

# Scottish Widows Complaint: PO-14071 (Preface)

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This document mirrors one of the main web pages on the above website. This contains proof of criminal misconduct by two organisations that one would expect to act with the highest standards of probity. Their contempt for the law amounts to a gross breach of the trust the public must place in them.

**Scottish Widows** is guilty of fraudulent evasion of personal pension encashment (amongst numerous other instances of [cavalier customer treatment](#)). In particular, the assertion that their onerous (and in my case, impossible to satisfy) "verification" demands "are required under UK legislation" is a blatant false pretence. In fact, the government requires no verification whatever when there is an ongoing business arrangement, let alone the draconian, changing, and dreadfully documented demands of Scottish Widows.

The Pensions Ombudsman is guilty of criminal protection of Scottish Widows in its refusal (after a year of quite deliberate inaction and prevarication) to investigate and determine the above, as is required under the Pension Schemes Act 1993/2017. Instead, it has forced an [illegal "pragmatic solution" with SW](#).

*Both the above organisations are also guilty of lies, deceit, and evasiveness. And if I were mistaken about SW's fraudulent verification requirements, the numerous statements on the matter that I have made to SW, TPO, and also TPAS would have been rebutted; instead they have met only with silence.*

*If my comprehensive website is accessible via the above link, please review this instead. This document nonetheless contains active links (underlined) to [web pages](#) in blue and [PDF documents](#) in crimson. It is also more suited to printing than the corresponding web page.*

## Links to Main Web Pages

<a href="#">Key Facts</a>	Key Facts of the case in numbered paragraph format.
<a href="#">Case Overview</a>	Case summary and narratives for SW and TPO.
<a href="#">Verification Issues</a>	Analysis of the "verification" requirements imposed by SW.
<a href="#">Event Summary</a>	Chronological lists of events (two separate timelines).
<a href="#">Details (SW)</a>	Detailed chronology with correspondence involving SW.
<a href="#">Details (TPO)</a>	Detailed chronology with correspondence involving TPO.
<a href="#">Determination</a>	Analysis of the TPO Final Determination.
<a href="#">Epilogue</a>	Analysis of the pensions 'industry' and its protection by TPO & DWP.
<a href="#">Questions for SW</a>	Questions sent to SW to probe their "verification" measures.
<a href="#">Document List</a>	Complete list of documents (including this one).

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# Scottish Widows Complaint: PO-14071 (Content)

## Key Facts

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*This document contains numerous hyperlinks: I use [blue](#) for HTML documents, [crimson](#) for PDF documents, and [black \(underlined\)](#) for links to sections within this document (navigate with Back/Forward arrows).*

This case concerns criminal misconduct by Scottish Widows, and its cover up by The Pensions Ombudsman, in relation to my application to take a lump sum from personal pension plans P56879Q and N80803X in April 2016. It demonstrates institutionalised corruption, which extends to other government organisations.

**Scottish Widows** (among numerous other instances of cavalier and dishonest customer treatment) imposed draconian requirements for pension encashment under the false pretence that they "are required under UK legislation".

**The Pensions Ombudsman** (among generally evasive and dishonest conduct) refused to investigate the case; instead TPO imposed an incongruous "pragmatic solution" that would allow Scottish Widows to maintain its false pretence and escape justice. This is in gross violation of the Pension Schemes Act 1993/2017. A Determination was issued only after I had sent five (unanswered) emails in rejection of this criminal misconduct.

*I give proofs of the above. See also my [Home](#) page and the [Personal Pension Fiasco](#) website.*

## Summary

1. Scottish Widows is guilty of criminal misconduct in its imposition of highly onerous documentation requirements for pension encashment, under the false pretence that they "are required under UK legislation". *This pretext is repeated in numerous documents.*
2. Scottish Widows never explained what was meant by this (despite my questions), but TPO's position is that it refers to Anti-money laundering (AML) regulations. Those applicable to my application of April 2016 are dated 2007 (the next update was in 2017).
3. AML regulations do not require any due diligence in my case, as a customer identified on a face-to-face basis in the UK with an ongoing business relationship. *The Opinion and Determination made absurd attempts to negate this statement on the basis of my Mexican residency. These documents show that instead of asking Scottish Widows to justify their requirements, TPO took on this role themselves. See ([13](#)), ([22](#)), ([23](#)), ([24](#)).*

4. Even if verification of identity were required under AML regulations, a single document giving good proof of Name plus EITHER Date of Birth OR Residential Address would be sufficient. Scottish Widows specified four certified documents, with confusing and changing documentation that contains conspicuous errors. See (34), (35). *The Opinion and Determination grossly misstated the requirements, making them appear reasonable.*
5. Apart from the AML regulations, the facts of my case provide overwhelming evidence that Scottish Widows implemented and applied their demands knowing them to be illegitimate:
  - a. The grossly-erroneous and changing nature of the forms sent from 5 April 2016 to 1 June 2016 indicates that they could hardly have been introduced to comply with AML regulations last updated in 2007; they clearly originate from shortly before my application (*probably after the Pension Freedom of April 2015*) (38), (45).
  - b. The requirements are so cumbersome and excessive that they could hardly have been genuinely considered a reasonable implementation of AML requirements (34).
  - c. There was never any explanation from Scottish Widows for their demands, other than that they "are required under UK legislation". I sent them questions on two occasions (*neither TPAS nor TPO would do this*), but there was no response.
  - d. The **Final Response** states that **all** customers must satisfy their requirements "*prior to the settlement of these types of pension policies*". But:
    - i. This statement is not consistent with TPO's "justification" of Scottish Widows' demands, which is based on my being resident in Mexico.
    - ii. AML regulations are not pension-specific; they apply equally to all transactions.
    - iii. No specific issue was raised in regard to my location in Mexico by either Scottish Widows or TPO until the Opinion (*which contains many other inept statements*).
  - e. About two years earlier, I encashed Scottish Widows investment and mortgage plans for a substantial amount to the same bank account in the same circumstances; only a signed letter was required. See (20d) for a desperate attempt to negate this awkward evidence. Moreover, from 2006 to 2013, I made numerous transfers from Lloyds bank accounts in the UK to this same HSBC Mexico account, some of which were also well above the AML threshold; again all required only signed letters.
  - f. When Scottish Widows realised I was about to make a complaint (I mistakenly asked for their Internal Dispute Resolution Procedure), the invalid documents that they had rejected (6) became acceptable, as they asked me to send them by post (48).
  - g. After I stated that my investigations showed that they had no business to require proof of address with proof of date of birth, they offered to accept my national ID card alone as verification of identity (this contains name and date of birth) (53).
  - h. Shortly after my case was assigned to the Adjudicator, Scottish Widows attempted to telephone me on five occasions (59). This was clearly a desperate attempt to get me to withdraw my case, and would have been their third "offer".
  - i. Other evasive conduct aimed at defusing my complaint included offering only telephone communication (50), and referring me only to the Financial Ombudsman Service without ever mentioning TPAS or TPO (51), (55).
  - j. TPO resorted to committing **demonstrable Misconduct in Public Office** (at least) in imposing a "pragmatic solution" in Scottish Widows' protection. They would surely not have resorted to this refusal to investigate, and their other evasive and dishonest conduct, if there were no serious misconduct by Scottish Widows to cover up.

6. My documents were rejected as, arising from the fact that post cannot be delivered to my home address, [I could not satisfy Scottish Widows' requirements for proof of Address](#).
  - a. The address that Scottish Widows holds is a correspondence address (*clearly I must supply them with an address to which they can send all their paper*).
  - b. The most recent document I had with this address was an April 2007 bank statement.
  - c. Even if I could have supplied other proof of the address held by Scottish Widows, it would be invalid for AML purposes, as verification of identity must be done on **residential** address.
  - d. *I believe that this was an oversight by Scottish Widows, who sought to make their requirements as onerous as possible, without being manifestly impossible to satisfy.*
  - e. The forms should have specified Residential Address, not just plain Address (among numerous other blatant errors in all but the PDF and latest paper forms).
7. It will be seen that Scottish Widows imposes the means of communication, while feigning flexible options. This is normally ordinary post, with telephone being used to browbeat the customer and keep sensitive (incriminating) information off the record.
8. Apart from all the above, the Chronology shows that Scottish Widows is not a company that anybody in their right mind would knowingly do business with. But unfortunately, those investing in pension plans have no means of knowing how they will be treated once it is their turn to receive the money.
9. TPO is guilty of a conspiracy to pervert the course of justice, in its protection of Scottish Widows from criminal charges. There is evidence that this followed a deal that was initiated shortly after my case was assigned to the Adjudicator (Barry Berkengoff), and concluded shortly before 23 November 2016 (59). The following is a synopsis of events:
  - a. From the time my case was assigned to the Adjudicator in October 2016, there was no communication from him whatever until 15 May 2017; and that was only after I had learned his name, surmised his email address, and contacted him directly.
  - b. Since then, he showed considerable evasiveness, and it became clear that he had no intention of investigating. I challenged him to give me evidence that he was taking my case seriously, but the response was unsatisfactory.
  - c. I then attempted to get information on my case. As this was not forthcoming, I explained in a reasonable and cautious manner my concerns about the conduct of the Adjudicator, urging an investigation. This resulted in more evasiveness (*including a blatantly false statement from the Casework Manager (Jane Stephens) that my case had been actively investigated since it was assigned in May 2017*), culminating in...
  - d. A bullying Complaint Response of 15 September 2017 from the Casework Director (Fiona Nicol). This slapped down my concerns and accused me of making allegations without evidence. *My over-cautious statements contained nothing resembling an allegation*. It gave quite untenable explanations for the delay and prevarication, and concluded by outrageously accusing me of mistreating staff. *With hindsight, I believe this was intended to "soften me up" into accepting the ensuing "pragmatic solution"...*
  - e. On 3 October 2017, I received an email from the Adjudicator (copied to Fiona Nicol) asking me to supply an alternative to my national ID card. This confirmed that he would not investigate. Apart from being brazenly illegal, this was also incongruous, as it was my address that I could not verify. There was no reply to the two emails I sent in rejection of this, both copied to the Pensions Ombudsman (Anthony Arter).

- f. On 31 October 2017, I received a further email from the Adjudicator, this time requiring me to either accept his "pragmatic solution" or withdraw my case. I sent an email to Mr Arter rejecting this and expressing my concerns. I later sent an email describing criminal misconduct by both Scottish Widows and TPO to the Legal Director (Claire Ryan). There was no response to either.
- g. On 5 November 2018 (over a year later), I received a quite extraordinary email from the Casework Manager in continuance of the "pragmatic solution" (84). My reply firmly rejected this, and explicitly demanded that my case be investigated and determined as required by the Pension Schemes Act 1993/2017 (again, no response).
- h. On 15 January 2019, I received a whitewash Opinion by the Casework Manager, containing gross misstatements, both over the facts of my case, and over AML regulations. After my rejection of 27 January 2019 followed an Amended Opinion of 22 March 2019, then the Determination of 26 March 2019.

## ***Determination***

- 10. I received the **Determination** by Anthony Arter only after I had refused in five emails to be party to the criminal "pragmatic solution", and quoted the Pension Schemes Act.
  - a. It is a mainly a superset of the inept and whitewash **Opinion** by the Casework Manager (Jane Stephens). Paragraphs [29-49] are in the Determination alone.
  - b. Although supporting Scottish Widows in other respects, the Determination partly upholds my case on the spurious premise that Scottish Widows did not do enough to help me in meeting their requirements, and I was awarded £1000 in compensation.
  - c. *This premise conceals Scottish Widows' "offers" to accept documents that did not comply with their requirements in their efforts to defuse my complaint (25) (48) (53).*
- 11. This section omits or condenses many important points that cannot be explained properly here as numbered paragraphs. For more details, see **Analysis of Determination**, which also includes the Opinion and shows that my statements in its rejection went unheeded.
- 12. The Determination and Opinion are clearly contrived at defending both Scottish Widows' "Identification and Verification" demands, and the TPO "pragmatic solution". They contain some strenuous assertions against overwhelming evidence, both over clearly-documented facts of my case, and in relation to AML regulations.
- 13. It is clear from these documents that TPO never asked Scottish Widows to explain their "Identification and Verification" demands. Nor did they ever consult HMRC to get an evaluation "from the horse's mouth" (*HMRC offers such a service to companies subject to AML regulations, and would surely have acted for TPO*). Instead, **TPO acted as both Scottish Widows' advocates and AML experts**. In so doing, they (especially Jane Stephens) made gross errors in confused and irrelevant statements.
- 14. Mr Arter did next to nothing to address the errors in the Opinion, both over the clearly-documented facts of my case and AML, even though I corrected them with detailed explanations in my **Opinion Rejection**. Whilst Mr Arter revised many of Ms Stephens' inept statements over AML regulations, he continued to assert that Scottish Widows was right to apply due diligence in the form that it did, on the sole basis that I live in Mexico.

15. Apart from being inconsistent with both the facts of my case and AML regulations, the Determination contains some serious internal inconsistencies, which can hardly bear close scrutiny even by someone unfamiliar with these two areas.
16. Paragraph [7] vastly misstates the documentation requirements given in Scottish Widows' [email](#) and [form](#) of 5 April 2016. The requirements listed in this paragraph are very simple, when in fact they are very cumbersome - see (34) and (35).
  - a. For example, it states that only one document was required to verify identity, when four documents were specified, and gives a simple list of options, ***including plain national identity card!*** - see (20b) and (28).
  - b. This was despite my painstaking explanations in both case documentation and Opinion Rejection. This, together with the degree of misrepresentation and its fundamental importance, indicates that **this gross misrepresentation was deliberate.**
  - c. The effect is to support TPO's assertions in Paragraphs [28.3] and [40] that Scottish Widows' documentation requirements were reasonable (21).
  - d. It also gives the impression that I am unreasonable in describing them as "onerous".
17. After stating that I have declined to provide a letter of introduction, paragraph [27] quotes me as saying that Scottish Widows is ***"guilty of criminal misconduct in imposing onerous verification requirements."*** (full stop included).
  - a. This is a misleading incomplete sentence, which gives the impression that I was unreasonable in describing Scottish Widows' conduct as criminal.
  - b. The sentence (in my [email of 11 November 2018](#)) continues: ***"... under the blatant false pretence that they 'are required under UK legislation'."***
  - c. The Opinion and Determination never mention my contention of a **false pretence**. Without this, the imposition of their documentation demands would be gross maladministration but presumably not criminal, and I would not describe it thus.
18. Paragraph [16] refers to a letter of 30 June 2016 stating that Scottish Widows could not accept photocopies or scanned documents. It conceals the awkward fact that Scottish Widows asked me to post documents that they had previously rejected (as I could not satisfy their address requirements). **This was their first attempt to defuse my complaint**, which (unlike their previous responses) was also **sent by email**. See (48).
19. Paragraphs [20] and [21] refer to an email of 1 August 2016 and its follow up three weeks later by another employee. In this, Scottish Widows offered to accept a scan of my national ID card alone as verification, provided it was emailed by my bank.
  - a. This offer was made after I had told Scottish Widows that verification of identity under AML regulations does not require proof of both address and date of birth. **This was their second attempt to defuse my complaint.**
  - b. My national ID card contains good proof of name and date of birth, and would satisfy AML regulations, were verification of identity required.
  - c. It is just one piece of evidence contradicting strenuous assertions by TPO that my national ID card was not valid verification of identity - see (20b) and (28). *Their "pragmatic solution" was based on my providing a passport or driving licence as an alternative to my national ID card.*
  - d. In paragraph [24.5], Scottish Widows (or TPO) claimed that this offer should not have been made (*even though it was made twice by different employees*) - see (20e).

20. Paragraph [24] contains five bullet points comprising the entirety of what is stated to be Scottish Widows' position (but which I suspect is originated by TPO). *The remaining paragraphs in this section [25-27] deal with another "solution" (a letter of introduction).* None of these statements explains Scottish Widows' documentation demands, all are preposterous, and most appear to be designed to sustain TPO's "pragmatic solution".
- a. **"The documents they have received to date only satisfy the criteria for verifying Mr S' address, not his name."** Yet the evidence is incontrovertible that Scottish Widows rejected my documents on account of the 2007 bank statement used for verification of Address, and accepted the national ID card I used as verification of Name.
  - b. **"His National ID card would not verify Mr S' name. As Mr S does not have a driving licence and he is not an EEA member, only a UK passport would suffice."** The evidence against this statement is again incontrovertible, but it is strenuously supported by Mr Arter - see (28). *The only straw Mr Arter has to clutch at against a torrent of clear evidence is a self-evident error (among many others) in the form sent on 14 April 2016, which he claimed was correct. His position is untenable.*
  - c. **"Bank statements from HSBC would verify Mr S' address..."** I have explained at length why this is ridiculous. In any case, this statement is inconsistent with the claim above that I had already sent documents verifying my address.
  - d. **"The reason Mr S was able to take monies was because, at that time, Anti Money Laundering exemptions applied to those policies. Those exemptions do not currently apply to these policies."** *This refers to my large encashment just over two years earlier of Scottish Widows investment and mortgage plans, to the same bank account, in the same circumstances, for which only a signed letter was required.*
    - i. AML due diligence applies to **all** transactions; the regulations (which date from 2007 and were updated only in 2017) contain no references to exemptions.
    - ii. *It seems that the second sentence (that the exemptions no longer apply) was ineptly added out of fear that otherwise the statement might be easy to disprove.*
    - iii. The fact remains that, if this unsatisfactory statement was from Scottish Widows, TPO should have asked them to substantiate it with proper information, including dates, references to legislation, and policy types involved.
    - iv. I challenged this statement in no uncertain terms in my Opinion Rejection. If it were true, Mr Arter would certainly have rebutted my rejection. But he stated only: [36] *"... I cannot comment on the previous instances where Mr S says that he has transferred funds, my review is limited to the facts of this particular case ..."*. *But the unsatisfactory statement above is part of the facts of this case, and it has not been addressed.*
    - v. I have no qualms about describing this self-evidently ridiculous statement as an **outrageous lie**. *And it would not be the only one from Ms Stephens (who I believe is its author, even though it is said to be from Scottish Widows). For other examples, see (77c), (84), and various other misstatements in the Determination e.g. (16) that are inherited from the Opinion.*
  - e. **"The offer for Mr S to email the documents should not have been made."** This refers to Scottish Widows' second attempt to defuse my complaint. *Their first offer required me to post the documents that I had emailed; "the documents" for this second offer consist of my national identity card alone - see (53), (54).* This appears to be another effort to deny the validity of my national ID card in support of the TPO "pragmatic solution", against overwhelming evidence. See also (16), (20b), (28).

21. Paragraph 28 contains the entirety of Ms Stephens' position on AML regulations in the Opinion. The only specific material is in paragraph [28.4], and it is nonsense (22). *All four bullet points that follow were heavily pruned and/or revised in the Determination.*
- Paragraph [28.1] is an irrelevant history of AML (excluding the 2007 regulations).
  - Paragraph [28.2] contains general excerpts from AML guidelines.
  - Paragraph [28.3] states (without explanation) that Scottish Widows was entitled to have asked me to provide the information in the format it did. *The second part of this assertion is made to look reasonable through the gross misrepresentations of the documentation requirements in paragraph [7] - see (16).*
  - Only paragraph [28.4] contains any specific analysis. It covers the issue of whether AML due diligence should have been applied at all, and thus attempts to justify the first part of the assertion in [28.3] ...
22. Paragraph [28.4] states that "... **HMRC guidelines say that 'enhanced due diligence' should be carried out when the customer is not physically present when the identification checks are carried out. As Mr S resides in Mexico, and so was not physically present for Scottish Widows to carry out the face-to-face checks, it follows that verification would be required.**". Mr Arter's revisions could do nothing to transform hogwash into veracity:
- To start with, I made clear in my Opinion Rejection and case documentation that I was identified on a face-to-face basis in the UK, and that this, together with the ongoing business relationship, means that no verification is required.
  - HMRC guidelines have been misquoted - they actually say that enhanced due diligence is applied "*when the customer **has not been** physically present for identification purposes*"; see the [guidance](#), section 7.11. I **have** been physically present for identification, and am thus a face-to-face customer, not requiring EDD.
  - There is much confusion over such terms as "identification checks", "verification of identity" and "identification", and it is not clear what is referred to above. Once a customer is identified, only verification of identity would normally be required. But even if "identification checks" legitimately apply to each transaction, TPO's position is nonsensical. It is ridiculous to claim that living in Mexico makes me a special case of a non face-to-face customer. I do not believe that customers would normally visit Scottish Widows' premises to encash a pension; most if not all such transactions would be "customer not present", regardless of where the customer lives.
23. In paragraph [36] Mr Arter again implied that my Mexican residency makes me a special case (*despite the evidence indicating that Scottish Widows' demands are applied to **all** customers*). But perhaps he realised the dubiousness of Ms Stephens' assertions even after his attempts to revamp them (22), and thought it a good idea to have another go.
- This time, the "justification" was mainly based on the premise that my circumstances had changed; this is covered in the next paragraph.
  - He also raised the issue of a "**cross-border transfer of funds to another account**". But far from being grounds for suspicion, this account is excellent proof of my identity:
    - It is an HSBC (Mexico) account in my full name of Ian Clive McInnes.
    - Scottish Widows held details of this account at the time of my application (31) .
    - I supplied Scottish Widows with a bank statement from this account (39) .
    - Numerous large transfers had been made to this account from the UK by both Lloyds Bank and Scottish Widows since 2006.
    - All these transfers required only signed letters.*



24. In paragraphs [\[37-39\]](#), Mr Arter endeavoured to capitalise on my purported change of circumstances plus an apparent catch-all clause in AML regulations, which gives situations in which it is appropriate to apply due diligence to an existing customer.
- He quotes Regulation 7(2) of the 2007 Regulations: "**a relevant person must also apply customer due diligence measures at other appropriate times to existing customers on a risk-sensitive basis.**"
  - He also quotes the equivalent Regulation 27(8) in the [2017 regulations](#) (*it is agreed that there are no material differences between the 2007 and 2017 regulations*).
  - However, Regulation 27(9), referring to 27(8), contains paragraphs exemplifying when this would be appropriate. All concern fundamental changes indicating that the customer is no longer that previously identified (e.g. signs of change of identity) or to the relationship. Location is quite clearly irrelevant; regardless of whether I live in the UK, Mexico, or on Pluto, I am still the same customer with the same relationship.
  - Mr Arter has no valid basis for his stated belief that Scottish Widows was justified in applying AML due diligence in my case.
25. In paragraph [\[41\]](#) Mr Arter states "**... Scottish Widows has tried to find other means of assisting Mr S to comply with its requirements.**". However, in [\[47\]](#) (in justification for partly upholding my case), he states "**... Also, this was exacerbated by Scottish Widows not appreciating the due diligence compliance difficulties much earlier and offering an alternative approach, which they have now done.**"
- It is not quite clear what Mr Arter means in paragraph [\[41\]](#), but it seems inconsistent with paragraph [\[47\]](#), which in turn is not consistent with the facts of the case...
  - Scottish Widows obviously appreciated the "due diligence" difficulties **very** early, and offered not just one "alternative approach", but three:
    - On 30 June 2016 (after receiving my request for their IDRP), they offered to accept documents that did not comply with their requirements, and had therefore rejected. *I rebuffed this offer partly due to the depreciation of my lump sum after Brexit, but also as it was clear that they could hardly have made this offer if their demands were indeed "required under UK legislation" ([48](#)).*
    - On 1 August 2016 and 22 August 2016, they offered to accept a scan of my certified national ID card alone as verification. *I also rebuffed this, as by now it had become clear that no documents whatever should have been required ([53](#)).*
    - On 8 and 9 November 2016, Scottish Widows attempted five times to contact me by telephone; clearly this would have led to their third "offer" ([59](#)).
26. In paragraph [\[41\]](#), Mr Arter also brazenly states: "**An attempt by my office to achieve a mediated resolution has also been rebuffed by Mr S.**"
- This refers to the blatantly-illegal (and also incongruous) "pragmatic solution" started by Barry Berkengoff on 3 October 2017 ([80](#)).
  - The functions of TPO given by the Pension Schemes Act 1993/2017 are limited to investigation and determination. *Mr Arter may have acquired the power of mediation after the consultations of December 2018, but it did not apply to my case.*
  - And this "pragmatic solution" was hardly "mediation"; the correspondence shows clearly that I was given the choice of agreeing to it, or withdrawing my case ([82](#)).
  - There was no response to five emails I sent in rejection of this "mediated resolution". I received an out-of-the-blue Opinion only after I explicitly demanded that my case be investigated and determined under the provisions of the Pension Schemes Act.

27. In paragraph [42], Mr Arter states "... **Scottish Widows now appears willing to accept documents readily available to Mr S as evidence of his address.**". This is quite absurd.
- It is inconsistent with the statements said to be from Scottish Widows in paragraph [24] (20a) that they had already received satisfactory verification of my address.
  - I have gone to great pains to explain why I cannot verify the address held by Scottish Widows; and even if I could, it would be invalid for AML verification purposes, as it is not my residential address.
28. Paragraph [45] pushes the untenable TPO position that my national ID card was invalid for verification purposes - see also (20b).
- Despite my having carefully explained and given links to the evidence, including documents that show beyond any doubt that Scottish Widows allowed and accepted my national ID card, Mr Arter continues to deny it. *And the two confirmations of telephone interview also list plain national identity card as verification of name.*
  - Apart from all the evidence from Scottish Widows, the bowdlerized requirements specifications given in paragraph [7] of the Determination (16) include plain national identity card!
  - In response to my clear information about the PDF form and the most recent paper form of 1 June 2016, he asserts "**it is unclear when that form was provided to him**" and that the form of 14 April 2016 is "correct", even though (unlike these more recent forms) it contains glaring errors:
    - Plain national identity card is given as a valid means of verifying Address, with the proviso that it is not used to verify Name (Mr Arter's sole shred of evidence is that inconsistently, for Name the specification is EEA identity card, if not used to verify Address).
    - The next option for Address verification reads: "**Utility bills and mobile phone bills printed from the internet ARE acceptable**" (clearly wrong, and inconsistent with specifications elsewhere that do not allow documents printed from the internet).
    - The above errors are only two of numerous conspicuous errors in this form.*
  - This position is clearly in support of the "pragmatic solution" based on my supplying an alternative verification of Name.
  - This position is also inconsistent with paragraph [42] (27), in which it was indicated that verification of my address had yet to be provided.
29. In paragraph [46], Mr Arter falsely states that my complaint was forwarded to TPO by the Financial Ombudsman Service.
- This was despite clear comments in my case documentation and the Opinion Rejection to the contrary; I never gave any indication that I first approached FOS.
  - Mr Arter's statement seems designed to negate the point I made that FOS has clearly NOT forwarded at least some Scottish Widows pension administration complaints.*
  - My statement was that complaint information from Scottish Widows and their Final Response referred me prominently to the Financial Ombudsman Service, but never mentioned either TPAS or TPO - see (51) and (55). *Nonetheless, I was not fooled.*
  - I further stated that I could easily find several Scottish Widows complaints that were purely about pension administration on the FOS website - and none was upheld. This suggests a corrupt SW-FOS relationship, and that the complaint information was designed to deceive. *There is now clearly a corrupt SW-TPO relationship.*

## Chronology

30. This section gives only a condensed sequence of events involving Scottish Widows and TPO, with links to the main correspondence. For more information, see the [Overview](#) and [Events](#) pages of my website. I also give links to sections in the [Details \(SW\)](#) and [Details \(TPO\)](#) pages, with popup images and links to the complete correspondence.
31. On [15 March 2016](#), I made my [initial enquiry](#) to Scottish Widows by fax, in which I gave bank details that they already held, and to which they had previously made a large transfer. I concluded by asking for a reply by email, stating that post from the UK to Mexico can take over three months to arrive.
32. On [18 March 2016](#), I received an [email reply](#) to the above, mentioning a "paperless" procedure for pension encashment, which involved a telephone interview. *I was apprehensive about this, but it appeared to be the only option.* It also mentioned "Identification and Verification" documents that they may require "under UK legislation", although I had no reason to believe that this would present problems.
33. On [5 April 2016](#), I underwent the telephone interview. In my case, this took about an hour and a half, most of which comprised thinly-disguised attempts to dissuade me from encashment. *With my hearing difficulties, I found it a nightmare, and was a nervous wreck afterwards. Although this matter is non-criminal, I do not consider it acceptable to impose this condition.*
34. During this interview, Scottish Widows sent an [email](#) stating that they required separate certified proofs of Name and Address, plus a certified birth certificate, and a separate proof of age. There were detailed certification requirements, which living in Mexico I could not completely comply with. *And I later found that if verification of identity were required under AML regulations, a single document giving good proof of Name plus EITHER Date of Birth OR Residential Address would satisfy the regulations.*
35. Attached to the above email was a [PDF form](#), which gave allowable options for verification of Name and Address, plus more certification requirements (these conflicted with those in the email). *Note that AML regulations require that verification of Address be on **Residential** address, but as mail cannot be delivered to my home address, Scottish Widows holds only a mailing address. The forms incorrectly specified plain Address.*
36. The email indicated that the documents could be sent by either email, fax, or post, and gave 30 days to respond. *It became clear only after examining fine print in the form that all documents must be certified, and certified documents must be sent by post.*
37. On 6 April 2016 (the very next day), Scottish Widows sent four postal items:
  - a. Two letters and forms (one for policy [P56879Q](#), the other for [N80803X](#)).
  - b. Two confirmations of telephone interview (for [P56879Q](#) and [N80803X](#)).
  - c. *This reminds me of the Monty Python sketch in which they were going to climb both peaks of Mount Kilimanjaro! Their later letters were arbitrarily for one or the other.*
  - d. I was told during the telephone interview that they would send a confirmation of this interview for my records. However, *I did **not** expect the paper forms (these were clearly never mentioned), and I did not receive them until [6 July 2016](#).*

38. The letters above (*which took three months to arrive*) stated that the completed form(s?) and documents must be received by Scottish Widows within 14 days of the date of the letter. *This contradicts information in the email, and would be difficult for someone living in the UK to satisfy, never mind someone living overseas.* The forms duplicated the PDF form, but were quite different in detail, and (apart from being so badly paginated that parts were illegible) contained numerous and conspicuous errors.
39. After going to considerable trouble in attempting to meet their requirements, it became clear that the best evidence of address I could provide was a [bank statement](#) dated April 2007. Nonetheless, as this was for the account to which payment was to be made, it ought to give excellent verification of identity.
40. On [11 April 2016](#), having visited a lawyer to certify the documents (the very specific requirements for this were also impossible to meet here in Mexico), I sent an [email with eight attachments](#), including scans of both certified and original documents (as some details in the certified photocopies were not too clear). I took great pains to explain my circumstances, and why it was not possible for me to supply alternative verification of address. I sent the documents by email as I feared they may be rejected, and the only viable option (courier) is very expensive. *I expected that they would simply reply to my email if they would not accept my documents.*
41. On 14 April 2016, Scottish Widows sent a [letter and form](#) in reply to my email (*received [16 June 2016](#)*), rejecting my documents.
- The form was the same as the paper ones they sent on 6 April 2016, except this one was properly paginated.
  - The letter contained an unhelpful repetition of the content of those of 6 April 2016, with the addition: "**Whilst we do understand that it can be difficult to acquire these documents, we do need these as a requirement to process your pension claim. Therefore we are unable to accept any documentation that has fall(sic) out of the required timescales. We are also unable to accept these by email.**".
  - Whilst this communication was to Scottish Widows' usual low standard, it could only refer to my outdated bank statement, as "timescales" do not apply to the other two documents.
42. On [21 May 2016](#), having waited for payment or response to my email of 11 April 2016 and received neither, I sent a [follow-up email](#), to which I also received no reply. *This was because Scottish Widows' policy, as indicated in their Final Response, is to reply to emails only by ordinary post: moreover, they claim that this suits the majority of their customers! ([55c](#))*
43. On 24 May 2016, Scottish Widows sent [another letter and form](#) (*received [6 July 2016](#)*) for policy P56879Q. This was clearly in response to the email I sent three days ago. Both letter and form were identical to that sent on 6 April 2016, except that this form was paginated differently again, occupying two more pages than that sent on 14 April 2016.
44. On 26 May 2016 (*just two days later*), Scottish Widows sent [yet another letter and form](#) (*received [10 October 2016](#)*) also for policy P56879Q. This was identical to that sent on 24 May 2016, except having the previous pagination. *There was clearly no good reason for sending this, or indeed any of the other paper forms, having sent the PDF form.*

45. On 1 June 2016, Scottish Widows sent their last letter and form (*received [6 July 2016](#)*), this time for policy N80803X.
- The letter was somewhat different, in that it now appeared to require original documents as well as certified ones.
  - The form was quite different to all the previous paper ones, being very similar to the PDF form, and thus free of obvious errors.
  - It is clear that the previous paper forms predate the PDF one, and must be from old stock; the PDF should be more recent, as it would be used to print the paper forms.
46. On 16 June 2016, Scottish Widows sent a letter terminating my application (*received [4 August 2016](#)*) as my documentation was unsatisfactory and **"As we have made three requests for the additional information without reply, we must assume that you do not wish to proceed with this claim and are therefore terminating this claim."**
- It should have been clear from my follow up of 21 May 2016 that I wanted to proceed with this claim.
  - The three requests referred to were sent within a period of 9 days, from 24 May 2016 to 1 June 2016.
  - On this very same day ([16 June 2016](#)), I received the letter of 14 April 2016 in rejection of my documents!***
47. On [26 June 2016](#), being unimpressed with Scottish Widows' standards of service, I sent an email requesting a copy of their Internal Dispute Resolution Procedure.
- I did not realise at the time that the IDRP does not apply to personal pension schemes, and was worried that the use of post would make this quite impractical.
  - A significant issue was that the delay caused by Scottish Widows' mishandling would result in the value of my lump sum depreciating by several thousand pounds due to the weak pound after Brexit, and I did not see why I should have to take this hit.
  - Also, their documentation requirements had always seemed unreasonable.
48. On [1 July 2016](#), I received two password-protected PDF documents by *email* (*not post!*):
- The first dated 27 June 2016 stated: **"Unfortunately we are not aware of the expression internal dispute resolution procedure. If you would be kind enough to clarify what you want, we would be happy to assist you if we can."**
  - The second dated 30 June 2016 stated: **"... I confirm that we have received the identity and verification documents which you sent in to us by email however we are unable to accept photocopies or scanned documents. Could you please send in the original certified copies of the identification and verification documents by post. We have tried phoning you several times to discuss without success." *My invalid documents were now acceptable! This was also sent by post (received [4 August 2016](#)).***
49. On [10 July 2016](#), having done some preliminary investigation into AML regulations (after consultation with TPAS), I sent a formal complaint, in which I averred that these did not require proof of address as well as proof of date of birth. The second paragraph stated that hearing problems made it difficult for me to use the telephone.
50. On [13 July 2016](#), I received a complaint response, which offered three means of communication - all of them telephone. They were unable to deal with my complaint by email on security grounds, despite having been able to email me two password-protected PDF documents with secure reply less than two weeks earlier.

51. On 15 July 2016, Scottish Widows re-sent the email of 13 July 2016, plus [Complaint Information](#) by post (*received [10 October 2016](#)*).
- This referred me prominently to the Financial Ombudsman Service, but there was no mention of either TPAS or TPO.
  - FOS is not supposed to handle pension administration complaints, but a quick search of their website revealed several Scottish Widows complaints that were purely pension administration - and none was upheld.
  - This complaint information was clearly deceitful.
52. On [17 July 2016](#), I sent my [rejection of discussion by telephone](#), supplying the initials, surname and postcode that their email required (for reasons that are unclear).
- I repeated that a hearing impediment made use of the telephone difficult.
  - I also stated that it was inappropriate as it would leave no record for TPO.
  - I also gave a link to my embryonic website.
53. On [1 August 2016](#), I received by email an [offer to accept a scan of my national ID card](#) alone as verification, provided it was emailed by my bank (with some other conditions that appear to have been invented on the spur of the moment).
- These conditions were clearly added to avoid the charge that they should have accepted this document as I emailed it.
  - This email was said to be in response to my email of 10 July 2016, and dealt with the issue that I raised in that proof of address was no longer required. However, after further investigation, it was now clear to me that no documents whatever should have been required, and I did not respond.
54. On 22 August 2016, another Scottish Widows employee sent a [follow-up letter](#) to the above email (*received [15 September 2016](#)*).
55. On 24 August 2016, Scottish Widows sent their [Final Response](#). This Fawltyesque document (*received [15 September 2016](#)*) is testimony to their standards of service. It:
- Evades the core issue that their requirements were impossible for me to fulfil.
  - Concentrates instead on the poor communication, for which the blame is placed entirely on the Mexican postal service.
  - States that they appreciate the difficulties I may face with the postal service in Mexico, and then "**Scottish Widows is a UK based company and our processes are set to suit the majority of our customers.**" (*including responding to emails by post*).
  - Again states that their "Identification and Verification" requirements "are required under UK legislation"; however, it adds "**we would ask all customers to satisfy these requirements prior to the settlement of these types of pension policies.**".
  - Endorses the sending of all their paper forms, stating that they had enclosed a copy of this document once more "for your convenience" (*none was enclosed*).
  - Again refers me to the FOS (their information sheet was enclosed).
56. On [24 September 2016](#), my attempts at arbitration through TPAS were exhausted. *After I had stated my findings from examining government AML documents, TPAS refused to get involved in any way with Scottish Widows' documentation requirements, and offered to mediate only on their use of post.* So I sent my [Application](#) to TPO by DHL. This gave links to my [original website](#), which contains the case documentation.

57. On [29 September 2016](#), having found that my application had been received by TPO:
- I sent a list of [Questions](#) (mainly concerning the documentation demands) to Scottish Widows, stating that my case was in the hands of TPO.
  - I sent a [follow-up email](#) to TPO, stating that I had sent my questions, and giving two links to documentation on my website. *I received acknowledgements to this from Rajan Bhundia (Investigation Assistant) and Carl Monk (Assistant Adjudicator).*
58. Having waited over a month without response from Scottish Widows to my questions:
- On [30 October 2016](#), I sent an [email to TPO](#) including a link to my website to ask whether they would like me to follow it up.
  - On 31 October 2016, I received a [reply](#) from Carl Monk suggesting that I wait another month. He also told me that my application was "earmarked" for an adjudicator, but it may be a few weeks before I hear from them.
  - In fact, I did not hear from the Adjudicator until 15 May 2017; and that was only after I had managed to email him directly. It was acknowledged that my case was assigned to the Adjudicator (Barry Berkengoff) in October 2016, but the TPO explanation for why I only heard from him on 15 May 2017 is untenable.*
59. On [8/9 November 2016](#), Scottish Widows attempted to telephone me five times and left three voicemail messages, in an apparently desperate effort to contact me.
- These calls were made at various hours (including one call at 0045 UK time!).
  - I made [recordings](#) of the voicemail messages on 10 November 2016.
  - I could not understand everything that was said in these messages, but it seemed clear that they were attempting to get me to withdraw my case.
  - I later examined these messages using digital signal processing to reduce the speed and change the pitch. At least two referred to "some ?paperments? that you have". *It was not "payments", and there is no word anything like "paperment" in my Oxford English Dictionary. Knowing Scottish Widows' deceitful strategies, I would not be at all surprised if this was a bogus phrase intended to hide the purpose of their calls and make a response more likely. But I'll stand corrected if anyone can explain them.*
  - I happily assumed at the time that Scottish Widows had been put on notice by TPO, and wanted to avoid being investigated by them (*they clearly wanted me to bring my case before FOS*). But as TPO later refused to investigate, this interpretation must be modified: that **TPO put Scottish Widows on notice, but offered a "solution"**; however this would be expensive, so they tried to deal with me. *This evidence of a deal may be circumstantial, but I can think of no other scenario that explains the facts.* And see [\(61\)](#), which suggests completion shortly before 23 November 2016.
60. On [10 November 2016](#), I sent an [email](#) to TPO to report the telephone calls I received from Scottish Widows, stating that I would not return them, and soliciting any advice they might have. I included a link to details with my recording of the calls.
61. On [23 November 2016](#), I received a [reply](#) to my email of 10 November 2016.
- This simply suggested that I email Scottish Widows and ask for a written reply.
  - It seemed strange that he took nearly two weeks to respond to this simple matter that called for an early response, given the prompt replies at other times (and there was no out-of-office notification). Was this to wait until the deal with Scottish Widows was done? (Otherwise, my email might have scuppered the deal).*

62. On [23 November 2016](#), I sent a belated [email](#) to Scottish Widows, taking the opportunity to re-send them the questions I sent on 29 September 2016. I also sent a [reply](#) to the Assistant Adjudicator, stating that I had done as suggested, and giving a link to the email I sent Scottish Widows. *He tried to access this link, unlike all the others - see below.*
63. On [2 December 2016](#), I received advice of the TPO secure email service, and an [encrypted email](#) stating that they could not access the link in my email of 23 November 2016, asking me to resend the information. *No problems were reported with the links in my previous three emails (all to my website). I initially thought that this block must be connected to the secure email service, and pursued the matter. But secure mail was introduced many months earlier, and it now appears that TPO staff only have access to a few specifically-authorised websites. If so, it indicates that he was not interested in links in my previous three emails; but **was** interested in what I had sent Scottish Widows.*
64. On [18 January 2017](#), I received a [request to participate in a "customer" survey](#), which worryingly stated that my case had been closed without my knowledge or consent. A correction sent about an hour and a half later stated only that the wrong version of the survey had been sent, and they would send the correct one later. *There were numerous issues arising from this that led me to be very worried about the status of my case. Only on 15 September 2017 was I told that there are two versions of the survey - one for those whose cases are closed, and another for those whose cases are still open.*
65. On [5 April 2017](#), having waited over five months since my application was assigned to the Adjudicator, and having received not a shred of information about my case, I sent an [email](#) to the Assistant Adjudicator expressing my concerns and asking for reassurance that they would investigate my case and could deal with it appropriately, On 7 April 2017, I received a [reply](#) stating that my email had been forwarded to Barry Berkengoff. *At last I knew the name of the Adjudicator.*
66. On [14 May 2017](#), having heard nothing from Barry Berkengoff, nor received any information on my case, I sent an [email](#) to Mr Berkengoff (having surmised his email address). I challenged him to give me some proper reassurance, and attached the email that he should have received from Carl Monk, plus further information on my case.
67. On 15 May 2017, I received the [first email from the Adjudicator](#). He affirmed that he would investigate my case, and stated that he may telephone to discuss matters in the first instance. He also stated that his main role is managing others. *Although Carl Monk referred to him as "Senior Adjudicator", his title is now given as "Deputy Casework Manager".* He stated that he will be in touch shortly, and thanked me for my patience.
68. On [17 May 2017](#), I sent my [response](#) to the above, urging him to review carefully the website that I have spent hundreds of hours developing, rather than attempt to obtain an understanding over the telephone.
69. On [22 May 2017](#), I received a [more extensive response](#) from the Adjudicator. He stated that he was scheduled to review my case last week, and was unable to as my website was inaccessible; but that he would proceed once the block was lifted. *He implied it was specific to my .mx domain, yet it seems that website access denial is general.* He also minimised what TPO could do, and in veiled terms encouraged me to withdraw my case.



70. On [24 May 2017](#), I sent a [reply](#) to the above, making the issues of my case very clear.
71. On [26 May 2017](#), I received a [response](#) from the Adjudicator. He again understated what TPO could do, but stated that he hoped to have access to my website shortly (*he again cited my .mx domain*) and would review my case then. After stating that TPO is impartial and does not take sides, he then stated that he expected my case to be the result of Scottish Widows having slightly different processes for overseas customers "to ensure appropriate ID checks are made". *This worrying statement is to dismiss the numerous clear statements that I had made and leap to the side of Scottish Widows.*
72. On [10 June 2017](#), having heard nothing, and being concerned that the lack of access to my website would be a reason to evade investigation, I attempted to send an [email](#) with a ZIP of most of my website, with a [second email](#) containing an aborted attempt to send the individual files. This effort to send him a solution he could use offline was thwarted by their mail delivery system.
73. There followed some communications relating to website access issues:
- On [13 June 2017](#), I received a [reply](#) affirming that access to my website had been denied, but offering to review my website on a non-secure server at home or in the office. *However, this was only after I had "threatened" him with a solution that he could use offline in the office.*
  - My [response](#) of 14 June 2017 acknowledged his willingness to use a non-secure connection.
  - His [email](#) of 15 June 2017 apologised for the security restrictions, but stated he would much prefer to view my case online (*seemingly not wanting to use an offline solution that would work in the office*). But he did state (*or imply*) that he would review my case early next week.
74. On [12 July 2017](#), it seems that the Adjudicator has still done nothing. So I sent an ["ultimatum"](#) challenging him to demonstrate his willingness to investigate my case. I also asked whether he would be willing to put to Scottish Widows the list of questions I had prepared, under legislation compelling them to respond. *This would easily show whether Scottish Widows is making "appropriate ID checks"*.
75. On [14 July 2017](#), I received his [response](#). Unfortunately, it offered no substance whatever, only reiterated implausible excuses. He again stated that he would "be in touch shortly". *He also again implied special security issues around my .mx website.*
76. On [6 August 2017](#), in an effort to clear up worries over the survey, I sent an [email](#) to the Communications Manager. The next day I received a [response](#) that was prompt but which simply referred me back to the Adjudicator, stating that he would send me a status report (*which he never did*).
77. On [30 August 2017](#), having failed to get any answers or the status report, I sent a [follow up](#) to the Communications Manager; this time with a full discussion of the issues. I also tried to resolve the questions over access to my website.
- My email was simply forwarded to Jane Stephens (the Casework Manager), from whom I received a [response](#) on 31 August 2017.
  - This gave a verbatim repetition of the "reassurance" over the survey.

- c. There was a blatantly-erroneous statement (*I now believe it to be a lie*) that my case had been actively investigated since being allocated to Mr Berkengoff in May 2017.
  - d. It also stated that "other matters" had been passed to Fiona Nicol (the Casework Director).
  - e. These "other matters" clearly excluded my key point (which had been "dealt with" by Ms Stephens): the complete inaction since my case was allocated to the Adjudicator in October 2016.
78. On 3 September 2017, I sent an [email](#) to Fiona Nicol, with an explanation of my concerns, urging that the matter be investigated. On 4 September 2017, I received an [acknowledgement](#). Fearing that the situation had still not been adequately presented, I sent a [further email](#) on 9 September 2017.
79. On [15 September 2017](#), I received an appalling [Complaint Response](#) from Fiona Nicol.
- a. *I never made a service complaint; I only tried to get information, then report my concerns about the conduct of the Adjudicator and urge an investigation.*
  - b. There are too many issues in this document to discuss here, and I refer the reader to the above web page link for further details.
  - c. However, this document appears intended to bully me into accepting the ensuing "pragmatic solution"...
80. On [3 October 2017](#), the Adjudicator sent an [email pushing a "pragmatic solution"](#).
- a. This confirmed my suspicions that there would be no investigation.
  - b. I am asked whether I hold a current UK passport or photo-ID driving licence as an alternative to my Permanent Resident ID card.
  - c. This did not make sense, as my ID card was clearly accepted by Scottish Widows - it was my address that I could not verify (and Scottish Widows had offered to accept my national ID card alone).
  - d. Apart from being incongruous, this was clearly an effort to evade investigation of my case in blatant protection of Scottish Widows.
81. On 4 October 2017, I sent a [reply](#) to Barry Berkengoff (copied to Fiona Nicol and Anthony Arter) making very plain that a "pragmatic solution" was unacceptable, and that I required a solution based on justice and the rule of law. On 8 October 2017, I sent an [explanatory follow up](#) to Mr Arter alone. *There was no reply to either of these emails, but at that time I held out the hope that Mr Arter might be above this sordid business, and be dealing with it.*
82. On [31 October 2017](#), I received an [email forcing the "pragmatic solution"](#) from Mr Berkengoff. This time I was asked whether I held a Mexican passport, and was given the choice of entering into this "solution" or withdrawing my case. On 1 November 2017, I sent a [reply](#) to Mr Arter; it was now becoming clear that there was a conspiracy to pervert the course of justice, from Mr Arter down. *At that time, I was not au fait with the Pension Schemes Act, but it was very clear that TPO was evading its duties in protection of Scottish widows. I read the Pension Schemes Act a little while later.*
83. On [10 January 2018](#), I sent an [email](#) to Claire Ryan (the Legal Director), who apparently also holds Scottish Widows pension plans. This explained the criminal misconduct of both Scottish Widows and TPO, and invited a response. *There was none.*

84. On [5 November 2018](#) (over a year since the last communication from TPO), I received an [extraordinary email](#) from Jane Stephens.
- This essentially continues the charade of Mr Berkengoff (*who left TPO shortly after his attempt to force this "pragmatic solution"*).
  - It states that TPO received an email from Scottish Widows in November 2017, but "**I am unclear from our papers whether this email was forwarded to you**" (!)
  - And rather than forward this email now, Ms Stephens' email contains text copied and pasted from what was purportedly Scottish Widows' email!
  - Now there is an alternative to a passport: a "letter of introduction".
  - This email contains several quite implausible statements, and I could give it no credibility.
85. On [11 November 2018](#), I sent an [email ridiculing and dismissing the above](#), making clear that I considered TPO to be guilty of a conspiracy to pervert the course of justice. I demanded explicitly that my case be investigated and determined under the provisions of the Pension Schemes Act 1993/2017. *I received no reply to this email.*
86. On [15 January 2019](#), I received a whitewash [Opinion](#) in the name of Jane Stephens, but sent by Tunde Adenubi (a new Adjudicator). On 27 January 2019, I sent the new Adjudicator my [Opinion Rejection](#).
- On 29 January 2019, the Department for Work & Pensions accessed my website over a period of several hours, and on two subsequent occasions. The hits were from links in my Opinion Rejection - see the [Access Report](#).
  - It seems likely that this arose from whistleblowing by a concerned new Adjudicator; alternatively it might be some kind of consultation. But in any case, it is clear that the Department for Work & Pensions is well acquainted with my case, and appears to have taken no action to deal with the self-evident corruption.
87. On [22 March 2019](#), I received a short [Amended Opinion](#), in the name of Tunde Adenubi.
- This sustained the documentation requirements and other misconduct of Scottish Widows.
  - However, it stated that Scottish Widows had offered £1000 in compensation in respect of purported failings in dealing with my difficulties over the requirements. *This is no more appropriate than an offender in Court offering the Judge a fine. And it conceals Scottish Widows' two "offers" to avoid being brought to justice (25).*
  - An early response was required, and on 24 March 2019, I obliged with my [Amended Opinion Rejection](#).
88. On 26 March 2019 (just four days later), I received the [Determination](#) plus a [Factsheet](#).
- I had 28 days in which to apply for permission to appeal and lodge the appeal; the deadline was thus 22 April 2019 (*Bank Holiday Easter Monday!*).
  - But being resident in Mexico, I am denied access to the High Court; nor is there any other legal channel open to me.
  - This would not simply be a narrow appeal on my own behalf, but an attempt to bring to justice serious criminal misconduct affecting pension holders in general.
  - And it has become clear that there is institutionalised corruption involving not only Scottish Widows and TPO, but other government organisations that appear to be in self-protective collusion, and which operate above the law with impunity.

## ***Background***

89. Both Scottish Widows and TPO have gone to considerable lengths to prevent my case from being brought to justice.
- These two organisations are both guilty, and so are acting in mutual self-protection.
  - The circumstances preclude any possibility that the misconduct of either Scottish Widows or TPO might have arisen through ignorance or misjudgment.
  - Both pushed "solutions" that might allow pension encashment while enabling Scottish Widows to escape justice.
  - Despite my parlous financial situation, I have consistently refused to be party to such criminal misconduct. It is vital for pension holders that these abuses be stopped.
90. But these are not the only organisations that are involved in this conspiracy to pervert the course of justice. There is clearly widespread government corruption in the area surrounding workplace and personal pension schemes, with a nexus of self protection. The following is a short summary - see my [Home page](#) for more.
91. [TPAS](#) was clearly aware of the illegitimacy of Scottish Widows' documentation requirements, and is part of the cover up:
- They refused to question Scottish Widows over this, or even send them the list of questions I had prepared, stating that they are not experts on AML (*unlike TPO!*).
  - They offered to mediate only on the matter of their postal responses to emails.
  - They implied that Scottish Widows was entitled to impose what documentation requirements it saw fit.
  - They gave me links to documents on AML, but implied that it would be applicable to my case (it was about a week before I was clear that no verification was required).
92. The [Department for Work & Pensions](#) is well aware of both Scottish Widows' and TPO's misconduct ([86a](#)), but has clearly taken no action. Furthermore:
- On 5 May 2018, I sent a [report](#) on the conduct of SW and TPO to the Select Committee for Work & Pensions, through a contact in response to their request for information with a deadline of 18 May 2018.
  - Hits on my website show that my report of serious criminal misconduct was received, but again it appears to have been completely ignored.
  - They appointed as Pensions Ombudsman someone with shares in 22 pension providers and a background as a solicitor defending such companies.
93. The [Metropolitan Police](#) ignored two reports raised against TPO; the first via Twitter, the second a paper report sent by registered post.
- Suspecting that TPO was "off their patch", I sent a third report (via Twitter), but this time raised it against the Adjudicator (not mentioning TPO - see the [Report](#)).
  - This time there was a response, and it was forwarded by the Contact Centre.
  - However, it seems that it was dropped after they made one or two accesses to my website and realised it was about TPO - see the [Access Report](#).
  - Mr Arter was a Detective Superintendent in the Special Branch, and one or two others in TPO are also ex-cops.*
94. [Action Fraud](#) gave a standard fob-off response to my report against Scottish Widows (although these appalling [reviews](#) suggest that this is the norm).