In the First-tier Tribunal
General Regulatory Chamber
(Consumer Credit)

Case No. CCA/2011/0013

On appeal from:

The Office of Fair Trading's Decision reference:	**ADJ/2340-26992**
Dated:	**5 December 2011**

BETWEEN:

Appellant:	**Mansell McTaggart Limited**
Respondent:	**The Office of Fair Trading**
Heard at:	**Field House, 15 Bream's Building, London EC4A 1DZ**
Date of Hearing:	**12 June 2012 (sitting in public)**
Date of this Decision:	**24 September 2012**
Before:	**Keith Rowley Q.C., Tribunal Judge** **Vernon Fuller** **D. Stuart McDonald**

Appearances:

The Appellant:	**Mr. Gordon Andrews, a director of the Appellant**
The Respondent:	**Ms. Jessica Simor instructed by the Office of Fair Trading**

Subject matter:

Appeal against the imposition by the Office of Fair Trading of a penalty of £3,000 under the Money Laundering Regulations 2007

Authorities referred to:

Associated Provincial Picture Houses Ltd. v. Wednesbury Corporation [1948] 1 K.B. 223

Legislation referred to:

European Communities Act 1972
Estate Agents Act 1979
Financial Services and Markets Act 2000
Money Laundering Regulations 2007 (S.I. No. 2157 of 2007)

DECISION OF THE FIRST-TIER TRIBUNAL

The unanimous decision of the Tribunal is that the appeal be dismissed.

REASONS FOR THE DECISION

A. Introduction

1. By a Notice of Appeal dated 6 December 2011 and received by H.M. Courts and Tribunal Service on 12 December 2011 an appeal was brought against the determination dated 5 December 2011 of Ms. Alison Spicer ("the Adjudicator"), acting on behalf of the Respondent ("the OFT"), to impose a penalty of £3,000 ("the Penalty") on Mansell McTaggart Limited under regulation 42(1) of the Money Laundering Regulations 2007 (S.I. No. 2157 of 2007), as amended ("the Regulations").

2. We expressed ourselves as we did in paragraph 1 above because, read literally, the appellant identified in the Notice of Appeal was Mr. Gordon Andrews, a director of and shareholder in Mansell McTaggart Limited, not that company itself which was, however, the legal person on whom the penalty was imposed.

3. By an order dated 23 December 2011 His Honour Judge Peter Wulwik directed (*inter alia*) that, notwithstanding the terms of the Notice of Appeal, Mansell McTaggart Limited be treated as the Appellant in these proceedings, hence in this Decision the term "the Appellant" falls to be read accordingly.

4. The grounds on which the Penalty was imposed were, in short, that the Appellant had carried on estate agency business after 31 January 2010 without being registered with the OFT under regulation 32 of the Regulations.

5. An application by the Appellant for registration under the Regulations, completed on its

behalf by Mr. Andrews, was received by the OFT, in circumstances we describe later in this Decision, on 13 October 2011.

6. The registration fee payable by the Appellant was the total sum of £148 and, after payment of that sum and the provision of some outstanding information about its business, the Appellant was informed, by an email from the OFT to Mr. Andrews dated 2 November 2011, that it had been registered under the Regulations.

7. The grounds of appeal, which were set out in an unsigned letter dated 6 December 2011 from Mr. Andrews on the Appellant's behalf that accompanied the Notice of Appeal, are in the following terms:

> "On the 2nd November we received confirmation from the Office of Fair Trading that they had received our payment of £74 for an annual subscription, therefore a fine of £3000 is totally disproportionate to the offence. As I have already stated to them we at 'Mansell McTaggart' do not take money from vendors or proposed vendors.
>
> For my own records now that I have signed up to the Money Laundering Act, I would like to know, how this would assist me in knowing if somebody is a money launderer. Since having paid I have noticed nothing new in the office that would help me detect such a person were I to meet them. I believe that the Office of Fair Trading are meant to assist small businesses and by creating laws that are completely irrelevant to a business shows that they are far removed on how small firms are trying to survive in these economic times.
>
> To attempt to fine me £3000 for a £78 registration fee is ridiculous and I would rather someone independent from the Office of Fair Trading make judgement on me, therefore I will not be paying this fine."

8. The OFT served a very full and comprehensive Response dated 26 January 2012.

9. In an attempt to clarify the grounds of appeal, a direction was made for the service of skeleton arguments by both parties prior to the hearing of the appeal.

10. The Appellant's skeleton took the form of a short unsigned letter from Mr. Andrews dated 9 May 2012 which stated as follows:

"1 I do not believe that Mansell McTaggart should be responsible or qualify for Anti Money Laundering. Mansell McTaggart does not take money from clients.

2 By being members of the Money Laundering Regulation it has not yet been explained to me what we receive with our membership.

3 A years membership to join the OFT is £53 per office, therefore a £1000 fine per office is totally disproportionate to the supposed offence."

11. Mr. Andrews appeared before us on behalf of the Appellant and we are grateful for the careful and courteous manner in which he presented the Appellant's case.

12. The OFT's skeleton argument was settled by Ms. Simor of counsel, who also appeared before us on its behalf; we are grateful to her also for the assistance she has given us.

B. Statutory background

13. The Regulations were made on 24 July 2007, were laid before Parliament on 25 July 2007 and came into force on 15 December 2007; they were recited as having been made by H.M. Treasury in exercise of powers conferred on them by the European Communities Act 1972 and the Financial Services and Markets Act 2000.

14. Unless the context otherwise so requires, references hereafter to a "regulation" is to the relevant provision in the Regulations.

15. By regulation 23(1), a number of bodies are constituted supervisory authorities in respect of the institutions or other entities there referred to.

16. In particular, by regulation 23(1)(b), the OFT is constituted the supervisory authority for consumer credit financial institutions ("CCFIs") and (materially for present purposes) estate agents.

17. We interpose that there is no issue before us that the Appellant is an estate agent within the definition of that term appearing in section 1 of the Estate Agents Act 1979, which definition is incorporated by reference into the Regulations, by regulations 2(1) and 3(11).

18. The duties of supervisory authorities are described in regulation 24(1) as follows:

> "A supervisory authority must effectively monitor the relevant persons for whom it is the supervisory authority and take necessary measures for the purpose of securing compliance by such persons with the requirements of these Regulations."

19. The Regulations provide for supervisory authorities to maintain registers of the persons who are subject to its supervision. In some instances those registers are mandatory whereas in others, as is the case with the OFT, the supervisory authority has the power (as opposed to being under a positive obligation) to maintain such a register in order to fulfil its duties under the Regulations (regulation 32(1)).

20. Pursuant to the power conferred on it by regulation 32(3), the OFT decided to establish a register of estate agents (and also CCFIs) with effect from 31 July 2009.

21. Despite some of the broader points made to us by Mr. Andrews in the course of his submissions on behalf of the Appellant to which we refer below, there is no challenge before us to that decision by the OFT nor, having regard to the limited nature of our jurisdiction, in our view could we entertain any such challenge if one were sought to be made.

22. Digressing from the Regulations for a moment, the material before us and to which we were taken by Ms. Simor in the course of her submissions demonstrated to our satisfaction that the OFT's decision to establish a register was widely publicised to those person who were, or whom it believed to be, carrying on estate agency business.

23. We refer in this regard to:

23.1 the OFT's Press Release dated 31 July 2009 which (*inter alia*) stated that businesses were required to be registered within six months of that date and that carrying on business as an estate agent after that date would constitute a criminal offence and could result in prosecution (document reference PN95/09);

23.2 the OFT's document entitled "OFT Anti Money Laundering Registration Policy Money Laundering Regulations" dated July 2009 (document reference OFT1104);

23.3 "Guidance on completion of the registration form" published by the OFT, also in July 2009;

23.4 the OFT's Press Release dated 19 January 2010 which warned businesses of the need to register by 31 January 2010 (document reference PN03/10);

23.5 the OFT's consultation document entitled "Anti-Money Laundering Future supervisory approach consultation" dated February 2010 (document reference OFT1157con);

23.6 the "Interim penalty policy for trading while unregistered" document published by the OFT in September 2010 (document reference OFT1271);

23.7 the "Summary of responses" document dated December 2010 published by the OFT (document reference OFT1157res) following the consultation launched in February 2010, it appearing that 38 responses were received by the OFT;

23.8 the "Anti-Money Laundering Registration Policy" document published by the OFT in February 2011 (document reference OFT1104);

23.9 "Guidance on completion of the registration form" document published by the

OFT, also in February 2011 (document reference OFT1090b);

23.10 the further "Interim penalty policy for trading while unregistered" document published by the OFT in February 2011 (document reference OFT1271);

23.11 the further "Interim penalty policy for trading while unregistered" document published by the OFT in May 2011 (document reference OFT1271);

23.12 the further "Interim penalty policy" document published by the OFT in September 2011, being the May 2011 version of that document as updated (document reference OFT1271).

24. In addition to the above, the notes to the Press Release dated 19 January 2010 recorded that the OFT had sent three mailings to businesses in the supervised sectors reminding them of the need to register under the Regulations though, and as Ms. Simor fairly accepted in her submissions to us, there was no evidence that any of those mailings went to the Appellant.

25. We do not propose to examine the documents referred to above in any detail, and would merely make three comments on them.

26. First, such was the number of those documents that we are satisfied that the OFT took reasonable steps to draw the attention of estate agents generally to the need to register under the Regulations, and to the potential penal consequences if they did not. We make that point in view of the uncertainty as to whether the Appellant received any correspondence direct from the OFT.

27. Secondly, we note that the various interim penalty policy documents to which we have referred above adopted the language of regulation 42(1) to which we refer further below, by explaining that any penalty imposed for breach of the Regulations needed to be "effective, proportionate and dissuasive".

28. Thirdly, we note the level at which penalties for breach of the Regulations were set, namely:

28.1 a starting point of £2,000, subject to adjustment up or down for aggravating or mitigating factors;

28.2 the addition of a sum of £1,000 for each set of additional premises from which the business traded (being unlimited in number).

29. Reverting to the Regulations, as a result of the OFT's decision to establish a register with effect from 31 January 2010 estate agents (*inter alia*) became obliged to register under regulation 33:

> "Where a supervisory authority decides to maintain a register under regulation 32 in respect of any description of relevant persons and establishes a register for that purpose, a relevant person of that description may not carry on the business or profession in question for a period of more than six months beginning on the date on which the supervisory authority establishes the register unless he is included in the register."

30. Regulation 35(1) authorises the OFT to imposes charges on (a) applicants for registration and (b) relevant persons supervised by them.

31. As they apply to the Appellant, those charges take two forms:

31.1 a one-off registration fee of £74, and

31.2 an annual fee of £53.

32. Both fees apply *per capita* to each set of premises from which a business trades, but capped at a maximum of 20 premises.

33. As foreshadowed by us at paragraph 27 above, regulation 42 confers power on the OFT (being, under regulation 36(1), a designated authority for this purpose) to impose a penalty on a person who fails to comply with any applicable requirement under the Regulations:

> "(1) A designated authority may impose a penalty of such amount as it considers appropriate on a relevant person .... who fails to comply with any requirement in regulation ... 33 .. [and] for this purpose, "appropriate" means effective, proportionate and dissuasive.
>
> (2) The designated authority must not impose a penalty on a person under paragraph (1) ... where there are reasonable grounds for it to be satisfied that the person took all reasonable steps and exercised all due diligence to ensure that the requirement would be complied with.
>
> (3) In deciding whether a person has failed to comply with a requirement of these Regulations, the designated authority must consider whether he followed any relevant guidance which was at the time—
>
> (a) issued by a supervisory authority or any other appropriate body;
>
> ..."

34. The procedure to be adopted where an authority proposes to impose a penalty is dealt with at regulation 42(6) and (7) to which provisions, however, it is not necessary for us to refer, no issues arising in relation to them.

35. Regulation 44 deals with appeals against (*inter alia*) a decision by the OFT to impose a penalty:

> "(1) A person may appeal from a decision by—
>
> ...
>
> (b) the Authority, the OFT or DETI under regulation 34 or 42.
>
> (2) An appeal from a decision by—
>
> ...

(c) the OFT is to the First-tier Tribunal;"

36. As appears from the above quotation, the material in the Regulations dealing with appeals is exiguous, in particular as to the function or powers of the First-tier Tribunal when disposing of an appeal. It was the subject of oral and supplemental written submissions made to us by Ms. Simor and is a point to which we will return later in this Decision.

37. Finally in this section of our Decision we note, for completeness, that under regulation 45 failure to comply with (*inter alia*) the requirement to register under regulation 33 is a criminal offence, triable either summarily or on indictment (and, in the latter event, subject to a maximum penalty of two years' imprisonment); this potential criminal liability is an addition to the person concerned being liable to suffer the imposition of a penalty under regulation 42.

38. We were told by Ms. Simor, and accept, that the OFT sees prosecution as a last resort, it instead adopting the policy of initially imposing a penalty on the person concerned.

39. We were also told that the instant appeal is the first against the imposition of a penalty by the OFT for failure to register under the Regulations, whether by an estate agent or a CCFI; we return to this point later in the Decision.

C. Material facts

40. We now turn to the relevant factual background.

41. We can deal with this fairly briefly, since Mr. Andrews on behalf of the Appellant did not take issue with any of the factual matters put before us on behalf of the OFT.

42. As to the Appellant itself, we understand that the business name "Mansell McTaggart" is in the nature of a franchise, that there are a number of companies other than the Appellant itself which use that name as a trading name, and that there are 10 branches in total which

use that franchised name.

43. It is not without significance, in our opinion, that four such franchisees, namely Mansell McTaggart Crawley Limited, Mansell McTaggart Hassocks Limited, Mansell McTaggart Cuckfield Limited and Mansell McTaggart Newick Limited, all registered under the Regulations without any apparent difficulty or objection.

44. Conversely the Appellant itself, Mansell McTaggart Limited, trades from premises at 5 Muster Green, Haywards Heath, West Sussex, and 53A High Street, Lindfield, West Sussex, neither of which was registered until early November 2011.

45. The Appellant's registered office is situate at 20 Station Road, Burgess Hill, West Sussex, which is also the address of another "Mansell McTaggart" office. However the entity which carries on business from those premises is Mansell McTaggart Burgess Hill Limited and, whilst that company is (or at least was) not registered under the Regulations, it was (we suspect inadvertently) not the subject of the process which led to the imposition of the Penalty.

46. Because the relevant factual matters are not in dispute, we do not propose to rehearse them in any detail. Instead, we attach as Annex 1 to this Decision (and with the correction of some typographical errors) a chronology prepared by the OFT for the purposes of this appeal, the contents of which we gratefully adopt.

47. That chronology, and the documents summarised in them (with which Mr. Andrews did not take issue), largely speak for themselves.

48. That said, that material does, in our judgment, amply justify the submissions made to us in this regard by Ms. Simor that:

48.1 the Appellant applied to register more than one year and eight months after the date on which it was obliged to be registered under the Regulations (31 January

2010 to 13 October 2011);

48.2 the Appellant registered almost five months after its default was first drawn to its attention by the OFT (23 May to 13 October 2011);

48.3 in that near five month period the Appellant was given, but declined, repeated opportunities to register so as to avoid the imposition of a penalty;

48.4 the failure to register was in respect of two separate branches;

48.5 the effect of the above was that, having regard to the terms of regulation 33, the Appellant traded illegally for a very substantial period;

48.6 it was only the activation by the OFT of the procedure to impose a penalty by its notice dated 7 October 2011 that led to the Appellant eventually registering under the Regulations; and

48.7 Mr. Andrews' manner and attitude throughout, as recorded in contemporaneous documents prepared by the OFT, was unhelpful and obstructive.

D. The Adjudicator's determination

49. By a notice dated 7 October sent under cover of a letter of the same date, the OFT gave the Appellant notice that it was proposed to impose a penalty of £4,000 in respect of its (the Appellant's) failure to register under the Regulations.

50. As mentioned at paragraph 48.6 above, it was only service of that notice which eventually stimulated the Appellant into registering.

51. The Appellant was invited to, but did not, make any representations in response to the notice.

52. In her admirably succinct determination, the Adjudicator concluded that the Appellant was in breach of regulation 33 and that the appropriate penalty was £3,000. The figure of £4,000 proposed by the OFT had proceeded on the erroneous assumption that the Appellant traded also from the Mansell McTaggart office at Burgess Hill (*c.f.* paragraph 45 above).

E. Submissions

53. We have already summarised Ms. Simor's submissions on the facts, at paragraphs 48.1 to 48.7 above.

54. Building on those factual conclusions Ms. Simor further submitted:

54.1 The Appellant belatedly accepted (by registering) that it was liable to register under the Regulations, but without offering any mitigating circumstances for not having done so promptly.

54.2 The Appellant therefore did not have any arguable grounds of appeal on liability (as we shall refer to it), as opposed to the amount of the Penalty, nor were any such grounds disclosed in the Notice of Appeal itself.

54.3 The Appellant could not bring itself within regulation 42(2) as it quite clearly had not taken all reasonable steps and exercised all due diligence to ensure that the registration obligation imposed on it under regulation 33 was complied with.

54.4 The Appellant's subjective belief that because it does not handle clients' monies it therefore should not be subject to the Regulations ignored the clear intention of Parliament as expressed in the Regulations.

54.5 The Appellant's further subjective belief that it does not derive any benefit from

being registered under the Regulations, or that the Appellant was in some way a "member" of the Regulations or the OFT, was misconceived, since the purpose of the Regulations is to detect, deter and disrupt money laundering and terrorism. Rather, the Regulations are conducive to a desirable public result from which all law-abiding members of the community (including the Appellant itself) benefit.

54.6 The registration system created by the Regulations would be impossible to operate if the OFT had to chase businesses in the manner in which it had to pursue the Appellant, because of the time, administrative effort and money that would be involved.

54.7 It is essential that penalties of some substance are imposed on deliberate defaulters as part of the dissuasive effect on others expressly provided for by Parliament under regulation 42(1).

54.8 In effect, the Appellant was the author of its own misfortunes.

55. When addressing us Mr. Andrews implicitly accepted that there was no answer to Ms. Simor's submission that the Appellant was liable to register under the Regulations, the bulk of his argument being directed towards:

55.1 the proposition that it made no sense for estate agents who do not handle clients' monies to be required to register, and

55.2 the contention that the £3,000 penalty was disproportionate.

56. In support of his first argument Mr. Andrews drew our attention to paragraphs 4.13 and 4.14 of the "Summary of responses" document dated December 2010 (document reference OFT1157res), from which it appears that certain respondents to the OFT's consultation exercise made broadly this point.

57. As to his second argument, Mr. Andrews contrasted the size of the Penalty (£3,000) with the registration fee (2 x £74), describing it as a "mighty big fine", especially in relation to the Appellant's Lindfield office, which we understand to be a very modest operation.

F. Our function on this appeal

58. We have already mentioned, at paragraph 39 above, that this is apparently the first appeal against the imposition by the OFT of a penalty under the Regulations.

59. Absent both any precedent and, also, any clear guidance in either the relevant primary or secondary legislation, we invited submissions as to the nature of the Tribunal's function on an appeal of this character. Inevitably given that (in effect, if not in form) the Appellant appeared before us in person, it fell to Ms. Simor to discharge this burden.

60. We refer again to the material parts of regulation 44, set out at paragraph 35 above.

61. Although not dealt with in her skeleton argument, we had the benefit of oral submissions (and brief supplemental post-hearing written submissions) from Miss Simor to the effect, as we understood them, as follows:

61.1 At the risk of stating the obvious, the starting point is that the Tribunal must determine whether the Penalty was lawfully imposed.

61.2 If there is a dispute as to whether there has been a breach of regulation 33 then the Tribunal must, if necessary, find the facts *de novo* for itself by way of a rehearing.

61.3 Assuming a breach of regulation 33, the Tribunal would then have to consider whether it would be reasonable for the OFT to impose any penalty on the defaulter.

61.4 Assuming that question was answered in the affirmative, the Tribunal would then

have to consider whether the amount of the Penalty was (in the language of regulation 42(1)) "appropriate".

62. In terms of the final stage of the above analysis, Ms. Simor suggested that the Tribunal's jurisdiction was of a strictly limited nature.

63. Drawing on the seminal public law authority of *Associated Provincial Picture Houses Ltd. v. Wednesbury Corporation* [1948] 1 K.B. 223, Ms. Simor submitted that we could only intervene if we considered that the level of penalty imposed was of a magnitude that no public body could properly have decided upon, with the consequence that:

63.1 If the *Wednesbury* test was not satisfied then we could not intervene, even if for our part we would have imposed a penalty of a lesser amount, but

63.2 if the *Wednesbury* was satisfied then we did not have the power to substitute a smaller penalty in place of the Adjudicator's determination, but should instead remit the matter to the OFT for a further determination.

64. The point is clearly one of some legal difficulty, given (so far as we are aware) the absence of guidance in any legislation. We can see that the regime suggested by Ms. Simor fills the apparent statutory lacuna presented to us, though we are far from persuaded that its produces a sensible or workable structure. In particular it:

64.1 seriously circumscribes the powers of the Tribunal on the hearing of an appeal of the present kind, and

64.2 places a significant burden on a successful appellant, who may find himself having to go through the process of a determination by an adjudicator and a possible appeal for a second time. Whilst appeals leading to retrials in ordinary civil proceedings are of course far from unknown, the general rule is that, if at all possible and unless the justice of the case so requires, the appellate court should

deal with the case itself rather than putting the parties to further expense. We freely admit that our instinctive preference would be for us to have rather greater and more flexible powers than Ms. Simor's analysis would admit.

65. We appreciate that in this case the OFT may be looking to us for guidance on this issue to assist in future appeals, but we feel somewhat circumscribed in our ability to do so having had the benefit of argument from one side only.

66. In the event and for reasons we will now explain, on the particular facts of this case we do not consider it necessary for us to resolve this question of law.

G. Our decision

67. First, we are entirely satisfied that (i) the Appellant failed to comply with its registration obligations under regulation 33 and (ii) the Appellant's conduct merited the imposition of a penalty.

68. The former point is unarguable and, as we have said, was implicitly accepted by Mr. Andrews.

69. The latter point can, in our view, fairly be described as unarguable also. Even allowing for the Appellant being unaware of its obligations prior to May 2011, in our opinion:

69.1 as an established estate agency business (a compliments slip at tab 34 in the bundle before us says "Estate Agents since 1947") it should have known of the scope of the Regulations, and

69.2 as from 23 May 2011 it clearly did know of their scope, but proceeded repeatedly to ignore its registration obligations.

70. We therefore turn to the amount of the Penalty.

71. As to this in our view the Penalty, in the sum of £3,000, does not simply satisfy (on Ms. Simor's analysis of the law) the *Wednesbury* test but, in our opinion, is manifestly (in the language of regulation 42(1)) of an appropriate amount.

72. That is to say, whether our jurisdiction is of a limited *Wednesbury*-type review nature or instead requires us to consider afresh the amount of the Penalty, we would uphold the figure of £3,000, and we do so for all the reasons advanced by Ms. Simor which we have summarised at paragraphs 48 and 54 above.

73. In short:

73.1 we repeat paragraph 69 above;

73.2 the evidence unambiguously establishes that the Appellant's disregard of its obligations, with effect from 23 May 2011, was wilful and deliberate;

73.3 the Appellant has thereby put the OFT to considerable time, trouble and expense; and

73.4 a message needs to be communicated to persons liable to register under the Regulations that conduct such as that on the part of the Appellant here will attract a penalty of some substance.

74. Conversely Mr. Andrews' complaint about, as he sees it, the illogical scope of the Regulations, is nothing to the point. Parliament has chosen to include estate agents within the Regulations and the Appellant, the OFT and the Tribunal must all respond accordingly.

75. Equally, Mr. Andrews' criticism of the amount of the Penalty is, in our view, misconceived. He knew that, by his conduct, he was exposing the Appellant to the risk

(if not the inevitability) of a penalty and, if he was unaware of its likely amount, the documentation published by the OFT was readily available to him and would have made clear the likely size of any penalty.

76. As Ms. Simor submitted, there are no mitigating circumstances; indeed in our view all the relevant circumstances go to aggravate the nature of the Appellant's conduct. If anything, in our view an increase from the OFT's published starting point might well have been justified.

77. For these reasons, therefore, we unanimously dismiss this appeal.

78. For the avoidance of doubt and again having regard to the limited nature of the argument addressed to us, we should make clear that the conclusion we have reached above is as to the appropriate penalty to be imposed given the facts of the instant case; we express no views as to the general applicability (or otherwise) of the OFT's starting point and additional sums described in paragraph 28 above.

H. Costs

79. No submissions were addressed to us on the question of costs.

80. Under Rule 10 of the Tribunal Procedure (First-tier Tribunal) (General Regulatory Chamber) Rules 2009, any application for costs must be made to the Tribunal not later than 14 days after the date on which the Tribunal sends this decision to the parties.

[Signed on the original]

Keith Rowley Q.C.
Judge, First-tier Tribunal (Consumer Credit)

24 September 2012