

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

BEFORE:

MATTHEW THOMAS PARISH

Claimant

- and -

PERSONS AND/OR ENTITIES UNKNOWN

Defendants

FIFTH FURTHER PARTICULARS OF CLAIM
(MURDER IN BELGRADE)

These Particulars of Claim supplement those dated 15 July 2021, 7 October 2021, 12 October 2021, 12 November 2021 and 18 January 2022 in this matter. No assertions previously therein made are withdrawn.

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. Without withdrawing any claims made in the prior Particulars of Claim in this matter, the Claimant now makes some further assertions that, for the reasons that follow, might more appropriately have been made in the Fourth Further Particulars of Claim dated 18 January 2022.
2. Of the USD60 million that the First Defendant Sheikh Ahmed Al-Fahed Al-Ahmed Al-Sabah in the Fourth Further Particulars of Claim declared at the trial of the Geneva Proceedings in August / September 2021 to be his total assets, despite his at the same time stating his

annual salary to be USD70,000, the Claimant estimates that (i) a substantial proportion thereof is the proceeds of corrupt funding arrangements in international sporting organisations, to the effect that the First Defendant controls the management of said organisations (appointed on a one member state-one vote basis) by making facilitation payments (or the equivalent in kind) to less well-off member states in exchange for their votes for management candidates who fall under his influence on the boards of said organisations; whereupon he has been able to cause those international sporting organisations to enter into commitments to his improper benefit, such as (but not limited to) the Olympic Council of Asia, which is principally a front for his financial activities; and (ii) another proportion thereof is the proceeds of passing hard drugs across international borders, including from Latin America to Europe and the Middle East and in particular Kuwait where he is a notorious drug dealer.

3. This Tribunal is in a unique position to assess the veracity of and rule upon the factual accuracy of these claims, because it is not bound by the usual rules of civil procedure disclosure or discovery of evidence pursuant to a Police warrant, having as it does full access to the files of all of the Security Service, the Secret Intelligence Service and Government Communications Headquarters, and equivalent files of equivalent agencies in the Five-Eyes intelligence-sharing network.
4. The Fourth Further Particulars of Claim are therefore expanded to include an allegation of negligence by the Secret Intelligence Service, through whosoever it was acting, in seeking to facilitate or have any part in the funding of the Claimant's proposed business activities using funds that in all probability at least in part had the foregoing sources. The Secret Intelligence Service should have known that said funds might have such improper sources and hence be laundered, but suffered those negotiations for the funding of the Claimant's business notwithstanding the palpable risk of money laundering (and without telling the Claimant the source of the funds, which he was left to infer from circumstantial evidence). This is not to say that the Claimant is accusing any specific individual through whom the Tribunal finds that the Secret Intelligence Service may have been acting of either knowing the foregoing or that they should have known the foregoing. The Claimant does not know which individual knew what. Rather the Claimant's assertion is that the Secret Intelligence Service as a whole should have been aware of the possibility that, given that the funds were to be provided by the Second Defendant Mr Hamad Al-Haroun who at all material times is and has been an agent of the First Defendant Sheikh Ahmed Al-Fahed Al-Ahmed Al-Sabah, they were likely to be tainted and hence unacceptable to both the Secret Intelligence Service who was intermediating the transaction and the Claimant who is an

English solicitor. The Secret Intelligence Service acted negligently in proceeding to play the role it did in the transaction, notwithstanding the aforementioned matters that it ought to have known that rendered the entire transaction unlawful.

5. The aforementioned negligence is corroborated by the fact that the financial advisors the Claimant had retained for the transaction, Smith Eliot Financial Management, declined instructions on Wednesday 19 January 2022, two days after the Claimant had resigned from the transaction (on Monday 17 January 2022), because their own due diligence procedures had yielded a negative result for the transaction no doubt by reason of the facts and matters described hereinabove.

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6. The purpose of this document is to set out a series of facts that may or may not cause the Claimant to have a cause of action. The Claimant does not know, but he believes that the Tribunal will find these facts extremely concerning and he invites the Tribunal to undertake the requisite enquiries to get to the bottom of the matter.

7. On the night of 30 December / 31 December 2021, at approximately 1:30am on 31 December 2021, a Croatian citizen by the name of Matej Periš left an Emirati-owned nightclub called Klub Gotik in the Belgrade Waterfront region of Belgrade, about 2km from where apartment of the Claimant. Matej Periš is an exact transcription into Serbo-Croat of the Claimant's name Matthew Parish.

8. Mr Periš, aged 27, lived in Split, in Croatia, and had travelled to Belgrade with friends to celebrate New Years Eve in the party capital of Eastern Europe. He had no other known connections with Belgrade and no known enemies of substance.

9. The CCTV cameras inside Klub Gotik were turned off during the period when Mr Periš was in Klub Gotik.

10. A CCTV camera on the main road outside the club records a man running out of the club on his own without a jacket, and attempting to flag down a taxi. The taxi stops, but refuses to take Mr Periš. This has been confirmed in a Police interview with the taxi driver, who informed the Police that he refused to take Mr Periš because he was going to collect a passenger on a pre-reserved ride.

11. There is no further sighting of Mr Periš, whether by witnesses, CCTV or otherwise, and he is missing presumed dead.

12. There is no evidence that Mr Periš was intoxicated in any way at any relevant time.

13. Matej Periš is an extremely rare name in the Balkans: so rare, in fact, that there appear to be only two people in the whole of Serbia and Croatia (the Claimant has checked the telephone directory for both countries): Mr Periš, age 27, of Split; and Matthew Parish, the Claimant, aged 46 and currently situated in Belgrade, Republic of Serbia.

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14. In informal discussions with the Claimant, with whom the Belgrade Police have informal and friendly connections, the Police have informed the Claimant that (a) that are convinced that Mr Periš is dead; (b) his body is in the River Sava; (c) they toyed with the hypothesis that Mr Periš had taken LSD and this had led him to throw himself into the River Sava when it was freezing cold, but ultimately they have discounted this hypothesis for multiple reasons not least that LSD is virtually impossible to acquire in Belgrade (moreover Klub Gotik, being a relatively upscale venue, is not a club known for drugs); (d) they have found some CCTV footage of a man jogging round Savski Venac (a region of Belgrade a short distance from Club Gotik) but there is no evidence that the person jogging is Mr Periš; (e) at one point there was a rumour that his body was 20km upstream in the Sava (close to a quiet village settlement called Ostružnica), and a trawl of the river has been done there but no body has been found; (f) no CCTV cameras in the centre of the city (which has fairly good CCTV coverage) show any person entering the River Save at any relevant time; (g) a trawl of the river has been undertaken near Klub Gotik has no body has been found.

15. Further, the Police have advised that (a) the Claimant take great care for his personal safety, just going to the regular venues he normally visits; (b) he informs a person daily of his intended nightlife movements; (c) he maintains his apartment CCTV cameras in full working order; and (d) he maintains his burglar alarm in full working order and turns it on during any extended absence from his central Belgrade apartment.

16. The matter has featured in virtually every Serbian newspaper every day since 31 January to the date of these Fifth Particulars of Claim, sometimes with multiple updates on rolling television / internet media. There has been blanket coverage but no substantial advances.

17. In the view of the Claimant the Police may or may not really know what became of Mr Periš and it is possible that they are hiding the truth. However the Police also seem, from their actions, to be concerned that the affair may relate to the Claimant, who is well-known in Dorćol, the neighbourhood of central Belgrade in which he has an apartment. In other words, the Police seem to think that this may be a case of mistaken identity. The Claimant does have powerful enemies, not least Sheikh Ahmed Al-Fahad Al-Ahmed Al-Sabah and Hamad Al-Haroun, whereas Mr Periš does not.

18. The Claimant has been to the Belgrade Waterfront region to study the location of Klub Gotik. It would not be easy to jump from the waterfront promenade into the River Side proximately to the location of Klub Gotik, because of the existence of various metal fences / barricades associated with the proximity of Belgrade maritime passenger terminal which is located at that point on the River Sava.

19. The water flows slowly at that point on the Sava, because it is just prior to the confluence of the Sava with the heavier-flow Danube River. Hence had Mr Periš been immersed in the Sava River proximately to Klub Gotik, by reason of the freezing temperature of the water he can expect to have been knocked unconscious immediately upon immersion, and to have died soon afterwards as his lungs filled with water. In consequence he would be easily found upon a trawl, his body being a maximum of 20 metres downstream from the place of immersion in the water. No body has been found within this perimeter.

20. Deaths by murder or misadventure of foreigners are exceptionally rare in contemporary Serbia.

21. One possible hypothesis upon a mistaken identity theory is that Mr Periš had been found on a list of people having reserved at the upscale Klub Gotik; Mr Periš was poisoned, on the assumption that he was the Claimant (because the name is so rare); he fled Klub Gotik in a hurry when he realised he had been poisoned; at some point accomplices found him unconscious or in a poor state of mind, realised they had got the wrong person; and disposed of the body.

22. The Claimant speculates in the foregoing. But the chances are more than a million-to-one against; if this was a case of mistaken identity, then the person with whose identity the victim was mistaken must surely have been the Claimant.

23. The attitude of the Police in informal discussions with the Claimant suggest that they are, at the least, entertaining this hypothesis.

24. If this was a case of mistaken identity, then the motives of the attackers is a matter for which the Tribunal can speculate as easily as the Claimant.

25. In any event the Claimant feels disconcerted by these events and wishes to bring them to the Tribunal's attention so that they might be investigated by the appropriate forum. The Claimant does not yet know whether these events give rise a cause of action justiciable by this Tribunal, and reserves his rights in this regard further to plead about this matter.

26. To read the constant media coverage of this affair (virtually all of which is in Serbian), Google "Matej Periš" to find hundreds of thousands of results.

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



Date: 20 January 2022