

x

Raheem J. Brennerman
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PRESCENCE OF INMATE
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P. O. Box 1000
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Mr. Paul LEWIS
Firmwide Managing Partner
LINKLATERS LLP
One Silk Street
London, EC2Y 8HQ
ENGLAND, UNITED KINGDOM

-and-

Mr. Thomas A. McGRATH
U.S. Managing Partner
LINKLATERS LLP
1290 Avenue of the Americas
New York, NY 10104

February 28, 2022

URGENT CORRESPONDENCE

BY E-MAIL

E: paul.lewis@linklaters.com

E: thomas.mcgrath@linklaters.com

WITHOUT PREJUDICE

Regarding: Request for Documents(Evidence)/Pre-Action Notice.

Dear Messrs. Lewis and McGrath:

The undersigned, Raheem J. Brennerman ("Brennerman") respectfully submits this correspondence in compliance with the civil procedure rule and applicable laws of England and Wales, the rules and regulations of the Solicitor Regulatory Authority ("SRA") in England and Wales, the U.S. Federal Rules of Civil Procedure and U.S. Federal Rules of Criminal Procedure, to respectfully request for certain pertinent and exculpatory documents/evidence in your possession as more succinctly highlighted below.

I write pursuant to the rules and regulation of the Solicitor Regulatory Authority and in compliance with applicable laws of England and Wales to request for the following documents, which were provided

to Linklaters LLP including Linklaters LLP's New York office by ICBC (London) plc, the [underwriting file] related to the bridge loan transaction between ICBC (London) plc ("ICBC London"), The Blacksands Pacific Group, Inc. ("BSPG"), and Blacksands Pacific Alpha Blue, LLC ("BSPAB"). In addition to the [meeting minutes], [notes], and [emails] related to the settlement discussion with respect to the aforesaid bridge loan transaction.

I will give fifteen (days) to receive the requested documents/evidence, otherwise I will proceed to formally file complaint with the Solicitor Regulatory Authority ("SRA") to compel compliance of Linklaters LLP. A U.K. law firm conspiring with a foreign government to wrongly convict and falsely imprison a U.K. citizen is a very serious matter. Likewise, aiding and abetting such conduct is equally serious.

Background:

Summarized within the collateral attack petitions at U.S. v. Brennerman, 17 Cr. 337 (RJS), EFC Nos. 269, 270, 272; at Brennerman v. U.S., 22 Cv. 996 (LAK), EFC Nos. 1, 2, 4, 9; and at U.S. v. Brennerman et. ano., 17 Cr. 155 (LAK), EFC Nos. 211, 212, 215 are the detailed summary and history of this matter.

Misconduct/Corruption:

In 2016, Judge Lewis A. Kaplan ignored the federal rule to conduct extra-judicial research into me, including Googling me and realizing that I am a black businessman, he invited Linklaters LLP through Attorney Paul S. Hessler, who was responsible for the ICBC (London) plc relationship at the Linklater's New York office, to pursue me for contempt even while there was no court order directing me personally to do anything. The underlying civil case at 15 Cv. 0070 (LAK) was between ICBC London and BSPG, an oil and gas corporation where I was Chairman and CEO. Without even filing a motion to compel me personally, Mr. Hessler filed an order to hold me in contempt of court, illegally piercing through the corporate veil of BSPG. Judge Kaplan did not permit either myself or my attorney enough time to appear in Court before granting Mr. Hessler's request and holding me personally in civil contempt. Following which, Judge Kaplan then actively sought federal prosecutors at the United States Attorney Office for the Southern District of New York ("USAO, SDNY") to prosecute me criminally. When the initial set of prosecutors refused to prosecute, Judge Kaplan actively sought more willing prosecutors.

In early 2017, the new prosecutors from USAO, SDNY charged me in two interrelated criminal cases, criminal contempt of court at case no. 17 Cr. 155 (LAK) before the same judge who initiated the prosecution, Judge Lewis A. Kaplan and fraud at case no. 17 Cr. 337 (RJS) before Judge Richard J. Sullivan.

The criminal contempt of court case charged me with flagrant defiance and willful disobedience of a legal court order issued by Judge Lewis A. Kaplan to BSPG notwithstanding that I was not personally named in the said court order. The fraud case charged me with fraud related to the bridge loan transaction between ICBC London, BSPG and BSPAB. Both criminal cases required the requested [underwriting file], [meeting minutes], [notes], [emails] to demonstrate that neither BSPG or I, willfully disobeyed or defied the court order, because agents of ICBC London continually advised agents of BSPG and I that they were interested in settling rather than receiving more discovery (BSPG had already provided over

400 pages of discovery at this point), compelling us to focus on settlement rather than providing more discovery, particularly given the second court order which stipulated for the parties to either settle or provide discovery. A settlement was agreed-in-principle prior to commencement of the prosecution (see Draft Settlement Agreement at U.S. v. Brennerman et. ano., 17 Cr. 155 (LAK), EFC No. 12 Ex. 10). The [underwriting file] was also required for my defense in the fraud case, for me to demonstrate that ICBC London did not rely on any representations or alleged misrepresentation by BSPG or me, in approving the bridge loan.

However, Linklaters LLP through Attorney Hessler conspired with the prosecutors at USAO, SDNY to deprive me access to the evidence/documents, by intentionally withholding the production of those pertinent and exculpatory evidence/documents to the prosecutors at USAO, SDNY, so as to ensure that they [prosecutors] would not produce the documents/evidence to me for my defense.

During trial of the fraud case, the prosecutors presented their sole witness from ICBC London, Mr. Julian Madgett to testify to the jury as to the contents of the underwriting file in establishing the essential element of "Materiality", knowing that I had been deprived of the documents/evidence I required to challenge his testimony. The prosecutors never obtained or independently reviewed the underwriting file to corroborate the statements of Mr. Madgett prior to charging me with a crime or presenting his testimony at trial. More significantly, the prosecutors never obtained or produced those documents/evidence to me for my defense. This was done with the deliberate intention of violating my Constitutional rights.

At trial, Mr. Madgett testified as to the existence of the underwriting file, its importance to the criminal cases. He [Madgett] testified that the underwriting file documents the basis for the bank, ICBC London approving the bridge loan finance between ICBC London, BSPG and BSPAB, thus highlights what the bank relied upon in approving the bridge loan. Yet the prosecution refused to obtain, review or produce the documents/evidence. Mr. Madgett also testified that, the bank had produced all documents/evidence related to the transaction to their New York based counsel, Linklaters LLP and Attorney Hessler and he [Madgett] was unaware whether those documents/evidence were fully turned over to the defense. See U.S. v. Brennerman, 17 Cr. 337 (RJS), trial tr. 551-554; see also U.S. v. Brennerman et. ano., 17 Cr. 155 (LAK), EFC No. 215 Ex. 1; and Brennerman v. U.S., 22 Cv. 996 (LAK), EFC No. 9 Ex. 1.

To convict me for bank fraud and bank fraud conspiracy, Judge Richard J. Sullivan then intentionally misrepresented (fabricated) evidence so as to falsely satisfy the law to convict and imprison me. See U.S. v. Brennerman, 17 Cr. 337 (RJS), EFC 269, 270, 272; see also 17 Cr. 337 (RJS), EFC No. 272 (emphasis added). Throughout the prosecutions, both Judge Kaplan and Judge Sullivan intentionally denied and deprived me access to those ICBC London documents/evidence. They both repeatedly denied my request for the documents/evidence.

During appeal of the criminal convictions, as highlighted at U.S. v. Brennerman, 17 Cr. 337 (RJS), EFC No. 269, the Second Circuit U.S. Court of Appeals' panel Court of three appellate judges, in an endeavor to protect Judge Sullivan, obfuscated on the issue of misrepresentation with respect to the bank fraud conviction and falsely stated in their affirmation summary order that "the only indication that the documents [ICBC underwriting file] are extant comes from Brennerman's bare assertion" in contrast with the case record and testimony at U.S. v. Brennerman, 17 Cr. 337 (RJS), trial tr. 551-554.

I have communicated with journalists and media organizations in both United States and United Kingdom to succinctly present evidence of corruption between Linklaters LLP, Attorney Hessler, USAO, SDNY and the Judges. I have now presented my collateral attack petitions which succinctly highlight the issues stated above at Brennerman v. U.S., 22 Cv. 996 (LAK), EFC Nos. 1, 2, 4, 9 in respect of the criminal contempt of court conviction and at U.S. v. Brennerman, 17 Cr. 337 (RJS). EFC Nos. 269, 270, 272 in respect of the fraud conviction.

Furthermore, I requested that the journalists and media organization allow me to succinctly present the issues on record, while they continue to closely watch my submissions and endeavors by both the judges and prosecutors in their attempt to prejudice me and obfuscate the issues, prior to their comprehensive reporting on the corruption.

Evidence Request:

Linklaters LLP is a limited liability partnership registered in England and Wales with registered number OC326345. It is a law firm authorized and regulated by the Solicitors Regulation Authority in England, U.K. While, I, Raheem Jefferson Brennerman, am a U.K. citizen who has been wrongly convicted and falsely incarcerated arising from the conspiracy between Linklaters LLP, a partner at Linklaters LLP - Attorney Paul S. Hessler and prosecutors at USAO, SDNY. As a British citizen, I have been assigned Vice Consul Jacqueline Greenlaw at the British Consulate General, N.Y. as my liaison and case manager in respect of this situation.

In reliance and compliance with applicable laws of England and Wales, the rules and regulations of the Solicitors Regulation Authority and the U.S. Federal Rule of Civil Procedure and U.S. Federal Rule of Criminal Procedure, I, Raheem Jefferson Brennerman respectfully request for the documents/evidence highlighted below to prove my innocence and regain my liberty. Linklaters LLP, a U.K. law firm has the obligation to ensure adherence with the rule of law, particularly to secure the human, civil and Constitutional rights of a U.K. citizen.

To-date, ICBC London through Linklaters LLP and Attorney Hessler already provided documents to the prosecutors at USAO, SDNY notwithstanding that they excluded the pertinent documents/evidence. Mr. Madgett testified at trial on behalf of ICBC London as to alleged contents of the underwriting file. And Attorney Hessler submitted victim impact statement at 17 Cr. 337 (RJS), EFC No. 177 on behalf of ICBC London, hence no privilege exists over the requested documents/evidence.

I respectfully request that you provide the requested documents/evidence by forwarding them to me at the address highlighted above. In addition, I am requesting for an in-person meeting with a partner from Linklaters LLP to discuss other related matters.

The documents/evidence requested are:

- a.) ICBC London, [underwriting file] related to the bridge loan transaction between ICBC London, BSPG and BSPAB
- b.) ICBC London, [meeting minutes], [notes], [electronic mails] related to settlement discussions with respect to the bridge loan transaction between ICBC London, BSPG and BSPAB.

Conclusion:

As courtesy to Linklaters LLP, I am writing to request the documents/evidence. In the event that no response is received within 15 days from the receipt of this correspondence, then I will proceed to submit formal complaint to the Solicitor Regulation Authority ("SRA"), and request that they [SRA] compel compliance of Linklaters LLP among other remedies. A U.K. law firm conspiring with a foreign government to wrongly convict and falsely imprison a U.K. citizen is a very serious matter. Likewise, aiding and abetting such conduct is equally serious. Linklaters LLP is required to adhere with the rule of law.

Given my experience to-date with the prosecution, U.S. judiciary and U.S. based criminal defense attorneys, I am representing myself Pro Se on the record, so as to avoid interference with my legal advisors and attorneys from both the judges and prosecutors.

Time is now of the essence.

This correspondence is submitted without prejudice and without waiving any rights, which are all expressly reserved.

Dated: February 28, 2022
White Deer, PA. 17887-1000

Respectfully,

/s/ Raheem J. Brennerman
RAHEEM JEFFERSON BRENNERMAN
Reg. No. 54001-048
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PRESCENCE OF INMATE
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P. O. Box 1000
White Deer, Pa. 17887-1000

Cc: A.U.S.A Robert B. Sobelman, USAO, SDNY (By U.S. Mail)