom, absolutely, is completed at all due pragmatic and documentary level(s) and/or also as is otherwise required to support the completion, transfer and assignment of such ownership and control to myself as I am legally and duly entitled, and in all regards.

Likewise, again as is important for yourself to hereby further note, you as Mr Earl, as a Director of JET and/or as the 'historic' trustee of the Trusts specifically addressed herein, are also now similarly and congruently legally obliged and duty bound to enable, facilitate, support and undertake actions such as to ensure that all associated legal rights as are connected and/or evidently due to be lawfully transferred and provided to myself, as a result of my now rightfully adopted full legal control & ownership of such trusts' assets, together with all net income and profits duly derived therefrom, absolutely, again, as have been detailed herein.

Ultimately, you are now legally obliged to assist, enable, facilitate and support the completion of the implementation and transfer of the full control and ownership of all assets, together with all net income and profits duly derived therefrom, absolutely, and all legal rights as are attached and/or associated and/or conveyed resultantly, as for the asset's as have been held under trust(s) by yourself as Trustee, for myself (Mr I Dimitrov) for the same specified trust(s) as have been repeatedly referred to, and as are specified in herein.

Accordingly, I further hereby lawfully relevantly request you duly undertake the following actions, as are requested below for your urgent and prompt attention; and whereby such actions and questions are directly related to and regarding the matters and entities addressed herein, and whereas, as communicated above, you are duty and legally bound and obliged to comply with such requests immediately.

I have specifically requested actions such as are believed need to be addressed as a matter of urgency forthwith, given their material importance to the interests of JET and JETS and the relevant owned trading businesses and connected entities as are RANsquawk, Talking-Forex and such companies as are TTN and/or RAN, and/or GCV. Thus, please now undertake the relevant actions, and respond in full to the queries as are as follows:

**Please Immediately Action:**

1. Please provide and support the transfer to myself of absolutely all details, logins, domains, passwords, servers, hardware, software, IT related support services and accounts and any other such type of information and details absolutely without exception or reservation in any regard as is related and/or a component and/or relevant in anyway to the IT Infrastructure, IT processes, IT Intellectual property or any other IT parameter for both RANsquawk and Talking-Forex immediately by return in response to this email, and to myself at [id@g-cv.com](mailto:id@g-cv.com), and Mr Albie Turner at [albie@versaaccountants.co.uk](mailto:albie@versaaccountants.co.uk), and Mr Adam Voce at [adam@g-cv.com](mailto:adam@g-cv.com) and **Mr David Bailey [David.Bailey@healys.com](mailto:David.Bailey@healys.com)** within 24 hours from this email correspondence being sent to the multitude of email addresses for yourself as specified at the outset of this correspondence as aforesaid.
2. Please provide and support the transfer to myself of absolutely all details, logins, passwords for all company support services for JET and JETS absolutely but as must principally and absolutely include all bank account details, all companies house logins and codes, all HMRC accounts, government gateways and IDs and logins and any and all other details for any and all other services and facilities such as have been and/or are being utilised by JET and JETS and RANsquawk and Talking-Forex.
3. I reiterate, Please facilitate and support promptly all updates and actions to Companies House and as otherwise required by and or for these said Companies and/or their relevant officers and legislation(s) so as to confirm my ownership and control of the shares and assets specified accordingly – and for both THE JET GROUP LIMITED and THE JET GROUP SERVICES LIMITED. I will correspond and communicate with Companies House and lawyers correspondingly such as to assist, enable and confirm your such actions as you are required and obliged to undertake and so as to affirm the lawful and legal compliance as is now required for these matters.

***(I will address THE JET GROUP SERVICES LIMITED myself and separately as appropriate as it only THE JET GROUP LIMITED that I understand you have taken sole control of (unlawfully I might add as I understand).***

4. I reiterate, please provide me with all access codes for THE JET GROUP LIMITED at Companies House as is now evidently and lawfully under my majority ownership immediately by return in response to this email.
5. In the event you do not comply with these urgent actions requested above, (as I hereby lawfully request, and which you are obliged to comply with, and are critically required so to enable my and others actions in the interests of the respective companies and businesses as are addressed herein), within 24 hours from the time that this correspondence is sent to you via email at the aforesaid multitude of emails detailed at the outset of this correspondence, I will undertake immediate legal action to address and ensure the completion of such actions in any event and seek to recover all legal costs incurred in full directly from yourself.

**I note, that I am aware and have been informed by many parties that you have been unlawfully withholding access codes and passwords for Companies House and for Company(s)' bank accounts historically. Please take note of the above and that this is absolutely now evermore so unlawful and will not be tolerated – as I trust I have conveyed above and herein.**

**I further note and comment below on some of the array of unlawful civil and criminal actions as I have been informed you have and / or are alleged and/or evidenced to have and/or be undertaking as have been addressed in separate correspondences and/or as are being investigated / to be investigated by respective current audits, governance investigations, and/or the future independent investigation and disclosure project proposed for the near future.**

I trust that I have hereby clearly communicated my demands and lawful requests regarding the aforesaid specified Trust(s) and the relevant associated matters and actions as are required and demanded herein.

Please be aware that this is an important document and whilst it conveys and communicates matters such as are actioned simply and immediately as a result of this correspondence, there are also the above specified additional proactive actions such as require your urgent and immediate attention as detailed.

Additionally, as I believe you are aware, there are also concurrently at this date other discussions regarding the shareholdings in the companies as are addressed herein. Please hereby be duly and categorically advised that these 'side' matters are intended to be addressed in isolation in due course / imminently and such as to try and achieve a just and equitable solution across all related parties.

But notwithstanding the above, you are hereby reiteratively further now again notified, that these such 'side' discussions do not in anyway affect the direct trust matters as are addressed herein, nor do they remove either your legal obligations as detailed herein or my said 'absolute entitlement' as aforesaid and such as, via this correspondence, hereby now irrevocably is resultant in the explained legal conclusions as have been outlined for your understanding and action and compliance above.

-----

**However, I would, regardless of above, hereby relay to you that is my wish and indeed I believe the wish of all relevant parties hereto to avoid conflict and simply seek resolution and progress by communication and professional interaction to complete all lawful actions and reach conclusions so as to ensure that the interests of the businesses are protected and enhanced in all aspects and thus such as can result in benefit and progress positively for all.**

**This said, such aspirations will of course likely require civil and professional interaction and communication by all. Respectively please feel free to contact Adam Voce if you wish to discuss any matters related to this correspondence or the matters addressed herein.**

-----

#### **A FINAL POINT REGARDING FALSE AND FRAUDULENT CLAIMS AS YOU HAVE MADE REGARDING THE MATTERS ADDRESSED HEREIN**

It is further hereby importantly noted that I and all parties as are copied in hereto and as are detailed below (*such as hereby confirm their support and verification of the truth and accuracy of the content as is conveyed to you herein*) are aware that you have recently filed an unlawful and fraudulent Statutory Demand against GCV LTD and relevant parties; moreover as is specifically relevant to this correspondence, it is noted that in your supporting letter and correspondence to this said Demand that you have fraudulently and unlawfully alleged that Mr Busfield 'insisted' you signed the Trust Documents referred to herein.

As both you and I are absolutely aware this is an absolute falsehood and a fraudulent claim. Accordingly, if it is of your consideration in reading this correspondence to try and further incriminate yourself and reiterate such a falsehood then I strongly advise you here directly that it is very likely not in your interests to do so.

Perhaps to illustrate some reasonings for this advise, firstly simply because your statements are known to be falsehoods and representative of fraud by yourself, and moreover can be extensively evidenced as such. You are more than aware that both you and I voluntarily signed the Trust Declaration(s) as relevant hereto, but moreover, you are I suggest able to recall that your signing of such documents was not made or given under any 'instance' but voluntarily and also not only witnessed by Mr Busfield, but also by two independent witnesses of upstanding and good character as *were Mr Edward Janes ACA and Mr N Ost (a Director of numerous Entities)*.

Moreover, all the above parties, including myself have now confirmed that they will each attest and confirm under oath their witnessing signatures and/or their visual observance of these facts and as represent the truth in this matter.

Additionally, whilst time and resources have not yet enabled the review and/or assimilation of further evidence regarding your aforesaid above false claims, if you continue to pursue and attempt to perpetuate your fraudulent claims here addressed, then the review of CCTV footage and all associated documentation will inevitably have to be undertaken.

In such an eventuality of such an unlawful decision by yourself, please hereby be advised that is the absolute and definitive opinion of myself and all other associated and / or affected parties, that not only will the costs of such investigations be sought to be recovered from yourself, but that we will pursue all legal actions and avenues as are available to us – via both the criminal and civil justice system – and we state this openly simply because it is known and can be evidenced that your statements as have been made are false and fraudulent and risk significant harm to numerous innocent parties.

This is my and all above and below parties detailed belief. But ultimately any decision or action is yours.

I will assume that you will not be perpetuating your such claims and will thus duly and lawfully action the requests as included and detailed herein. Albeit, no doubt you will advise and/or not comply thereto if you wish to take action such as will duly inevitably demonstrate that this stated assumption is incorrect. I truly hope that this is not the case.

Thus, in order to try and be positive – I look forward to your provision of the above requested access codes as requested for companies house and ideally if I may be so bold your assistance post in helping to resolve the above aforementioned 'side' matters as to sort shareholdings and such equitably across all relevant parties as id deemed and as may be agreed appropriate.

It is noted respectively that you will still, even post the results of the demands hereto, still be holding 24% under trust of the relevant entities and such as perhaps may assist you / all in being able to reach a positive and financially advantageous, fair and equitable and appropriate and lawful solution to the 'side' matters as have been referred to herein.

Regardless, I look forward to hearing from you shortly.

Please reply via email to my email address as is [id@g-cv.com](mailto:id@g-cv.com).

Please note, as inferred above, all signatories as are provided together with my own have reviewed and approved and agreed the content in this correspondence as to represent the truth and the facts accurately and comprehensively as relevant.

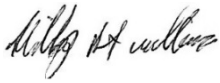
Yours Sincerely



**Mr I Dimitrov**  
Trust Beneficiary

-----

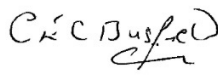
*As stated above, please hereby be advised that all the parties as are signatories below have reviewed, approved and agreed the content within in this correspondence such as it represents the truth and the facts accurately and comprehensively as are relevant to the matters addressed herein.*



**Mr P R Williams**



**Miss D Shtereva**



**Mrs C Busfield**



**Mr G Busfield**



**Mr A Voce**

*Furthermore, all such signatories / parties, and also Mr Ost and Mr Janes have confirmed that they will willingly attest to their signatures and the voluntary provision of all such signatures and/or witnessing to the Trust Declarations as are relevant to the matters hereto insofar as to the parties as have been detailed hereto as relevant to such accordingly.*

-----