THE DISCIPLINARY TRIBUNAL **TDB/2023/36**
OF THE TAXATION DISCIPLINARY BOARD **TDB/2024/49**

TAXATION DISCIPLINARY BOARD
(TDB)

v

Mr NOEL TYLER **Defendant**

(Membership Number 195942)

DECISION AND REASONS

Date of Hearing	**21st March 2025**
Venue	**Virtual via Microsoft Teams**
Tribunal Members	
Legally Qualified Chair	Ms Annabel Joester
Lay Member	Dr Angela Brown
Professional Member	Ms Janet Wilkins
Taxation Disciplinary Board	
Case presenter	Mr Dennis Hamill
Tribunal Clerk	Mr Nigel Bremner
Member	Not in attendance

INTRODUCTION:

1. The Disciplinary Tribunal of the Taxation Disciplinary Board (TDB) sat remotely on Friday March 21st 2025 to hear charges brought by the TDB against the Defendant, a member of The Chartered Institute of Taxation, membership number **195942**, following a complaint by the Chartered Institute of Taxation (CIOT).

2. The following abbreviations are used in this Decision.

   The "CIOT" means the Chartered Institute of Taxation;

   The "ATT" means the Association of Taxation Technicians;

   The "Regulations" means the Taxation Disciplinary Scheme Regulations 2014 (as amended November 2016 and January 2024);

   "PRPG 2018" means the Professional Rules and Practice Guidelines effective from 9 November 2018 (updated 2021);

   "PRPG 2018" means the Professional Rules and Practice Guidelines effective from 9 November 2018 (updated 2021);

   "PCRT" means the Professional Conduct in Relation to Taxation 2017 (republished 2023).

   "AML" means Anti Money Laundering.

   "CDD" means Client Due Diligence.

   The "ISG" means the Indicative Sanctions Guidance 2025

The Tribunal had read and considered the case papers, including a Bundle, Supplementary Hearing Bundle, Additional Bundle and further correspondence, being an email dated 20 March to Mr Bremner from the Defendant and an email from Anest Ellis at the TDB to the Defendant dated 6 January 2025 serving the IC's decision in relation to matter 2024-49.

SERVICE

3. Mr Hammil invited the Tribunal to conclude that there had been valid service of notice of the hearing on the Defendant.

4. The Panel noted the email dated February 11th 2025, appearing at page 2 of the Supplementary Hearing Bundle, sent by the Clerk to the Tribunal, Mr Bremner, to the Defendant dated February 11th That email enclosed all the material required under Regulation 14 of the Taxation Disciplinary Scheme Regulations 2014 and giving him notice of the date and time of the hearing. In the absence of a reply from the Defendant the Clerk sent further emails dated 12 and 18 March confirming arrangements for the hearing. By letter of 19 March the Defendant confirmed that he had received emails with regard to this matter, including the email of 11 February. He responded to the charges and made representations to them, both in the letter and in the accompanying completed form. In an email of 20 March sent to the Clerk the Defendant stated that he had nothing further to add to his submissions and would not be attending the hearing.
5. The Tribunal was satisfied that the notice of this hearing had been properly served on the Defendant.

PROCEEDING IN THE ABSENCE OF MR. TYLER

6. Mr Hamill on behalf of the TDB applied for the matter to proceed in the absence of the Defendant. He drew to the Tribunal's attention the relevant provisions of Rule 17(3) of the Taxation Disciplinary Scheme Regulations 2014, which confers upon the Tribunal an express power to proceed in the absence of the Defendant, and to Rule 17.4, which provides that before determining an application to proceed in absence the Tribunal should consider any representations submitted by the Defendant. He referred to the relevant case law in the area, drawing the attention of the Tribunal to the specific considerations set out in GMC v Adeogba [2016] and to the public interest in proceeding with the hearing within a reasonable period of time. He further referred to the circumstances of the Defendant's absence, to his engagement with the Clerk and to the indication that he had given that he did not wish to attend. He submitted that it was safe and proper for the hearing to proceed in the absence of the Defendant.

7. The Tribunal bore in mind the right of the Defendant to participate in these proceedings and considered the application to proceed with the utmost care and caution. It bore in mind the reasoning set out in the case of Adeogba. It had to balance the rights of a member to participate, with the public interest in the fair, economical, expeditious and efficient disposal of allegations made against members of a profession. In the circumstances of this case, the Tribunal bore in mind the engagement of the Defendant

in the process, that he had confirmed receipt of notice of the hearing and the email sending the Bundle, that he had responded to the charges in writing and that he had indicated that he did not wish to attend the hearing. The Tribunal considered that there was no reason to believe that an adjournment would secure the Defendant's attendance, and that this was a case where he had made a decision not to attend the hearing and had made extensive representations in writing. There was no indication from the Defendant that he was unable to attend or that he would attend on another date. In exercising its powers the Tribunal decided that the public interest in proceeding outweighed the Defendant's right to participate in the hearing in person, which he had chosen not to exercise. The Tribunal ruled that the case should proceed in his absence.

CHARGES

8. The Charges against the Defendant are:-

Charge 1

1.1. By a consent Order dated 9 May 2024, the Defendant was made subject to a sanction of censure and he agreed to pay a fine of £1,200 and costs of £1,050 within a period of 28 days. These were not paid until on or about 16 December 2024.

Charge 2

2.1 Consequent on the facts and matters set out in Charge 1, the Defendant is in breach of the following rules of the PRPG: Rule 2.13.1; 2.13.2 and 2.13.3.

Charge 3

3.1 The Defendant has failed to comply with certain requirements imposed by the Chartered Institute of Taxation in relation to his anti-money laundering requirements.

In particular, the Defendant has:

(i) Failed to provide a compliant Practice Wide Risk Assessment;

(ii) Failed to provide evidence of training of staff on anti-money laundering requirements; and

(iii) Failed to provide evidence of CDD (customer due diligence) undertaken and risk

assessment of individual clients.

Charge 4

4.1 Consequent on the facts and matters set out in Charge 3, the Defendant is in breach of the following rules of the PRPG: Rule 2.6.1, 2.6.2, 2.6.3, 2.10.1, 2.12.1 and Rule 5.4, 5.5., 5.6 and 6.2 of the CIOT Anti-Money Laundering Scheme Rules.

9. The Defendant made partial admissions to the charges, as indicated in his letter to the TDB of 19 March and the accompanying Response Form, appearing in the Additional Bundle at pages 4 to 14. In the form he indicated admissions to Charges 1 and 2 and a denial of Charges 3 and 4.

BACKGROUND

10. The Defendant is a member of CIOT, who currently practices as the sole principal of VATAngles Consultancy Limited. He has indicated an intention to retire and close the company but currently remains in practice.

11. In 2023 CIOT referred a complaint to the Investigation Committee of the TDB regarding the Defendant's alleged breach of Rules 2.10.1, 2.10.2 and 2.12.1 of the PRPG. This complaint was assigned the case reference TDB/2023/36. On 12 April 2024 the Investigation Committee considered the case and concluded that there was a prima facie case against the Defendant.

12. The Investigation Committee offered the Defendant the opportunity to conclude the case by way of a Consent Order. The Defendant signed the Consent Order, agreeing to the terms, which were that he would be censured, pay a fine totalling £1,200 and costs of £1,050. The Defendant was invoiced for the fine and costs totalling £2,250 on 9 May 2024. A letter accompanying the invoice informed him that payment was due within 28 days, pursuant to TDS Regulation 27.1.

13. The Defendant failed to make payment of the fine and costs by the due date of 6 June. Chaser letters and emails were sent to him, some of which he responded to, but payment was not received by the TDB until 16 December 2024.

14. Due to his apparent non-compliance with the terms of the consent order the CIOT referred a complaint against the Defendant to the TDB. This complaint forms the basis of Charges 1 and 2 of the extant proceedings under the reference TDB/2024/49.

15. A further complaint was referred by CIOT to the TDB on 1 August 2024. This related to the Defendant's alleged failure to comply with his obligations under the Money Laundering Regulations 2017, specifically his alleged failure to complete and provide to CIOT a compliant Practice Wide Risk Assessment (PWRA); his alleged failure to provide evidence of AML training given to his firm and his alleged failure to provide evidence of CDD and client risk assessments.

16. The case was considered by an Investigation Committee of the TDB on 6 November 2024. The Investigation Committee found a prima facie case against the Defendant and offered him a Consent Order, which was not accepted by the Defendant within the required period of 14 days. Accordingly, the Defendant was referred to the Tribunal.

17. The Defendant completed his Response to the Charges and returned it to the TDB on 19 March 2025. In it he admits Charges 1 and 2 but denies charges 3 and 4.

18. Mr Hamill submitted, on behalf of the TDB, that the Defendant had been properly served with the Investigation Committee's Order of 9 May and that it had been served on him on that date with an invoice which required payment within 28 days. He submitted that the Defendant was required to comply with the terms of the Order, which included making payment, within 28 days of the Order. He submitted that the obligation to pay was made clear to the Defendant and that from the correspondence he sent, which appeared in the bundle, he was aware of the requirement. He referred to the contents of the bundle, which he submitted proved that the Defendant did not pay until on or around the 16 December 2024, and that he had accordingly breached the Order and was subject to disciplinary action. He also submitted that charges 1 and 2 seemed to be admitted by the Defendant.

19. In relation to charges 3 and 4 Mr Hammill submitted that these all related to the Defendant's obligations in respect of AML compliance. In respect of the obligation to provide a PWRA he conceded that he had provided some documents, but that none had constituted a PWRA. He referred to the correspondence between the CIOT and the Defendant and submitted that he had been provided with advice and documentation to assist in completion of the PWRA, but that he had not done so. In relation to the training requirement he submitted that there was no evidence of such training and that there was

a ‘shifting position’ from the Defendant who had initially seemed to indicate that training had taken place, and later (June 2024) that it had not. He said that various deadlines/extensions had been allowed to the Defendant, but that he had not met them. In respect of CDD he said simply that it had not been completed.

20. Mr Hammill drew the attention of the Tribunal to the timeline of events appearing in the Tribunal Bundle, and took the Tribunal through the chronology of contact between the CIOT and the Defendant and the TDB and the Defendant. He referenced the correspondence from the Defendant, the assurances he had given in relation to future compliance and the assistance given to him by the staff of the CIOT in an attempt to assist him into compliance. He referenced the Defendant’s submissions that the work he did was low risk, but submitted that CDD is required regardless of assessment by the member that his individual clients are low risk.

21. Mr Hammill invited the Tribunal to find that the Charges were proved.

Findings

22. In making its findings, the Tribunal bore in mind that the burden of proof rests on the TDB. The standard of proof is of the civil standard, which is the balance of probabilities.

23. The Tribunal made the following findings of fact:

Charges 1 and 2

(a) The Defendant had accepted the terms of a Consent Order offered by the Investigation Committee of the TDB on or around 2 May 2024. He signed the Notice of Proposed Consent Order dated 2 May 2024, which appeared at pages 12 and 13 of the Bundle. That Notice confirmed that a fine and costs totalling £2,250 were to be paid. The Consent Order was signed on behalf of the TDB on 9 May 2024.

(b) The TDB sent the Defendant an invoice dated 9 May 2024 for the amount due to it under the terms of the Consent Order. That invoice appeared at page 15 of the Bundle. It stated the amount due, that it was due in respect of a ‘Consent Order for Costs and fine’ and that payment should be made within 28 days. It gave details of how to pay.

(c) The TDB sent chaser letters to the Defendant on 3 July, 22 July and 2 August 2024. In her emails of 22 July and 2 August Ms Gardiner of the TDB referred the Defendant to his obligations under the PRPG and Rules to comply with an order in respect of fines and costs.

(d) The Defendant wrote to the TDB on 22 July, 3 August and 8 August indicating that he would make payment. On 19 August he was provided with a copy of the original invoice in order to make payment, but none was made until the full amount was received by the TDB on or around 16 December, by which time the failure to pay had been referred for further action.

(e) The Defendant was under an obligation, pursuant to Rule 2.1.13 of the PRPG to comply with the terms of the Consent Order, including payment of the fine and costs. He failed to do so. This breached the PRPG and the Defendant admitted this breach in his Response.

Charges 3 and 4

(f) The Defendant is supervised by the CIOT for the purposes of the AML Regulations. He is accordingly obliged to adhere to the CIOT Anti-Money Laundering Scheme Rules 2017. Under those Rules he is obliged to comply with the requirements of the CIOT as set out in or issued in pursuance of the Scheme Rules, which includes an obligation to provide such information as the CIOT requests Rule 5.4); he must comply where appropriate with his direct obligations under the 2017 AML Regulations and other relevant legislation (Rule 5.5) and he is responsible for ensuring that all of his staff comply with the CIOT AML Scheme and with any requirements of the 2017 Regulations (Rule 5.6). Under the PRPG the Defendant is obliged (*inter alia*) to comply with AML legislation in force from time to time (Rule 2.10).

(g) The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 require the Defendant, as a principal in a firm of tax advisors, to have an AML supervisor in place. In this case he has registered with the CIOT. The Regulations require the Defendant, as a 'relevant person' to have in place a risk assessment (Regulation 18) and policies, controls and procedures to mitigate and manage effectively the risks of money laundering and terrorist financing identified in the risk assessment undertaken under regulation 18 (regulation 19).

(h) The CIOT sent several communications to the Defendant in the first six months of 2024 regarding his ongoing requirement for AML compliance. Specifically, the Tribunal found that on 24 June 2024 Jane Mellor, Head of Professional Standards at the CIOT sent the Defendant a letter confirming what outstanding actions needed to be completed by him in order to comply with his AML duties. That letter required the Defendant to (i) provide his AML PWRA to the CIOT by 1 July 2024; (ii) Provide confirmation of the AML training undertaken and provide 'documentary evidence by way of the course booking form or other related emails' by 1 July 2024 and (iii) Undertake any outstanding CDD to bring him in line with his AML CDD requirements for his client by 31 July 2024, and to provide details to the CIOT in a telephone call on that date so that sample records could be reviewed.

(i) On 1 August 2024 Ms Mellor wrote again to the Defendant, confirming that some matters had been dealt with, but that the AML training and PWRA had not been supplied, and that the Defendant would be referred to the TDB for those failures. She also noted that the CIOT had received a 'risk assessment schedule' from the Defendant and that if an appointment was made to speak to Helen Ballantine at the CIOT and the CDD was acceptable, no referral would be made to the TDB about that matter.

(j) On 13 August 2024 the Respondent wrote to Ms Mellor at the CIOT. He did not provide any further documentation that could constitute a PWRA nor any confirmation of training undertaken. He referred to the exercise of obtaining and collating CDD being 'ongoing'. Ms Ballantine emailed the Defendant on 14 August, confirming the requirements for the PWRA and thanking him for his update on the training. She asked for 'a short meeting to confirm that you have everything required' in relation to the CDD review.' The position of the TDB at the hearing was that the Defendant had not complied with this requirement to arrange a meeting.

(k) The Tribunal found that the above correspondences required the Defendant to provide evidence to his regulator of compliance with his AML duties.

(l) The Defendant failed to complete and provide to the CIOT a compliant AML Practice Wide Risk Assessment, which they required from him, and which is also required under the MLR. The Tribunal noted that the Defendant denied this charge and indicated that he had produced some documentation to the CIOT, including a document that he referred to in his Response to be a PWRA. The Tribunal considered the previous communications sent to the CIOT by the Defendant. He had received guidance from the CIOT, both in writing and orally as to the information to be included in a PWRA. He had been directed to the

free pro forma document available on the CIOT's website but had not completed and sent same to the CIOT. He had referred in his letter of 25 June 2024 to attaching a PWRA, but the attached document was a spreadsheet of client risk ratings, and its deficiencies were pointed out to the Defendant by the CIOT, who advised him that it was not a PWRA. He was referred again to the proforma risk assessment available on the CIOT website and reminded that his AML renewal form had indicated that this was in place. The CIOT had referred the Defendant's apparent failure to complete and provide the assessment to the Tribunal and the position of the TDB at the hearing was that it had not been provided. The Tribunal found that the documentation produced by the Defendant did not constitute a PWRA. Accordingly, the Tribunal found that the Defendant had failed to provide a complete and compliant PWRA to the CIOT as required.

(m) The Defendant failed to provide to the CIOT evidence of training of staff on AML requirements, which was required from him by the CIOT. The Tribunal noted that in his Response, the Defendant indicated that he had no staff that required training. However, the Tribunal found that the Defendant was required to provide evidence of his own training, in addition to that of any staff. The Defendant had previously indicated to the CIOT, in his AML renewal form that he had completed the training requirement via attendance on an external course provider. He had later indicated he would be attending to the training requirements, and the Tribunal noted the apparent changing position in relation to training. The CIOT had referred the Defendant's apparent failure to provide evidence of training to the Tribunal and the position of the TDB at the hearing was that no evidence had been provided. The Defendant had provided no evidence of training with his Response to the Tribunal. Accordingly, the Tribunal found that the Defendant had failed to provide evidence of this training to the CIOT as required.

(n) The Defendant failed to provide evidence of CDD undertaken and of the risk assessment of individual clients, which was required from him by the CIOT. The Tribunal noted that in his Response, the Defendant states that he has provided the document 'to HMRC'. He does not claim that he submitted such evidence to the CIOT. The Defendant had sent a number of communications to the CIOT regarding this requirement. In his letter of 25 June 2024 the Defendant refers to having sorted his clients into four categories and to being 'in the process of contacting' clients who had 'live' files to conduct CDD. In his letter of 13 August 2024 to CIOT the Defendant referred to 'collating governance details' of clients, but not to sending the CIOT evidence of CDD undertaken. In his subsequent communications to the CIOT and to the TDB, the Defendant did not include such evidence and the position of the TDB at the hearing was that no evidence had been provided.

Accordingly, the Tribunal found that the Defendant had failed to provided evidence of CDD to the CIOT as required.

(o) The Tribunal found that the Defendant had been required by his regulator, which was also his supervisor for AML, to provide evidence of his compliance with AML requirements in its letters to him of 24 June and 14 August 2024, and that he had failed to do so.

24. The Tribunal found the Charges proved. Dealing with each part of the charge:-

Charge 1

1.1. By a consent Order dated 9 May 2024, the Defendant was made subject to a sanction of censure and he agreed to pay a fine of £1,200 and costs of £1,050 within a period of 28 days. These were not paid until on or about 16 December 2024.

Proved on the admission of the Defendant, the face of the Order of the Investigation Committee and the subsequent correspondence between the TDB and the Defendant.

Charge 2

1.2 Consequent on the facts and matters set out in Charge 1, the Defendant is in breach of the following rules of the PRPG: Rule 2.13.1; 2.13.2 and 2.13.3.

Proved. The Defendant admitted this charge and the Tribunal found that the his failure to pay the fine and costs imposed by the TDB within 28 days breached the Defendant's duties under the PRPG to comply with orders from the TDB and that his failure to correspond timeously to correspondence from the TDB breached his duty to respond to correspondence from the TDB without reasonable delay (usually defined as within 30 days), such failure being a disciplinary matter in and of itself.

Charge 3

1.3 The Defendant has failed to comply with certain requirements imposed by the Chartered Institute of Taxation in relation to his anti-money laundering requirements.

In particular, the Defendant has:

(i) Failed to provide a compliant Practice Wide Risk Assessment;

(ii) Failed to provide evidence of training of staff on anti-money laundering

requirements; and

(iii) Failed to provide evidence of CDD (customer due diligence) undertaken and risk assessment of individual clients.

Proved. The Defendant failed to provide items I, ii and iii to the CIOT, having been required to do so by them in letters dated 24 June and 1 August 2024.

Charge 4

4.1 Consequent on the facts and matters set out in Charge 3, the Defendant is in breach of the following rules of the PRPG: Rule 2.6.1, 2.6.2, 2.6.3, 2.10.1, 2.12.1 and Rule 5.4, 5.5., 5.6 and 6.2 of the CIOT Anti-Money Laundering Scheme Rules.

Proved. The Tribunal found that the Defendant breached Rules Rule 2.6.1, 2.6.2, 2.6.3, 2.10.1, 2.12.1 of the PRPG and CIOT 5.4, 5.5., 5.6 and 6.2 on the basis that, per the Tribunal's findings, the Defendant had failed to:-

i. **comply with the CIOT'S AML Scheme requirements by failing to provide such information as the CIOT requested**
ii. **comply with his direct obligations under the 2017 Regulations**
iii. **ensure that all of his principals and staff (including himself) complied with the scheme and any requirements of the Regulations**

and that he had therefore breached the CIOT Rules as alleged.

And that the Defendant had:-

iv. **Failed to uphold the professional standards of the CIOT and had not taken due care in his professional dealings**
v. **Conducted his practice inefficiently, negligently and incompletely to such an extent as to be likely to bring discredit to himself, to the CIOT or to the tax profession**
vi. **Failed to comply with the UK's AML legislation**
vii. **Failed to provide information reasonably requested by the CIOT without unreasonable delay**

and that he had therefore breached the PRPG as alleged.

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SANCTION:

25. In determining what, if any, sanction to impose the Tribunal had regard to the Indicative Sanctions Guidance ('ISG'), all the evidence in the case and the submissions that had been made.

26. The Tribunal bore in mind the purpose of a sanction is not to punish a member, albeit it may have that effect. The purpose is to promote the public interest which includes not only protecting the public but upholding the proper standards of conduct in the profession and maintaining its reputation.

27. Any sanction imposed by the Tribunal must be appropriate and proportionate, considering the member's own interests and should be the least onerous measure that adequately meets the facts of the charges found proved.

28. The Tribunal identified no specific mitigating factors.

29. The Tribunal identified the following as aggravating features:-

    (a) Scale of breach and failure in relation to charges 3 and 4, specifically that there were three failures over a period of months

    (b) Intent or reckless conduct by the Defendant which the Tribunal found were indicative of attitudinal issues

    (c) That the Defendant had been given an opportunity to improve his AML governance and practices via the previous Consent Order, but little improvement had been made and further failures had occurred

30. The Tribunal had reference to the ISG, and specifically considered sections (8), which relates to 'other breaches of byelaws or regulations' and (11), which relates to 'AML Related Breaches'. It noted that the guidance for breaches under heading 8 for 'breach of AML regulations (not involving criminal activity or dishonesty)' was censure and fine of £1,000. It further noted that the guidance for breaches under heading 11 for 'failure to correspond to AML compliance related queries' 'failure to deal with action points set out following the review of AML renewal forms' and 'failures to meet the requirements of the MLR' was a fine and censure.

31. The Tribunal considered the options available to it from the bottom upwards on the scale of seriousness.

32. The Tribunal considered that imposing no sanction would be inappropriate as it would not appropriately mark the nature and seriousness of The Defendant's conduct.

33. The Tribunal considered that an order to rest on file, or a warning would be inappropriate as it would not appropriately mark the nature and seriousness of The Defendant's conduct.

34. The Tribunal considered imposing a censure and fine and noted that that was the starting point for each breach suggested by the ISG. However, it found that this would be inappropriate as it would not appropriately mark the nature and seriousness of the Defendant's conduct, taking specific account of the number and extent of the Defendant's breaches and failures.

35. The Tribunal determined that the appropriate and proportionate sanction in this case was an order that the Defendant be suspended from membership of the CIOT for two years. It considered that this action would make it clear that such failures were unacceptable, and sufficiently serious to warrant temporary exclusion from membership, but not to require permanent exclusion. The Tribunal considered that the protection of the public could be assured by a temporary exclusion from the benefits of membership. In all the circumstances of the case the Tribunal considered that a two-year suspension was the proportionate and appropriate sanction.

COSTS:

36. The Tribunal has the power under regulation 20.7(f)(xii) of the Disciplinary Regulations to make an award of costs in favour of the TDB. The TDB applied for costs in the sum of £3,025. The Tribunal considered the Guidance on awarding costs contained in the TDB Indicative Sanctions Guidance. The Defendant did not raise any specific challenges to the costs sought and the Tribunal was satisfied that the costs sought were reasonable and proportionate. It therefore orders that the Defendant pay the costs in full.

PUBLICITY

37. Regulation 28.3 of The Taxation Disciplinary Scheme Regulations 2014 (amended November 2016 and January 2024) ('The Regulations') provides that, 'Unless the

Disciplinary Tribunal or the Appeal Tribunal otherwise directs, the order and the written reasons for making that order shall ordinarily be published without redaction of the name of the Defendant'.

38. The Defendant made no submissions or representations regarding publicity.

39. Accordingly, the Tribunal found no reason to depart from the usual practice of publication, which it found to be in the interests of justice and the protection of the public.

40. The Tribunal made an Order under regulation 28.1 that the Order and its written reasons should be published.

41. Pursuant to Regulation 28.4, publication shall be made after the expiry of the appeal period, provided no valid notice of appeal is served within that period.

Effective Date

42. Pursuant to regulation 20.9 of the Regulations this decision will be treated as effective from the date on which it is deemed served on the Defendant.

Signed:

Annabel Joester
(Chair)

Date: 13 April 2025