

**IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION
INVESTIGATORY POWERS TRIBUNAL**

BEFORE:

MATTHEW THOMAS PARISH

Claimant

- and -

PERSONS AND/OR ENTITIES UNKNOWN

Defendants

FURTHER PARTICULARS OF CLAIM

These Particulars of Claim supplement those dated 15 July 2021 in this matter.

1. The Claimant is a British citizen, English solicitor and New York attorney and counselor-at-law, date of birth 21 July 1975. He is a well-known international lawyer and an English solicitor of some repute, with some 20 years plus of experience in litigation and arbitration.

2. From no later than early 2013, and quite possibly before, the United States Central Intelligence Agency considered him in some sense or other an intelligence agent to be used for sensitive legal cases. It is not known whether and if so when and to what extent the British Secret Intelligence Service similarly so considered him.

3. At all material times until June 2019 (as explained below), the Claimant was a close personal friend of Daniel Vadim O'Brien, a citizen of the United Kingdom of Great Britain and Northern Ireland and of the Russian Federation, who at all material times lived in Dubai, in the United Arab Emirates. They had studied at Christ's College, Cambridge together as undergraduates between 1993 and 1996. There was a difference in their academic records;

whereas the Claimant had achieved Triple First Class Honours, Mr O'Brien was a notoriously bad student, almost failing his Finals until the Senior Tutor stepped in to appeal for him.

4. In May and June 2019, the Claimant was present in Belgrade, in the Republic of Serbia, and was suffering from a nervous breakdown as the result of a 'sexualised disinformation campaign' apparently run by the Russian government against the Claimant and his Ukrainian fiancée, as described in the Particulars of Claim dated 15 July 2021.

5. At all material times Mr O'Brien was, whether wittingly or otherwise, working as an intelligence agent of a government in the course of his employment as a consultant for a purported management consultancy called 'Thuso' and whose head office was/is in Tallinn, Estonia. The *de facto* manager of 'Thuso' was a man variously known as Maty Damborkand/or Matey Damborsky, variously described as of Czech, Estonian and/or Russian nationalities.

6. Somewhat before 10 June 2019, the Claimant's Ukrainian fiancée having left Belgrade to live with her parents in southern Ukraine on 16 May 2019, herself under circumstances of a nervous breakdown as described in the Particulars of Claim dated 15 July 2021 before this Honourable Tribunal, Mr O'Brien invited the Claimant to come to visit him in Dubai, an offer which the Claimant accepted. The Claimant eventually stayed in two weeks, arriving in Dubai on 10 June 2019 and leaving on the morning of 23 June 2019, in the circumstances as hereinbelow explained.

7. Mr O'Brien and his wife arrived with their family car to collect the Claimant from DXB (Dubai's principal airport) on the evening of 10 June 2019, but both extremely drunk and aggressive and refusing aggressively the Claimant's proposal that the three of them go to the O'Brien house on 'the Palm' (an area of Dubai) in a taxi because neither of the O'Briens were in the opinion of the Claimant fit to drive. (The Claimant was not drunk but he does not have a driving licence.)

8. During the Claimant's stay with them in their house on 'the Palm', both Mr O'Brien and his wife insistently and without provocation or request repeated a narrative that the Claimant's relationship with his beloved Ukrainian fiancée (as detailed in the Particulars of Claim dated 15 July 2021) was irrevocably over, without the O'Briens offering any explanation of this assertion; this repeated and ungrounded assertion was much to the Claimant's distress, who had attempted suicide twice in consequence of his fiancée's having left Belgrade and the sexualised disinformation campaign against her as described in the Particulars of Claim dated 15 July 2021. When the Claimant explained that he did not want to discuss this subject (about which at the time

he had no reason to believe that either Mr O'Brien or his wife had any knowledge), both Mr and Mrs O'Brien became ever more insistent and confrontational about the matter.

9. Mr O'Brien and his wife drank alcohol (which the Claimant was seeking to abstain from in light of his recent nervous breakdown) virtually non-stop from morning to night, something which made the environment exceptionally aggressive for the Claimant who was in an admittedly poor mental state.

10. It became apparent to the Claimant that Mr O'Brien and his wife were of extremely poor finances, by reason of (so they explained) their becoming involved in a Russian fraudulent mortgage scheme by which they had been persuaded to buy one or more apartments in residential skyscrapers on credit with banks the owners of which were unknown to them; and with Russian tenants who would subsequently cease paying the rent, rendering Mr O'Brien and his wife potentially subject to incarceration and/or a ban upon leaving the country under the United Arab Emirates' laws on the criminalisation of debt.

11. Mr O'Brien's work obligations for and income from his employment with Thuso were, as he explained to the Claimant, highly erratic.

12. The Claimant invariably paid for Mr O'Brien and his wife whenever they ventured out from their house for a meal or refreshment.

13. During the Claimant's stay with the O'Briens, Mr O'Brien repeatedly removed his penis and testicles from his trousers and displayed them in public in a number of Dubai bars and restaurants, much to the Claimant's disgust and notwithstanding his remonstrations.

14. One night, on or about 17 June 2019, the Claimant's remonstrations about this matter came to a head with Mr O'Brien standing naked (save for a bath towel around his waist) demanding that the Claimant strike him with Mr O'Brien being prone and/or not protecting himself. The Claimant having had some training in martial arts, he refused to do this but was so concerned about Mr O'Brien's aggression that he locked himself in the guest bedroom and called a colleague of Mr O'Brien, explaining the situation and asking that colleague to call a taxi to take the Claimant away from the house of Mr O'Brien.

15. That colleague refused to call a taxi but, under pressure, did give the Claimant the number of a Dubai taxi company that the Claimant then called. The Claimant departed in the middle of the

night with all his belongings and spent the balance of his stay in Dubai in a hotel, the Marina Byblos Hotel in the Dubai Marina, without seeing Mr O'Brien.

16. A colleague of Mr O'Brien asked the Claimant to meet him in a mediatory or conciliatory mode and the Claimant agreed. Eventually the Claimant and Mr O'Brien met at 07.45am on the morning of 23 June 2021, just before DXB passport control as the Claimant prepared for boarding his return flight to Belgrade. The Claimant had prepared some conciliatory remarks to the effect that he had had no desire to upset Mr O'Brien as the guest of Mr O'Brien and his wife; and the Claimant delivered those remarks to Mr O'Brien, who responded with vile and bilious remarks and said that the Claimant and Mr O'Brien would not meet one-another until they were both 80.

17. Subsequently Mr O'Brien took measures to expel the Claimant from his London Club, as set out in the attached Particulars of Claim 'Parish v The Athenaeum' dated 6 October 2021 which the Claimant incorporates herein as part of these Particulars of Claim.

The Slovene Incident

18. In 2012 (the Claimant forgets which month), Mr O'Brien invited the Claimant to dinner at a house just outside and to the west of Ljubljana, the capital of Slovenia, with a couple we shall call 'X' (the female partner) and a gentleman called Richard Chambers. They were married. Mr Chambers is and was an academic theologian.

19. The house in question had extraordinary security measures, including but not limited to steel shutters that came down over the windows and essentially made the property a fortress.

20. Mr O'Brien explained to the Claimant that X was an officer of the US Central Intelligence Agency, something she and Mr Chambers themselves confirmed over dinner. The conversation over dinner was principally a discussion of X's forthcoming CIA mission to Helmand Province, Afghanistan (that was to be for either one or two years; the Claimant forgets precisely how long but it was for a substantial period).

21. The dinner proceeded amicably until the Claimant asked X how the extended mission would impact upon her family. In response X flew into an incoherent and frightening rage, at which point the Claimant went to his appointed bed in the house, on an upstairs level, to avoid further conversation.

22. In the morning the Claimant rose at approximately 7.30am and only X was in the kitchen. In order to calm matters, the Claimant apologised for anything he might have said amiss the previous evening. X's response was 'you are not forgiven' (the Claimant remembers these precise words). X was wielding a sharp large kitchen knife in an aggressive way, and the Claimant did not feel that this was a safe environment. The Claimant asked X 'do you want me to leave right now?'. She said 'yes', whereupon the Claimant gathered his belongings in his bag, left the house and walked the few miles into central Ljubljana. Mr O'Brien came by car to collect the Claimant from a central Ljubljana coffee shop later in the day.

23. The Claimant does not know what cause of action he has arising out of or relating to these events; but he strongly suspects there has been an Article 8 European Convention breach of his rights to a family and/or private life; and he asks this Honourable Tribunal to make the appropriate enquiries.

24. In particular, the Claimant respectfully asks this Honourable Tribunal to investigate whether (a) the foregoing events and/or any events arising out of them or related to them, have damaged his career; (b) the same have damaged his friendships; and/or (c) the same were part of a pattern of activity that ultimately led to the termination of the Claimant's relationship with his Ukrainian fiancée.

25. The Claimant also respectfully invites this Honourable Tribunal to investigate whether the conduct hereinabove described may have jeopardised the Claimant's efforts in negotiating a financial settlement with the Kuwaiti Royal Family in respect of the events referred to in the prior Particulars of Claim filed before this Honourable Tribunal and dated 15 July 2021.

26. In the circumstances, the Claimant respectfully submits that there has been a breach of his Article 8 European Convention rights, and/or other legal rights, which ought to be recognised and for which he ought to be compensated.

AND THE CLAIMANT CLAIMS, as against X, Mr O'Brien, and/or any other culpable person and/or entity:

1. Damages, including but not limited to punitive, aggravated and/or exemplary damages, for loss of career opportunity, loss of family relations, and loss of relationships and/or friendships;
2. Declaratory relief, in such terms as the Tribunal may think fit;

3. Legal costs and expenses;

4. Interest on the foregoing, on a statutory basis, pursuant to the inherent jurisdiction of the Court, and/or on such basis as the Court considers appropriate.

Statement of Truth

The Claimant believes that the facts stated in this Particulars of Claim are true. The Claimant is aware that proceedings for contempt of court may be initiated against a person who signs a Statement of Truth in respect of a Particulars of Claim which contains statements of fact in respect of which the person does not have an honest belief.

SIGNED

A handwritten signature in blue ink, appearing to be 'M. P. [unclear]', written over a horizontal line.

Date: 7 October 2021