

Non-negotiable, No commercial activity

Page 1 of 19

**All Rights Reserved – Without Prejudice – Without Recourse – Non-Assumpsit
Errors & Omissions Excepted – Strictly No Rights of Usufruct.
Notice of Void Order & Jurisdictional Challenge**

From:, sui juris, jus naturale, jus in rem sovereign woman
of England

To: District Judge J. D. Curtis

Grimsby & Cleethorpes Magistrates Court, Victoria Street, Grimsby, DN31 1NH
Cc.

Admiralty Court, Rolls Building, London, EC4A 1NL

Royal Courts of Justice, Chancery Division, Foreign Process Section, London, WC2A
2LL

Supreme Court,

The Office of the United Nations High Commissioner for Human Rights (OHCHR)

Palais Wilson, 52, rue des Pâquis, CH-1201 Geneva.

North Lincolnshire Council, Council Offices, Scunthorpe, DN19 1AB

Claim/Case numbers:

Date: Tuesday, 21 October 2025

1. Introduction and Purpose

This Notice formally declares that all judicial acts, orders, proceedings and judgments
rendered

by District Judge J. D. Curtis in this matter are void, ab initio—void from the
beginning—due to

foundational defects including but not limited to, absence of lawful jurisdiction, lack
of consent by

the living sui juris party, refusal to produce judicial oath and bond and fraudulent
exercise of

administrative Admiralty commercial jurisdiction rather than lawful constitutional
authority;

These elements contravene constitutional law principles, common law maxims,
natural justice and

settled procedural rules;

The proceeding styled under administrative Admiralty doctrine is misapplied and
unauthorised as

it improperly converts living lawful persons into legal fictions and subjects them to
unlawful

commercial penalties sans conviction, violating sovereignty and constitution;

2. Absence of Consent and Jurisdictional Challenge

The court's jurisdiction was explicitly challenged;

The judge's judicial oath and bond were repeatedly demanded in accordance with
19the Promissory

Oaths Act 1868 and Article 6 ECHR, to no avail;

Non-negotiable, No commercial activity

Page 2 of 19

All Rights Reserved – Without Prejudice – Without Recourse – Non-Assumpsit
Errors & Omissions Excepted – Strictly No Rights of Usufruct.

The administrative body of the court refused to identify and disclose the lawful court seal,

substituting instead a black corporate commercial seal associated with Admiralty maritime

jurisdiction—insufficient and incorrect to exercise criminal or constitutional jurisdiction;

Pursuant to fundamental legal maxims and natural justice rights, the living sovereign woman named

herein holds jus naturale and jus in rem standing, affirming her absolute legal capacity;

These sovereign rights include strict requirements for jurisdiction, consent and lawful authority

prior to court adjudication, all of which were entirely disregarded;

This fundamental absence invalidates all orders and judgments issued.

3. Fraudulent Plaintiff and Contempt of Court

North Lincolnshire Council serves as a corporate legal fiction—a person of statutory creation

without living person capacity or person of significant control (PSC);

It issued claims under Single Justice Procedure (Claim No. 10142) associated with administrative

Admiralty doctrine commerce jurisdiction and further criminalised these unlawfully (Case No.

2300124577);

Legal principles dictate: Fraud is fraud is fraud ab infinitum; fiction is fiction is fiction ad infinitum;

A claim brought by a fictitious plaintiff against a living person lacking demonstrable harm or loss is

null, void, and contemptuous per Black's Law Dictionary (4th-6th edition);

The Council's councillors and its criminal prosecution barrister have openly rejected constitutional

court standards, admitting ignorance or refusal to recognise the Bill of Rights 1688/9 and

constitutional safeguards, thereby participating in administrative and judicial fraud;

4. Claims and Enforcement Beyond Authority

The Council's use of Single Justice Procedure 10142 is an administrative device for minor civil

infractions, not a mechanism authorised to impose criminal penalties or effect arrest;

The unlawful conversion of such procedural notices into criminal actions in case number

2300124577, contravenes lawful criminal procedure prerogatives and the foundational principle of

due process;

More critically, the maxim: “No claim is given to an entity that has suffered no legal harm or loss.”

Here, the fictitious corporate plaintiff suffered no injury warranting enforcement or penalty,

rendering all claims and enforcement unlawful from inception;

The absence of consent and failure to meet criminal procedural requirements renders actions

under this illegal conversion treasonous as per Archbold 2025, and grossly contrary to the Bill of

Rights 1688/9;

Non-negotiable, No commercial activity

Page 3 of 19

All Rights Reserved – Without Prejudice – Without Recourse – Non-Assumpsit

Errors & Omissions Excepted – Strictly No Rights of Usufruct.

5. Judicial Misconduct and Abuse of Office

The presiding judge has committed serious breaches of judicial oath and office by refusing to

produce evidence of having taken the judicial oath and by concealing the judicial bond;

This conduct violates legal and ethical obligations, constituting judicial misconduct under the

standards set forth in the Guide to Judicial Conduct (Revised July 2023) which requires judges to

act with integrity, transparency and uphold the rule of law;

By refusing to disclose these fundamental constitutional documents, coupled with omissions and

misrepresentations regarding jurisdiction, the judge has violated the duty of candour owed to the

court and all parties, thus undermining public confidence in the judiciary;

The coercion applied by court staff to suppress valid challenges to jurisdiction is further evidence

of abuse of office;

6. Failure to Provide Evidence of Fair Process

The court has denied the petitioner access to critical evidence including Zoom hearing recordings

and comprehensive case files;

This contravenes procedural fairness guaranteed under the Civil Procedure Rules 32.12, which

mandates disclosure necessary to ensure just adjudication;

Moreover, it breaches Article 6 of the European Convention on Human Rights, requiring fair trial

rights, including adequate time and facilities to prepare a defence and the right to examine

evidence;

Such refusal subverts the fundamental principle that justice must not only be done but must be seen

to be done.

7. Legal Maxims and Constitutional Principles

The following fundamental legal and constitutional maxims govern the administration of justice and stand violated herein:

Jus naturale est lex aeterna — Natural law is eternal and supersedes statutory enactments;

Lex injusta non est lex — An unjust or immoral law is no law and lacks binding effect;

Fraus omnia corrumpit — Fraud vitiates all acts touched by it, rendering them void;

Consensus facit legem — Law arises from the consent of governed parties;

Non-negotiable, No commercial activity

Page 4 of 19

All Rights Reserved – Without Prejudice – Without Recourse – Non-Assumpsit
Errors & Omissions Excepted – Strictly No Rights of Usufruct.

Nemo judex in causa sua — A person cannot act as judge in his or her own cause;

Actus curiae neminem gravabit — Acts of the court shall harm no one;

The legal maxim that no claim or remedy lies where no loss or harm has been suffered applies to

fictitious plaintiffs lacking personal damage;

8. The Black Seal and Administrative Jurisdiction

All court documents bear a black corporate seal purchased via administrative process at the Royal

Courts of Justice Seal Office, Thomas More Building, London;

This black seal designates the invocation of Admiralty maritime commercial jurisdiction — a

corporate and contractual jurisdiction distinct from and inferior to the Imperial Crown's lawful

constitutional authority marked by the red wax Imperial Crown seal;

Thus, orders and processes sealed with the black administrative seal dissolve into administrative

commercial acts devoid of constitutional weight and must be nullified as lacking jurisdictional

foundation;

9. Declaration of Voidness and Demand for Remedy

Due to all the foregoing defects and frauds, every judicial act, order and penalty relating to this

matter is void ab initio (from the outset) and demands immediate remedy:

Full production and disclosure of the judicial oath taken and associated bond;

Confirmation and production of lawful jurisdiction proofs;

Detailed disclosure of court seal(s) and associated administrative fees;

Immediate cessation of all enforcement proceedings;

Release of all hearing recordings, transcripts, filings and case documents without redaction;

10. Fictitious Plaintiff and Breach of Bill of Rights 1688/9 with Betty Boothroyd's Parliamentary

Sovereignty Statement and R (Thoburn) Case Law

North Lincolnshire Council's enforcement is a direct breach of Article 11 of the Bill of Rights 1688/9,

prohibiting “all grants and promises of fines and forfeitures of particular persons before

conviction” [Bill of Rights 1688/9, Article 11, Avalon Project];

In the landmark case *R (Thoburn) v City of Sunderland* EWHC 195 (Admin), paragraphs 62 and 63,

Lord Justice Laws established the doctrine of constitutional statutes, stating:

“62. A class of statutes, known as constitutional statutes, comprises those fundamental to

governance and individual rights, including the Bill of Rights 1688/9”;

Non-negotiable, No commercial activity

Page 5 of 19

All Rights Reserved – Without Prejudice – Without Recourse – Non-Assumpsit

Errors & Omissions Excepted – Strictly No Rights of Usufruct.

“63. Unlike ordinary statutes, constitutional statutes may not be impliedly repealed; repeal must

be by express words”;

This affirms the Bill of Rights as an entrenched constitutional safeguard, not subject to implicit

erosion by administrative procedures like the Council's enforcement;

Speaker of the House of Commons, Betty Boothroyd, reaffirmed this in 1993: “The Bill of Rights

stands paramount, and the courts must uphold its protections”

“Parliamentary sovereignty and constitutional law remain the foundation for individual rights”

Together, these affirm that no administrative or legislative mechanism, including those used by

North Lincolnshire Council, may override constitutional rights protected by the Bill of Rights;

11. Constitutional Statutes and Parliamentary Sovereignty

The Act of Settlement 1701 and Security of Succession Act 1701 codify lawful succession to the

Crown and uphold constitutional monarchy;

The Treason Act 1351 criminalises attempts to subvert lawful succession or constitutional order;

In addition, the legal fiction created by the council and registered solicitors/barristers (Gray’s Inn

vs. Lincoln’s Inn) demonstrates jurisdictional complexities used to circumvent natural law and

constitutional protections;

The 12 presumptions of Bar guild must be rebutted, which was duly accomplished by hand delivery

the day before the claim, in accordance with de jure law;

The maxim: “Fraud is fraud is fraud ab infinitum” applies to these false presumptions [Archbold

2025, p. 391, para 18-014];

12. Void Criminal Procedure, Treasonous Judicial Conduct and Archbold Maxims

The criminal procedure is invalid, lacking jurisdiction, authority and criminal trial foundation;
Archbold 2025 declares, "A judge acting beyond jurisdiction commits treason under the Treason Act 1351";
No obedience is owed to those exceeding their legal commission (Blackstone Vol. IV, p.336);
Such illegal acts render judicial orders void;
Therefore, judicial acts beyond lawful jurisdiction are void, ab initio with criminal liability consequences;

13. Service of Void Order by De Jure Authority

Non-negotiable, No commercial activity

Page 6 of 19

All Rights Reserved – Without Prejudice – Without Recourse – Non-Assumpsit Errors & Omissions Excepted – Strictly No Rights of Usufruct.

The void order is served by the lawful Imperial Crown Sovereign Authority on:

Grimsby & Cleethorpes Magistrates Court, Victoria St, Grimsby DN31 1NH;

Admiralty Court, Rolls Building, London, EC4A 1NL;

Royal Courts of Justice, Chancery Division, Foreign Process Section, London WC2A 2LL;

International Commission on Civil and Human Rights (ICCHR);

This constitutes formal notice of invalidity of all unlawful proceedings;

14. Judicial Fiduciary Duty and Misconduct: "No Constitution" statement and Illegal Conversion

During a Zoom strike-out hearing, the judge declared: "There is no constitution in this court."

This unequivocal statement reveals a flagrant abdication of the judge's constitutional duties and an

implicit denial of the rule of law;

Such a claim disavows the sacred judicial oath that binds judges to uphold the supremacy of the

Constitution;

The judge also engaged in illegal conversion by removing proper representation and basing

decisions on false claims, relying on a fictitious plaintiff created solely by statutory legislation;

By illegally removing representation and relying on fictitious plaintiff claims under legislation—

which binds legal fictions but not natural living persons—the judge breached fiduciary obligations

outlined in the Guide to Judicial Conduct (2023) and further detailed in Sweet & Maxwells' Archbold

2025;

Building on the UK Supreme Court ruling in Rukhadze and others v Recovery Partners GP Ltd (see

Annex 1), fiduciary duties are not confined to directors or trustees but extend to all cases where a relationship of trust and confidence arises, including judges, who are bound to: act with single-minded loyalty to constitutional and natural law; maintain good faith, transparency and impartiality; avoid conflicts of interest or profiting from office without informed consent; Failure to honour fiduciary obligations, as this judge has done, constitutes judicial misconduct and a breach of the Treason Act 1351, rendering all related court acts void, ab initio;

References:

Bill of Rights 1688/9, Article 11: avalon.law.yale.edu

R (Thoburn) v Sunderland EWHC 195 (Admin), paras 62–63: uniset.ca

Betty Boothroyd, Hansard 22 July 1993: parliament.uk

Non-negotiable, No commercial activity

Page 7 of 19

All Rights Reserved – Without Prejudice – Without Recourse – Non-Assumpsit

Errors & Omissions Excepted – Strictly No Rights of Usufruct.

Archbold 2025, paras 10-99, 10-101: Sweet & Maxwell Publications

Guide to Judicial Conduct (2023): judiciary.uk

15. Sovereignty, Natural Law and Jurisdictional Incompatibility

The living woman and men acting as sovereign individuals under sui juris, jus naturale and jus in

rem law, serve as witnesses and jurors rejecting unlawful jurisdiction;

Legal maxims and constitutional principles prohibit two jurisdictions from operating simultaneously within the same sovereign space;

The corporate fiction, North Lincolnshire Council, cannot lawfully supersede the natural person or

command jurisdiction therein;

This illegal substitution of administrative commercial jurisdiction for lawful constitutional authority

constitutes:

Fraud, ab initio and renders all related proceedings unlawful and without effect;

Contravenes natural rights and established constitutional law as explained in

Archbold 2025;

All such jurisdictional contradictions collapse under doctrine and case law;

16. Denial of Court Access, False Claims and Judicial Misconduct

The court refused the petitioner access to judicial oaths and bonds when questioned, left no lawful

authority on record, and deployed police officers to intimidate;

This overreach infringes the petitioner's natural law right to a fair hearing and contradicts the

fiduciary duties held by the court;

No witnesses were called on behalf of the respondent—a direct violation of the Jury Act—and

judicial misconduct was evident;

False legislative claims and fictions used to justify rulings further illustrate the breach of due

process and natural justice principles;

19. Judicial Fiduciary Obligation and Breach Thereof

Judges owe fiduciary duties to act in good faith, with undivided loyalty and fairness, embodying the

constitutional rule of law and natural justice;

The UK Supreme Court has underscored fiduciary duties as encompassing fulfilment of trust,

avoidance of conflicts, and accountability for unlawful profits (e.g., *Lehtimäki v Children's*

Investment Fund Foundation UKSC 33);

Non-negotiable, No commercial activity

Page 8 of 19

All Rights Reserved – Without Prejudice – Without Recourse – Non-Assumpsit

Errors & Omissions Excepted – Strictly No Rights of Usufruct.

Breach of these fiduciary duties amounts to judicial misconduct, punishment, and invalidation of

court orders, aligned with the principles articulated in the Guide to Judicial Conduct 2023 and

Archbold 2025;

18. Two States, Two Jurisdictions and the Inviolability of Natural Law (see Annex 3 also)

The United Kingdom's constitutional framework recognises dualism, wherein international law and

domestic law occupy separate, independent spheres, with domestic may incorporate international

law into its internal system only through explicit legislation (Roger Masterman, 2021);

The principle of jurisdictional exclusivity maintains that two distinct jurisdictions or "states" cannot

simultaneously operate with equal authority over the same sovereign territory or person. This is

fundamental to avoiding conflicts of law and ensuring orderly justice;

The constitutional doctrine asserts that the coexistence of commercial administrative (Admiralty)

jurisdiction alongside constitutional common law jurisdiction creates an irreconcilable legal

conflict;

Such dual jurisdiction without clear supremacy infringes upon the natural law sovereignty of living

persons, who cannot be subject to contradictory legal claims simultaneously;

The Royal Courts have emphasised that domestic law must recognise the ultimate legislative

authority (Parliament) and that any foreign or "fictitious" legal constructs acting without

constitutional sanction lack enforceability within the UK's sovereign space;

19. Fraud, Legislation and the Nullity of Improper Claims

Legislation, while binding upon legal fictions such as corporate entities, cannot override the natural rights and sovereignty of living persons without explicit, voluntary consent; Claims founded on legislation that attempt to convert living persons into legal “persons” or quasiidentities without consent are inherently fraudulent; This fraud is fraud ab infinitum—a principle reiterating that fraud at its origin vitiates all subsequent

acts and proceedings [Archbold 2025; Legal Dictionaries];

Such fraudulent claims lack jurisdiction, violate due process and must be declared null and void;

Courts have no authority to enforce claims violating constitutional protections or the Bill of Rights

1688/9, under which no fines or forfeitures may be imposed without lawful conviction (Article 11);

20. Summary and Enforcement

This comprehensive declaration asserts that all judicial acts, orders and proceedings under

administrative Admiralty commercial jurisdiction that purport to bind sovereign living persons are

void, ab initio;

Non-negotiable, No commercial activity

Page 9 of 19

All Rights Reserved – Without Prejudice – Without Recourse – Non-Assumpsit Errors & Omissions Excepted – Strictly No Rights of Usufruct.

The natural law inviolability of the sovereign individual and the constitutional supremacy of

parliamentary statutes such as the Bill of Rights 1688/9 establish the nullity of all improper claims

and judicial misconduct;

Formal service of this void order to relevant courts and authorities demands immediate cessation

of all enforcement and restitution of lawful jurisdictional order;

The Sovereign governed hereby reserves all rights to seek lawful remedy and redress through

recognised constitutional and common law mechanisms.

21. Declaration of Void Order, Solicitor Duty, Court Jurisdiction and Demand for Enforcement by

Superior Courts

Any and all orders, rulings, or decisions issued by the Grimsby & Cleethorpes

Magistrates Court,

operating strictly as an Administrative Admiralty doctrine commerce court without lawful

jurisdiction, consent or authority over the living woman

sui juris, jus naturale, jus in rem, are declared void ab initio and without any lawful effect;

The authorised courts empowered to issue, uphold, and enforce the nullity of such fraudulent orders

are: The High Court of Justice, including the Foreign Process Section, with jurisdiction over admiralty and administrative tribunal matters; The Admiralty Court, limited strictly to maritime jurisdiction; The Supreme Court of the United Kingdom, as the ultimate guardian of constitutional supremacy;

Such orders violate constitutional and common law protections, including the Treason Act 1351—criminalising usurpation or unlawful assumption of judicial power—breaches of the Bill of Rights 1688/9, and the Coronation Oaths Acts that bind judicial officers to uphold lawful governance;

Breaches result in loss of judicial immunity and criminal liability;

Fundamental maxims of natural common law, reflected in Archbold Criminal Pleading, Evidence and Practice 2025 and Sweet & Maxwell legal texts, dictate that unconstitutional acts must face lawful consequences;

No corporate fiction or administrative tribunal can override the sovereignty of the *jus in rem natural* person;

Additionally, any solicitor acting pursuant to the SRA Handbook as a bar guild officer has failed to disclose to the natural *jus in rem* individual any unlawful corporate conversion, invalidating authority and all related proceedings;

Where this void order is issued to the court of record or higher courts, the High Court, Admiralty Court and Supreme Court are duty-bound to immediately:

- uphold and enforce the doctrine of the void order;
- promptly return the sealed void order to the issuing court and all parties;

Non-negotiable, No commercial activity

Page 10 of 19

All Rights Reserved – Without Prejudice – Without Recourse – Non-Assumpsit Errors & Omissions Excepted – Strictly No Rights of Usufruct.

prevent any enforcement, recognition or further proceedings based on impermissible or fraudulent orders;

expeditiously issue necessary directions or orders to effectuate the cessation and quashing of all such void proceedings;

Failure by these entities to enforce the void order doctrine constitutes continuing violation of constitutional safeguards and judicial accountability, subject to legal and criminal sanction;

The natural sovereign woman, , reserves all rights to

damages for unlawful coercion and deprivation of rights and demands immediate and unconditional enforcement of the void order;

22. Directive to Higher Courts for Immediate Enforcement and Return of Sealed Void Order

In accordance with the established hierarchy and jurisdiction of the courts of England and Wales,

it is hereby directed that the: High Court of Justice; Admiralty Court; and, Supreme Court of the United Kingdom, must immediately uphold and enforce the doctrine of the void order upon receipt of this sealed void order addressed to those courts;

Pursuant to the Civil Procedure Rules Part 70 and established enforcement procedure, these superior tribunals are duty-bound to provide immediate relief by:

recognising the nullity and absolute voidness of any orders originating from the Grimsby & Cleethorpes Magistrates Court lacking lawful jurisdiction or consent;

facilitating the return of the sealed void order to the originating court and all parties forthwith;

preventing any enforcement, recognition, or further proceedings based on impermissible or fraudulent orders;

expeditiously issuing necessary directions or orders to effectuate the cessation and quashing of all such void proceedings;

Failure to comply with this duty amounts to continuing breach of constitutional safeguards, violation of natural common law maxims as discussed in Archbold 2025, and may incur personal and official liability for contempt and breach of oath under the Treason Act 1351 and other relevant statutes;

This directive is made in the interest of justice, upholding sovereignty and protecting the fundamental rights of the natural, jus in rem, woman.

Non-negotiable, No commercial activity

Page 11 of 19

All Rights Reserved – Without Prejudice – Without Recourse – Non-Assumpsit Errors & Omissions Excepted – Strictly No Rights of Usufruct.

Annex 1: Recovery Partners GP Limited v Rukhadze & Others (2025) UKSC 10

<https://connections.nortonrosefulbright.com/post/102k5vc/uk-supreme-court-rules-on-fiduciaryduties>

UK Supreme Court rules on fiduciary duties

Earlier this week, the Supreme Court gave a judgment in Rukhadze and others v Recovery Partners

GP Ltd and another. The decision will be important to company directors and others with fiduciary

duties as it makes it clear that if they profit from their position as a result of breaching their duties, they may have to repay the whole amount.

What are fiduciary duties?

Directors owe fiduciary duties to their company, but fiduciary duties are not limited to a director-company relationship. They will arise whenever someone undertakes to act for or on behalf of another in a particular matter, in circumstances which give rise to a relationship of trust and confidence.

In essence, the core obligation is single-minded loyalty. The concept of loyalty in this context requires the party to act in good faith and to refrain from benefitting from their position without consent. It includes the duty not to exploit property, information or opportunities received through their position.

Beyond the director-company relationship, fiduciary relationships arise where there is a trustee and beneficiary relationship, but they also can arise contractually in modern commercial arrangements.

What happened?

The appellants worked for the respondents, a company incorporated in the British Virgin Islands and an English LLP. They held positions of responsibility, and therefore owed fiduciary duties to the respondents.

The appellants diverted a lucrative business opportunity from the respondents, pursuing it for the own benefit instead.

The High Court ordered the appellants to repay the respondents the profits they had made from that business opportunity, and their appeal to the Court of Appeal was unsuccessful. Supreme Court's decision

The Supreme Court has clarified that those breaching their fiduciary duties may be liable to repay the whole amount of any profit received. While the case did not involve a director-company fiduciary duty, the same principles would apply where a director breaches their duties.

The appellants in this case argued for a modification of the law, so that they should not have to account for any profit they would have made in any event, had there been no breach of duty.

Non-negotiable, No commercial activity

All Rights Reserved – Without Prejudice – Without Recourse – Non-Assumpsit
Errors & Omissions Excepted – Strictly No Rights of Usufruct.
The Supreme Court unanimously rejected this argument, albeit for varying reasons.
Therefore it remains the case that where a party breaches their fiduciary duties, in the absence of fully informed consent, they are liable to account for that profit in full.
The decision is important for company directors and others with fiduciary duties. The law is crystal clear that if they profit from their position as a result of breaching their duties, they may be liable to repay the whole amount - even if they feasibly could have made the same profit without any breach.
<https://www.pinsentmasons.com/out-law/news/supreme-court-high-standards-fiduciaries>
A recent UK Supreme Court ruling underscores the importance of judicial precedent and the high standards expected of fiduciaries, particularly company directors, an expert has said. The Supreme Court's decision (113 pages/624 KB) "underscores the critical role of judicial precedent in our legal systems across the UK", said Chris Dryland, litigation expert at Pinsent
Masons. Judicial precedent ensures consistency and predictability in the application of the law, and in this instance, provides a clear framework within which fiduciaries must operate. Dryland said: "This case reaffirms the established principle that fiduciaries must account for any profits made from their fiduciary relationship unless the principal has given fully informed consent for the fiduciary to retain those profits."
In this case, Irakli Rukhadze, Igor Alexeev, and Benjamin Marson, along with several associated entities (the appellants), were found to have breached their fiduciary duties by diverting a business opportunity away from their employer, Recovery Partners GP Ltd, and exploiting it for their own benefit. The lower courts had ordered the employees and associated entities to pay the profits made from this business opportunity to Recovery Partners. The appellants challenged this decision, arguing that the current test for an account of profits should be modified. They proposed that a fiduciary should only be required to repay profits if it could be shown that the same profit could not have been made without a breach of duty.

The Supreme Court, however, rejected this argument. The court reaffirmed the traditional equitable principle that fiduciaries must account for any profits made from their fiduciary relationship unless the principal has given fully informed consent for the fiduciary to retain those profits. The judges in this case emphasised that the duty to account for profits is a fundamental aspect of the fiduciary relationship, highlighting the importance of adhering to established legal principles to maintain the integrity of fiduciary relationships. Kirsty Gallacher, litigation and regulatory specialist at Pinsent Masons, said: "The judgment illustrates the very high threshold which must be overcome to justify a judicial change in the law and a departure from enshrined principles of legal precedent." The ruling has significant implications for company directors, who are often in positions of trust and must be mindful of the complex and onerous obligations placed on them as fiduciaries. Directors are required to act in the best interests of the company and its shareholders, prioritising the

Non-negotiable, No commercial activity

Page 13 of 19

All Rights Reserved – Without Prejudice – Without Recourse – Non-Assumpsit
Errors & Omissions Excepted – Strictly No Rights of Usufruct.

company's success over personal gain. This includes the duty to account for any profits made from their position, ensuring transparency and accountability.

Gallacher said: "The ruling serves as a useful reminder of the origins of why directors of companies

are in law treated in an analogous position to beneficiaries of a trust."

The Supreme Court decision also highlights that the duty to account for profits is not limited to a

specific timeframe but instead extends throughout the duration of the fiduciary relationship and beyond.

Gallacher said: "The continuing nature of the fiduciary duty to account, even after the end of the

fiduciary relationship, is fairly onerous. Post-termination profits derived from, or made out of, a

former fiduciary relationship will still be caught. It is something to bear in mind when a fiduciary

relationship ends and one of the parties begins a new venture in a similar field.

Annex 2: More on Fiduciary duty remedy

Based on constructive trust

There is also the possibility of pursuing additional claims against other people involved in the breach.

A wronged principal may be able to seek equitable compensation or account for profits from anybody who dishonestly assisted in the breach or was in knowing receipt of misappropriated trust funds.

Sources

Civil Fraud: Law Practice & Procedure First Edition, Sweet & Maxwell (2018) 11-012

Sales J at [222] in F&C Alternative Investments Ltd v Barthelemy [2012] Ch. 613

Civil Fraud: Law Practice & Procedure First Edition, Sweet & Maxwell (2018) 11-062

Non-negotiable, No commercial activity

Page 14 of 19

All Rights Reserved – Without Prejudice – Without Recourse – Non-Assumpsit Errors & Omissions Excepted – Strictly No Rights of Usufruct.

Annex 3: The Dualist System of the English Constitution & the Victorian Acquis

<https://ukconstitutionallaw.org/2019/04/28/eirik-bjorge-the-dualist-system-of-the-englishconstitution-and-the-victorian-acquis/>

The Privy Council observed in Higgs (also relied on in Miller) that ‘unincorporated treaties cannot

change the law of the land’; ‘They have no effect upon the rights and duties of citizens in common

or statute law: see the classic judgment of Sir Robert Phillimore in The Parlement Belge’ ([2000] 2

AC 228, 241).

But what, then, did The Parlement Belge actually determine?

The case concerned a Belgian mail boat that collided into the vessel of a British subject. The Crown

had, based on an unincorporated postal convention, purported to confer immunity on the Belgian

vessel, with the potential effect of depriving the British subject of the right to bring proceedings.

Sir Robert Phillimore explained that there was ‘a class of treaties the provisions of which were

inoperative without the confirmation of the legislature; while there were others which operated

without such confirmation’ (p 150). Pausing there, that statement is noteworthy in so far as it plainly

goes against the grain of the Tin Council and Higgs idea that no unincorporated treaty obligation

can be part of English law. One example in this regard was:

the Declaration of Paris in 1856 ... which very high authorities in the state and in the law had

considered to be of vital importance to it. But this declaration did not affect the private rights of the

subject; and the question before me is whether this treaty does affect private rights, and therefore required the sanction of the legislature. ... If the Crown had power without the authority of parliament by this treaty to order that the Parlement Belge should be entitled to all the privileges of a ship of war, then the warrant ... cannot issue, and the right of the subject, but for this order unquestionable, to recover damages for the injuries done to him by her is extinguished (ibid).

Non-negotiable, No commercial activity

Page 15 of 19

All Rights Reserved – Without Prejudice – Without Recourse – Non-Assumpsit
Errors & Omissions Excepted – Strictly No Rights of Usufruct.

Annex 4: Affidavit

I,, of my domain domicile in Yorkshire, England, being a natural person and sovereign under jus naturale et lex aeterna, hereby solemnly affirm:

No Witnesses or Summons Issued

The presiding judge failed to summon witnesses or issue lawful witness summonses, in breach of the Criminal Procedure (Attendance of Witnesses) Act 1965 and Civil Procedure Rules Part 34;

This fundamental defect undermines the principles of natural justice and fair trial guaranteed under

UK constitutional law and common law doctrine, which ensure the right to present evidence and be

heard before an impartial tribunal;

Coerced Proceedings Denying Consent

The respondent's consent to these judicial proceedings was never given but forcibly extracted by

coercion involving court officials, North Lincolnshire Council, the judge, and the respondent's

criminal prosecution barrister;

This action violates the respondent's natural rights as a sui juris person, breaches due process

safeguards guaranteed by UK constitutional law, and violates international human rights

instruments protecting freedom and contract;

Communications with Barrister and Admissions

The North Lincolnshire Council's criminal protection barrister openly admitted to having no

understanding of the nature or jurisdiction of a "constitutional monarchy court," stating explicitly

that he "did not understand" such concepts;

He disclosed his membership with Gray's Inn Bar Guild, a professional legal guild that functions

without sovereign jurisdiction over natural persons;
Further, this barrister refused to accept or recognise foundational constitutional documents including Magna Carta and the Bill of Rights 1688/9, dismissing these as irrelevant to this court's jurisdiction and proceedings;
This constitutes a clear admission that the court operated outside legitimate constitutional authority and engaged in acts bordering on fraud and treason against the sovereignty of the individual;
Jurisdictional Challenge and Barred Representation
Upon lawful challenge to jurisdiction, the respondent's choice of legal representation was denied by judicial fiat;
The judge forced the respondent into an Administrative Admiralty commercial jurisdiction without contract or consent, thereby violating the highest de jure sovereign principles of England and the Non-negotiable, No commercial activity
Page 16 of 19
All Rights Reserved – Without Prejudice – Without Recourse – Non-Assumpsit Errors & Omissions Excepted – Strictly No Rights of Usufruct.
respondent's protected rights under international human rights laws such as the UN Charter (Condor clause);
The respondent was subjected to intimidation and coercion amounting to peonage through forced presumption, characterised as unlawful conversion of the respondent's natural personhood into a vessel or quasi-identity—legal fiction and fraud;
Fictitious Plaintiffs and Contempt of Court
Claims advanced under the names of fictitious plaintiffs, such as the North Lincolnshire Council (a corporate entity without natural personhood), constitute acts of contempt of court according to authoritative legal texts, including multiple editions of Black's Law Dictionary;
This manipulation elevates legal fiction beyond its lawful bounds, constituting misinformation and an unlawful politicisation of the courts;
Despite repeated notification of these grave points, the barrister and court officials wilfully ignored them;
Admission of Invoice and Maximum Enforcement Strategy
The barrister admitted ignorance regarding the substance of the case but acknowledged that an outstanding invoice exists;

He conceded that barring respondent's legal representation aimed at causing maximum enforcement impact under commercial judicial fraud and treasonous conduct;
Debt Owed by Fictitious Plaintiff
Affidavit evidence establishes that the fictitious plaintiff, North Lincolnshire Council corporation,
owes a substantial debt of GBP £3,000,000 (Three million pounds sterling) to the respondent for
breached constitutional protections, particularly Article 11 of Bill of Rights 1688/9, which forbids
fines or forfeiture without lawful conviction;
The council has attempted to impose unlawful liabilities upon the respondent through repeated
actions: administrative enforcement, Single Justice Procedure in 2023 and 2024 and contrived
criminal proceedings—all without lawful jurisdiction or conviction;
This misconduct was condemned in R (Thoburn) v Sunderland for affirming constitutional
supremacy;
Unlawful Court Closure and Fraudulent Orders
The court process ended with closure and rulings devoid of lawful consent or authority, made
against the respondent on fraudulent grounds, violating natural justice and fundamental
constitutional principles;
Non-negotiable, No commercial activity
Page 19 of 19
All Rights Reserved – Without Prejudice – Without Recourse – Non-Assumpsit
Errors & Omissions Excepted – Strictly No Rights of Usufruct.
Judicial Authority and Constitutional Monarchy Framework
The authority of UK courts is constitutionally derived solely from the monarch's commission;
Judges must abide by constitutional jurisdiction, separation of powers doctrine and procedural
fairness; failure renders their jurisdiction and acts null and void.
Common Law Maxims
The following maxims apply decisively:
Fraud is fraud ab infinitum—any act of fraud invalidates all linked proceedings indefinitely;
Fiction is fiction ad infinitum—legal fictions do not bind living natural persons without express
consent;
Nemo debet esse iudex in propria causa—no person may judge their own case.
Natural Person Sovereignty
A natural sovereign individual is distinct and exempt from admiralty, maritime or corporate statutes
applicable only to legal fictions lacking personhood;

Void Orders and Contempt

Enforcement of void, unstamped, unexecuted or fraudulent orders will be regarded as contempt of

court and a breach of constitutional protections under the Bill of Rights 1688/9, the Coronation Oath

Act 1688, and eternal natural law;

Peonage, International Law and Act of War

This situation constitutes peonage—enforced indebtedness and loss of liberty—prohibited under

international human rights law;

Furthermore, under Article 6 of the Charter of the International Military Tribunal (“London

Agreement”), such proceedings amount to acts of war against the respondent’s sovereignty,

demanding immediate cessation and redress;

Sworn this Tuesday, 21 October 2025, at Yorkshire, England