



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

Loan scheme(s) used / operator(s)

Matrix - Neil Masters

Approximate liability in £ (nearest £5K)

£200,000

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 £

2 years

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

Letters to company and letters to me, reviews of every tax return since 2012

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

I took professional advice from my accountant who recommended the scheme in 2011 and told me he was in it too. He gave me the name of a QC who had created the scheme and told me it was lawful - I am a lawyer and so was keen not to break any laws.  
  
Every time I get a letter from HMRC in a brown envelope I have a sense of dread. As I fear what I may face. At every step of the way I have taken professional advice.  
  
Changing the law retrospectively is a breach of human rights and I feel that this is wrong in principle. It's impossible to live when the law that applied at the time gets changed. It's like driving at 30mph 10 years ago only to be prosecuted now because they have changed the limit to 20mph.

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

There will be no point in continuing. I run a law firm and my reputation will be in tatters. I will also have no choice but bankruptcy. Having started a business, employed staff, and but for these 2 years in 2011 and 2012 paid all taxes in my entire working life this is unbearable.  
  
The shame of bankruptcy in my 50s would be awful for me, my wife and children. My youngest is 12 and we have lived all her life in the shadow of this.  
  
I am angry that the advisers who made fortunes from these schemes still promote them and seem beyond the law. I also can't understand how a government can change tax law retrospectively without assessing the impact on working families.  
  
100% of the money that the tax scheme I used created was used at the time to fund a new business that has created jobs and paid taxes. It was all done on advice and now I face ruin.