

Mr Adam Voce, GCV LTD  
The Foxdales, 51 Close Lane  
Alsager, Cheshire, ST7 2JS  
[adam@g-cv.com](mailto:adam@g-cv.com)  
07785 227586

Jason Earl, J Earl Ltd  
71-75 Shelton Street  
London, WC2H 9JQ  
[jaseearl@gmail.com](mailto:jaseearl@gmail.com)  
07479359581

**AS TO BE COPIED TO:**

**The Court**, Thomas More Building, Royal Courts of Justice, Strand, London, WC2A 2LL

(RE: Response to Unlawful Statutory Demand & request to set aside and for injunction restraining false "Creditor" presenting or advertising winding-up petition)

**THE RELEVANT STAKEHOLDERS & PROFESSIONAL ADVISORS BELOW:**

*(Note: As include the legal and independent professionals and advisors who can validate matters herein, and/or are (and/or have been / are to continue to be) advising on such issue(s), and/or those materially connected / referred hereto); but in all instances as to share correspondence transparently with such parties so to enable & facilitate just resolution(s) to this matter and the other serious related matters forthwith asap).*

**All Directors & Majority Shareholders, as Detailed herein, as referred to as the "OWNERS-DIRECTORS" or otherwise.**

**Albie Turner FCCA**, VERSA Accountants, Auditors & Secretarial, Unit 2 99-101 Kingsland Road, London, UK, E2 8AG. [lbie@versaaccountants.co.uk](mailto:lbie@versaaccountants.co.uk)

**Richard Rones ACA**, Insolvency Practitioner, Director, ThorntonRones Ltd, 311 High Road, Loughton, Essex IG10 1AH. [ones@thorntonrones.co.uk](mailto:ones@thorntonrones.co.uk)

**The Kiris Group**, Corporate Intelligence & Investigation Services, 4th Floor, 166 College Road, Harrow-on-the-Hill, HA1 1BH. [info@kirisgroup.com](mailto:info@kirisgroup.com)

**David Bailey LLP**, Partner, Head of Dispute Banking & Finance (Civil), 8-9 Old Steine, Brighton, East Sussex, BN1 1EJ. [David.Bailey@healys.com](mailto:David.Bailey@healys.com)

**Brian O'Neill QC**, Business Crime, 2 Hare Court, Temple, London, Greater London, UK. EC4Y 7BH. [David.Bailey@healys.com](mailto:David.Bailey@healys.com)

**Andrew Marshall**, Partner, (Fraud, Financial Crime), 5 Cock Lane, London, EC1A 9BW. [andrewmarshall@emmllegal.com](mailto:andrewmarshall@emmllegal.com)

**Tamlyn Edmonds**, Partner, (Fraud, Financial, IP & Cyber Crime), 5 Cock Lane, London, EC1A 9BW. [tamlynedmonds@emmllegal.com](mailto:tamlynedmonds@emmllegal.com)

**NFU Insurance, DAS Legal Expenses Insurance**, DAS House, Quay Side, Temple Back, Bristol BS1 6NH. Confidential

**LV Insurance, Arc Legal Assistance**, PO Box 8921, Colchester, CO4 5YD. Confidential

**Royal & Sun Alliance Insurance plc, Legal Expenses Cover**, St Mark's Court, Chart Way, Horsham, West Sussex RH12 1XL. Confidential

**Mr Nicholas Ost**, (As Independent Attesting Witness to relevant documentation herein),

**Mr Edward Janes ACA**, (As Independent Attesting Witness to relevant documentation herein),

**URGENT & CONFIDENTIAL**

16<sup>th</sup> July 2019

Dear Mr Earl and J Earl Ltd,

**RE: Your False Claim(s) for Payment and Issuance of Unlawful Statutory Demand (as evidences abuse of process)**

Please note that this correspondence is sent by myself on behalf of myself and the other numerous parties as are detailed, and whom have confirmed their support of the contents of this correspondence absolutely.

Please further note, (given the content of this correspondence, and the false claims, defamatory statements and unlawful statutory demands as you have made respectively), this correspondence is also copied, provided and sent to the other stated parties as detailed herein, and includes the court for obvious reasons – i.e. predominantly such as to ensure justice is attained and secured in regards to these matters.

**SUMMARY**

1. All relevant claim(s), as you have made such as to claim that you are a creditor, entitled to a debt and payment, from GCV Ltd, (and/or Mr Dimitrov, and/or Mr Busfield and/or Mr Voce), and/or as you have detailed in the Statutory Demand you served to GCV LTD on the 28<sup>th</sup> June 2019 relatedly, are hereby disputed absolutely and known and evidenced not to be due.
2. Furthermore, it is also believed, known and evidenced, that you have falsely fabricated these claims, and that in your issuance of said Statutory Demand, and the accompanying statements, accusations and acts, as you have detailed in your array of associated correspondence(s), that you clearly intend to continue to undertake extensive unlawful criminal and civil actions to seek financial reward for yourself regardless as to the law, or the harm you cause innocent parties as a result.

3. It is worthy of note that the initial allegations and/or knowledge of your (and your accomplices) unlawful intentions and actions were identified in earnest back in 2018 and duly referred to the appropriate legal and Accounting, Audit professionals at that time and such that evidence has been captured accordingly as part of the current Audit processes, and/or other Governance Investigations.
4. Given the extent of the matters highlighted in “3” clearly relate to wider issues than those as now need to be urgently addressed herein, they are being addressed concurrently and collaboratively by the relevant companies, individuals and legal / financial professionals separately. I understand that further correspondence will follow in due course accordingly.
5. Congruently, specific key points regarding, refuting and evidencing your false and unlawful demand(s), and Statutory Demand, for payment to yourself are detailed below.

**SPECIFIC POINTS OF FACTS & EVIDENCE AS EVIDENCE NO DEBT TO YOU IS DUE AND YOUR STATUTORY DEMAND IS UNLAWFUL, FRAUDULENT AND AN ABUSE OF THE STATUTORY DEMAND PROCESS**

1. A copy of this correspondence and related forms are concurrently provided to all relevant entities and for the Court’s attention appropriately.
2. It is noted you have provided no actual contract or relevant legal documentation to support your claim(s) – save only your only fabricated letters and invoices – this is because none exists to support your false claim(s).
3. It is believed that you have tried to unlawfully capitalise on Mr Busfield’s illness (and thus lack of ability to attend the office or respond to matters) such as to attain financial benefit for yourself.
4. GCV is a business services company and has no commercial agreements with you (as Jason Earl and/or as J Earl Ltd) and moreover has no need or use of the IP you refer to.
5. Unbelievably, you do NOT even own the IP that you allege you do and that you base your false claim upon. At best you have forgotten the actual facts and contracts as were related accordingly, at worst this is but yet another attempt to ignore the law and seek unlawful financial reward for yourself via either blackmail and/or abuse of the Statutory Demand process as evidenced hereto.
6. The actual factual and lawful relevant documentation - predominantly pertinent to point 5 – are duly provided and available to the court, legal advisors, and the accountants and auditors.
7. Again, as arguably unbelievable, given the fundamental implication(s) on this matter and as clearly evidences the inappropriateness, unlawfulness and abuse of process by the issuance of your statutory demand, you don’t own any of the relevant entities thereto your claims, and moreover such entities are owned by the majority shareholders as support this correspondence and entirely refute and reject your claims and demands for monies as you have demanded respectively.
8. Again, the actual factual, lawful and relevant definitive documentation - predominantly pertinent to point 7 – are duly provided for the court and the appropriate legal advisors, and the accountants and auditors – and such as includes Declarations of Trust(s) as you refer to and other supportive evidential documents that you seem (conveniently) to have completely ignored in your correspondences and Statutory Demand.
9. Your correspondences and Statutory Declarations contain so many falsehoods, defamatory statements, and untruths that it is impossible to address them here. However, a few pertinent illustrations are addressed, refuted and reportedly detailed as to their falsehoods below:
  - a. Firstly, as stated repeatedly the debt is absolutely refuted and not due.
  - b. Mr Earl does not own the IP he refers to.
  - c. His statements re shares and pay are untrue and inaccurate materially.
  - d. His allegations of fraudulent unlawful actions at companies house are untrue and false and uninformed
  - e. His allegations of ‘insistence to sign’ documents are false and untrue and defamatory.
  - f. His claims are simply not due and false.

**All points in 9 can be extensively evidenced.**

10. It is further to “9” worth of note that it also evidenced and known, such as is believed to indicate your bad character, that you have also additionally recently and relentlessly actioned the following further threats and defamations to various associated parties (in response to them not “doing what you want”:
  - a. Threatened and/or falsely reported Mr Bailey to the SRA (Solicitors Regulation Authority)
  - b. Threatened and/or falsely reported Mr Turner to the ACCA (Association of Chartered Accountants)
  - c. Threatened and/or falsely reported Mr Voce, Mr Busfield, GCV, VERSA Accountants, Mr Dimitrov, Mr Williams to the HMRC and likely array of other authorities.
  - d. You have either claimed signatures have been forged, or that you were ‘forced’ to sign an array of documents that you don’t want to exist – again conveniently(?) as would lawfully prevent your unlawful intents – but as are supported and witnessed by numerous professional individuals and persons of good character and such as have already confirmed their agreement(s) to attest to the validity and truth of the correct and legal signatory to such documentation(s).
  - e. You have actioned and ignored an array of actions in breach of your fiduciary duties and as include a multitude of fraudulent actions and submissions to Companies House (Again all of which can be evidenced beyond any doubt my many independent and/or relevant senior individuals.
  - f. You have mocked and marginalised and discriminated and defamed Mr Busfield’s illness despite such being longstanding and evidenced via his GP and one of the Country’s leading Consultants – clearly believing your Medical diagnosis is more helpful to support your said unlawful activities.
11. Additionally, whilst your demand(s) for payment(s) detailed herein are wholeheartedly & absolutely rejected, both GCV LTD and other Companies detailed and referred and/or connected hereto, have valid, due and evidential costs that you are due to settle and pay thereto, such as being calculated and evidenced at this time.
12. As a minor point perhaps, but it is also noted that Mr Busfield provided you with an initial response to your claim(s) of relevance here, explaining that he was n ill health but would do his best to reply as soon as possible – whereby you deemed it appropriate to provide a two day extension save as to you progressing your false and fraudulent claims and issuing a Statutory Demand. 2 Days? Surely even Mr Earl can recognise that such timeframe is entirely inappropriate in any normal circumstance, never mind where someone is in ill health? And moreover, that would be obviously where an valid and non false and fraudulent claim was being made – which as communicated and as evidenced is clearly not the case here for Mr Earl / J Earl Ltd.

## **CONCLUSION AND ACTIONS AS ARE TO BE AND MUST NOW BEEN UNDERTAKEN**

### **CONCLUSION**

1. Mr Earl and J Earl Ltd’s debt is disputed in entirety and absolutely. It is known and evidenced to be fabricated, not due and believed to be part of an array of unlawful actions as are being undertaken by Mr Earl such as whereby he is seeking to unlawfully and fraudulently attempt to attain financial reward for himself and as to which he is absolutely, definitely and again evidentially not due.
2. Whilst Mr Earl, J Earl Ltd have provided no material or actual supporting documentation or lawful evidential contracts, GCV LTD and the associated parties hereto (such as support this correspondence absolutely) have an extensive volume of clear, lawful, factual and definitively supporting evidence such as to refute and evidence the falsehoods of Mr Jason Earl’s and J Earl Ltd’s claims addressed herein.
3. Further relevant to “2”, these documents and evidence have and are provided with full transparency for the court and all the independent professional advisors and lawyers and accountants and auditors and Directors and majority shareholders and other government or other bodies.
4. As per the request below, Mr Earl and J Earl Ltd are requested to immediately redact, rescind and cancel the Statutory Declaration as he / they have issued and ensure that evidence of such is passed to GCV LTD in response to this correspondence via email to [adam@g-cv.com](mailto:adam@g-cv.com) today.
5. Given it is anticipated, given Mr Earl’s historic behaviour(s) and unlawful misconduct(s), that Mr Earl will not demonstrate any such integrity of action as per “4” above, GCV LTD and the relevant supporting parties and professional advisors have and/or will duly complete the following:
  - a. application to the court to have the Statutory Demand “Set Aside” for reasons defined herein.

- b. Prepare application to seek and ask the Court to issue an injunction as appropriate such as to restrain this false “creditor” from presenting or advertising a winding up petition in any event.
  - c. Share all such details and supporting evidence with the court and due independent professionals and advisors – including (as stated) lawyers, accountants, insolvency practitioners, auditors, Corporate Intelligence and Investigation Consultants, Directors, Majority Shareholders, and government bodies and other entities as appropriate to ensure transparency and lawful compliance absolutely.
6. GCV LTD also hereby declares that it will seek the costs (court costs and/or otherwise) as it has and/or may duly incur as a result of Mr Earl / J Earl Ltd’s unlawful actions defined herein.
  7. GCV LTD reiterates for the court’s attention – that Mr Earl’s demands are an evidential flagrant abuse of the Statutory Demand process and moreover as is deemed to evidence blackmail and fraud, in correlation with other evidence and investigations as are ongoing.

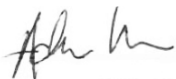
**ACTIONS NOW REQUESTED BY MR EARL & J EARL LTD.**

1. In alignment and accordance with above points, to immediately redact, rescind and cancel the Statutory Declaration as he / they have issued and ensure that evidence of such is passed to GCV LTD in response to this correspondence via email to [adam@g-cv.com](mailto:adam@g-cv.com) today.
2. To make an immediate offer of settlement to compensate GCV costs incurred as a result of these matters.
3. To approach Mr Voce and offer to engage in discussions such as to resolve these matters and such as to limit the harm caused by them accordingly by Mr Earl and J Earl Ltd.

**ACTIONS GCV LTD TO NOW COMPLETE / REVIEW / ASSURE**

1. In alignment and accordance with above points, GCV LTD and relevant supporting parties and professional advisors will action the points identified in the “Conclusion” above under point “5”.
2. GCV will disburse this communication to Mr Earl and his legal representative (per the Statutory Demand) such as to request for the redaction of the Statutory Demand, compensation of costs and agreement to engage in discussions to address and limit the harm caused by these matters.

Yours Sincerely,



Mr Adam Voce,  
Director GCV

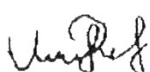
And On behalf of (as confirm such below):

- (1) Mr I Dimitrov, Director of GCV\*, JET\*, JETS\*, RAN\*, Unit 2 99-101 Kingsland Road, London, United Kingdom, E2 8AG  
*(Majority Shareholder of GCV\*, JET\*, JETS\* and TTN\* directly and/or via Trust(s) and/or as a Trustee)*
- (2) Mr A Voce, Director of GCV\*, The Foxdales, 51 Close Lane, Alsager, Cheshire, United Kingdom, ST7 2JS  
*(Joint Majority Shareholder of GCV\*)*
- (3) Mr P R Williams, Director of JET\*, JETS\*, RAN\*, TTN\* Unit 2 99-101 Kingsland Road, London, United Kingdom, E2 8AG
- (4) Miss D Shtereva, Director TTN\*, Unit 2 99-101 Kingsland Road, London, United Kingdom, E2 8AG  
*(Miss Shtereva is a Majority Shareholder of TTN\* directly and/or via Trust(s) and/or as a Trustee)*
- (5) Mrs C Busfield, Field House, 59 Stafford Road, Stone, Staffordshire, ST15 0HE,  
*(Mrs Busfield is Majority Shareholder of RAN\*, JET\*, JETS\* and TTN\* directly and/or via Trust(s))*
- (6) Mr George Busfield, Field House, 59 Stafford Road, Stone, Staffordshire, ST15 0HE.

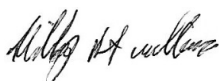
**Whereby:**

All parties above are together referred to as the “OWNERS-DIRECTORS” unless otherwise stated  
GCV\* refers to GCV LTD, RAN\* refers to Realtime Analysis and News Limited, TTN\* refers to Trade The News Limited  
JET\* refers to The Jet Group Services Limited, and JETS\* refers to The Jet Group Limited, (JET\* and JETS\* are together referred to as JET(S))  
“RANSquawk” and “Talking-Forex” are trading businesses as are, or have been, owned by above Companies<sup>^</sup>. (<sup>^</sup>excluding GCV LTD)

**The “OWNERS-DIRECTORS”**



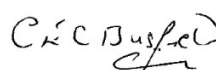
Mr I Dimitrov



Mr P R Williams



Miss D Shtereva



Mrs C Busfield



Mr G Busfield

