

U.S. DISTRICT COURT
DISTRICT OF WYOMING
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JESSICA L. HARRIS, CLERK
FEDERAL BUILDING
100 N. PLATTE AVENUE
CHEYENNE, WY 82001

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WYOMING

IAIN CLIFFORD, et al.,

Plaintiffs,

v.

DANIEL MARC NEIDLE, et al.,

Defendants.

Case No. [To be assigned]

**PLAINTIFF'S MOTION FOR ALTERNATIVE SERVICE OF PROCESS PURSUANT
TO FRCP 4(f)(3)**

I. INTRODUCTION

1. Plaintiff Iain Clifford respectfully moves this Court, pursuant to Federal Rule of Civil Procedure 4(f)(3), for an order authorising service of the Summons and Complaint on Defendants Daniel Marc Neidle and Tax Policy Associates Ltd by:
 - (a) **Royal Mail Special Delivery (or Recorded Delivery)** to the Defendants' known addresses in the United Kingdom; and/or
 - (b) **Email** to dan@taxpolicy.org.uk; and/or
 - (c) **Publication on taxpolicy.org.uk.**
2. Service under the Hague Convention would be impractical, unnecessarily expensive, and would cause material delay. The Defendants are known to the Plaintiff, have known addresses in the UK, and were previously served with the Letter Before Claim and Final Notice by Royal Mail Recorded Delivery.
3. The Plaintiff is concerned that the Defendants may have blocked the Plaintiff's email address (service@ecclesialaw.org), making email service unreliable. Royal Mail Special Delivery provides tracked, signed-for delivery that creates a verifiable proof of service.

II. FACTUAL BACKGROUND

3. Defendant Daniel Marc Neidle is a resident of the United Kingdom. His known address is available through the electoral roll and Companies House records.

4. Defendant Tax Policy Associates Ltd is a company registered in England and Wales. Its registered office address is available through Companies House.
5. On 17 July 2026, the Plaintiff served the **Letter Before Claim** on the Defendants by **Royal Mail Recorded Delivery**. The Defendants received and read it, as evidenced by their subsequent publications referencing the letter's contents.
6. On 22 July 2026, the Plaintiff served the **Final Notice** on the Defendants by **Royal Mail Recorded Delivery**. Proof of delivery is available (Exhibit 20).
7. Between January 2025 and the present, the Plaintiff also served the Defendants with over 50 technical research papers and formal correspondence by email to dan@taxpolicy.org.uk. The Defendants received and read these communications, as evidenced by their continued publication of articles referencing the materials served.
8. However, the Plaintiff has reason to believe that the Defendants may have blocked the Plaintiff's email address, as recent communications have not elicited any response.

III. ARGUMENT

A. Legal Standard

9. Federal Rule of Civil Procedure 4(f)(3) authorises service on an individual in a foreign country "by other means not prohibited by international agreement, as the court orders." The Tenth Circuit and other circuits have held that alternative service is permissible where it is "reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action."
10. Royal Mail Special Delivery (or Recorded Delivery) is not prohibited by any international agreement. The UK permits domestic service by post under its own Civil Procedure Rules.

B. Royal Mail Service Is Reasonably Calculated to Provide Notice

11. The Defendants were successfully served with the Letter Before Claim and Final Notice by Royal Mail Recorded Delivery. The same method should be authorised for service of the Summons and Complaint.
12. Royal Mail Special Delivery provides:
 - o Tracked delivery with a unique reference number
 - o Signature on delivery
 - o Proof of delivery available online
 - o Compensation cover if the item is lost or damaged
13. This method is faster, more reliable, and more cost-effective than Hague Convention service, which typically takes 4-6 months.

C. Email Service as a Backup Method

14. In the alternative or in addition, email service should be authorised because:
- The Defendants have communicated with the Plaintiff by email throughout the pre-litigation period
 - The Defendants operate taxpolicy.org.uk, which uses dan@taxpolicy.org.uk as its contact address
 - The Defendants are sophisticated parties who have demonstrated their ability to engage with US legal processes (filing the Wyoming State Bar complaint, reading PACER filings)
15. If email service fails (due to blocking), Royal Mail Special Delivery provides the reliable backup.

D. Hague Convention Service Would Be Impractical

16. Hague Convention service typically takes 4-6 months and involves significant expense.
17. Given the ongoing and compounding nature of the defamation — the Defendants' publications remain live and are being amplified by AI platforms — delay would cause irreparable harm.
18. The Defendants are not hiding; their addresses are publicly available through Companies House and the electoral roll. There is no need for the slow, centralised Hague process.

IV. CONCLUSION

For the foregoing reasons, Plaintiff respectfully requests that this Court grant this Motion and authorise service of the Summons and Complaint on the Defendants by:

- (a) **Royal Mail Special Delivery (or Recorded Delivery)** to the Defendants' known addresses in the United Kingdom (primary method);
- (b) **Email** to dan@taxpolicy.org.uk (secondary method); and/or
- (c) **Publication on taxpolicy.org.uk** (tertiary method).

Dated: 5th August 2026

Respectfully submitted,



/s/ Iain Clifford **Iain Clifford**, Pro Se Plaintiff service@ecclesialaw.org