



Martin v HMRC

Philip Ridgway

Barrister

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Chronology (1)

- Contract signed effective 7 November 2005
- Notice of termination 2 August 2006
- Letter JLT to Martin 5 October 2006
- Martin repays Oct 2006 and Jan 2007
- Amendment of tax return
- Enquiry 5 November 2007
- Letter of determination 3 November 2008



Chronology (2)

- Letter following technical review 21/5/09
- Claim for negative earnings 24/6/09
- Reply “this is not a Utopia” 28/7/09
- Determination plus penalties 2/10/09
- Appeal
- Section 33 claim 22/3/10
- Acceptance 23/3/10



Chronology (3)

- FTT 10-11/12/12
- UT February 2007 (authorities)
- Written submissions 15/7/14
- Further written submissions (sat) 2/8/14
- Judgment 22 sept 14
- Costs: HMRC v Martin No2?



Discussion

- Ramifications
- HMRC's position
- Losses
- Bonuses