



Loan Charge Update - Personal Statement
Individual facing the Loan Charge - Form 2(a)

Loan scheme(s) used / operator(s)

2011 - 2013 AML, 2013 - 2014 Norris International

Approximate liability in £ (nearest £5K)

£307,000

Amount in £ of any money paid to HMRC so far e.g. APNs, Penalties (nearest £5K)

If your loan has been subject to recall demands :

Who is demanding repayment ?

How many months/years using loan arrangements

And for how much in £

3 years

Report of any action to date by and latest communication from HMRC

Last communication from HMRC related to settlement was August 2020, despite repeated attempts by me, my accountant and tax advisor to try and settle a £307,000 demand. A number so big, it doesn't even fit into the box above for approximate liability.

The personal impact (financially and in other ways) so far

I worked for 4 years as a consultant for a global hotel company. I was working away from home, in a demanding job, and appointed my accountant to take charge of all of my limited company accounting so that I could concentrate 100% on the client requirements. At the start of that process, my accountant recommended a loan scheme, on the basis that it was tax efficient, was fully consensual with HMRC and that the scheme, which he selected, had also been independently QC checked to avoid any breach of tax law. Every year, between late 2011 and 2014 the loan arrangements were declared in full on an annual tax return. I had no queries. I left the assignment at the end of the contract at the end of 2014. In 2015, I took up a senior role at another large hotel company, but as a full time employee, and I switched to a permanent contract with PAYE, still working away from home. In 2016, I began to receive a stream of constant brown envelopes from HMRC, with varying amounts which were allegedly owed, back dated to 2011. It has been devastating, despite many attempts to settle

The personal impact (financially and in other ways) if HMRC enforce the Loan Charge as laid down in the legislation

The scale of the charge is such that we would have to sell our home. In the meantime we lost our family business due to covid, which went into administration and we lost 600k in the process. Our 20 year old son was diagnosed with a degenerative disease in 2018, he will lose the use of his legs. We were hoping to be able to help him as he grows but that looks impossible with the charge. To maintain employment and have some chance of being able to make any repayments, I took a job overseas in 2019, which I wouldn't have considered if this wasn't hanging over me, living away permanently from family. My wife receives the HMRC letters and has to open them. I know she has considered suicide. Imagine the levels of my anxiety and panic at her telling me such things through floods of tears whilst being 2,000km away, not being able to travel to her because of Covid. She has been devastated by this. I would be lying if I told you I hadn't considered it as well. This is our worst nightmare. Everything we have achieved is about to come crashing down. We are honest hardworking people, being punished for taking professional advice and declaring everything openly, whilst being ghosted by HMRC. The retrospective nature of this is barbaric. HMRC could have told me immediately this was wrong. I would have stopped immediately. They didn't.