Contra Cabal 880-07-14b The Quango Quacks and their Fellow Travellers

General Optical Council, Harley Street, London
Samantha Peters, Chief Executive/Registrar - Mandie Lavin, Director of Regulation

The Complaint Principle

There is a principle which is a bar against all information, which is proof against all arguments and cannot fail to keep a man (or woman) in everlasting ignorance - that principle is contempt prior to investigation. William Paley.

The Bar Standards Handbook - The Core Duties
(personalized for Mary Mandie Jane Lavin, Barrister, GOC Director of Regulation):

- Lavin must observe her duty to the court in the administration of justice.
- Lavin must act in the best interests of each client.
- Lavin must act with honesty and integrity.
- Lavin must maintain her independence.
- Lavin must not behave in a way which is likely to diminish the trust and confidence which the public places in her or in the profession.
- Lavin must keep the affairs of each client confidential.
- Lavin must provide a competent standard of work and service to each client.
- Lavin must not discriminate unlawfully against any person.
- Lavin must be open and cooperative with her regulators.
- Lavin must take reasonable steps to manage her practice, or carry out her role within her practice, competently and in such a way as to achieve compliance with her legal and regulatory obligations.

General Optical Council - Mission and Values

- We protect and promote the health and safety of the public.
- We are responsible, forward thinking and principled.
- We inspire confidence.
- We make clear, well-reasoned, evidence based decisions.
- We account for our actions and are open to scrutiny.
- We apply our resources in a targeted and proportionate manner.
- We make a difference.
- We pursue defined goals and measure our results.
- We are progressive, innovative and agile in our ways of working.
- We achieve and deliver more by working collaboratively.
- We are a learning organisation committed to continuous improvement.
- We build trust.
- We gain respect through our credibility, integrity and high standards.
- We listen openly, act responsively and communicate honestly.
- We behave consistently and fairly to everyone.
- We foster a positive and productive culture.
Impending complaints against Lavin will predicate upon a devastation trail using “willful blindness”, a term defined as contrived ignorance to evade civil or criminal liability for unlawful acts by feigning unawareness of facts that would render her liable. By that, she allegedly violated the core duties published by Bar Standards Board (BSB), the mission and values proclaimed by General Optical Council (GOC) and the overriding principle of fairness by the philosopher William Paley originated in A View of the Evidences of Christianity (1794) which described “contempt prior to investigation as an intellectual vice from which the greatest faculties of mind are not free”.

[Bar Standards Board - Handbook 2014]

Paradoxically, it was announced that the Director of Regulation, Mandie Lavin will leave the General Optical Council during January 2015 after almost three years in the role. Lavin has been appointed as Chief Executive of the Chartered Institute of Legal Executives (CILEx).

[Optometry Today]

**Quango Quacks and their Fellow Travellers**

During the seventeenth century, the English monarch had absolute sovereignty, including the prerogative to disregard laws passed by the House of Commons and rulings made by the House of Lords. In the eighteenth century, absolute sovereignty was transferred from the British monarchy to Parliament. The Rule of Law now requires UK government to exercise its authority under existing law and legal precedents.

Government regulators and public sector officials know that if a quango (a quasi non-governmental organization) receives government funding, and wishes to punish an individual by word or deed, then a director of regulation holds ultimate responsibility for compliance in accordance with law, legal precedents and published protocols *in pari materia*. Mary Mandie Jane Lavin, Barrister-at Law, Director of Regulation, General Optical Council, extortionately funded from the public purse, holds that responsibility.

Lavin has a duty to require that punishment for violation of laws and protocols must result from due process and not abandon victims by wilful blindness or condone arbitrary decisions by bureaucrats. Lavin, a barrister and public sector official, allegedly reverted to seventeenth century monarchical prerogatives in violation of law which construes as misconduct in public office. Due process requires that administration of justice must conform with established rules and principles to insure life, liberty or property.

The law presupposes that public sector officials (especially barristers and solicitors) have knowledge of the law and intend to apply it equally. Only those quangos that function within the law preserve the individual freedoms granted by parliament despite constructional privileges that they may also possess.

GOC denies both registrants and victims of abuse the basic protection that courts provide as a right even to shoplifters. They do not make formal charges and present no evidence before convening kangaroo courts (or make arbitrary decisions *in absentia*). Frequently, individuals neither know the names of their accusers nor the names of adverse witnesses. By that, GOC denies them an opportunity to present a defence and their victims a chance to state their case.
They deny basic rights in law by disallowing either oral testimony or written affidavits and employ gag stratagems that use email monitoring and filtering.

The octogenarian victim, whose only transgression probably relates to exercise of mandated freedom of expression in a politically correct and divisive bureaucracy, does not have access to oral recordings or written transcripts of testimony that would enable him to appeal arbitrary and biased findings. Due process requires notice and preliminary hearings before dismissal of a complaint.

Legislators have recognised that unlawful and vague definitions, also secret investigation without accountability or due process, lead to extreme politicizing and totalitarian control presently rampant in the UK bureaucracy. GOC officials used opinionated, self-serving dicta instead of formal resolution or determination of issues by using promulgated procedures. By that, they orchestrated a blatant denial of human rights and due process of law.

Arbitrary denial destroys the careers of GOC staff, introduces racism and precludes individuals from earning a livelihood with integrity. The present issues will not come to rest until both Lavin and Peters comply with law. They must, jointly and severally, arrange for independent investigation then discipline or indict the people who clearly and deliberately participated in unlawful activities.

They have consistently denied civil rights under the published GOC mission and values and Lavin has blatantly ignored BSB core duties. They have also used boilerplate language, broken laws and framed evidence to support sham disciplinary proceedings and covered up kangaroo court findings. Only an independent investigator can fairly examine the documents which support their arbitrary contentions.

GOC must now provide the documents previously requested and obtain the documents withheld by the registrants at Houghton Opticians. They must choose three of the eight other NHS quangos that are independent and outside the GOC remit, then arrange for an independent investigation by one of them selected by the claimant.

The attitude that permeates most of GOC tends to predominantly base either upon ignorance and neglect or political expedience and sycophancy. The document and information withholding by Peters and Lavin et alia belies the Information Commissioner’s statement published on all ICO correspondence: “The ICO’s mission is to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals”.

What a lot of codswallop from Christopher Graham (ICO) who pulls in a taxpayer-funded salary of £140,00-£145,000/pa (2010) plus expenses and does not answer personally addressed correspondence. Instead, he sabotages document requests and uses blackmail and extortion in a similar manner to Peters and willful blindness as used by Lavin.

Lavin received 14 notices during an eight week period and has not answered a single request to mitigate the damage that Peters caused with regard to the current GOC complaint. For that, they each receive salaries and benefits of £112,029/pa (2014).

[Correspondence - Lavin GOC] [Information Commissioner]
The GOC Quintet

Samantha Peters, Chief Executive and Registrar, GOC.
Gareth Morgan Hadley, Chair, General Optical Council, GOC.
Mary Mandie Jane Lavin, Chief Executive, Chartered Institute of Legal Executives, CILEx.
Lisa Mariska Davis, Barrister, Director of Fitness to Practice, GOC.
Kiran Gill, Head of Legal Compliance, GOC.

Alleged Railroading, Fraudulent Investigation and Decisions

Railroading denies due process of law by forcing rapid litigation to prevent careful consideration and criticism. It forms an essential part of most kangaroo court procedures which allow denial of human rights without a fair hearing by using trumped-up evidence. The procedure dragoons or compels, subjugates and persecutes by coercion and threats in violation of law. By that, it construes as harassment and when it applies to an octogenarian it violates human and civil rights.

The Quintet obviously colluded to pervert the course of justice by neglecting to investigate a serious complaint supported by legal argument and documentation that required immediate attention. By that, they repeatedly denied due process by stonewalling despite mandated time-frames for responses.

Stonewalling relates to public sector officials and their executive directors and managers who frequently refuse to name the people responsible for processing complaints. They then use low-echelon employees as proxies to orchestrate evasion stratagems and illegal merry-go-rounds. By that, they deny appeals of their decisions and abrogate complainant rights by allowing contempt prior to investigation.

The Quintet used these aberrant techniques, then Peters used them to close the case without an iota of substantiation or documentation under the relevant protocols. Moreover, she has not disclosed the names of independent participants involved in her determination. Laws require public sector employees to document and publish any disciplinary issue in which they participate.

Silent withholding, another evasion stratagem used by the Quintet, prevented access to records or to describe them with particularity to evade acting upon lawful requests especially when the initial requests relate to Part 31 disclosure which mandates immediate release of documents and information.

The Quintet evaded their responsibility to refer the criminal aspects to law enforcement authorities. That allowed Nina Houghton to remain on the run after committing a criminal offense that involved assault with a dangerous weapon which she could easily repeat on other elderly people. It has also allowed GOC registrant of record (Ian Dobson) to continue to practice without independent investigation of his fully documented participation in the criminal acts committed by Nina Houghton. Another GOC registrant (Christopher Houghton), nepotistically orchestrated a cover-up which also construes as misconduct in public office.
Public office holders have an obligation to perform public duties in which the public has an interest especially if they receive a salary or other payment directly or indirectly funded by the taxpayer. Any prosecution must prove that a suspect classifies as a "public official".

No simple definition exists and prosecutors individually take into account the nature of the role, the duties carried out and the level of public trust involved. Case law contains an element of circularity which tends to define a public official as any person who carries out a public duty or has an office of trust defined by legal precedents. Those precedents define a public official as one who holds an office of trust concerning the public, especially if attended with profit by whomever and in whatever way the officer accepted appointment.

The person concerned need not hold an office in a narrow or technical sense. Relevance rests in the nature of the duties and the level of public trust involved rather than the manner or nature of appointment. Individual GOC registrants affiliated with Houghton Opticians who perform NHS funded duties classify as (and have the same responsibilities as) public sector officials. Nina Houghton held no GOC registration and is the wife and employee of an individual GOC registrant (Christopher Houghton) who held responsibility with Ian Dobson for her when she illegally performed optical services.

Around the time of the zap, Nina and Christopher Houghton formed a limited liability company with Nina Houghton as company secretary who held a responsibility to register the company with GOC. That omission compounded the original complaint and brought Nina Houghton firmly into the remit of GOC prosecutorial protocols despite arbitrary claims by Peters to the contrary. She acted as an unregistered optometrist's assistant who allegedly committed assault with a deadly weapon while funded by NHS; moreover, she concurrently formed a limited liability company using the term “Optical” in its title without registering it with GOC.

The Quintet neglected to act with due diligence by using unsubstantiated boilerplate language to evade the issues which also construes as misconduct in public office. The term “boilerplate” describes uniform language with unvarying meaning normally used in legal document templates which require a rewrite to argue specific points in a case.

Boilerplate language has no place in investigation reports without the words being individually fashioned to address the legal issues. It ranks as inadmissable “general denial” which means a statement in answer to a lawsuit or claim in which the defendant denies everything alleged in the complaint without specifically addressing the issues or refuting allegations with particularity. It exists as a quick and dirty get-out-of-trouble card for shysters which Peters and Hadley collusively implemented.

**Criminal Prosecutions**

The Quintet repeatedly used boilerplate: arbitrary decisions which have no place in answers to criminal complaints or in any legal argument. Boilerplate does not form a continuum within the context of the complaint. It defines as a general denial, historically used by anarchists to evade responsibility for their actions devoid of interpretation of laws.

Peters decisions in this case rank as anarchistic which demonstrates the inability or neglect of government quango employees and lawyers to follow their own protocols. That resulted in a state
of lawlessness and disorder. Peters evaded her responsibility to address the issues within GOC protocols which created a general denial. Peters and her gatekeeper lawyers have completely ignored admonitions and used their personal animosity to make outrageous statements. Davis tried to enforce arbitrary and biased decisions made by Peters while Lavin continued her campaign of willful blindness and Hadley used insulting language to declare the biased decisions final.

Peters introduced the term “bimbo” into the evidence by extrapolation out of context from unrelated correspondence in an attempt to derogate the complainant. She then objected to its use which demonstrated her duplicity. In the original published content several years ago, the term had a clear definition which, coincidentally, also covers Peters’s present behaviour.

“Machiavellian Bimbos” define as: Marked by cunning, duplicity or bad faith. Conniving people who can strike anytime without warning. They watch events unfold then silently slither to grab any spoils. Deceitful and treacherous they use flattery to gain personal advantage and to win favors from individuals who wield influence.

Or, according to Leo Tolstoy, War and Peace: "Crowds of sycophants who flatter power attributing to it qualities of genius it does not possess."

A “bimbo” approach to answering serious issues and points of law ranks as an insult to the intelligence of professionals handling the case and leaves the Quintet open to investigation under appropriate codes of practice, especially as neither Peters nor Hadley have the qualifications or education to deal legitimately with the basic requirements of protocols which state that GOC may receive allegations verbally or in writing, and may receive anonymous allegations and specifically rules that:

The Registrar must at all stages consider whether to refer the matter for a fitness to practice investigation or to consult or notify another agency in relation to the matter, including external legal advisers, another regulator or the police.

The GOC oxymoronic, psychotic mix of oligarchy and anarchy in decision-making by Peters and Hadley, neither of whom allegedly possesses the skills or the education to make arbitrary legal determinations prior to investigation of a near-death experience, ranks beyond belief. The lack of a hearing by the Fitness to Practise panel, especially when Hadley arbitrarily parroted the general denial by Peters, effectively classifies as misconduct in public office.

[Illegal Stratagems - General Optical Council - Protocol]

A blatant irony relates to the statement by Alistair Bridge, Director of Policy and Communications, GOC:

The specific purpose of this project is to develop a clear strategy for preventing and addressing illegal practice. It sits under our work stream for protecting the public from harm from illegal practice and supports our strategic aim to deliver effective, proportionate and fair public protection.
Another irony by Samantha Peters relates to bureaucratic hypocrisy and demonstrates the double standards employed by GOP executives. The Professional Duty of Candour claims:

We will promote this joint statement on “the duty of candour” to our registrants, our students and to patients, ensuring our registrants know what we expect of them . . . . We will also work with other regulators, employers and commissioners of services to help develop a culture in which openness and honesty are shared and acted on.

**[The Professional Duty of Candour]**

Samantha Peters, Gareth Morgan Hadley, Lisa Mariska Davis and Karin Gill showed that they cannot even lie convincingly. Willful blindness by Mandie Lavin denied all complainant privileges under human rights legislation as an aged party which showed a total lack of ethical and moral principles.

**Case Study and Legal Argument**

Early August 2014, Houghton Opticians, Hoole, Chester, Cheshire, CH2 3AZ sent individually addressed invitations to its registered patients requesting them to attend an annual eye examination. The Patient (Paul Trummel referred to Houghton Opticians during 2012 by David Snowden MD GP, The Elms Medical Centre, Chester) responded by appointment on Tuesday 19 August, 2014 at 14:10. During the preliminary examination, Nina C Houghton (Houghton-N), Marketing Manager cohabitant with Christopher Mark L Houghton (Houghton-C), Independent Optometrist (GOC #01-19936) acted as assistant to Ian Robert Dobson, Independent Optometrist (GOC #01-19623). Dobson neither attended nor supervised that examination which was conducted in the style of a Tesco checkout.

Optometrists, dispensing opticians, trainee optometrists and trainee dispensing opticians employed by Houghton Opticians must register as individuals with General Optical Council (GOC) and abide by the GOC Code of Conduct in their personal and professional conduct at all times. Houghton-N allegedly holds no optical or academic qualifications that permit her to act as a trainee optometrist and GOC has not verified registration. Her name does not appear on the optometrist and dispensing opticians register.

**[Opticians Act 1989 section 24]**

A trainee optometrist usually requires a two or three year applied science degree before assisting an ophthalmologist or optometrist with vision testing. Houghton-N claims to hold a degree from Anglia Ruskin University, BA Hons, Communication Studies 1995-99. Although Ruskin U grants ophthalmic degrees and diplomas, no published record exists of her having earned more than a communication studies degree.

Although a reasonable person would expect GOC to investigate a report of this nature as soon as it received the information, Samantha Peters, Chief Executive and Registrar, GOC arbitrarily evaded her responsibility to act and several times insisted that the Patient contact the police.

On Peters insistence, the Patient filed with Cheshire Constabulary alleging assault with a deadly weapon against Nina C Houghton. He expects Lisa Mariska Davis, Barrister and Head, Fitness to Practice (FTP), GOC to provide a reason for the neglect by Peters to file with police on behalf...
of GOC after investigation and mitigation of the damage caused by delaying that process. Both Lavin and Davis must also respond, without further prevarication, to the remaining issues which fall within the GOC/FTP remit for processing criminal complaints which Peters repeatedly stonewalled.

Janette McCormick, Deputy Chief Constable
Cheshire Constabulary
26 October 2014

I have attached the latest correspondence from Samantha Peters, Chief Executive and Registrar, General Optical Council who has neglected to process a criminal complaint by reporting this case to law enforcement authorities for more than two months, contrary to GOC rules. She now wants to start another merry-go-round by suggesting judicial review. The content of her correspondence prevaricates and has no relation to facts. She has taken words and phrases out of context and used general denial.

Please take whatever action you deem necessary to expedite due process of law. As you will see from the responses, GOC are now prevaricating and using incitement. They allegedly have a political or financial axe to grind based upon the way they have behaved which has left elderly people in Hoole, Chester at similar risk to myself for more than two months. I have appended two files which explain the present situation and clarification can be obtained by viewing the web site and downloading PDFs. I will answer an interrogatory if you need more information.

I am now classified as partly disabled as a result of the assault. I can only work 2/3 hours before my eyesight fails to a degree that precludes me from using a computer and I must now wear spectacles all the time and dark glasses when outside. I am pumped up with medication and have repeated headaches and balance problems.

Consequently, it was as much as I could do to produce the attached documents. They take about six times the normal effort. I have another appointment with the ophthalmologist and neurologist at the end of January to see whether I need surgery.

Paul Trummel, Professor Emeritus

Cheshire Constabulary has not responded or recorded the complaint despite three requests.

[Cheshire Constabulary - Correspondence]

Intent

Houghton-N said that she intended to take a photograph then zapped the Patient’s eyes: “zap” means to release electromagnetic radiation which could include blue light, X-rays, radio waves and microwaves. By that, she allegedly committed assault with a deadly weapon. Optometric equipment used for detecting eye diseases becomes a deadly weapon when misused by optometrists and optical employees especially individuals not registered with GOC.
It ranks equally with court defined deadly weapons intended to do harm (guns or knives) and blunt instruments like clubs, baseball bats, monkey wrenches, automobiles or any other object which can cause death. For example, in a few 1990s cases, courts allowed definition of erect penises of AIDS sufferers as deadly weapons. These definitions form a basis for evidence when trying criminal charges brought for assault with a deadly weapon.

By that, Houghton-N caused actual bodily harm. The Patient has not established whether she had malicious intent which law enforcement officials must determine in view of a history of malicious elder abuse and violence suffered by the Patient in the vicinity during the preceding five years and a cover-up of unlawful activity by Houghton Opticians following effectuation of the zap.

In UK law, the only factors that distinguish common assault from assault occasioning actual bodily harm relate to the degree of injury or disability that results and the sentence available to the sentencing court. The definition of disability under the Equality Act 2010 includes any physical or mental impairment that has a substantial and long-term negative effect on the ability to perform normal daily activities.

**Offences against the Person Act 1861, section 47.**

Whosoever shall be convicted upon an indictment of any assault occasioning actual bodily harm shall be liable to imprisonment for a term not exceeding seven years; and whosoever shall be convicted upon an indictment for a common assault shall be liable, at the discretion of the court, to be imprisoned for any term not exceeding two years.

[Offences Against the Person Act 1861 section 47]

**Punishments for Assault with a Deadly Weapon**

Assault with a deadly weapon is a felony level offense. Aggravated felonies can usually result in punishment from two to thirty years. Other factors, like the age of the victim or the extent of the injury, can result in an even higher level of punishment. Even where the punishment level is lower, the parole consequences are usually higher. Due to prison overcrowding, offenders who are convicted of using deadly weapons are held in prison longer and parole later than defendants who are convicted of non-violent offenses. Even though not a direct punishment, an assault with a deadly weapon charge can have other collateral consequences on a person's employment, educational funding opportunities and professional licenses.

After the preliminary examination by Houghton-N, Dobson conducted his examination and issued a GOS 2 Patient's Optical Prescription or Statement dated 19 August 2014 based upon the examination by Houghton-N. The statement contained no mention of age-related macular degeneration or cataracts as a preexisting condition at the time of the zap (which concurs with the findings of different optometrists during the preceding five years).

Since the zap, thorough examinations by another optometrist and later an ophthalmologist showed minimal macular degeneration which the Patient viewed on the screen and with which he concurs; however, not age-related as Hickley claims. In fact, it relates to cataracts and a number of other injuries caused by the zap. Two academic medical papers (among others) support
the contention that traumatic macular degeneration and cataracts can occur after releasing a sudden intense burst of radiant energy into the eyes.

Ham, Walter, University of California Davis: J Occup Med 1983 Feb;25(2):101-3:

Photochemical damage from blue light produces solar retinitis and is postulated to accelerate aging which leads to senile macular degeneration. Lens removal exposes retina to near UV that is six times more dangerous than blue light.

Zrenner E, Universitäts-Augenklinik, Tübingen, Bundesrepublik Deutschland: Lehrstuhl und Abteilung für Pathophysiologie des Sehens und Neuroophthalmologie:

Photochemical damage of the retina occurs typically after a longer interval and is mainly due to short-wavelength visible light ("blue light damage"); it entails destruction of membranes of the photoreceptor outer segments and finally photoreceptor death. There are indications that age-related macular degeneration can be accelerated by photochemical light damage.

The Patient returned to Houghton Opticians the day following the zap and received an insolent general denial by the receptionist who told him to see his general practitioner. Dobson subsequently ignored three requests for the name and job title of his "ophthalmic assistant" together with details of her GOP registration or academic certification which allowed her to conduct optical examinations in his behalf. GOC publishes a list of recognized qualifications for optometrists and dispensing opticians.

[Recognised Qualifications]

Three days later, the Patient asked Countess of Chester Hospital, Ambulance and Emergency (A & E) (unbeknown to anyone else except his Foundation associate) for a second opinion on both optical and associated intracranial damage. However, Nicholas Michael Hickley (GMC #7039559) in a consort with Graham John Bott (GOC #D-2589) acting as gatekeeper or proxy for Christopher Mark L Houghton (GOC #01-19936) falsely interpreted the traumatic macular degeneration that he discovered to cover-up the more serious injuries caused by the zap. More important, he conspired with a witness to alter evidence which construes as subornation and concealing evidence. By that, he violated the Patient's right to confidentiality as defined by General Medical Council (GMC).

Dobson neglected to disclose the full name and credentials of Nina C Houghton (the Patient identified her from photographs and journalism sources); consequently, Dobson classifies as an accessory after the fact to criminal activity which also construes as misconduct in public office as a private sector, individual provider of optical services to public sector NHS patients.

Due to alleged collusion among named parties in a cover-up to reduce the seriousness of the offense to a non-consequential level and delay in recording the complaint by GOC, which has allowed ex parte communication and more subornation, the Patient elevated the issues for medical opinions to acknowledged international ophthalmologists and neurologists. He has since obtained opinions from four medical specialists in US, three of whom concurred with his analysis. Therefore, the Patient challenges the conclusion published by Hickley as inaccurate due to it
diverting the intent of the examination to a lesser optical condition caused by the injury which evaded examination of extensive cranial neurological damage caused by the zap.

The denial of process by GOC of the original complaint and the identification of Houghton-N allowed elevation of the complaint to a criminal investigation by GOC and an impending investigation by General Medical Council (GMC) for malpractice as defined in Medical Act 1983 and misconduct in public office by non-compliance with GOC Fitness to Practise Rules 2004.

**Summary**

GOC protocols govern the conduct of investigations and the decision whether to prosecute suspected criminal offenses under the Opticians Act 1989, as amended by the Opticians Act 1989 (Amendment) Order 2005 (the Act) and other legislation in pari materia. The stated overriding objective of GOC in conducting a criminal investigation intends to protect and maintain the health and safety of the public. GOC has neglected its duty of care by not reporting assault with a deadly weapon and subsequent injuries as part of an unlawful delay and deny stratagem orchestrated by Samantha Peters, Gareth Hadley, Mandie Lavin, Lisa Davis and Karin Gill.

The General Optical Council claims that its work is built on a foundation of six main values:

1. Proportionate: targeting the issues of greatest risk to public safety;
2. Accountable: involving stakeholders and partners;
3. Consistent: working with others to make sure our work is fair;
4. Transparent: explaining our decisions wherever possible;
5. Targeted: focusing our efforts where there is most public benefit; and
6. Well organised: providing value for money, high standards of customer service and promoting equality and diversity in all our work.

The Patient, an international investigative journalist has a similar objective, hence this summary which meets his responsibility under the fundamental principles widely held as essential to a fair hearing or valid decision at the hearing of any complaint. Moreover, justice must not only be done, but must be seen to be done following an opportunity for mitigation.

The farce described in this position paper shows application of none of the six values either by Houghton Opticians or GOC; instead, it describes a cover up of serious crime. Peters and her disingenuous GOC bimbos must now learn that political correctness in public service is an ethical and moral antithesis to democracy which legally defines as misconduct in public office.

The Patient filed a complaint with GOC (29 August 14) alleging malpractice and misconduct in public office by employees of Houghton Opticians and Countess of Chester Hospital to which they responded with a general denial. The term "general denial" defines arbitrary and biased statements, innuendo and assumption that bear no relation to facts. GOC must controvert all the declarations and assertions as common law requires and not use a narrow construction when legal precedents generally require a liberal construction, at least until a judge rules otherwise.

Precedents show definitions of a public official as one who holds an office of trust concerning the public, especially if attended with profit by whomever and in whatever way the official accepted
appointment. Private sector workers performing public sector functions arguably classify as public sector employees for the purposes of defining misconduct in public office.

The person concerned need not hold an office in a narrow or technical sense. Relevance rests in the nature of the duties and the level of public trust involved rather than the manner or nature of appointment. Public office holders discharge any duty in which the public has an interest especially if they receive a salary or other payment funded by the public and have an obligation to perform a public duty.

Lavin, Davis and Gill must present a legal argument based upon fact if wish to deny the substantiated assertions in the complaint and must provide access to public documents. A general denial, in its legal sense, classifies as proscribed behavior and courts will not accept it nor should any properly convened investigating panel admit it into evidence.

Peters decided not to act on the complaint by effectively holding a kangaroo court. She received an offer to mitigate damage caused by her arbitrary finding which she ignored. The term "kangaroo court" describes biased courts or regulators that hand down foregone conclusions using sham legal proceedings to render decisions or opinions before hearing evidence or argument.

By that, Peters denied the basic protection that courts provide as a right even to shoplifters. Proxies, usually sycophantic staff members, sit on kangaroo panels for personal gain and follow the dictates of their executive directors and managers. In this case, GOP tried to destroy the credibility of the Patient and to deny him due process of law by stonewalling.

Stonewalling denies appeals and abrogates rights by allowing public sector officials to indulge in contempt prior to investigation. Neglect to investigate promptly, or substantiate a denial with particularity, construes as silent withholding to evade acting upon requests to comply with law.

Misconduct in public office and, by extension, perverting the course of justice classify as criminal offenses. In common law, they carry a maximum sentence of life imprisonment. They can include any of three acts: fabricating or disposing of evidence; intimidating or threatening a witness or juror; and intimidating or threatening a judge.

The sentence appropriate for perverting the course of justice essentially depends on three issues:

1. Seriousness of the offense.
2. Degree of persistence.
3. Effect of an attempt to pervert the course of justice.

The course of justice includes police investigation of a possible crime (although not necessary to have active legal proceedings). A false allegation which risks the arrest or wrongful conviction of an innocent person or denial of his/her civil and human rights, suffices.

The term "to pervert" can also mean "alter" but behavior does not have to go that far. Any act that interferes with an investigation or causes it to head in the wrong direction may tend to pervert the course of justice. The prosecution only needs to prove a possibility that what the suspect did "without more" might lead to a wrongful consequence.
The terms intent and motive differ: the motive of the suspect has importance if public interest applies. The prosecution must prove intent either to pervert the course of justice or to do something which, if achieved, would have that effect. Proof of knowledge of all the circumstances and the intentional doing of an act which has a tendency, when objectively viewed, to pervert the course of justice, suffices. Where the prosecution case involves false allegations, then the law only requires proof of intent for police to take the allegations seriously.

[Misconduct in Public Office]

**Assault with a Deadly Weapon**

*Principals and Accessories before and after the fact*

Samantha Peters (48) (academic credentials could not be verified at the time of publication)
*Chief Executive and Registrar, General Optical Council.*
605 Beatty House, Dolphin Square, Westminster, London, SW1V 3PL.

Gareth Morgan Hadley (60-64)
*Chair, General Optical Council.*
5 St. Stephen’s Gardens, Putney, London, SW15 2RR.

Mary Mandie Jane Lavin (50-54)
*Barrister, formerly Director of Regulation, General Optical Council.*
*Now Chief Executive, Chartered Institute of Legal Executives, CILEx.*
38 Orford Gardens, Twickenham, Middlesex, TW1 4PL.

Lisa Mariska Davis (34-38)
*Barrister, Director of Fitness to Practice, General Optical Council.*
38 Kingscroft, King’s Avenue, Clapham, London, SW4 8ED.

Kiran Gill
*Solicitor, Head of Legal Compliance, General Optical Council.*
4 Kent House, 112 Hardy Road, Wimbledon, London, SW19 1HZ.

[Senior Management Team Salaries]

[Council Members Fees]

GOC protocols allow Samantha Peters, Chief Executive/Registrar and Gareth Morgan Hadley, Chair, General Optical Council (GOC) to receive allegations verbally or in writing (also anonymously) which they must immediately process in accordance with GOC rules and statutes *in pari materia.* Ignoring or prevaricating to delay due process ranks as a cover-up: a criminal offence which in the case of a public sector official also classifies as misconduct in public office.

The protocols require Peters and Hadley to consider at all stages of processing a complaint whether to refer it for a fitness to practice investigation or to consult or notify other agencies, external legal advisers, regulators or police regarding the issues. However, for more than three months they neglected to follow those mandates.
That exacerbated the criminal aspects of the complaint by allowing the principal registrants to continue to practice optometry without suspension prior to investigation. Allegedly to evade the issues, the Houghtons incorporated a new limited liability company with the term "optical" in the title without the mandatory registration with GOC which Complainant reported and Peters took no action.

Hadley claimed in an insolent letter (20 Nov 14), despite a plethora of evidence to the contrary:

I am satisfied that the submissions contain no evidence whatsoever of misconduct on the part of the Council’s Chief Executive and Registrar.

But, he would say that, wouldn’t he. Although Peters delegated Hadley to investigate the issues, he responded without any investigation that:

I have concluded that your complaints are unfounded and vexatious; and that they do not require further investigation. The matter is therefore closed: I will neither acknowledge nor respond to any further correspondence that I receive from you.

He can tell that to the judge.

His unsubstantiated statements exemplify the lack of legal standing in this (and many other) GOC decisions. They define as actual bias which shows existence of a state of mind on the part of Hadley which would not satisfy any ethical court. His statements lack the exercise of sound discretion and show that he cannot decide the issues impartially and without prejudice to the rights of the Complainant.

By effectively condoning his statements, and those of Peters through use of wilful blindness and boilerplate terminology, Lavin, Davis and Gill sycophantically support arbitrary determination of a continuum of issues which contradict Professional Standards Authority directives and General Optical Council protocols which construes as misconduct in public office.

Arbitrary bureaucratic opinions used as regulatory decisions have no standing in law. Current evidence contains arbitrary decisions that Peters, Hadley and Lavin have used at GOC (and in their previous employment) which shows a pattern or practice of machination for self-aggrandizement and collusion in denial of due process of law for political and financial gain.

[Hadley Decision]

The GOC illegal practice strategy determines procedures for preventing and addressing illegal practice. GOC claims to protect the public by supporting a strategic aim to deliver effective, proportionate and fair public service. However, in this case that amounts to nothing more than propaganda. Alistair Bridge, Director of Policy and Communications leads that project. He has done absolutely nothing to stop Peters and Hadley running rampant although fully aware of the circumstances surrounding the assault.

The Houghtons registered themselves as director and secretary of a new company at a proxy address in Cheshire Oaks. Complainant informed Erik Pohl, Registration Officer, GOC. He provided proof of the alleged illegal Companies House registration with a Certificate of Incorporation in the name of Leath Optical Limited (#9173219). Opticians Act 1989 requires any
company using the term "Optical" in its title to be registered with GOC. Bridge did not address that situation; instead, he left vulnerable people at risk of serious injuries from a zap similar to that which caused the optical and neurological damage to Complainant.

The Buck Passes - Legacy of Wilful Blindness by Lavin inherited by Davis

Mary Mandie Jane Lavin, Barrister, formerly GOC Director of Regulation now Chief Executive, Chartered Institute of Legal Executives, CILEx

Out with the Old and In with the New, at public expense and to its detriment!

Mandie Lavin "did a runner" which evades her responsibility for willful blindness at GOC. Media announced that Mandie Lavin, Director of Regulation, GOC left the regulator (31 Dec 14) after almost three years in the role. Lavin, appointed Chief Executive, Chartered Institute of Legal Executives (CILEx) (01 Jan 15), used wilful blindness to evade her GOC responsibilities by condoning fraudulent investigation and decisions during her final six months at GOC.

GOC officials neglected to investigate and address a serious complaint, that required immediate investigation, by repeated denial of due process and deliberate stonewalling despite mandated time-frames for responses. Lavin evaded her responsibility to investigate or refer the complaint to law enforcement or other fitness to practice authorities which allowed alleged optometry criminals to remain on the run after committing an offense that construes as assault with a dangerous weapon which caused injury and disabled the Complainant.

The GOC protocol governs the conduct of investigations and the decision on whether to prosecute suspected criminal offences under the Opticians Act 1989, as amended by the Opticians Act 1989 (Amendment) Order 2005 and related legislation ("the Act").

The Public Interest Test under that Protocol required that Lavin consider whether:

. . . a prosecution was necessary to serve the interests of the public, not whether a prosecution would serve the interests of the optical or other professions. In considering this issue, the Registrar [and Director of Regulation] must have regard to all the circumstances of the case, including details of the offence, the circumstances of the suspect and the impact of the offending behaviour on the health and safety of the public. The effect on a profession’s commercial [or political] interests is not a relevant factor. . . .

There is a risk to patient safety and public protection when unqualified people pass themselves off as registered professionals. Health professional regulators have a duty to ensure protection for patients and the public, and tackling title misuse is an important part of this.

Although requested several times by Complainant, following the arbitrary and biased decision by Peters and Hadley, evidently in an aura of wilful blindness Lavin did not follow the protocol:

Write to the suspect, including asking the suspect to cease the alleged activity and desist from continuing or repeating such activity;
Take other informal action, including asking the suspect for an undertaking;
Notify the informant (if known) and any other parties of the decision;
Report the matter to another agency;
Conduct such further investigation as might be appropriate; and/or
Institute a prosecution by laying information in the Magistrates court.

The Registrar may delegate any or all of the above functions to the Director of Regulatory Services Mandie Lavin, GOC Director of Regulation and/or such other person as the Registrar considers appropriate presumably for a legal opinion. A decision that might (in the opinion of the decision maker) have major implications for the GOC, must be made or endorsed by the Registrar and notified to the Council Chair after taking legal advice presumably given or endorsed by the principal in-house barrister, Mandie Lavin.

GOC neglected to meet its responsibility for due diligence in that it did not take reasonable steps to avoid committing a tort or criminal offence. The use of unsubstantiated boilerplate language to evade the issues construes as misconduct in public office. Moreover, the oligarchical misappropriation of decision-making by Peters (who evidently possesses neither skills nor education to make arbitrary legal deliberations) and lack of a hearing by a fitness to practise panel in accordance with GOC Criminal Prosecutions Protocol, ranks as contempt prior to investigation and misconduct in public office. Railroading by Peters denied due process of law by forcing rapid litigation to prevent careful consideration and criticism which Lavin exacerbated by wilful blindness.

Railroading forms an essential part of quango investigation hearings that use trumped-up arguments to deny human rights. The procedure dragoons or compels, subjugates and persecutes by coercion and threats in violation of law. It construes as harassment when it applies to an octogenarian by violating human and civil rights.

In an interview with Shereen Ali (18 Aug 14), Lavin showed her lack of integrity and wilful blindness regarding GOC work while still soaking the public GOC purse. In other words, she effectively implemented a campaign of wilful blindness while starting her CILEx work six months before she left GOC when she should have been addressing this case.

The Chartered Institute of Legal Executives (CILEx) announced the appointment of Mandie Lavin as its new Chief Executive (01 Jan 15) upon the retirement of Diane Burleigh OBE. In her first interview (18 Aug 14) about her appointment at CILEx, Lavin, while still director of regulation at the General Optical Council, talked to Today’s Conveyancer about her enthusiasm for the role and the challenges she thinks it will bring. . . .

Shereen Ali: “So the next six months you’ll be preparing to take over as Chief Executive in January 2015?”

Mandie Lavin: “Yes, I’ll do a lot of reading and, just as importantly, a lot of talking to people. It’s a time of consolidating what I’ve done at the General Optical Council and handing over to my successor there [Lavin did not have a successor at GOC before circa 07 Jan 15] and focussing on what’s on the horizon and preparing myself in the best possible way for taking up the post. I’m going to a couple of conferences about legal education and looking at my own continuing
development and training. Learning is what keeps the world of work exciting and stimulating and that’s what CILEx offers and why I’m so positive about starting there in January.”

[Today’s Conveyancer - 18 Aug 14]

Lavin joined GOC as Interim Director of Regulation (00 Oct 11). A qualified barrister, she has significant experience working in regulation. A former director of the Bar Standards Board also director of fitness to practise and legal affairs at the Royal Pharmaceutical Society of Great Britain.

Lavin will leave GOC (31 Dec 14) to take up an appointment with Chartered Institute of Legal Executives as Chief Executive. She will remain responsible for the chaos that she leaves behind at General Optical Council.

Lavin spent three years in financial regulation at the Chartered Institute of Management Accountants and prior to that was the Director of Fitness to Practise at the UKCC, the predecessor of the Nursing and Midwifery Council. Called to the Bar in October 1993 and a Member of Middle Temple she previously qualified as a nurse at Guys Hospital in 1987.

Academic credentials subject to verification and validation.

[Mandie Lavin]

Lavin chaired the General Medical Council’s Investigating Committee and the Association of Accounting Technicians’ disciplinary tribunal and appeared on the Doctors and Dentists Appeal Panel Chairs list for NHS Employers. Also, a member of: Professional Negligence Bar Association, Bar Association for Commerce, Finance and Industry (Member of the Professional Standards and Issues Committee); Medico Legal Society; Association of Women Barristers; and, The Association of Regulatory and Disciplinary Lawyers.

Lavin held a dual responsibility as both a GOC Barrister and Director of Regulation to comply with published GOC protocols and laws in pari materia. Predominantly, she regulated and disciplined the manipulation of them by GOC officials and staff members. Neglect to take action on the alleged serious crimes allegedly committed by Peters, and the racial misuse of a barrister and a solicitor (both people of colour) as gatekeepers to deny due process of law to members of the public, classifies as misconduct in public office which will eventually construe as perverting the course of justice.

Lavin was given until Friday, 19 December 2014 by the journalist and victim of the assault with a deadly weapon (an aged person with privileged protection under the Human Rights Act 1998) to mitigate the damage caused by Peters. However, Lavin neglected to address impending criminal charges against Peters for misconduct in public office again using wilful blindness.

The evidence against Peters includes, but is not limited to: arbitrary denial of due process of law; arbitrary refusal to process a complaint of assault with a dangerous weapon which caused serious optical and neurological injury to Complainant by GOC registrants (optometrists), et alia; alleged false and misleading academic credentials to obtain or to maintain employment in a public office; arbitrary denial of human rights; and, threats and blackmail in attempts to impose a prior restraint on an international journalist also as a web page hacking suspect.
Lavin adopted a policy of contempt prior to investigation which effectively supported Peters alleged misconduct in public office which made them jointly and severally liable. That principle bars or gags all information and allows use of constructive proof by introduction of inference and interpretation to replace forensic investigation. It also supports willful blindness which forms a basis for the use of boilerplate language in response to legitimate complaints and distorts the legal continuum.

By that, Lavin continued to evade her civil and/or criminal liability for wrongful acts as a public sector barrister. She intentionally placed herself in a position where she remained constructively unaware of facts that would render her liable and has "done a runner" to new employment and constructive impunity which also constitutes misconduct in public office. Her pattern or practice of disingenuous behaviour in public office allegedly violates the Fraud Act 2006 which includes fraud by false representation, fraud by failing to disclose information and fraud by abuse of position.

Blatant disregard of repeated offers to mitigate damage showed the arrogance of Peters and Lavin (both public sector officials) who each received £91,350.00 salary, £11,544 ERNIC (Earnings-Related National Insurance Contributions) and £9,135.00 pension for a total of £112,029.00/pa (with Lavin receiving an additional £3,072.00 for private medical expenses). Neither of them possess more than undergraduate academic degrees which certainly proves that the "mutton-dressed-as-lamb stratagem" pays off!

(Degrees subject to validation by Peters and Lavin)

[Fraud Act 2006 - Contents]

[Lawyer Brief - The Lavin Legacy]

Lisa Mariska Davis, Barrister, Director of Fitness to Practice, GOC.

Fraudulent Decision

The allegedly fraudulent decision, does not comply with the GOC protocol that governs the conduct of investigations and the decision on whether to prosecute suspected criminal offences under the Opticians Act 1989, as amended by the Opticians Act 1989 (Amendment) Order 2005 and related legislation ("the Act"). Peters and Hadley quashed any investigation and made an arbitrary, frivolous, fraudulent decision which will form part of other serious misconduct in public office charges against them, now taken under advisement.

Arguments by opposing sides were not heard or disclosure documents exchanged (in fact not a single document was furnished by GOC in response to repeated requests under FOIA/DPA/Part 31 disclosure protocols. Therefore, the decision classifies as arbitrary and wilfully false and misleading which creates a deliberate miscarriage of justice.

Complainant, as part of his duty of care, warned Davis that Peters used her as a gatekeeper; however, she took no notice. Instead, she accepted promotion and a public funded salary increase rather than file a Bar Standards Board complaint for racial discrimination.
Since writing the letter, Davis (a public sector employee) has been promoted from Head to Director of Fitness to Practice at an estimated public funded income of £91,350.00 salary, £11,544 ERNIC (Earnings-Related National Insurance Contributions) and £9,135.00 pension for a total of £112,029.00/pa. She can now afford to employ a ghostwriter to rewrite the appended diatribe which must now be translated into a viable deadlock letter to mitigate the damage already caused.

As can be seen from the linked Lawyer Brief - Appendix B, the decision is not worthy of a first-year, undergraduate law student let alone an experienced barrister. As professor emeritus of rhetoric and communication with legal qualifications, who formerly taught post-graduate law and technical communication students, he suspended or arranged expulsion of several students for lesser transgressions.

[Legal Brief - The Lavin Legacy]

The content remains anonymous without even a final signature or an appendix containing copies of more than twenty referenced documents. The ghostwriter has named none of the alleged sources in accordance with legal and Information Commissioner protocols; moreover, boilerplate language always requires substantiation with law or legal precedents; otherwise, it classifies as arbitrary and biased opinion or general denial.

The document contains many arbitrary statements without referenced assertions which require substantiation with copies of referenced documents or legal citations. The appended Deadlock Letter contains more than 5,000 words of incomprehensible and pompous gobbledygook which has no place in a legal document.

Lisa Davis, a practising barrister for thirteen years, with a background in healthcare regulation, criminal and civil law managed oversight and held responsibility for end to end process from complaint through to investigation, adjudication and appeal in respect of Fitness to Practise allegations. Since her promotion, she manages holds ultimate responsibility for both internal and external teams. GOC claims that she has previous experience in both presenting and managing cases before a variety of panels including magistrate’s, crown, county and high courts also regulatory committees.

Davis inherited an unlawful farce orchestrated by Peters and Gill then wrote to the Complainant (28 Oct 14) to say: "I am writing to you further to your various communications with General Optical Council members of staff. Please note that we are aiming to respond to all outstanding issues by Thursday 13 November 2014".

Davis published an unsigned document attributed by the recipient to Lisa Mariska Davis after her neglect to mitigate damage caused by condoning anonymity in a cover-up of facts by Peters which construes as misconduct in public office. It is quite obvious that no investigation took place in accordance with GOC protocols; instead, Davis used a plethora of boilerplate language and disinformation to deny due process of law and acted as a gatekeeper instead of an advocate to frustrate proceedings.

Davis neither obtained a signature from Peters on a copy of the document that she submitted nor signed it herself per procuratum. Moreover, she neglected to provide the full name, middle initial, surname and job title of the people who authored the denial as required by ICO guidance.
Davis made frivolous and vexatious charges designed to obfuscate serious outstanding issues relating to investigation of charges of assault with a dangerous weapon and other offenses filed under GOC regulations governing public sector officials (GOC registrants). She has tried to cover up facts allegedly by using threats of arbitrarily censoring and hacking of correspondence and tried to place a prior restraint on published information important to an understanding of the case.

By that, she showed malicious intent to illegally block delivery of email documents to named parties. That filtering process would prevent compliance with laws that require a duty of care and due diligence when journalists publicly name and shame public sector employees; especially those employees who received instructions to act unlawfully by their supervisors.

Davis insists that email communications should not bear specific GOC addresses to officials to whom they refer; instead, she wants those email messages sent to an anonymous address to which she has access. By that, she can control all responses and outcomes for political expedience contrary to GOC regulations.

Moreover, a prosecutor cannot later hold anonymous employees or their supervisors accountable for malpractice. Her threats constitute a deliberate interference with due process of law especially when the issues relate to international journalism and first party complaints that GOC has not processed in accordance with its own regulations.

Frivolous and vexatious charges have no place in legal or regulatory proceedings. In law, they consist of complaints or legal proceedings used to deny (or attempt to deny) a hearing or to dismiss or strike out ensuing judicial or non-judicial process. The term “frivolous and vexatious” often appears in laws and regulations although not defined by statute; instead, it relies for interpretation on legal precedents.

A statement defines as “frivolous” if it has no justiciable question, little prospect that it can ever succeed and lacks substance or seriousness and “vexatious” if instituted maliciously or based on improper motives intended to harass or annoy. Frivolous actions (not serious in content, attitude or behaviour) readily recognizable as devoid of merit have little prospect of success in ethical courts or arbitration hearings.

Designated clearly insufficient as a matter of law, the frivolous communication presents no debatable question and is clearly unsupported by facts or issues for which the law provides no remedy. Thus, it classifies as frivolous, vexatious or an abuse of process when a reasonable person cannot classify it as bona fide (undertaken in good faith): a defense that certainly applies to these frivolous and vexatious demands and statements by Peters, Davis et alia.

Alleged fraudulent decision not in accordance with the protocol that governs the conduct of investigations and the decision on whether to prosecute suspected criminal offences under the Opticians Act 1989, as amended by the Opticians Act 1989 (Amendment) Order 2005 and related legislation (“the Act”). Peters quashed any investigation and made an arbitrary, frivolous, fraudulent decision which will form part of other serious misconduct in public office charges against her now taken under advisement.
Professional Regulation - Kiran Gill

Kiran Gill, Head of Legal Compliance, General Optical Council
Admitted as a Solicitor 15 February 1994
SRA ID #162819
SRA Regulated
Employee at General Optical Council
41 Harley Street, London, W1G8DJ
Background in process of validation by SRA

This report based upon a description of the events during investigation of the issues by Keith Watts. Evidently, none of them have been addressed by GOC investigators. They have neither asked for disclosure documents nor substantiated their finding.

Medical claims have since been independently validated and there has been further criminal activity in an attempt to cover up the assault (the assailant has now been identified as Nina Houghton the cohabitant of Christopher Houghton, principal owner of Houghton Opticians, who has conspired (using Bott his hit-man) to fabricate the evidence and falsify the medical outcome of the examination by (A & E) since deliberately misquoted by Peters). He is listed on GOC register and jointly and severally liable with his cohabitant for what has occurred.

Gill altered the continuum in the original complaint. The assault by an unregistered person involves a joint and several criminal cover up and falsification of medical records by Hickley et alia. By any stretch of the imagination, the assault (it has yet to be established whether it was malicious which is possible taking into account previous attacks on the Complainant) cannot be investigated without addressing all of the issues. Moreover, Complainant has not received a single substantiation of the previous decision and there has been no exchange of pre-hearing disclosure documents.

The procedure to date has been nothing more than a railroading to reorganize serious evidence to support a slap-on-the-wrist decision. Correspondence showed that Gill intended to orchestrate another unlawful merry-go-round by not addressing all the issues in context. Complainant advised her that before any further hearing could take place, she must provide the documents upon which the previous decision based and a full disclosure of the facts in hand, for rebuttal if necessary. She ignored that request and published another arbitrary and fraudulent decision in a consort with Lisa Sparkes, Accreditation and Quality Officer, GOC.

[Fraudulent Decision - Full Text]

Nina C Houghton - Assault with a Deadly Weapon

Peters and Hadley orchestrated a cover-up by concealing evidence of wrongdoing, error, incompetence and other embarrassing information by withholding documents necessary for due process of law. By that, they allegedly committed both misconduct in public office (criminal) and a tort (civil) which makes them personally liable for indictment and a civil lawsuit for damages.
They have left the aged Complainant (who suffered a near death experience which has partly disabled him) in limbo and denied him his human and civil rights.

The term “cover-up” applies when a person in a position of authority abuses his/her power to avoid or silence criticism and/or to deflect guilt or wrongdoing. In a passive cover-up, the authority withholds information and documents to maintain silence; in an active cover-up, deception and prevarication create a dichotomy. Peters, Hadley and Bridge have used both stratagems and instructed GOC staff to do the same by whitewashing illegal activity and stonewalling access to incriminatory evidence.

The law governing complicity in criminal offences is codified in Accessories and Abettors Act 1861 section 8 (as amended by s.65(4) Criminal Law Act 1977) which states:

An accessory is a person who assists in the commission of a crime, but who does not actually participate as a joint principal. The distinction between an accessory and a principal is a question of fact and degree. The principal is the one whose acts or omissions, accompanied by the relevant mens rea (guilty mind), are the most immediate cause of the actus reus (guilty act).

If two or more people are directly responsible for the actus reus, they can be charged as joint principals. The test to distinguish a joint principal from an accessory is whether the defendant independently contributed to causing the actus reus rather than merely giving generalized and/or limited help and encouragement.

**Conspirators**

*Consultant Ophthalmologist.*
Field House, Mannings Lane, Chester, Cheshire, CH2 4EU.

Graham John Bott, FADO (alleged Accessory).
*Qualification no longer granted. Foundation Fellowship of the Faculty of Dispensing Opticians.*
129 Butterbache Road, Chester, Cheshire, CH3 6DE.

Ian Robert Dobson, BSc, MCOptom (alleged Accessory).
*Member, British College of Ophthalmic Opticians.*
12 Coombe Park, Ellesmere Port, Cheshire, CH66 1TG.

Nicholas Michael Hickley MB, ChB (alleged Accessory).
*SpR in Ophthalmology.*
Holmleigh, Park West, Wirral, Merseyside, CH60 9JE.

Christopher Mark Leslie Houghton, BSc, MCOptom, FBDO (alleged Principal).
*Member, British College of Ophthalmic Opticians.*
2 Cambrian Villas, Whitchurch Road, Chester, Cheshire, CH3 9DY.

Company Director, Leath Optical Limited, Ellesmere Port.
Chester House, Lloyd Drive, Cheshire Oaks Business Park, Ellesmere Port, Cheshire, CH65 9HQ.
Private Limited Company #09173219 (Incorporated 13 August 2014).
Not registered with General Optical Council.

Nina Catherine Houghton, BA Hons, Communication Studies (alleged Principal).
*Marketing Manager, Houghton Opticians, Chester.*
2 Cambrian Villas, Whitchurch Road, Chester, Cheshire, CH3 9DY.

Company Secretary, Leath Optical Limited, Ellesmere Port.
Chester House, Lloyd Drive, Cheshire Oaks Business Park,
Ellesmere Port, Cheshire, CH65 9HQ.

Private Limited Company #09173219 (Incorporated 13 August 2014).
Not registered with General Optical Council.

**Complainant**

Paul Trummel, Professor Emeritus (The Patient and Victim).
PhD (RPI ABD), PhD (UW ABD), MS (RPI), MSc (UK), BSc (UK), FISTD, FIOP.
Professor Emeritus, Chairman and Chief Executive Officer, Contra Cabal Foundation Ltd.

© Copyright 2014 by Paul Trummel
All Rights Reserved: 21 Sep 14/07:21
Edition: #880-07-14b/15-0116-1044
Feedback: Webspinner@ContraCabal.org