

----- Forwarded message -----

From: **Michelle Johnson** <mjohnson@bartlettslaw.co.uk>

Date: Fri, May 10, 2019 at 4:29 PM

Subject: RE: Hearing on 20th May 2019 at 12:30pm Liverpool District Registry

- Our Ref: PNB/BAN46 - Chronology for Court - EMAIL 1 of 2

To: Dr Mark Jones <mark@myvibe.net>

Dear Dr Jones

**RE: Hearing on 20th May 2019 at 12:30pm Liverpool District Registry**

**Our Ref: PNB/BAN46**

**Chronology for Court**

**EMAIL 1 of 2**

With reference to the above, please find attached letter for your kind attention.

Kind regards,

Michelle Johnson

For and on behalf of Bartletts Solicitors Limited

Bartletts Solicitors, 16 Nicholas Street, Chester, CH1 2NX

Telephone: 01244 313301 | Website: [www.bartletts.co.uk](http://www.bartletts.co.uk)

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# HOOLE SURGERY

N81102 G/870660/3

DR. A. K. BLAND B.Sc M.B Ch.B  
anthony.bland@gp-n81102.nhs.uk  
DR. D. A. KING DCH MRCP DRCOG  
dorothy.king@gp-n81102.nhs.uk

71 Hoole Road  
Chester CH2 3NJ  
Tel: 01244 325721  
Fax: 01244 313836

Tuesday the 16th of October, 2007

Dr. C. Gilmore  
Memory Clinic  
Countess of Chester Hospital  
COHealth Park  
Liverpool Road  
Chester

Dear Dr. Gilmore,

Re: Mrs. Mavis Banks; 22/06/1929; Tel: 343665; NHS No: 6327483372  
Address: 32 Hoole Road, Hoole, Chester, CH2 3NJ

Thank you for seeing this seventy-eight year old lady, who is suffering from some loss of memory, and from confusion.

She first presented in September of this year, accompanied by her daughter and partner, both of whom had become increasingly concerned at the lapses in her memory. It appears that Mrs. Banks has had increasing difficulty in managing her day-to-day personal and business affairs, and appears to be unaware of what needs to be done in the running of her Bed and Breakfast business. She has also been going out on specific errands or other business, but then forgetting why she has gone out. Her daughter states that Mrs. Banks's short-term memory is severely impaired, and that this is coupled with a fairly mild paranoia relating to her belief that small items that she has in fact mislaid have been stolen. She is also concerned that her daughter is trying to take control of her finances, and believes that any effort on her daughter's part to have her assessed in the Memory Clinic is part of this.

In view of this, I should be most grateful if this lady could be seen and assessed rather soon.

Many thanks for your help in this matter.

Yours sincerely,

Dr. A. K. Bland.

# Exhibit 038 & 039

EXHIBIT 038

Matthews  
& Goodman

Property Advisers

196 Deansgate Manchester M3 3WF

tel. 0161 839 5515 fax. 0161 839 5590 www.matthews-goodman.co.uk

direct dial. 0161 214 4667 mobile 07884 117805 devans@matthews-goodman.co.uk  
secretary direct dial. 0161 214 4358/4669/4697

DE/SLJ

R Grimshaw Esq

BY HAND

24 October 2007

Dear Robin

## CAPITAL GUEST HOUSE, HOOLE, CHESTER

Thank you for attending the meeting with Chris Coan of Visual Metrics on Friday. I hope you found the meeting useful and I am pleased to confirm we are now in a position to come forward with a formal written offer for your client's freehold interest in the above property. For ease of reference, I set out below the precise terms of the offer.

1. Purchaser: Chris Coan of Visual Metrics
2. Purchase Price: £600,000 (Six Hundred Thousand Pounds), subject to contract and exclusive of VAT.
3. Conditions: The offer is made subject to the following conditions:
  - i) Acceptable valuation
  - ii) Building survey
  - iii) Confirmation from the Local Planning Authority that a change of use to office will not be contentious.
  - iv) Confirmation of Title
  - v) Attainment by the purchaser of an appropriate architect's scheme for the internal redesign of the property.
4. Whilst the offer is not subject to the achievement of an acceptable planning permission for a single storey extension to the rear of the property, the Purchaser will have the right to submit an application, without objection from the vendors, prior to the exchange. The application will be for a single storey extension will be provided, roughly covering the existing area covered by the more modern buildings to the rear of the property. This is unlikely to be contentious with the Local Planning Authority.
5. It is proposed that the sale will be dealt with by way of a transfer of a going concern (TOGC) for VAT purposes.
6. Timing: It is proposed an exchange of contracts will take place before Christmas, with a completion to take place at a mutually agreed time, not to be later than the end of February 2008.



M:\Manchester Investment\Dominic\2007\October\231007-R Grimshaw HOTs.doc

**Evidence**

CRAIG HARRISON 28 NORTHFIELDS BRADBY SEABY 4085JS.

I the under sign agree to the following statements on past events is true.

In the past Mavis Banks was of sound mind but was physically ill at times.

She owns a Guest House at 32 Hoole Road, Hoole, Chester. CH2 3NJ.

Mavis Banks has a son called Dr Mark Jones.

My statement.

On many occasions I have seen Mavis Banks become upset by Vicky Boulbee who wanted Mavis Banks to sell the guest house (32 Hoole Road, CH2 3NJ).

Mavis Banks did not want to sell it.

On one occasion I was here and Vicky Boulbee got an estate agent to value the property and Mavis Banks did not know about this and was not happy about this event. Mavis Banks said clearly she did not want to sell it.

 3/6/13

I the under signed witnessed the above.

**Witnessed by:** M. EVANS

Signed: 

1, KEFFI STREET,  
HOLYHEAD,  
GWYNEDD LL65 2BR.

Date: 3/6/13

**Second witnessed by:** J. TINGEY

Signed:



Date: 3/6/2013,

67, KENTMELE DRIVE, PENSBY, WIRRAL,

C.O. G. 

3/6/2013





Cheshire and Warrington Partnership NHS Foundation Trust

Chester Community Mental Health Team for Older People  
 Oxton Lea Resource Centre, Bowmore Hospital  
 Liverpool Road, Chester  
 CH2 1BQ

Telephone No (01244) 364423  
 Fax No (01244) 364301

Consultant: Dr. C. Gilmore  
 Reference: CD/CAG/Banks M.  
 Type of Attendance: Outpatient Clinic  
 Date of Attendance: 29<sup>th</sup> January 2009  
 Date: 12<sup>th</sup> February 2009

Dr. A. Bland  
 Hooke Road Surgery  
 71 Hooke Road

Chester  
 CH2 3NJ

Dear Dr. Bland,

Mavis Banks DOB 22/06/1920  
 32 Hooke Road, Chester CH2 3NJ

CPA Level Standard

ICD 10 Diagnosis Possible Alzheimer's Disease late onset (F00.2)

## Current Issues

I reviewed Mrs. Banks at outpatient clinic with her daughter on the 29<sup>th</sup> January 2009. Mrs. Banks appears to be doing reasonably well and there does not appear to have been any significant deterioration in her memory over the last three months. Unfortunately, she has decided against selling her bed and breakfast business. She says she has always been a business woman and she cannot envisage a future where she is fully retired. I think this is regrettable as she clearly has memory problems and I can envisage there will be increasing difficulties for Mrs. Banks in managing her property and business over the next years. Her daughter tells me that she is not too concerned about her mother at the present time. She has a reasonable amount of supervision through her friend Howard and through Heidi who visits the property on the Hooke Road every day. Mrs. Banks has been in the habit of misplacing money, she takes money from her residents and will hide it around the house before it is found and then banked by Heidi. Since her last clinic appointment Mrs. Banks has been to see a solicitor, her friend Howard who is himself 93 has been appointed to be Power of Attorney should she lose capacity to deal with her own finances.

I retested Mrs. Banks today and she once again scored 20/20 on the mini mental state examination. I have explained to her that she has significant memory problems and as a result of this she would be better in the longer term if she would consider retiring from her business. She however cannot be persuaded that this is the right course of action. She has



made a decision not to take the risk of worsening her seizures by taking any of my anti dementia medication and her daughter is in agreement with this decision.

Mrs. Banks and her family are happy with the current situation but of course this may change over the months to come so I have made arrangements to review her again in clinic in six months time.

Yours sincerely,



**Dr. C. Durnin (Care Co-Ordinator)**  
**Associate Specialist in Psychiatry**





Cheshire and Wirral Partnership **NHS**  
NHS Foundation Trust

Chester Community Mental Health Team for Older People  
Upton Lea Resource Centre, Bowmere Hospital  
Liverpool Road, Chester  
CH2 1BQ

Telephone No (01244) 364423  
Fax No (01244) 364301

Consultant: Dr. C. Gilmore  
Reference: CD/CAC/Banks M.  
Type of Attendance: Outpatient Clinic  
Date of Attendance: 29<sup>th</sup> January 2009  
Date: 12<sup>th</sup> February 2009

Dr. A. Bland  
Hoole Road Surgery  
71 Hoole Road  
Chester  
CH2 3NJ

Dear Dr. Bland,

Mavis Banks DOB 22/06/1929  
32 Hoole Road, Chester CH2 3NJ

CPA Level Standard

ICD 10 Diagnosis Possible Alzheimer's Disease, late onset (F00.1)

Current Issues

I reviewed Mrs. Banks at outpatient clinic with her daughter on the 29<sup>th</sup> January 2009. Mrs. Banks appears to be doing reasonably well and there does not appear to have been any significant deterioration in her memory over the last three months. Unfortunately, she has decided against selling her bed and breakfast business. She says she has always been a business woman and she cannot envisage a future where she is fully retired. I think this is regrettable as she clearly has memory problems and I can envisage there will be increasing difficulties for Mrs. Banks in managing her property and business over the next years. Her daughter tells me that she is not too concerned about her mother at the present time. She has a reasonable amount of supervision through her friend Howard and through Heidi who visits the property on the Hoole Road every day. Mrs. Banks has been in the habit of misplacing money, she takes money from her residents and will hide it around the house before it is found and then banked by Heidi. Since her last clinic appointment Mrs. Banks has been to see a solicitor, her friend Howard who is himself 93 has been appointed to be Power of Attorney should she lose capacity to deal with her own finances.

I retested Mrs. Banks today and she once again scored 20/30 on the mini mental state examination. I have explained to her that she has significant memory problems and as a result of this she would be better in the longer term if she would consider retiring from her business. She however cannot be persuaded that this is the right course of action. She has



made a decision not to take the risk of worsening her seizures by taking any of my anti dementia medication and her daughter is in agreement with this decision.

Mrs. Banks and her family are happy with the current situation but of course this may change over the months to come so I have made arrangements to review her again in clinic in six months time.

Yours sincerely,



**Dr. C. Durnin (Care Co-Ordinator)**  
Associate Specialist in Psychiatry

Chester Community Mental Health Team for Older People  
Upton Lea Resource Centre, Bowmere Hospital  
Liverpool Road, Chester  
CH2 1BQ

Telephone No (01244) 364423  
Fax No (01244) 364301

*Scan*

**Consultant:** Dr. C. Gilmore  
**Reference:** CD/CAC/Banks M.  
**Type of Attendance:** community visit  
**Date of Attendance:** 1<sup>st</sup> November 2007  
**Date:** 1<sup>st</sup> November 2007

Dr. A. Bland  
Hoole Road Surgery  
71 Hoole Road  
Chester  
CH2 3NJ

Dear Dr. Bland,

**Enhanced Care Plan**

**Mavis Banks** DOB 22/06/1929  
32 Hoole Road, Chester CH2 3NJ  
**Diagnosis :- Organic Manic Disorder (F06.3)**  
**Dementia – Unspecified (F03.3)**

**Current Issues**

I reviewed Mrs. Banks at home with our CPN Karen Sanders on the 1<sup>st</sup> November 2007. I am pleased to say that Mrs. Banks anxiety and agitation has lessened over the last 2-3 days but she remains loud, garrulous and rather volatile. I was struck by how disorganised and chaotic her living conditions are. She made multiple entries in her diary in an attempt to keep track of recent events and I found her still to be rather religious making frequent signs of the cross throughout the time I was with her.

I was able to obtain a little history from her partner who was also present but he again was very difficult to pin down. He described Becky as always being rather eccentric and garrulous but he did admit that this had been more marked over recent months and has certainly been worsened by the events within the bed and breakfast last week. He told me that she is unable to manage her finances and has been hiding money in jars all over the living quarters. She is increasingly irritable and angry and he described her as being irresponsible with money.

I believe that Becky did agree to sell her bed and breakfast and move in with her daughter and son in law but she abruptly changed her mind and has subsequently been quite abusive to her daughter and son in law accusing them of trying to steal her money. Mrs. Banks partner says that this attack was quite unjustified and that Becky was the one who altered her plans at the last minute with some support from her son.

**Care • Well-being • Partnership**

**Adult and Older People's Mental Health Services**

*MIA*

*Phds all taken down never visited*



Mental State Examination

Mrs. Banks was still dressed entirely in black with her rosary beads around her neck and she made frequent signs of the cross throughout my visit. She did however recognise me immediately and I found her alert and talkative and quite a lot more settled than when I saw her a week ago. She was however still very volatile. She shouted aggressively at her partner on numerous occasions and she continues to be grandiose and a little disinhibited with marked pressure of speech. She also has mildly persecutory ideas regarding her monetary situation.

I was finally able to complete a mini mental state examination and she scored 26/30. Although fully orientated in time, place and person with good concentration she was unable to recall three items after five minutes and showed evidence of quite severe dyspraxia. She has difficulty in retaining and learning new information and on cursory testing I did wonder whether she had some difficulty with her frontal lobe functions.

Risk Assessment

Mrs. Banks remains very volatile but her level of impulsiveness appears to have reduced and she is no longer voicing ideas of self harm. Although it has been difficult to obtain a pre-morbid personality it would appear that existing personality traits have become more marked over recent months and I think are of sufficient severity to diagnose her with an organic manic disorder. I think it is impossible to assess her cognitive functioning until her mood is more settled and so I will be asking you to prescribe an anti psychotic. I am aware however that there is a risk of the seizure threshold being reduced by the introduction of such medication.

Interventions

I would be grateful if you could prescribe Olanzapine 2.5 mgs in the morning. Mrs. Banks remains on enhanced CPA and will be followed up regularly by her CPN and myself. When her mood is more settled she will need more in depth cognitive assessment. I have contacted Walton Hospital requesting that her neurosurgical review is brought forward. It is a little unusual for a lady who present so acutely and I would like their opinion as a matter of urgency.

Appointment

I will make arrangements for her to be seen again in community clinic in four weeks time.

Yours sincerely,

  
Dr. G. Durnin

Associate Specialist in Psychiatry

CPN Ros Curtis  
CMHTOP, Chester  
Upton Lea Resource Centre

*do this please  
San letter on  
asap*

## Witness statement

**1** Enter your full name

I,

**1** Victoria Jane Pauline Boulton

**2** Enter your occupation or description

**2** Retail Assistant Manager

**3** Enter your full address including postcode or, if making the statement in your professional, business or other occupational capacity, the position you hold, the name of your firm or employer and the address at which you work

of

**3** 110 Broughton Hall Road  
Broughton  
Chester  
CH4 0QN

☒ am a party to the proceedings

☐ am employed by a party to the proceedings

and state that:

**4** Set out in numbered paragraphs indicating:

- which of the statements are from your own knowledge and which are matters of information or belief, and
- the source for any matters of information or belief.

Where you refer to an exhibit, you should state the identifier you have used. For example, 'I refer to the (description of document) marked Exhibit A...'

**4** I was appointed as joint attorney for Mavis Vicky Rebecca Banks, my mother, with my brother Mark Robert Edward Jones in August 2010 however, we have not been able to work together due to differences of opinion regarding the care my mother should receive, management of Capital Guest House and the payment of bills, both business and personal on behalf, of my mother. Consequently, I asked the Public Guardian to intervene and investigate the suitability of my brother to act on behalf of my mother.

With regard to the care my mother requires, she suffers from Alzheimer's disease and has had a series of strokes, the most serious in 2010. These health issues have necessitated 24 hour nursing care (I refer to the document from Western Cheshire Exhibit A) which cannot be provided at home and so she is resident in Oaklands Nursing Home Hoole Chester which is easily accessible to both myself and my brother. Both my brother and I visit my mother on a regular basis, taking her out when appropriate and she is able. One of the main disputes between my brother and I has been the payment of the bills for Oaklands Nursing Home as he did not agree, despite the assessment to the contrary, that my mother should be liable for payments. I have recently made arrangements for the bills to be paid from her pension payments as I am Appointee for the DWP. It is my understanding that my brother still wishes my mother to return home to Capital Guest House but both I, her carers and doctors do not believe that this would be in her best interests (I refer to the Best Interests Meeting minutes dated 9/9/2011 marked Exhibit B).

With regard to Capital Guest House my mother ran this as a successful business for many years (approximately 40 years) however, she became unable to manage as her health deteriorated and wanted to sell the property. The property was marketed several times but as soon as my brother discovered this was the case he became very aggressive and annoyed, threatening my mother that if she did not take the property off the market she would never see him again, consequently, my mother did not manage to sell the property before she became too ill to sign the necessary paperwork. My brother has moved into the property since my mother was admitted to Oaklands and has been overseeing the running of the business, but was commuting between there and his family

continued over



4

(partner Flora and 2 year old daughter Alexi) in London until his Flora and Alexi went on an extended holiday to New Zealand at the end of January 2013 to visit Flora's family. My brother has instructed the accountants not to show me the details of income and expenditure from the business and they have confirmed that they do not believe that most transactions are paid into or out of the bank account, this is very worrying to me as proper records do not appear to have been kept (I refer to the documents from Hall Livesy Brown Accountants marked Exhibit C). There is no apparent record of the lettings and tariffs charged. The business, which once had a good reputation, appears to be being run into the ground with poor reviews on Trip Advisor and the general state of the property is deteriorating, many decisions seem to have been made regarding replacement of furniture, building works etc without consultation with me as joint attorney and no record of where the funds came from to pay the resulting bills (I refer to the package of documents including receipts and photos marked Exhibit D).

Since I made my original application to the Court I have become aware that there may be more accounts in my mother's name but as these are basically dormant accounts mostly with small balances, except for a Nationwide account which may have approximately £40,000.00 invested, I do not believe that these have been accessed recently and were omitted from my application in error as I had forgotten about them.

I am concerned that if Mark is appointed as Deputy for my mother he will appropriate any funds for a possible refurbishment of the Capital Guest House instead of using them directly for the benefit of my mother, including payment of her bills and ensuring her continued care at Oaklands. My mother's original intention was to appoint me solely as her Attorney, as I was living nearby and Mark was living in London, but when Mark discovered this he was annoyed with my mother and I believe his reaction caused my mother to alter her original instructions and have us both appointed jointly. We were not appointed jointly and severally as my mother was concerned that if one of us made a decision the other would not be consulted and this would lead to conflict between us.

One of my major concerns is a credit agreement, originally signed by my mother in August 2010 for a period of 10 months but these payments are still being deducted from her current account, I have not been asked to sign or counter-sign any subsequent agreement paperwork but believe that paperwork must have been signed for these payments to still be being made.

Mark instigated a claim for clinical negligence on behalf of our mother, against The Countess of Chester Hospital in approximately October 2011 and asked his solicitors in this matter (Oliver & Co of Douglas House 117 Foregate Street Chester CH1 1HE) to ask me to approve his sole dealing with this matter. I refused as I was appointed as the joint attorney and as such expected to be involved in all aspects of my mother's affairs.

I also believe that if Mark was appointed as Deputy he would remove my mother from the nursing home, which would not be in her best interests and, in my belief, could accelerate her demise. He would put pressure on my mother, as he has in the past, she is vulnerable and open to suggestion, especially if threatened with no longer seeing her son. He does not seem to be able to accept that my mother no longer has the capacity to make her own decisions regarding her personal or financial affairs. I usually find my mother in good spirits when I visit as she seems to enjoy the company of the staff, but she does comment that the other residents are "old"! I do acknowledge that Mark does take my mother out eg to church or for coffee but as far as I am aware, he does not fund this himself but uses my mother's funds.


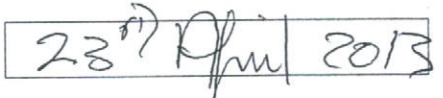
I believe that I am best placed to be appointed as my mother's Deputy as I would always have her best interests at heart, make sure she receives the best possible care and is looked after financially and personally. I would be able to manage my mother's affairs in the way she managed them before she had her strokes.

continued over

**Statement of truth**

The statement of truth is to be signed by the witness.

I believe that the facts stated in this witness statement are true.

**Signed****Name****Date****Please return the completed witness statement to:**

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

# Exhibit T5 COP24 J. Hurst

COP  
24  
03 10

Court of Protection

## Witness statement

Statement given by (name of witness)

JASON HURST

Statement

☒ 1<sup>st</sup>

☐ 2<sup>nd</sup>

☐ 3<sup>rd</sup>

☐ Other \_\_\_\_\_

Filed on behalf of (name of party)

MARK JONES

ROBERT EDWARDS

Date statement was made

6/07/14

Case no.

12237493.

Full name of person to whom the application relates  
(this is the person who lacks, or is alleged to lack capacity)

MAVIS VICKY REBECCA BANKS

### Please read first

- If you are filing written evidence with the court then it should be included in or attached to this form.
- If the court requires that evidence be given by affidavit then you need to use the COP25 affidavit form.
- You must initial any alterations to the witness statement.
- A document referred to in a witness statement and provided to the court is known as an exhibit. Each exhibit must be identified in some way (e.g. 'Exhibit A'). The first page of the exhibit must contain all of the information provided in the box in the top-right corner of this page.
- Practice Direction A accompanying Part 14 of the Court of Protection Rules 2007 sets out more detailed requirements in relation to witness statements.
- Please continue on a separate sheet of paper if you need more space to provide your witness statement. Please mark each separate sheet with all of the information provided in the box in the top-right corner of this page.
- If you need help completing this form please check the website, [www.hmcourts-service.gov.uk](http://www.hmcourts-service.gov.uk) or [www.direct.gov.uk](http://www.direct.gov.uk), for further guidance or information, or contact Court Enquiry Service on 0300 456 4600 or [courtprotectionenquiries@hmcourts-service.gsi.gov.uk](mailto:courtprotectionenquiries@hmcourts-service.gsi.gov.uk)
- Court of Protection staff cannot give legal advice. If you need legal advice please contact a solicitor.



## Witness statement

1 Enter your full name

I,

1

JASON PAUL HURST

2 Enter your occupation or description

2

ARTIST

3 Enter your full address including postcode or, if making the statement in your professional, business or other occupational capacity, the position you hold, the name of your firm or employer and the address at which you work

of

3

60 TELFORD WAY, CHESTER, CH480A

☐ am a party to the proceedings

☒ am employed by a party to the proceedings

and state that:


4 Set out in numbered paragraphs indicating:

- which of the statements are from your own knowledge and which are matters of information or belief, and
- the source for any matters of information or belief.

Where you refer to an exhibit, you should state the identifier you have used. For example, 'I refer to the (description of document) marked Exhibit A...'

4

I have written my Statement on the following page.

 06/07/14

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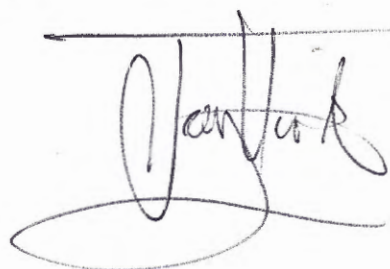
At the request of my friend Mark Jones I attended the Pinetum Nursing Home on the morning of Thursday, 3rd July at approx 11:00 am. I was asked by Mark Simply to observe whatever transpired.

An employee of TSF consulting was already present with the stated intention of visiting Marks Mother to carry out a mental capacity assessment of her. She ~~had~~ was being prevented from doing so at the request of Russel and Russels<sup>4</sup> solicitors who had been contacted 'for their permission' by the Management of Pinetum Nursing Home. She left the nursing Home without having been able to conduct this assessment.

I was also prevented from accompanying Mark on his scheduled visit to his mother.

It is my understanding that this attempt to conduct a mental capacity assessment was prevented by Tracy Simpson.

§

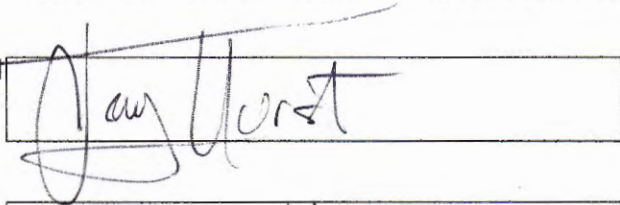
 6/7/14

continued over

**Statement of truth**

The statement of truth is to be signed by the witness.

I believe that the facts stated in this witness statement are true.

**Signed****Name**

JASON HURST

**Date**

06/07/14

**Please return the completed witness statement to:**

Court of Protection, Archway Tower, 2 Junction Road, London N19 5SZ



# Public inquest in to the death of Mavis Banks. New evidence has shown conflict of interest

## Exhibit: Signatures



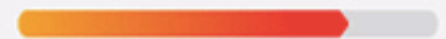
Mark Jones started this petition to [Prime Minister of England](#)

Experts can see no reason for the death of Mavis Banks: my mother.

Chester City Council (after her home), Care UK nursing home (saw mistakes and said she had dementia and then stopped son who also saw these mistakes) and Chester Police detectives (gained by Will) all had conflict of interests.

Also Mavis Banks died under DoLS so Article 2 by jury inquest should have been done but was not even with all the conflict of interests and ignored evidence that shows massive corruption. New evidence further shows mother was on a pathway of death but the CQC report says she was not and hospital says she was and also was not! Also Mavis Banks wanted to live and was starved to death! **We want a public inquest in London. Many lawyers and QC support this.**

1,910 have signed. Let's get to 2,500!



Ornella Biagetti signed this petition

Alvaro Tortora signed this petition

Thanks to your support this petition has a chance at winning! We only need 590 more signatures to reach the next goal - can you help?

[Take the next step!](#)

Our Ref  
Your Ref  
Date

KB/J2350.1  
10th December 2012

Dr Mark Jones  
32 Hoole Road  
Chester  
CH2 3NJ

# Exhibit S

By Email and Post: drjonesaa@googlemail.com

Dear Dr Jones

**Re : Clinical Negligence Claim**

I refer to the above and thank you for your email dated 8<sup>th</sup> December 2012.

If we could prove a successful claim against Dr Bland, then the value of the claim would be significantly higher, if we could show that your Mum's stroke was avoidable. However, as you are aware, your Sister is not prepared to investigate a claim against Dr Bland and I am therefore unable to pursue this avenue of enquiry any further.

Your Sister has however agreed to continue with the claim against the Countess of Chester Hospital regarding the C Diff infection.

With regards to the cost of your Mum's nursing home, it is our view that your Mum has required the nursing home care because of her significant injuries caused by the stroke. We do not believe that we would be able to prove that this has been caused by the C Diff infection.

I look forward to hearing from you regarding the proposed Part 36 offer as detailed in my letter of 27<sup>th</sup> November 2012 as soon as possible.

Yours sincerely



**Miss Kerry Bateman**  
kerry.bateman@oliverandco.co.uk  
Solicitor  
Oliver & Co

**Direct Dial Clinical Negligence Department: 01244 354688**

**QualitySolicitors. The UK's nationwide legal brand.**

**Douglas House 117 Foregate Street Chester**  
**T 01244 312306 F 01244 350261**

**www.oliverandco.co.uk law@oliverandco.co.uk**

CH1 1HE / DX 19977 Chester 1



**IN THE HIGH COURT OF JUSTICE**

**Matthews Lewis  
Martins Bank Chambers  
31 Hoole Road  
Chester**

**FAMILY DIVISION**

**Ref: BAN46**

**The Liverpool District Probate Registry Probate Registry**

**In the estate of the late Mavis Vicky Rebecca Banks deceased**

**I Pierre Nicholas Bartlett make oath and say that:**

- 1. I believe the paper writing now produced to and marked by me to contain the true and original Last Will and Testament (the "Will") and the first Codicil to the Will dated 14<sup>th</sup> January 2009 of Mrs Mavis Vicky Rebecca Banks deceased late of Pinetum Nursing Home, Valley Drive, Chester, Cheshire, CH2 1UA (formerly and in the Will of 32 Hoole Road, Hoole, Chester, CH2 3NJ)**
- 2. The Deceased was born on the 22<sup>nd</sup> day of June 1929 and died on the 14<sup>th</sup> day of March 2015 aged 85 years, domiciled in England & Wales;**
- 3. To the best of my knowledge, information and belief, there was no land vested in the said deceased which was settled previously to her death, and not by her Will, and which remained settled land notwithstanding her death;**
- 4. I further make oath and say I am the Executor named in the said Will of the said deceased being one of the profit sharing members in the firm of Bartletts Solicitors Limited at the date of death of the said deceased the firm which had at that date succeeded to and carried on the practice of Matthews Lewis and Co. Solicitors and power is reserved to the remaining profit sharing members in the said firm at the date of death.**

I will:

- (i) collect, get in and administer according to law the real and personal estate of the said deceased;
- (ii) when required to do so by the Court exhibit in the Court a full inventory of the said estate and render an account thereof to the Court; and
- (iii) when required to do so by the High Court, deliver up to that Court the grant of probate;

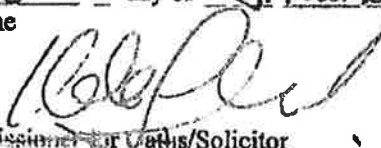
To the best of my knowledge information and belief the gross estate passing under the grant amounts to £519,039.00 and the net estate does not exceed £412,521.00

Sworn by

Pierre Nicholas Bartlett  
the above-named deponent



on the 8 day of JANUARY 2015 2016  
Before me



Commissioner for Oaths/Solicitor

By Email & Post: Mark Jones mark@myvibe.net



Mr Mark Jones  
The Guest House  
32 Hoole Road  
Chester  
CH2 3NJ

Our Ref: PNB/MJ/BAN46  
Your Ref: BD/910/gmr

Please ask for: Pierre Bartlett  
Direct Dial: 01244 313301  
Email: mjohnson@bartletts.co.uk

Date: 25<sup>th</sup> June 2015

EXHIBIT A2

Dear Mark,

**Re: Your Mother's Estate**

Thank you for your email of 24<sup>th</sup> June 2015.

Please find enclosed a copy of the Will of your mother dated 14<sup>th</sup> January 2009 and a copy of her death certificate.

Please take separate advice concerning our letter of 24<sup>th</sup> June 2015.

We are not inclined to extend your time to reply to that letter.

The reason is that if IHT is to become payable interest runs as from 6 months of the date of death.

Unless you can properly assist Barbara the present accounts will probably not justify a claim for BPR.

Yours sincerely

**Pierre Bartlett**  
**For and on behalf of Bartletts Solicitors Limited**  
Enc

16 Nicholas Street  
Chester  
CH1 2NX

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Company Number 7147450 at Marldon Chambers, 30 North John Street, Liverpool, L2 9QN and  
Authorised and Regulated by the Solicitors Regulation Authority, no. 536269. VAT No. 985 8043 75.

**Tel: 01244-313301**  
**Fax: 01244-319398**  
**DX: 19989 CHESTER**

Exhibit  
CAVEAT 1  
109/17

IN THE HIGH COURT OF JUSTICE  
FAMILY DIVISION  
(PROBATE)



Delete whichever  
is inapplicable

79631 dated the 1<sup>st</sup> day of December 2016

Full name and address of deceased:-

Mavis Vicky Rebecca Bank 32 Hoole Road, Hoole, Chester. CH2 3NJ

(2) Dr Mark Jones FRSM

Flat 9 Pine house 197 Townmead Road, London SW6 2HF

Here set out

the name, address &

interest of the

person warning (as stated

in warning) or cited

Full name and address of caveator [or person cited]

Dr Mark Jones FRSM

Flat 9 Pine house 197 Townmead Road, London SW6 2HF

(3) The Will of Mavis Banks 2009 is invalid because it can be proved  
it was done by coercion.

A previous Will is valid and is supported by one of the named executors  
of the Will, Howard Fey. The same executors has on many occasions asked  
for Mr P Bartlett the current executor of the will to be removed for many  
reasons. Many people have removed Mr P Bartlett as an executor of the  
Will and he is now being removed.

Here set out the

interest of the caveator

I, Dr Mark Jones can show and have support of lawyers stating that I have  
Proprietary Estoppel and Constructive Trusts issues with my Mother's  
estate which Mr P Bartlett ignores.  
I would like any issues to be resolved in a London Court.

(reason for caveat &

interest in deceased's

estate) or person cited,

stating date of will, if

any, under which such

interest arises



Enter an appearance for the above named caveator/person cited in this  
matter

Dated the

10<sup>th</sup>

day of

April

2017

Signed

whose address of service is Dr Mark Jones FRSM

Flat 9 Pine house 197 Townmead Road, SW6 2HF

LONDON.



## EXHIBIT BILLS 2017to2019

By Email and **First Class Post**: mark@myvibe.net

**First Class Post**

Dr Mark Robert Edward Jones  
The Guest House  
32 Hoole Road  
CHESTER  
Cheshire  
CH2 3NJ

Our Ref: **PNB/MJBAN46**  
Your Ref:

Please ask for: Pierre Bartlett  
Tel: 01244 313301  
Email: mjohnson@bartletts.co.uk

Date: 1<sup>st</sup> February 2019

Dear Dr Jones,

**Re: The Estate of your Late Mother, the Late Mrs Mavis Vicky Rebecca Banks who died on 14<sup>th</sup> March 2015**

1. I write with reference to your criticisms both in your defence to the proceedings 'Mr Pierre Nicholas Bartlett and Mrs Victoria Jane Boulton -v- Dr Mark Robert Edward Jones, Case number E30LV485'.
2. I can assure you that under no circumstances whatsoever will I be involved by myself or any persons on my behalf in acquiring any interest beneficially in 32 Hoole Road, Hoole, Chester.
3. The Executor's role is to work with the family on a fair basis to wind up the Estate in a reasonable and sensible manner and pay off the creditors and distribute the residue to the Beneficiaries.
4. It can occur from time to time that the Beneficiaries named in the Will enter into a dispute between themselves. If this happens, they each normally instruct their own solicitors and the Executor stands aside awaiting the outcome. I enclose the Assets List prepared in 2017 and a copy of the IHT400 calculation and pages 1 and 6-10 thereof.

Regrettably, Business Property Relief could not be claimed in respect of the Guest House at 32 Hoole Road because Hall Livesey Brown (your late mother's accountants) advised that

**16 Nicholas Street  
Chester  
CH1 2NX**



there were no accounts to justify a claim for such Relief.

5. As a preliminary overview of the Estate finances, I am checking at the moment what the current amount is that is due to the CWAC (Cheshire West and Chester Council) for Care Home fees. If we use the draft figures in the enclosed Asset List, the figure is £100,000.00 but it is likely to be more. The IHT figure is approximately £35,000.00 but it is probably more than £40,000.00 with interest and penalties.

The interest and penalties arise because of the caveats you have entered preventing your mother's Will dated 14<sup>th</sup> January 2009 being proved and her Estate wound up. In very broad terms, the net Estate using the figures in the draft Asset List might be in the region of £350,000.00 less £10,000.00 of specific gifts, say £340,000.00.

The 'ballpark' figure that would therefore be distributed equally between yourself and your sister Victoria would be £170,000.00 each.

It is quite possible that the value for Probate purposes of £450,000.00 could now be greater;

If the house sold for £600,000.00 there would be a further £150,000.00 to divide between yourself and your sister (subject Capital Gains Tax on that figure).

Please do not rely on those figures which exclude costs and other matters.

6. You are aware of the discretion given to the Executor in clause 6 of the said Will dated 14<sup>th</sup> January 2009. This provides that if you wish to reside at 32 Hoole Road, the Executor or Trustee has a discretion to allow you to acquire your sister's share representing half the value of the equity of 32 Hoole Road, Hoole, Chester.

Do you wish to reside at 32 Hoole Road, Hoole, Chester and request the proposed Executor to exercise his discretion as set out in clause 6 of the said Will?

7. Could you please indicate whether you have kept the property insured for rebuilding costs in the event of fire and the usual risks, and in respect of Public Liability claims?

The above comments list some of the practical issues that need to be addressed by the proposed Executor in consultation with the Beneficiaries.

The present position puts the CWAC and the Inland Revenue at a great disadvantage in that they are not being paid sums due to them.

It has to be noted that the Will dated 29<sup>th</sup> November 2007 which was superseded by the 2009 Will divides the residue in equal shares.

## EXHIBIT BILLS 2017 to 2019

8. You should be aware that the above mentioned proceedings only relate to the grant of Probate to your mother's 2009 Will and the appointment of myself as Executor.

Your claim for Equitable Interests in 32 Hoole Road, Hoole, Chester would be made in the winding up of the Estate once the Executor had been appointed.

Perhaps you would review this letter and respond constructively as to how this Estate is to be dealt with along the above lines.

Yours sincerely



**P.N. Bartlett**  
**For and on behalf of Bartletts Solicitors Limited**

Enc

# EXHIBIT BILLS 2017to2019

## Mrs Mavis Vicky Banks deceased

### Assets as at Date of Death

**D o D**      **14/03/2015**

**D o B**      **22/06/1929**

**NI no**

#### Property

Capital Guest House, 32 Hoole Road, Chester CH2 3NJ      £ 450,000.00

#### Bank accounts

Nationwide	396583283	£	49,997.26	
Nationwide	08696177	£	1,551.89	
West Brom	022311199	£	1,097.10	
Santander	X14664234BAN	£	13.69	
Britannia	342212476	£	6,646.46	
Barclays	80920320	£	827.24	
Barclays	70140155 Overdraft see below	£	-	
Barclays	53779645	£	1,807.40	
NS&I	105284077	£	97.65	£ 62,038.69

#### Chattels

£ 7,000.00

£ 519,038.69

#### Liabilities

Funeral      £ 4,889.00

Care fees due      £ 100,000.00

Accountants fees due      £ 80.89

Barclays      70140155      £ 1,547.93      £ 101,628.82

£ 412,520.87

# Exhibit BILL7March2019

----- Forwarded message -----

From: Dr Mark Jones <[mark@myvibe.net](mailto:mark@myvibe.net)>

Date: Thu, Mar 7, 2019 at 11:18 AM

Subject: Bills for late Mavis Banks DOB 22 6 1929 Murder 14 March 2015

To: <[enquiries@cheshirewestandchester.gov.uk](mailto:enquiries@cheshirewestandchester.gov.uk)>, Brian Gerrish  
<[brian@ukcolumn.org](mailto:brian@ukcolumn.org)>, Ben Rumsby <[ben.rumsby@telegraph.co.uk](mailto:ben.rumsby@telegraph.co.uk)>

To Whom it might concern.

Care home payments for Mavis Banks DOB 22 6 1929 Murdered 14 March 2015

I was told there were bills against my late mother Mavis Banks.

I am saying these costs will be challenged as:

1) first nursing home Oakland (2011 to 2013) she was trapped and drugged there against her wishes by a doctor who was struck off in 2018.

Also can now show she was also nearly murdered there.

2) 2nd nursing home 2014 to 2015 Pinetume where my mother was again trapped against her wishes and murdered. Can now show high death rate and other issues with this nursing home.

3) Can show other crimes.

Therefore I am rejecting any bills against her.

Also if her care was the level of care they stated then these costs are covered by NHS guidelines Section 117 of Act of After Care so why should she pay.

If there any bills then counter claims will be taken.

Can you please contact me so this can be sorted out.

I hope to hear from you soon.

Dr Mark Jones FRSM  
MBA, PhD, Ma, PgDip :.

Defendant:  
P. N. Bartlett:  
1st:  
PNB1,2,3,4,5,6,7,8,9:  
15<sup>th</sup> March 2019:

IN THE HIGH COURT OF JUSTICE  
BUSINESS & PROPERTY COURTS OF ENGLAND AND WALES  
PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM No. PT-2019-000185

In the estate of Mavis Vicky Rebecca Banks deceased (Probate)

BETWEEN :-

**DR MARK ROBERTS JONES**

**Claimant**

**-and-**

**MR PIERRE NICHOLAS BARTLETT**

**Defendant**

---

## **WITNESS STATEMENT OF PIERRE NICHOLAS BARTLETT**

---

I, Pierre Nicholas Bartlett, of Bartletts Solicitors Limited, 16 Nicholas Street, Chester, CH1 2NX, Solicitor of the Senior Courts, will say as follows:

1. I am named as the Defendant to this claim and I am a director and partner of Bartletts Solicitors Limited, the solicitors for the Defendant. I make this witness statement in support of my application notice seeking to strike out the Claimant's Part 8 claim form on the basis that it is an abuse of the Court's process under CPR 3.4(2)(b). I also make this witness statement, insofar as it is necessary, in response to the Claimant's Part 8 claim form and the statement attached to it pursuant to CPR 8.5(3) and (4).

posted allegations against me and my firm based on the allegations he is making in this claim and in claim no. E30LV485. Those allegations, to the effect that I and my firm are "corrupt", are untrue. They are at the very least defamatory. I have made repeated requests to the Claimant to take those allegations down from the websites he has published them on but he has failed or refused to do so. I know absolutely nothing of his allegations concerning Dr Bland or his treatment of the Deceased. For the avoidance of doubt, neither I nor my firm have any connection with him. The allegations of any wrongdoing against Mrs Boulton are also denied. I also know nothing of the allegation that the Claimant "has had threats and nasty things" done to him, which he gives as a reason for asking that his claim is dealt with in London. Certainly, neither I nor my firm are responsible for anything of the sort.

25. Finally, the Claimant's claim for removal of me as an executor of the Deceased is deficient, insofar as it continues. He has failed to support his application with written evidence containing the information required under paragraph 13.1(2) of Practice Direction 57A to the Civil Procedure Rules 1998 and he has failed to accompany the application with any signed consent to act and written evidence as to fitness of any proposed substituted personal representative as required under paragraph 13.2 of that Practice Direction. For the avoidance of doubt, I can confirm that when my Probate Department on my behalf prepared the application for a grant of probate in December 2015/January 2016, I did set out that to the best of my knowledge the Deceased's gross estate amounted to £519,039 and her net estate to a sum not exceeding £412,521. This was based on the information available to me at the time, which was that the Property was valued at approximately £450,000 and that the Deceased had some savings and other assets (personal chattels etc.) but had liabilities, including for nursing home fees. To the best of my knowledge, those figures remain accurate on the information available to me. However, the Cheshire West & Chester Council were shown in my Inheritance Tax Account 2016 as being owed £100,000.00 nursing home fees. Recently, they have indicated that only £871.87 is owed. I am not aware that they have been paid the larger sum. This issue will be settled once Probate is granted.

26. In the circumstances, I respectfully seek the relief sought in my application notice.

## STATEMENT OF TRUTH

27. I believe that the facts stated in this witness statement are true.

# EXHIBIT: BartCareCost15March2019

Signed



**Pierre Nicholas Bartlett**

DATED this 15<sup>th</sup> day of March 2019



----- Forwarded message -----

From: Dr Mark Jones <mark@myvibe.net>

Date: Tue, Mar 26, 2019 at 4:04 PM

Subject: Bills for late Mavis Banks DOB 22 6 1929 Murder 14 March 2015

To: <Janice.skelton@cheshirewestandchester.gov.uk>, CORBYN, Jeremy

From Dr Mark Jones FRSM

Parliamentary candidate MBA, PhD, Ma, PgDip :. Freeman of the City of London

Fellow of the Royal Society of Medicine.

Fellow of Chelsea and Westminster Hospital (2010) but stopped due to ill mother. Tel (44) 077 355 75 011

Dear Janice,

I am writing to you about the care payments for Mavis Banks DOB 22 6 1929 then Murdered 14 March 2015. I am a Parliamentary candidate who will be moving forward this is one of many cases that need investigation.

I was told there were bills against my late mother Mavis Banks.

I am saying these costs will be challenged and rejected. A court action is taking place. The reasons for rejecting them are the following:

1) first nursing home Oakland (2011 to 2013) where Mavis Banks was trapped and drugged there against her wishes by a doctor who was struck off in 2018. It can be shown that it was stated she had dementia when in fact she was being drugged to stop her from being a witness to the truth in 2010 Mr B was trying to steal her home. Also, it can now be shown in Oakland nursing homes Mavis Bank was nearly murdered there in 2013.

2) 2nd nursing home 2014 to 2015 Pinetum where Mavis Banks was again trapped against her wishes by a DOLS (several in one year!) based on a lie. Mavis Banks nearly died several times by deliberate actions.

Can now show a high death rate and other issues with this nursing home by expert Prof Brian Jarman.

In the end Mavis Banks was murdered and this is what the CPS is now going to be given.

3) other crimes will be listed.

Therefore I am rejecting any bills against Mavis Banks.

The claim is that all of this was done to help Mr B steal her home and then when it went wrong deliberate actions to silence Mavis Banks.

It is now clear that Mavis Banks was one of many.

4) Also if her care was the level of care they stated then these costs are covered by NHS guidelines Section 117 of Act of After Care so why should she pay.

If there are any bills then significant counterclaims will be taken.

Can you please contact me so this can be sorted out.

I hope to hear from you soon.

Regards,

Mark

# Exhibit: Vaule Part 1

<https://corruptsolicitors.co.uk/bartletts-solicitors-house-valuations/>

## Bartletts Solicitors House Valuations.

Bartletts Solicitors House Valuations in local Cheshire property probate cases might not be what they seem at first glance.

They gave me a valuation of £450,000 for my property of a 12 bedroom house in central Chester that has a value of over 1m on Xoopla and tells me they have my best interests at heart.

We will let our many thousands of readers decide for themselves if they think its a true statement?

# Zoopla

For sale To rent House prices New homes Commercial Overseas Invest Move Find

## Zoopla Estimate for 32 Hoole Road, Hoole, Chester CH2 3NJ

Zoopla Estimate ?

**£1,060,000**

[Refine estimate](#)

Value range ?

£923,000 - £1,198,000

Rental value ?

£3,600 pcm

You have to laugh at Bartletts Solicitors Property Valuations, is it not strange 2 UK property experts can come up with similar valuations but Bartletts somehow manages to miss the mark by a whopping £700,000 plus!

Now some might say ah but if they are doing the probate they might give you the bottom valuation and shift the house to an offshore company so no-one knows who actually bought it and sell later on to make 200% profit, how else can any reasonable person think?

If anyone is reading this is aware of a recent Bartletts probate case please check the purchase price paid against these companies valuations and report here or on trustpilots site, if the correct amount was paid its only fair thats reported aswell but please name the property correctly?



## Exhibit: Vaule Part 2

<https://corruptsolicitors.co.uk/bartletts-solicitors-house-valuations/>

You have to laugh at Bartletts Solicitors Property Valuations, is it not strange 2 UK property experts can come up with similar valuations but Bartletts somehow manages to miss the mark by a whopping £700,000 plus!

Now some might say ah but if they are doing the probate they might give you the bottom valuation and shift the house to an offshore company so no-one knows who actually bought it and sell later on to make 200% profit, how else can any reasonable person think?

If anyone is reading this is aware of a recent Bartletts probate case please check the purchase price paid against these companies valuations and report here or on trustpilots site, if the correct amount was paid its only fair thats reported aswell but please name the property correctly?

https://propertydata.co.uk/property-valuation/nV9rGDBd

Facebook Amazon Browser button | What... Booking.com Support

Property valuation

27 February 2019

Edit inputs

Download .pdf

Local data

Plot map

SALE VALUATION

£1,150,000

+/- £60,000


RENTAL VALUATION

£2,611pm

Location

Inputs

Local data



Postcode	CH2 3NJ	Area type	Urban city and town
Property type	Detached house	Avg 5-bed asking	£655,000

First Class Post

Dr Mark Jones  
The Guest House  
32 Hoole Road  
Chester  
CH2 3NJ

Our Ref: PNB/MJ/BAN46  
Your Ref:

Please ask for: Pierre Bartlett  
Direct Dial: 01244 313301  
Email: mjohnson@bartletts.co.uk

Date: 7<sup>th</sup> March 2017

Second letter

Dear Mark,

**Re: The Estate of your Late Mother Mavis Vicky Rebecca Banks who died on 14<sup>th</sup> March 2015**

Thank you for your emails of 7<sup>th</sup> March 2017 and 2<sup>nd</sup> March 2017.

I enclose herewith the IHT400 account which you will have had before.

You will see on page 5, item 40 that we have put the answer "no" to "Do you want to deduct Business Relief from any business interests and assets owned by the deceased?"

The reason for the answer is that Hall Livesey Brown, your mother's accountants advised following your mother's death that Business Property Relief could not be claimed in this case. No evidence of business activity has been provided either to ourselves or to the accountants despite requests over a long period.

- On page 6, item 51 you will notice that the valuation put in is £450,000.00 at the lower end of the spectrum because of the poor state of repair of the building at 32 Hoole Road. You will note the mention of the Building Society accounts at £61941.00, National Savings £98.00, personal and household goods £7,000.00.

16 Nicholas Street  
Chester  
CH1 2NX

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Tel: 01244-313301  
Fax: 01244-319398  
DX: 19989 CHESTER



01244 311 033  
enquiries@daulbyread.co.uk  
www.daulbyread.co.uk

Liverpool House  
47 Lower Bridge Street  
Chester  
CH1 1RS

Dr Mark Jones  
Capital Guest House  
32 Hoole Road  
Chester  
CH2 3AJ

4th March 2019

Our ref: 1279774

Dear Dr Jones

**RE:                   NIG Bed & Breakfast Package Policy: MAN/006059711**  
**Renewal Date: 26<sup>th</sup> January 2020**

Our recent conversations and correspondence refer. To confirm, Daulby Read has arranged Insurance in respect of the Buildings of the property referred to above. The cover is included within the Package Policy covering the Guest House and business risks as requested.

Our computerised records in this respect date back to 2007 and I can confirm cover has been in place continuously since that time. Hopefully this is sufficient for your needs. If you need anything else please let me know.

I look forward to hearing from you.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'John Haslam', with a large circular flourish at the beginning.

John Haslam  
Commercial Broker  
**Direct Dial:** 01244 560122  
**Email:** john@daulbyread.co.uk



# Exhibit Biz 1



Liverpool House  
Lower Bridge Street  
Chester  
CH1 1RS

Tel: 01244 311033  
Fax: 01244 319941

[www.daulbyread.co.uk](http://www.daulbyread.co.uk)

21st March 2017

Our ref: 1279774

Dr Mark Jones  
Capital Guest House  
32 Hoole Road  
Chester  
CH2 3AJ

Dear Dr Jones

**RE: NIG Bed & Breakfast Package Policy: MAN/006059711**

Our conversation this morning refers. To confirm, Daulby Read has arranged a Commercial Insurance on a Guest House Package basis for the above property for a number of years.

Our computerised records date back to 2005 and cover has been continuously in place since that time. If any further information is required please do not hesitate to get in touch.

I trust this meets with your approval and look forward to hearing from you.

Yours Sincerely

A handwritten signature in blue ink, appearing to be 'John Haslam', with a long horizontal flourish extending to the right.

John Haslam  
Commercial Broker  
Direct Dial: 01244 560122  
Email: [john@daulbyread.co.uk](mailto:john@daulbyread.co.uk)

Daulby Read Ltd.

Registered Office:  
Liverpool House, Lower Brige Street,  
Registered Number: 6239225  
Incorporated in England and Wales

Authorised and regulated by the Financial Conduct Authority

nesta



25 April 2002

Mark Jones  
32 Hoole road  
Chester  
Cheshire  
CH2 3JN

Dear Mark

**Offer to fund: FELLOWSHIP: Computer Assisted Child Medicine: FEL 0123**

Our Trustees have agreed to award you a NESTA Fellowship in support of the above idea. The award will be for up to £70,100 over a period up to 18 months, subject to the agreement of suitable contractual terms and conditions. I would like to take this opportunity to offer you my congratulations.

I will take you through the contracting process and then you will have a Programme Manager, allocated to you who will undertake any award management.

Enclosed is your draft contract. The main part of the contract contains all of our standard terms and conditions; additional ones specific to your proposal are in the appendix. We will need to agree suitable wording for these. While we are willing to provide clarification of how the clauses in the main part of the contract might apply to you, I hope you will understand that we are not able to offer individually tailored contracts.

Also enclosed are our Monitoring Documents containing important information about publicity requirements, payments, and monitoring. You will need to familiarise yourself with our Monitoring Documents, as clauses in your contract refer to them. However, please bear in mind that these documents are currently being revised, and some sections will therefore not apply to all individual cases. Over the next few weeks we will also need to agree the cost plan so that it can be incorporated into your final contract.

Once you have indicated your willingness to sign the contract, and the cost plan is agreed with a schedule, we will issue two copies of the final, engrossed version, for you to sign and return to us for our signature. It is only after both signatures appear on the engrossed contracts that our funding offer will be treated as accepted and we will be able to release funds to you.

We will do our best to answer any queries you may have. However, you should note that any reliance that you place upon assistance provided by NESTA, its employees or agents, whether before or after the terms of the funding contract have been agreed, is at your own risk and that such assistance should not be regarded by you as a substitute for any legal, financial or other professional advice which you may need.



**W.E. Anfield & Co. Ltd.**

GLASS • JOINERY • PLUMBING • BATHROOMS • DIY • HARDWARE • P.V.C.u / WOODEN WINDOWS

Station Road,  
Chester CH1 3PA.

Telephone (01244) 312404 Fax (01244) 312400 E-mail info@anfields.co.uk

15<sup>th</sup> October 2002Mr M Jones  
32 Hoole Road  
Chester  
Cheshirecalled Richard  
20

Dear Mr Jones

I thank you for your recent enquiry and have pleasure in providing the following quotation.

To supply &amp; fix white secondary glazing as detailed below

Qty	Width	Height	Substance	Comment	Location	Total +VAT
1	1300	1800	White Aluminum Secondary	v/slider, hardwood subframe	Office	260.85
2	800	2000	White Aluminum Secondary	v/slider, hardwood subframe	Room O	449.78
1	1360	2000	White Aluminum Secondary	h/slider, hardwood subframe	Room O	260.85
2	800	2000	White Aluminum Secondary	v/slider, hardwood subframe	Room O	449.78
1	1360	2000	White Aluminum Secondary	h/slider, hardwood subframe	Room O	260.85
1	1250	1870	White Aluminum Secondary	v/slider, hardwood subframe	Room 2	260.85
2	900	1650	White Aluminum Secondary	Fixed pane lift in/out	Room 7	370.40
1	1000	1600	White Aluminum Secondary	v/slider, hardwood subframe	Mother's Room	221.31
1	1640	1060	White Aluminum Secondary	v/slider, hardwood subframe	Room 3	226.96
1	870	1700	White Aluminum Secondary	v/slider, hardwood subframe	Room 4	209.87
1	870	1700	White Aluminum Secondary	v/slider, hardwood subframe	Room 4	209.87
1	1200	1020	White Aluminum Secondary	h/slider, hardwood subframe	Kitchen	230.27
						3411.64

For the sum of

£ 4,008.68 incl.VAT

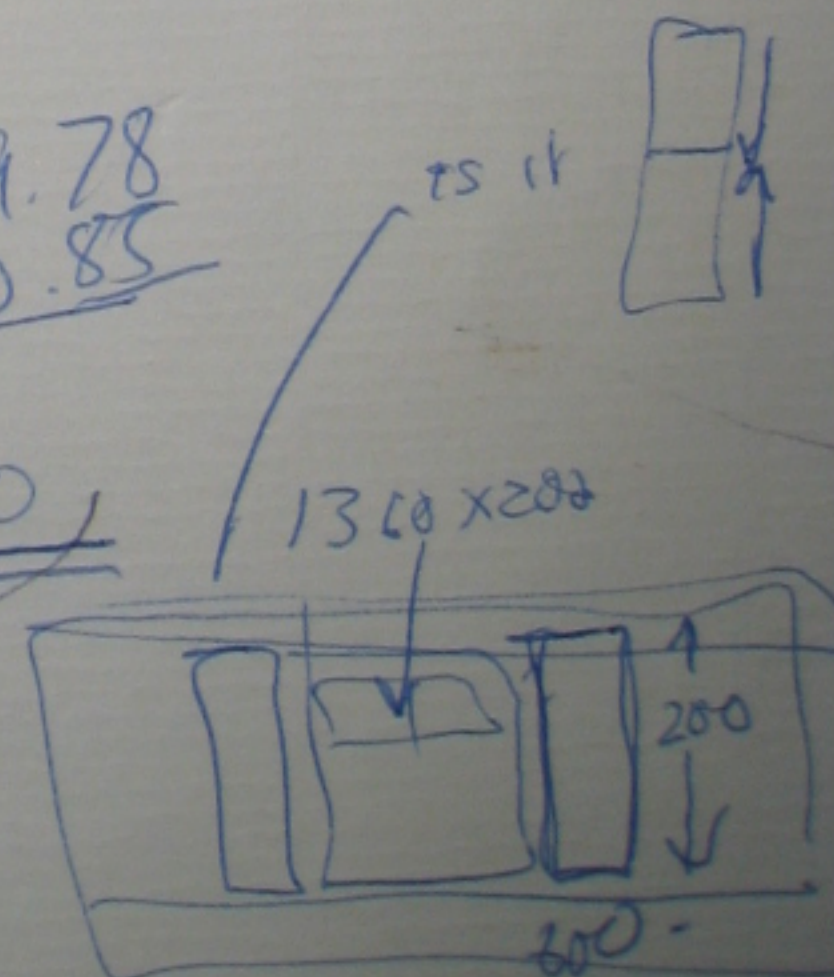
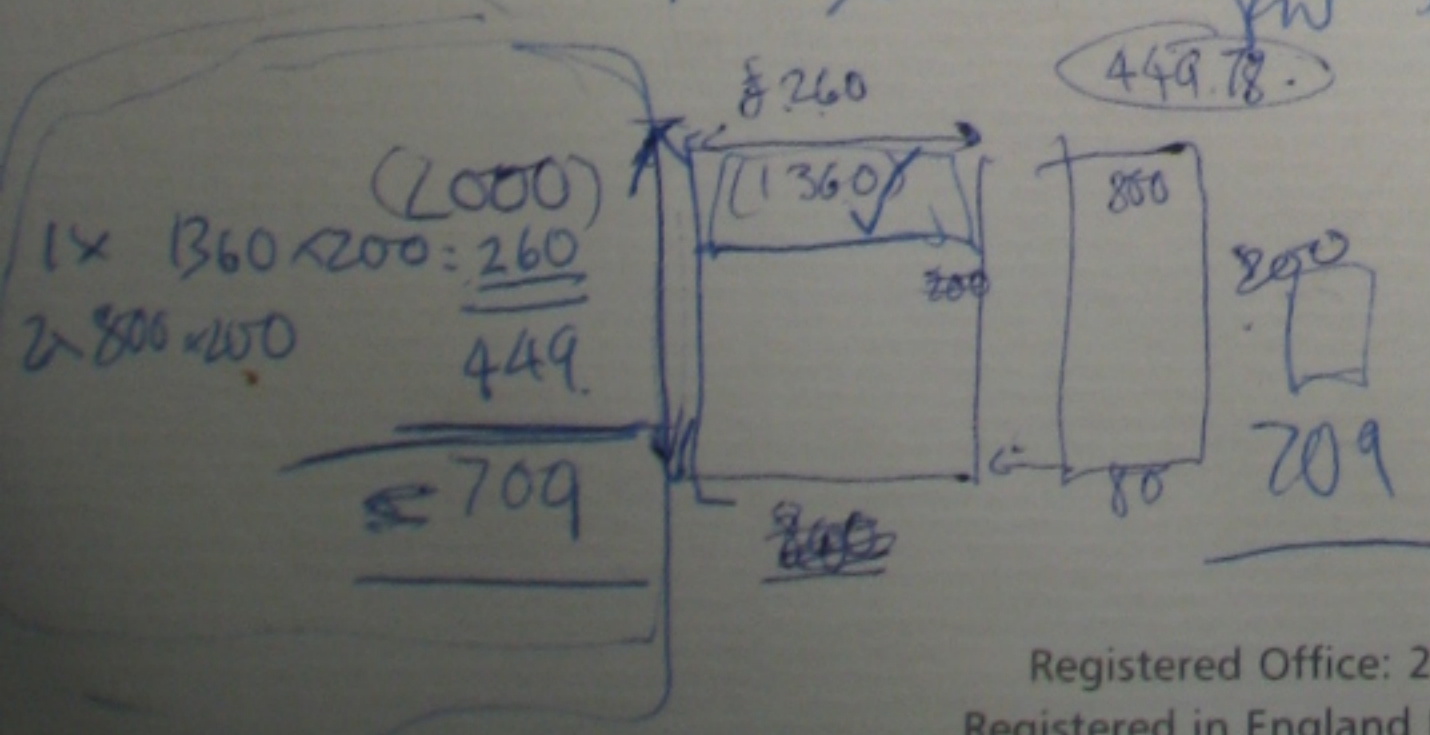
check Room O.

1 13600x200 - no need  
for slider?Room O 449.78  
260.85

suppos 700

000 office.

000 Room O





**Evidence**

I the under sign agree to the following statements on past events is true.

Mark Jones did buy the following windows from you in the past.

C) New window frame. See picture below (need two of these)  
And second glassing on top of it. (see below)  
67 inches height by 46 inches across,



D) One window by 74 inches height by 55 inches across (see below)



I the under sign agree to the above.

**Witnessed by:**

Signed:  Paul Ferrar ( W. B. Whitel - co ctd

Date: 10/5/13

**Second witnessed by:**

Signed:

Date

**Exhibit T****Evidence**

I the under sign agree to the following statements on past events is true.

Mark Jones did buy the following windows from you in the past.

All cost to include fitting and the highest quality glass and trims etc

A) Four of the following windows 64 inches height by 38 inches across (see top row of windows in photo below. There are 5 windows but we only did 4).



B) Two front windows groups (see bottom windows in the picture above)  
First window 78 inches height by 32 inches across (left and right window side)  
In the center is a window, which is 78 inches height by 54 inches across.  
There are two set of these.



I the under sign agree to the above.

**Witnessed by:**

Signed: *[Signature]*

Date: 10/5/13

**Second witnessed by:**

Signed:

Date:

*Paul Farrall work at W E. Anfield. co.*





# Witness statement

1 Enter your full name

I,

1 CAROL ANN JONES

2 Enter your occupation or description

2 HAIRDRESSING SALON OWNER

3 Enter your full address including postcode or, if making the statement in your professional, business or other occupational capacity, the position you hold, the name of your firm or employer and the address at which you work

of

3 DERBY HOUSE  
30 HOOLE ROAD.  
CHESTER CH2 3NJ

☐ am a party to the proceedings

☒ am employed by a party to the proceedings

and state that:

4 Set out in numbered paragraphs indicating:

- which of the statements are from your own knowledge and which are matters of information or belief, and
- the source for any matters of information or belief.

Where you refer to an exhibit, you should state the identifier you have used. For example, 'I refer to the (description of document) marked Exhibit A...'

4 I HAVE KNOWN MAVIS AND HER SON MARK FOR 40 YEARS. AS THE ADDRESS ABOVE IS MY FAMILY HOME AND IS NEXT DOOR TO CAPITAL QUEST HOUSE, WHEN CALLING AT THE HOUSE MAVIS WOULD TALK A LOT ABOUT MARK SAYING HOW PROUD SHE WAS OF HIM AND HOW LUCKY SHE WAS TO SUCH A KIND AND CONSIDERATE SON. PRIOR TO HER STROKE IN 2010 MAVIS WAS VERY PLEASED THAT MARK WAS ARRANGING AND HAVING CONSTRUCTED A WET ROOM FOR HER DOWNSTAIRS SO SHE COULD LIVE AT HOME WITH HIM AND RUN THE QUEST HOUSE TOGETHER  
b.g.jones-3-7-14 continued over

# Witness statement

1 Enter your full name

I,

1 PETER FRANCIS BOOTH.

2 Enter your occupation or description

2 SELF-EMPLOY BUILDERS.

3 Enter your full address including postcode or, if making the statement in your professional, business or other occupational capacity, the position you hold, the name of your firm or employer and the address at which you work

of

3 3 PEARL LANE, VICARS CROSS,  
CHESTER. CH3 5NU.

☐ am a party to the proceedings

☒ am employed by a party to the proceedings

and state that:

4 Set out in numbered paragraphs indicating:

- which of the statements are from your own knowledge and which are matters of information or belief, and
- the source for any matters of information or belief.

Where you refer to an exhibit, you should state the identifier you have used. For example, 'I refer to the (description of document) marked Exhibit A...'

4 I have know Mavis Banks for over 30 years. I stand by my previous statements. I started work on the wet-room before Mavis Banks had her stroke in 2010. It was being built for her long term care and <sup>her</sup> intention was to stay at home. She enjoy going to the local shops and that Mark was going to be looking after her. In all the times that I worked for Mavis Banks, I never saw Mark being agresive, bullying or be unkind to his mum. In fact it was mark who had me finish off the wet-room, as it was what Mavis Banks wanted.

Peter F. Booth.  
6/6/2014

continued over

# Reeds Rains

The Estate Agent

## Exhibit J 7

Mrs V Boulton  
110 Broughton Hall Road  
Broughton  
Chester  
CH4 0QN

Chester Branch  
29 Watergate Street  
Chester  
CH1 2LB  
Telephone: 01244 328257 Fax: 01244 320305  
Email: chester@reedsrains.co.uk

27<sup>th</sup> April 2010

Our Ref. 146.Mark.1

Dear Mrs Boulton,

Re: 32 Hoole Road, Chester, CH2 3NJ

Firstly, thank you giving me the opportunity of inspecting your property. I hope you found my comments with regards to the marketing and sale of your property helpful and I would be delighted to act on your behalf.

I would like to confirm my recommendations to market your property at an asking price of £550,000.

# Reeds Rains

The Estate Agent

## Exhibit J 7

→ Mrs V Boulton  
110 Broughton Hall Road  
Broughton  
Chester  
CH4 0QN

Chester Branch  
29 Watergate Street  
Chester  
CH1 2LB  
Telephone: 01244 328257  
Fax: 01244 320305  
Email: chester@reedsrains.co.uk

→ 20<sup>th</sup> May 2010

Our Ref. 140.Admin1

→ Dear Mrs V Boulton

Re: 32 Hoole Road, Chester, CH2 3NJ

Further to your recent instructions to market your property, please find enclosed draft property particulars pertaining to your property.

Under the terms of the Property Misdescriptions Act 1991, the property particulars for your property must be factually correct and in no way misleading. Please read through the particulars carefully and check that they provide a fair and accurate description of your property. If they do, we should be grateful if you would sign one copy of the particulars and return them immediately in the enclosed stamped addressed envelope. However, if there are any amendments these should be written on the particulars and returned to us without delay for consideration. We assume that any items mentioned in the property particulars are included in the sale and that



# Countess of Chester Hospital

NHS Foundation Trust

## Exhibit J 6

Emergency Department Tel 01244 365215 Fax 01244 365225

Date: 18/05/10

Time: 0922

Acc Number: EM0023827/10

Consultant: NICK LAUNDY

Unit Number: CC00682103

Name:

BANKS, MAVIS VICKY

Age: 80

Sex: F

GP Dr AK BLAND

DOB:

22/06/29

Address: 32 Hoole Road

Hoole

Chester

Cheshire

343665

CH2 3NJ

Source of Referral: REF TO A+E - OTHER HEALTH CARE

GP Ref: N

CH2 3NJ

01244 325721

ROMAN CATHOLIC

MR: BOUTBEE, VICKY

110 BROUGHTON HALL ROAD

BROUGHTON

CHESTER

CHESHIRE

343665

CH4 0QN

Accompanied by: DAUGHTER

Arrived From: OMN

PENICILLIN

NONE

Food/Other Allergies: NO

Reason for Visit: UNWELL ADULT

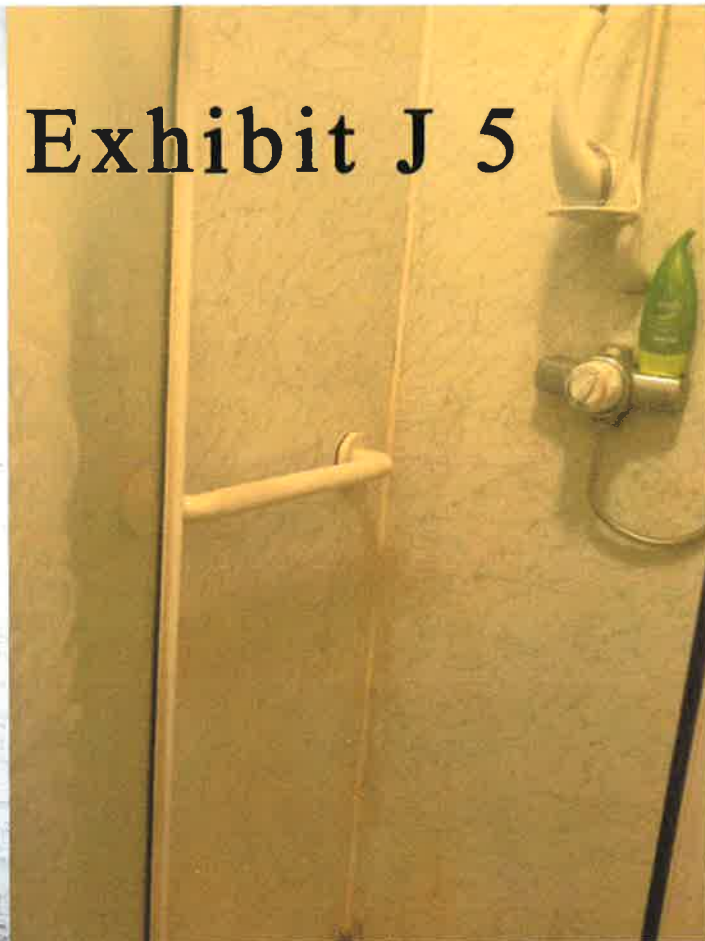
visits in 3 months  
visits in 12 months

\*\*CCT\*\*

ADULT GENERAL ASSESSMENT

Acceding EM doctor (b

# Exhibit J 5





Court of Protection

**Witness statement**

Statement given by (name of witness)

DILLON KASTNER

Statement

☒ 1<sup>st</sup> ☐ 2<sup>nd</sup> ☐ 3<sup>rd</sup> ☐ Other

Filed on behalf of (name of party)

Dr MARK ROBERT EDWARD JAMES

Date statement was made

20 / 6 / 14

Case no.

12237493

Full name of person to whom the application relates  
(this is the person who lacks, or is alleged to lack capacity)MAVIS ~~WICKY~~ REBECCA BANKS.**Please read first**

- If you are filling written evidence with the court then it should be included in or attached to this form.
- If the court requires that evidence be given by affidavit then you need to use the COP25 affidavit form.
- You must initial any alterations to the witness statement.
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- Practice Direction A accompanying Part 14 of the Court of Protection Rules 2007 sets out more detailed requirements in relation to witness statements.
- Please continue on a separate sheet of paper if you need more space to provide your witness statement. Please mark each separate sheet with all of the information provided in the box in the top-right corner of this page.
- If you need help completing this form please check the website, [www.hmcourts-service.gov.uk](http://www.hmcourts-service.gov.uk) or [www.direct.gov.uk](http://www.direct.gov.uk), for further guidance or information, or contact Court Enquiry Service on 0300 456 4600 or [courtsofprotectionenquiries@hmcourts-service.gsi.gov.uk](mailto:courtsofprotectionenquiries@hmcourts-service.gsi.gov.uk)
- Court of Protection staff cannot give legal advice. If you need legal advice please contact a solicitor.



## Witness statement

1 Enter your full name

I,

1

DILLON GABRIEL KASTNER

2 Enter your occupation or description

2

FILM SALES REPRESENTATIVE

3 Enter your full address including postcode or, if making the statement in your professional, business or other occupational capacity, the position you hold, the name of your firm or employer and the address at which you work

of

3

FLAT 5  
16 UPPER BROOK STREET  
LONDON  
W1K 7PT

☐ am a party to the proceedings

☒ am employed by a party to the proceedings

and state that:

4 Set out in numbered paragraphs indicating:

- which of the statements are from your own knowledge and which are matters of information or belief, and
- the source for any matters of information or belief.

Where you refer to an exhibit, you should state the identifier you have used. For example, 'I refer to the (description of document) marked Exhibit A...'

4 To Whomever It May Concern:

I, Dillon Kastner, do hereby state that I know Dr. Mark Jones personally for a good many years, having met at YCTV, a youth charity, in approximately 1997, and find him to be one of the most helpful, kind and unselfish persons I have ever had the good fortune to meet.

I can confirm my late father, the respected film producer Elliott Kastner, also met Mark around this time through me, and was very impressed by his character and gentle nature, and also by his expertise in creative and technical matters, specifically with computers and programming, so much so that he wanted Mark to work for him on a significant paid salary, as my father was putting together a team for a number of exciting projects at the time. If any of these hundred million dollar projects were to take off, Mark was also promised a significant cut of the profits as well as his paid salary.

I can confirm that Mark seriously considered joining my father, and wanted to very much, and could have used the money and the immense professional contacts that would have entailed, however, he felt he must decline, as his mother was very important to him, and getting on in life with still many responsibilities, and he felt it his duty to be near to her, look after her, and help her to run her guesthouse, as well as invest what small but significant savings he had into the guesthouse.

As it turned out, none of the big projects came to fruition, but my father was working with a fledgling computer graphics company on an animated version of Treasure Island with a hundred million dollar budget, and Mark was to have been instrumental in developing the computer programming and security and IT support for this company, a company that later was to make several hit animated films and win several awards.

As it happened, Mark had already prepared a lot of the budgets for this film for free and in good faith, thanks to his knowledge from working in preproduction for the BBC for many years. My father did end up making four 10 million dollar films in this period, and the returns were significant enough for Mark to have made enough to show for it for many years to come. Instead he chose to be loyal to his mother, and my father respected his decision.

He remained a very close family friend and still does to this day, as well as having gained a circle of close friends who value his loyalty, and who repeatedly state: "This man doesn't have a mean bone in his body." As my late father, and my sister stated many times as well.

Sincerely,

Dillon Kastner

continued over

4

**Statement of truth**

The statement of truth is to be signed by the witness.

I believe that the facts stated in this witness statement are true.

**Signed****Name**

DILLON GABRIEL KASTNER

**Date**

20/06/14

**Please return the completed witness statement to:**

Court of Protection, Archway Tower, 2 Junction Road, London N19 5SZ

COP  
24  
03.10

Court of Protection

**Witness statement**

Statement given by (name of witness)

Lady Daisy Jellicoe

Statement

☒ 1<sup>st</sup>☐ 2<sup>nd</sup>☐ 3<sup>rd</sup>☐ Other \_\_\_\_\_

Filed on behalf of (name of party)

Dr Mark Robert Edward Jones

Date statement was made

18 June 2014

Case no.

12237493

Full name of person to whom the application relates  
(this is the person who lacks, or is alleged to lack capacity)

Mavis Vicky Rebecca Banks

**Please read first**

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- Court of Protection staff cannot give legal advice. If you need legal advice please contact a solicitor.



## Witness statement

1 Enter your full name

I,

1 LADY DAISY JELlicoe

2 Enter your occupation or description

2 CHARITY WORKER

3 Enter your full address including postcode or, if making the statement in your professional, business or other occupational capacity, the position you hold, the name of your firm or employer and the address at which you work

of

3 104 CHESTERTON RD.  
LONDON  
W10 6EP

☐ am a party to the proceedings

☒ am employed by a party to the proceedings

and state that:

4 Set out in numbered paragraphs indicating:

- which of the statements are from your own knowledge and which are matters of information or belief, and
- the source for any matters of information or belief.

Where you refer to an exhibit, you should state the identifier you have used. For example, 'I refer to the (description of document) marked Exhibit A...'

4 To Whom It May Concern:

I, Lady Daisy Jellicoe, do hereby state that I have known Mark Jones since 2002, when we were introduced by a mutual friend. I found that we had much in common as I have worked for charitable causes for many years, and Mark had a history of working with sick children and cancer patients at both Great Ormond Street and Bart's Hospitals.

I was also grateful to Mark as I have never been especially adept with handling computers, and he was very helpful in choosing a personal computer for me, and explaining its functions. Whenever I have had any 'tech' related problems he has always been extremely generous with his time, and patiently helped rectify them. It is obvious that Mark has a real affinity for technology and is highly skilled in this field.

I, in turn, helped Mark with the linguistics of a computer game he was developing for sick children as an entertainment and educational tool, as I had done English Literature for A-level, and some Literature classes at university, and have always read a great deal. Mark, I believe, had been sponsored and was receiving research funds and the project is now being successfully used for sick children in world wide.

I had also suggested to Mark in 2010, whilst working for a mental health charity, that he might help me set up an online database for service users in my borough, and I offered to pay him a retainer for this work. However I remember that he was unable to participate in this venture because of his familial responsibilities, namely his mother and the guesthouse in Chester. I was struck by his extraordinary devotion to her and his unwavering loyalty and support towards her. It seems he is forever trying to find ways to help lessen her discomfort, be it through nutritional or exercise programmes.

I would like to say that I have always found Mark to be of good and sound character who is honest and selfless in his actions and advice. He is only ever interested in helping others it seems, especially disadvantaged children, which I understood was motivated by Mark being very ill himself as a child and having to spend much of his childhood in hospital. On other projects involving our mutual friend, I saw that he was always helpful, truthful and supportive.

It is clear to me that his mother's welfare has been his number one priority for the best part of the last decade.

Yours sincerely,

Lady Daisy Jellicoe

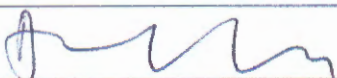
continued over

4

**Statement of truth**

The statement of truth is to be signed by the witness.

I believe that the facts stated in this witness statement are true.

**Signed****Name**

DAISY JELlicoe

**Date**18<sup>th</sup> June 2014**Please return the completed witness statement to:**

Court of Protection, Archway Tower, 2 Junction Road, London N19 5SZ

EXHIBIT D3

**List of Copies of Completed Wills and Codicils**  
**of the Late Mrs Mavis Vicky Rebecca Banks (Mrs Banks, formerly Jones)**  
**Who Died on 14<sup>th</sup> March 2015**  
**Stephen Woodside's (Solicitor) File**

6 <sup>th</sup> March 1986	Will	-	MVR Jones
10 <sup>th</sup> November 2004	Will	-	MVR Banks
27 <sup>th</sup> October 2006	Codicil	-	MVR Banks
29 <sup>th</sup> November 2007	Will	-	MVR Banks
14 <sup>th</sup> January 2009	Will	-	MVR Banks

Exhibit 2006intentWillAndseenSigned

h. Arthur  
32. Ashlands Road  
Buxton

Exhibit 10  
7 PARKFIELD ROAD  
BRIGHTON  
2/9/16

W 16 SFW AD

14 March 2006

Dear Mrs Banks,

Following recent discussions I enclose draft of your proposed Will.

Thus it is provided that Mark should now inherit 32 Hoole Road (together with the studio apartments). The Will stipulates that in effect Mark will be responsible for such Inheritance Tax (or other like Tax) which would be attributable to the value of 32 Hoole Road. Otherwise the whole burden of Inheritance Tax would have fallen upon the Residuary Estate whereby Vicky would have been left with very little if anything.

Once you have considered the draft perhaps you could contact me and I can advise further as necessary.

Yours sincerely,

STEPHEN WOODSIDE

10 When to my Concern  
I saw this Will signed  
I recognise that this is  
the Will content that  
Mrs Mavis Bank. always  
wanted. There was no  
discussion, at any time the  
Mark should possess the  
House after her demise  
S. Woodside 2/9/16

Mrs M V R Banks  
32 Hoole Road  
Hoole Chester



EXHIBIT D4

I MAVIS VICKY REBECCA BANKS of 32 Hoole Road Hoole in the City of Chester declare this to be a second Codicil to my Will which bears date the Twenty Sixth day of June One thousand nine hundred and ninety eight

WHEREAS

BY my said last Will I have made provision for the disposition of my Guest House at number 32 Hoole Road Hoole Chester and have indicated certain specific instructions with regard to the annexe thereto

FOR the avoidance of doubt however I am desirous of ensuring that my son Mark Robert Edward Jones shall be assured of residential facilities if at the date of my death he shall be resident at the Guest House at 32 Hoole Road Hoole Chester or any other address of which I may die possessed

NOW I therefore direct my Trustees to ensure that in the event of my death and provided that my said son shall require residential accommodation at the said Guest House then he shall have full use of the same for so long as he requires and no undue influence shall be brought to bear upon him to grant vacant possession thereof provided that in so residing there he shall pay a proper proportion of the cost of its maintenance which shall include a proportion of the customary outgoings associated with the premises

AND I confirm my said Will and my First Codicil as modified by this Second Codicil

IN W I T N E S S whereof I have hereunto set my hand

This 22<sup>nd</sup> day of August One thousand nine hundred and ninety nine

M. V. R. Banks

Signed by the said Mavis Vicky Rebecca Banks the Testatrix as a Second Codicil to her Will which bears Date The 26<sup>th</sup> June 1998 in the presence Of us present at the same time who At her request in her presence have Hereunto set our hands as Witnesses :-

L. C. Stagg  
Legal Executive  
with Matthew Leach  
Solicitors Chester

Alison Downey  
Secretary with  
Matthew Leach  
Hoole, Chester

# EXHIBIT T1

Exhibit Transcript from Mavis Banks in 24/7/2014

00:00

00:01

MJ: okay so tell me who is Mr Woodside

00:07

Mavis Banks: My solicitor

00:12

00:14

and why did you stop having him

00:16

Mavis Banks: he could not cope with it

00:25

MJ: doing things wrong ?

00:28

Mavis Banks : Nods

NURSE: looking to your wishes yeah hello all

00:36

MJ: right thank you

00:39

MJ: mum in your will the guest house was going to be left to me

00:44

Mavis Banks: Mmm (Agrees)

00:47

MJ: that truth that's and Howard agrees to that

00:50

MJ did you want it to change

0.53

Mavis Banks: No

00:56

NURS: I know you like that got more

01:03

MJ: comfortable

01:25

MJ: yeah that way

01:27

01:45

NURSE: this one's really yeah why did it so

01:48

MJ: Mr Woodside is your Lawyer?

Mavis Banks: agrees

01:51

MJ: what did he do mum

Mavis Banks: jester she was hit by him

02:04

MJ: He did what?

Mavis Banks: he slapped me

02:11

MJ: He physically touched you - are you sure.

02:15

MJ: Woodside physically Hit

Mavis Banks: Nods.

Exhibit T2.

COP  
24  
03.10

Court of Protection

**Witness statement**

Statement given by (name of witness)

MICHAEL EVANS

Statement

☐ 1<sup>st</sup>

☐ 2<sup>nd</sup>

☒ 3<sup>rd</sup>

☐ Other \_\_\_\_\_

Filed on behalf of (name of party)

DA MARK ROBERT EDWARD JONES

Date statement was made

9/7/14

Case no.

12237493

Full name of person to whom the application relates  
(this is the person who lacks, or is alleged to lack capacity)

MAVIS VICKY REBECCA BANKS

**Please read first**

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- Court of Protection staff cannot give legal advice. If you need legal advice please contact a solicitor.



## Witness statement

1 Enter your full name

I, **1** **MICHAEL EVANS**

2 Enter your occupation or description

**2** **ENGINEER**

3 Enter your full address including postcode or, if making the statement in your professional, business or other occupational capacity, the position you hold, the name of your firm or employer and the address at which you work

of **3** **1, KEFFI STREET  
HOLYHEAD  
GWYNEDD  
LL65 2BB**

☐ am a party to the proceedings

☒ am employed by a party to the proceedings

and state that:

4 Set out in numbered paragraphs indicating:

- which of the statements are from your own knowledge and which are matters of information or belief, and
- the source for any matters of information or belief.

Where you refer to an exhibit, you should state the identifier you have used. For example, 'I refer to the (description of document) marked Exhibit A...'

**4** **I HAVE KNOWN MAVIS BANKS AND HERSON MARK FOR ABOUT 15 YEARS.**

**AT 12:00 ON 9/7/14 I HAD A CHAT WITH MAVIS OVER THE PHONE AFTER MARK HAD CALLED ME FROM THE NURSING HOME.**

**MAVIS REMEMBERED ME AS I HAD BEEN STAYING AT THE GUEST HOUSE FOR SUCH A LONG TIME.**

**MAVIS WAS ABLE TO TELL ME THE FOLLOWING BASIC INFORMATION:**

- 1) HER NAME**
- 2) HER AGE (95)**
- 3) HER BIRTHDAY (JUNE 22)**
- 4) THAT SHE WAS IN A NURSING HOME AS SHE HAD SUFFERED A STROKE**

**5) SHE HAD TWO CHILDREN, MARK & VICKY.**

**6) SHE KNEW SHE HAD RUN A GUEST HOUSE**

**7) SHE WAS ABLE TO DO A SIMPLE SUM OF 5+5**

**MARK ALSO ASKED HER SOME QUESTIONS, THAT MAVIS WAS ABLE TO REPLY TO:**

**MAVIS REMEMBERED THAT A WET ROOM WAS BEING BUILT.**

**MAVIS CONFIRMED THAT SHE DIDN'T WANT TO SELL THE GUEST HOUSE AND DID NOT WANT TO LIVE ANYWHERE ELSE OR MADE ARRANGEMENTS**

continued over

TO LIVE ANYWHERE ELSE.

MAVIS WANTED MARK TO RUN THE GUEST HOUSE AND TO BE ABLE TO RETURN THERE AND LIVE WITH MARK,

MAVIS CLEARLY INDICATED THAT SHE WANTED MARK TO TAKE CHARGE OF ALL MATTERS AND HAVE SOLE POWER OF ATTORNEY.

MAVIS SAID 'NO' WHEN ASKED IF SHE WANTED VICKY TO HAVE POWER OF ATTORNEY.

MAVIS, WHEN ASKED ABOUT A MR WOODSIDE, SAID THAT SHE DID NOT TRUST HIM BUT ~~WAS UNABLE~~ <sup>9/7/14</sup> COULD NOT SPECIFICALLY REMEMBER WHY.

CONSIDERING THE EFFECT A STROKE CAN HAVE, MAVIS WAS REASONABLY COHERENT AND GAVE ~~SOME~~ <sup>9/7/14</sup> ACCURATE ANSWERS WITHOUT HAVING TO DELAY IN REPLYING.

*M. G.*  
9/7/14

continued over

**Statement of truth**

The statement of truth is to be signed by the witness.

I believe that the facts stated in this witness statement are true.

**Signed****Name**

MICHAEL EVANS

**Date**

9/7/14

**Please return the completed witness statement to:**

Court of Protection, Archway Tower, 2 Junction Road, London N19 5SZ





Jones Mark  
1 review

EXhibit. T4



Just now

### My mother is on video saying Mr...

My mother is on video saying Mr Woodside hit her to force her to change her Will. Also, she said she had no money which later was found out to be a lie. As for Mr P. Bartlett, he is after peoples Wills to get their homes and this is on video with a person also complaining again about Mr Woodside. When my mother wanted to leave them and complain about them she became ill under a doctor who is now Struck off and knew them. In the end, my mother was murdered. Avoid these people.

Then Bartletts said:

**Bartletts Solicitors reported this review for breach of Trustpilot guidelines. We are currently assessing the review in accordance with our reporting processes.**

### Bartletts Solicitors's reason for reporting

The person who left the review is not a client of this firm and violates Section 1.1 of the Trustpilot's User Guidelines.

The allegations are libellous.



Jones Mark  
1 review

Reported a day ago

**Bartletts says I am not a "Client of this firm" which is a clear lie**

----- Forwarded message -----

From: Michelle Johnson <mjohnson@bartlettslaw.co.uk>

Date: Wed, Dec 19, 2018 at 12:55 PM

Subject: Re: In the matter of the Will of Mr Pierre  
Nichols Bartlett and I (Claimants), and Dr Mark Robert Edward Jones (Defendant)

To: mark@myvibe.net <mark@myvibe.net>

**I am a client as Bartlett are doing my mother's Will.**

The Deceased was of sound mind, memory and understanding at the time she made the Will and she knew and approved of the contents of the Will at the time she made it, as it was prepared on her instructions by her solicitor, Stephen Woodside, then a partner in Matthews Lewis & Co., and was duly executed by the Deceased in the presence of the said Stephen Woodside the attesting witnesses in accordance with the provisions of section 9 of the Wills Act 1837. (Matthews Lewis & Co amalgamated with Bartletts Solicitors Limited on or about 1<sup>st</sup> October 2011.)

**And my mother is on video and other recordings saying "Mr Woodside hit her and told her she had no money to force her to sell her home" See Video  
[https://youtu.be/gdZJGBY5q\\_M](https://youtu.be/gdZJGBY5q_M)**



Woodside

therefore everything is true and this should be put back onto Trustpilot  
it will be on my twitter which has million of hits

By Email only: mark@myvibe.net

Dr Mark Robert Edward Jones  
The Guest House  
32 Hoole Road  
CHESTER  
Cheshire  
CH2 3NJ



Our Ref: PNB/MJ/BAN46  
Your Ref:

Please ask for: Pierre Bartlett  
Tel: 01244 313301  
Email: mjohnson@bartletts.co.uk

Date: 16<sup>th</sup> January 2019

Dear Dr Jones,

**Re: Your Website; Corrupt Solicitors Chester Corrupt Solicitors England**

We write on behalf of Mr Pierre Bartlett and Mr Stephen Woodside who are libelled and slandered in the above website which you have set up according to information received at this office. Mr Bartlett and Mr Woodside deny all allegations of corruption which are untrue and unsupported.

The purpose of this letter is to request you as follows;

1. To withdraw all mention of Mr Bartlett and Mr Woodside from your website on or before 4pm on Thursday 17<sup>th</sup> January 2019.
2. To provide Mr Pierre Bartlett and Mr Stephen Woodside with an undertaking as follows;

**"I, Dr Mark Robert Edward Jones hereby undertake to Mr Bartlett and Mr Woodside:**

- a. That I will not publish or repeat false allegations of corruption made by me on the above website against the reputation and professional practice of Mr Bartlett and Mr Woodside."**
3. You will provide a formal apology to Mr Bartlett and Mr Woodside in the following terms; **"I apologise to Mr Bartlett and Mr Woodside for the untrue and libellous allegations which I have made on the above website against Mr Bartlett and Mr Woodside and I undertake**

16 Nicholas Street  
Chester  
CH1 2NX

**not to repeat such allegations.”**

Failing receiving these undertakings and failing the withdrawal of mention of Mr Bartlett and Mr Bartlett on the above mentioned website, Mr Bartlett and Mr Woodside will be free to issue proceedings for an Injunction preventing you from making such allegations and in addition claim substantial damages for injury to reputation and practice as solicitors.

Yours sincerely

A handwritten signature in black ink, appearing to read 'P. Bartlett', written over a horizontal line.

**Pierre Bartlett**  
**For and on behalf of Bartletts Solicitors Limited**



By Email only: mark@myvibe.net

Exhibit B3 1860 - 2018



Dr Mark Robert Edward Jones  
The Guest House  
32 Hoole Road  
CHESTER  
Cheshire  
CH2 3NJ

Our Ref: PNB/MJ/MREJones - LIBEL  
Your Ref:

Please ask for: Pierre Bartlett  
Tel: 01244 313301  
Email: mjohnson@bartletts.co.uk

Date: 21<sup>st</sup> January 2019

Dear Dr Jones,

**Re: Your Website Entries; Corrupt Solicitors Chester Corrupt Solicitors England**

We note that you include Bartletts Solicitors Limited and members of the firm still as at 21<sup>st</sup> January 2019 on your above website. You have been requested by two previous letters to remove the names of the members of the Bartletts Solicitors Limited's firm and the name of Bartletts Solicitors Limited from your website. You have been requested for undertakings. You have taken no notice of these letters. We again request you to provide the undertakings already requested, and to remove all mention of this firm and its members from your above website.

Both the firm and its members reserve the right to immediately serve proceedings upon you for an Injunction preventing these libels contained in your website and claiming damages from you. You are hereby requested to immediately remove all mention of this firm and its members from your said website.

Yours sincerely

**P.N. Bartlett**  
**For and on behalf of Bartletts Solicitors Limited**

**16 Nicholas Street  
Chester  
CH1 2NX**

**Tel: 01244-313301  
Fax: 01244-319398  
DX: 19989 CHESTER**

Bartletts Solicitors is the trading style of Bartletts Solicitors Limited registered in England and Wales, Company Number 7147450 at Maridon Chambers, 30 North John Street, Liverpool, L2 9QN and Authorised and Regulated by the Solicitors Regulation Authority, no. 536269. VAT No. 985 8043 75.

Exhibit P1

No. 8751-2003

IN THE MATTER OF PIERRE NICHOLAS BARTLETT AND  
JANETTE ENTWISLE, solicitors

- AND -

IN THE MATTER OF THE SOLICITORS ACT 1974

---

Mr A G Ground (in the chair)  
Mr J R C Clitheroe  
Mr D Gilbertson

Date of Hearing: 6th March 2006

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## **FINDINGS**

of the Solicitors Disciplinary Tribunal  
Constituted under the Solicitors Act 1974

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An application was duly made on behalf of The Law Society on the 4th day of February 2003 by David Elwyn Barton, Solicitor Advocate of 5 Romney Place, Maidstone, Kent, ME15 6LE that Pierre Nicholas Bartlett, solicitor of 16 Nicholas Street, Chester, CH1 2NX and Janette Entwisle, solicitor c/o David T Morgan, 9 Gray's Inn Square, London, WC1R 5JF might be required to answer the allegations contained in the statement which accompanied the application and that the Tribunal should make such order as it thought right.

The application was heard at the Court Room, 3rd Floor, Gate House, 1 Farringdon Street, London, EC4M 7NS when David Elwyn Barton appeared as the Applicant, Mr Bartlett was represented by Jim Sturman of Queen's Counsel and Andrew Hopper of Queen's Counsel and Ms Entwisle was represented by David Morgan, solicitor, of 9 Gray's Inn Square, London, WC1R 5JX.

### **The history of the matter**

Although the application had been made in 2003 and the substantive hearing had not taken place until March of 2006, all parties had been active. There had been four interim hearings before the Tribunal. During the course of two of the interim hearings there had been

182. On the second day amended allegations were presented to the Tribunal by consent. Mr Bartlett admitted all of them. Then, in addition to the Solicitors Accounts Rules breaches and conduct unbefitting relating to his failures under allegations 4 to 8, Mr Bartlett admitted conducted unbefitting in that he had:

“compromised or impaired his integrity, good repute and that of the solicitors’ profession by making statements to the Office for the Supervision of Solicitors in the course of an enquiry that were materially false and misleading.”

This was the same allegation as that initially made absent the allegation that such behaviour had been dishonest.



6. MY TRUSTEES shall hold the rest of my estate upon trust either to sell it or (if they think fit and without being liable for loss) to retain all or any of it and :

(a) to pay debts, such tax not attributable to the gift of 32 Hoole Road Hoole Chester, funeral, testamentary and administrative expenses and legacies;

(b) to pay the residue to my daughter Victoria Jane Boulton

7. PROVIDED ALWAYS that if either of my said children namely Doctor Mark Robert Edward Jones or Victoria Jane Boulton shall die in my lifetime leaving a child or children living at my death who attains or attain the age of eighteen years then such last mentioned child or children shall take by substitution (and if more than one in equal shares) that gift which his, her or their parent would have taken under my Will if he or she had survived me but otherwise if either of my said children should die in my lifetime without leaving a child or children living at my death then my surviving child shall take by substitution that gift which such child who has predeceased me would otherwise have taken if he or she had survived me

8. MY TRUSTEES shall have the following powers in addition to their powers under general law:

- (a) to pay to, or apply for the benefit of, any beneficiary as my trustees think fit the whole or any part of the income from that part of my estate to which he is or may in future be entitled;
- (b) to pay to, or apply for the benefit of, any beneficiary as my trustees think fit the whole or any part of the capital to which that beneficiary is entitled or may in future be entitled: and I leave it to the discretion of my trustees as to whether any such beneficiary shall, on becoming absolutely entitled, bring into account any payments received under this sub-clause;
- (c) to exercise the power of appropriation conferred by section 41 of the Administration of Estates Act 1925 without obtaining any of the consents required by the wording of that section, and even though one or more of them may be beneficially interested in the appropriation;
- (d) to invest as freely as though they were an absolute beneficial owner, and to use trust money in or towards the purchase or improvement or repair of a property for occupation as a residence by a beneficiary;

# Exhibit: Fay saw 2006 Will signed

I WITNESSED ECH HOOLE  
SAY I SAW THIS GRAMER  
HOOLE SAY I W. SECOND MIND  
A. Butler 7. PARFEL RD  
Of me MAVIS VICKY REBECCA BANKS of 32 Hoole Road Hoole Chester

1. I REVOKE all former Wills and testamentary dispositions

2. I APPOINT Howard Ernest Churchill Faye of Corner House Farm Park View

Rossett Wrexham and the Partners at the date of my death in the firm of Matthews

Lewis and Co. of Martins Bank Chambers Hoole Chester or in the firm which at

that date has succeeded to and carries on its practice to be the Executors and

Trustees of my Will (hereinafter called "my Trustees") which expression shall

include the Trustees or Trustee for the time being and I express the wish that one

or two only of such Partners shall prove my Will it being my wish that there shall

only be two proving Executors

3. I GIVE the following specific legacies :-

(a) To my daughter Victoria Jane Boulton all my jewellery

(b) To Howard Ernest Churchill Faye whatever furniture may be in the room at 32  
Hoole Road Hoole Chester which the said Howard Ernest Churchill Faye has  
from time to time used as his office

4. I GIVE pecuniary legacies free of tax as follows :-

(a) To Howard Ernest Churchill Faye the sum of Five thousand pounds

(b) To Henrietta Patrick (the Granddaughter of Howard Ernest Churchill Faye) the  
sum of One thousand Five hundred pounds

(c) To Trina McHugh the sum of One thousand Five hundred pounds

(d) To my Granddaughter Claire Ankors the sum of Two thousand pounds

(e) To the Church of St Columba's Upton Chester for general Church purposes the  
sum of One hundred and fifty pounds

5. I GIVE to my son Doctor Mark Robert Edward Jones my property known as 32  
Hoole Road Hoole Chester (and which for the avoidance of doubt shall include the  
studio apartments situated at 32 Hoole Road Hoole Chester) subject however to the  
provision that this gift shall bear it's own share of any Inheritance Tax (and all other  
like Taxes and duties) payable on or by reason of my death

✓ I saw this signed by Mavis  
Banks. H.C. Fay 2/9/16

R. Butler 32. Aslwards Road Chester

- 3
- (e) to insure any asset of my estate on such terms as they think fit, and to pay premiums out of income or capital, and to use any insurance money received either to restore the asset in question or as if this money were the proceeds of sale;
  - (f) in any case where they have an obligation or discretion under this my will or general law to pay income or capital to or for the benefit of an infant, to meet that obligation or exercise that discretion by paying either to a parent or guardian of the infant or to the infant personally, if he shall have attained the age of 16, so that their respective receipts shall be a full discharge to my trustees who shall not be required to see to the application of any payments so made

9. ANY Executor or Trustee for the time being hereof being a Solicitor or other person engaged in any profession or business shall be entitled to charge and be paid (in priority to all other dispositions contained herein) all usual professional or other charges for business done by him or his firm in connection with the proving hereof whether in the ordinary course of his profession business or not and including business which an Executor or Trustee not being engaged in any profession or business could have transacted personally

AS W I T N E S S my hand to this my last Will the                      day of  
Two thousand and six

SIGNED by the said MAVIS VICKY  
REBECCA BANKS the Testatrix as and for her last  
Will in the presence of us both present  
At the same time who at her request in  
Her presence and in the presence of each  
Other have hereunto subscribed our names  
As witnesses :

Exhibit will 2

I H. Fey want Dr Mark Jones to be Executor of Mavis Banks Will.  
I ask for Mr Bartlett to step down and be removed immediately.

Signed:  
DATE

H. I. Fey

2/9/16 M.J.

Witnessed by  
DATE

I am of sound mind  
and limbs and  
have a clear  
recollection of the  
situation that  
seemingly, has  
led to this dispute

I SIGNED HEREBY  
SAY OF SOUND  
MIND AND  
TO THE

H. I. Fey  
7 PARK FILL

~~2/9/16~~ 2/9/16

R. Brown  
32. Ashlands Road.  
Weston Rhyn  
Oswestry



Exhibit WILL 3

I H. Fey want Dr Mark Jones to be given the Guest House for the invoices value.  
Also other assets to the value of the total value of Dr Jones invoices.

Signed:  
DATE

J. H. Fey.

Witnessed by  
DATE

2. 9. 16

H. P. P. P. P.  
7 PARKFIELD  
RD  
B. REC. (H7C)

A. Arthur  
32. Ashlands Road  
Weston Rhyn  
Gwent

**Evidence**

I the under sign agree to the following statements on past events is true.  
 In the past Mavis Banks was of sound mind but was physically ill at times.  
 She owns a Guest House at 32 Hoole Road, Hoole, Chester. CH2 3NJ.  
 Mavis Banks has a son called Dr Mark Jones.

1) Mavis Banks clearly said that if Mark Jones looked after the guest house: maintain, update, put money into etc (detriment to Mark Jones) and help Mavis Banks.

Then Mark Jones would have in CONSIDERATION the guest house.  
 Mavis Banks also said "Mark Jones had in the past on many occasions looked after the Guest House (maintain, updated, put money into, made sacrifices, stopped it going bust etc) and it was therefore fair that Mark Jones had it.  
 The EVIDENCE is she said this in front of H. Faye and others.

2) Acceptance, "Mark Jones accepted this at face value."

3) Intention to create legal relations, "was not taken at that time as Mark Jones trusted his mom". Mark Jones was shown and told he would get the guest house for the work he was doing on many occasions.

4) Consideration. "Mark Jones had loss of income, opportunities and worked for nothing for his mom for the consideration of the Guest House"  
 Mark Jones changed his whole life to help support the Guest House and his mom.  
 Mark Jones did not take important fellowships (on two occasions) with a loss of income and opportunity. Mark Jones did not go to USA/London for a job offers etc.

5) Mavis Bank made it quite clear if she became ill she would let Mark Jones run her business and bring up his family there for the above consideration.  
 Note: Now the council has put a charge on the guest house which ignores the above and they were told about the above. This must change.

6) All of the above statements were repeated on many occasions in the past when Mavis Banks was in good mind (good Mental Capacity) and physically well.

I the under sign agree to the above.

**Witnessed by:**

Signed:

Date:

**Second witnessed by:**

Signed:

Date:

H. Faye -  
 11 Feb 2013

Ann Arthur  
 11/2/13

Ann Arthur  
 32, Ashlands Rd.  
 Weston Rhyn  
 Oswestry  
 11.02.13 Shops  
 SY10 7TW

Exhibit P1.



ACRO Criminal Records Office

ACRO Criminal Records Office

PO Box 623

Fareham

PO14 9HR

Dr Mark Robert Edward JONES  
Flat 9 Pine House  
197 Town Mead Road  
London  
SW6 2HF

Our Ref: SA/17/006540  
Originating Police Force:  
Metropolitan Police

E-Mail:  
[subjectaccess@acro.pnn.police.uk](mailto:subjectaccess@acro.pnn.police.uk)  
Date: 02 May 2017

Dear Dr JONES

**Subject Access Section 7, Data Protection Act 1998**

I am writing in reply to your request for information that may be held about you on the Police National Computer (PNC).

The Data Protection Act 1998 places an obligation on the police when holding personal information on computer to provide a copy of that information to the individual concerned on request, unless an exemption applies.

**From the personal details supplied in your request there is no information held about you on the PNC.**

**This document does not constitute a Certificate of Good Character**

If you have requested information which may be held on a local police system, that will be returned to you under separate cover by the appropriate police force. ACRO does not have access to information held on local police systems.

Should you have any concerns regarding the information contained in this disclosure, please contact us in writing or by email using the contact details shown above.

Yours sincerely

James Fulton  
Superintendent  
Head of ACRO Criminal Records Office