



**HM Revenue
& Customs**

**Local Compliance
Personal & CGT Compliance**

Trinity Bridge House
2 Dearmans Place
Salford
M3 5BH

Martyn F Arthur
Forensic Accountant Limited
23 Bryneglwys Gardens
Porthcawl
Bridgend
CF36 5PR

Phone 0161 261 3660
8.30am to 5.00pm Monday to Friday

Fax 0161 261 3356

hmrc.gov.uk

Date 21 March 2012

Our ref
Your ref

Dear Sir

I acknowledge receipt of your faxed letter dated 29 February 2012 I have brought my enquiries into your client's Self Assessment returns to a conclusion based on the proposals in my letter dated 7 February 2012.

2005/06

I enclose a copy of the amended Revenue assessment. The appeal against the assessment raised on 30 March 2010 is now considered settled by agreement under S54(1) Taxes Management 1970.

2006/07

Please find enclosed a copy of the closure notice issued direct to your client.

Copies of this correspondence has been issued direct to Messrs

Yours faithfully

H M Inspector of Taxes

Information is available in large print, audio and Braille formats.
Text Relay service prefix number – 18001



**Local Compliance
Personal & CGT Compliance**
Trinity Bridge House
2 Dearmans Place
Salford
M3 5BH

Phone 0161 261 3660

**Reference
number**

Date 20 March 2012

Notice of amended further assessment for the year ended 5 April 2006

Total amount now assessed	-£56.70
Previous assessment	-£49,877.70
Amount charged by this assessment	£49,821.00

I am sending this assessment to you because we have found that there is additional tax due that was not previously shown on your tax return. It is now too late for us to amend your tax return so this assessment allows us to collect the additional tax.

I enclose a copy of my calculation showing the amount charged by this assessment. I have also included this amount on your Self Assessment statement.

About your adviser

I have sent a copy of this notice to your adviser, Martyn F Arthur.

Paying what is due

Please make sure that you pay the amount shown at the top of this assessment by 19 April 2012.

If you do not pay all the tax that is due within 28 days of the date it should be paid, we will add a surcharge. A surcharge is an extra amount of money that you will have to pay as well as the tax that is due. The surcharge will be an amount equal to 5% of the tax that you have not paid. If you still have not paid all the tax due within 6 months of the date it should have been paid, we will add an additional surcharge. The additional surcharge will be 5% of the tax that is still due.

Interest we charge for paying late

We charge interest on any tax that is paid late. We show any interest charges on your Self Assessment statement.

We will charge you interest on the above amount from 31 January 2007 until the date it is paid.

How to pay

We recommend that you pay us electronically. There are two ways of doing this, either by online Direct Debit, or by online debit or credit card payment. You can find more details on our website at www.hmrc.gov.uk/payinghmrc/index.htm

If you would prefer to pay by post, please send a cheque made payable to HM Revenue & Customs to:

HM Revenue & Customs
Accounts Office Shipley
BRADFORD
BD98 1YY

If you pay by cheque, please write the tax reference number and the full name of the person the payment relates to on the back of the cheque.



**Local Compliance
Personal & CGT Compliance**
Trinity Bridge House
2 Dearmans Place
Salford
M3 5BH

Mr [REDACTED]

Phone 0161 261 3660
8.30am to 5.00pm Monday to Friday

Fax 0161 261 3356

hmrc.gov.uk

Date 21 March 2012

Our ref [REDACTED]

Your ref [REDACTED]

Dear [REDACTED]

Information about our check of your Self Assessment tax return – year ended 5 April 2007

I have now completed my check of your Self Assessment Tax Return for the year ended 5 April 2007. This letter is a closure notice issued under Section 28A (1) & (2) Taxes Management Act 1970.

I am sending a copy of this notice to your tax adviser.

My conclusion

Foreign Tax credit relief

Amendments has been made to reflect the revision to your client's original claim as it has been accepted that the deductions from your client's income identified as Social Charges fulfil the criteria laid down by Article 2 of the Double Taxation Agreement between United Kingdom and Switzerland.

Land and Property Income

Following your agreement to a proportion of the loan interest being disallowed I have amended your figure of losses to carry forward please see computation attached. In their letter dated 2 December 2008 Messrs [REDACTED] [REDACTED] accepted that the rental income losses were incorrectly offset against general income. These losses are only available to carry forward against any future letting income that may arise.

I have amended your Self Assessment return to reflect my conclusion.

- It previously showed that you were due to pay £74,917.68 tax.
- It now shows that you are due to pay £68,154.69 tax.
- The difference is £6,762.99.

Information is available in large print, audio and Braille formats.
Text Relay service prefix number – 18001

