

AM22

Notice of move from administration to creditors' voluntary liquidation



Companies House

WEDNESDAY



A20 *A81MM2CA* #260
20/03/2019
COMPANIES HOUSE

1 Company details

Company number 0 2 4 5 5 8 0 7

Company name in full The Lifetime SIPP Company Ltd

→ Filling in this form
Please complete in typescript or in
bold black capitals.

2 Court details

Court name HIGH COURT OF JUSTICE BUSINESS AND
PROPERTY COURTS IN BRISTOL

Court case number 8 4 2 0 1 8

3 Administrator's name

Full forename(s) Ian

Surname Robert

4 Administrator's address

Building name/number Devonshire House

Street 60 Goswell Road

Post town London

County/Region

Postcode E C 1 M 7 A D

Country

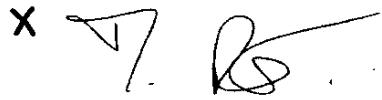
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Notice of move from administration to creditors' voluntary liquidation

5	Administrator's name ①		
Full forename(s)	Ryan Michael		① Other administrator Use this section to tell us about another administrator.
Surname	Davies		
6	Administrator's address ②		
Building name/number	Devonshire House		② Other administrator Use this section to tell us about another administrator.
Street	60 Goswell Road		
Post town	London		
County/Region			
Postcode	E C 1 M 7 A D		
Country			
7	Appointor/applicant's name		
	Give the name of the person who made the appointment or the administration application.		
Full forename(s)	Robin		
Surname	Hooper		
8	Proposed liquidator's name		
Full forename(s)	Ian		
Surname	Robert		
Insolvency practitioner number	0 0 8 7 0 6		
9	Proposed liquidator's address		
Building name/number	Devonshire House		
Street	60 Goswell Road		
Post town	London		
County/Region			
Postcode	E C 1 M 7 A D		
Country			

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Notice of move from administration to creditors' voluntary liquidation

10		Proposed liquidator's name ^①	
Full forename(s)	Ryan Michael		
Surname	Davies		
Insolvency practitioner number	1	5	2 5 0
		① Other liquidator Use this section to tell us about another liquidator.	
11		Proposed liquidator's address ^②	
Building name/number	Devonshire House		
Street	60 Goswell Road		
Post town	London		
County/Region			
Postcode	E	C	1 M 7 A D
Country			
		② Other liquidator Use this section to tell us about another liquidator.	
12		Period of progress report	
From date	d 2 9	m 0 9	y 2 0 1 8
To date	d 1 5	m 0 3	y 2 0 1 9
13		Final progress report	
		<input checked="" type="checkbox"/> I have attached a copy of the final progress report.	
14		Sign and date	
Administrator's signature	Signature 		
Signature date	d 1 5	m 0 3	y 2 0 1 9

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Presenter information

You do not have to give any contact information, but if you do it will help Companies House if there is a query on the form. The contact information you give will be visible to searchers of the public record.

Contact name **Ellis Brealey**

Company name **Kingston Smith & Partners LLP**

Address **Devonshire House**

60 Goswell Road

Post town **London**

County/Region

Postcode **E C 1 M 7 A D**

Country

DX

Telephone **020 7566 4020 / 020 7566 4021**



Checklist

We may return forms completed incorrectly or with information missing.

Please make sure you have remembered the following:

- ☐ The company name and number match the information held on the public Register.
- ☐ You have attached the required documents.
- ☐ You have signed and dated the form.



Important information

All information on this form will appear on the public record.



Where to send

You may return this form to any Companies House address, however for expediency we advise you to return it to the address below:

The Registrar of Companies, Companies House,
Crown Way, Cardiff, Wales, CF14 3UZ.
DX 33050 Cardiff.



Further information

For further information please see the guidance notes on the website at www.gov.uk/companieshouse or email enquiries@companieshouse.gov.uk

This form is available in an alternative format. Please visit the forms page on the website at www.gov.uk/companieshouse

**The Lifetime SIPP Company Ltd
(In Administration)
Joint Administrators' Trading Account**

Statement of Affairs £	From 29/03/2018 To 19/03/2019 £	From 29/03/2018 To 19/03/2019 £
TRADING EXPENDITURE		
Computer Services	690.00	690.00
Website Maintenance	1,600.00	1,600.00
	<u>(2,290.00)</u>	<u>(2,290.00)</u>
TRADING SURPLUS/(DEFICIT)	<u>(2,290.00)</u>	<u>(2,290.00)</u>

The Lifetime SIPP Company Ltd
(In Administration)
Joint Administrators' Summary of Receipts & Payments

Statement of Affairs £		From 29/03/2018 To 19/03/2019 £	From 29/03/2018 To 19/03/2019 £
	ASSET REALISATIONS		
716,126.28	Cash at Bank	705,298.68	705,298.68
	Data Access requests	50.00	50.00
	Bank Interest Gross	368.89	368.89
	Trading Surplus/(Deficit)	(2,290.00)	(2,290.00)
Uncertain	SIPP Administration	325,000.00	325,000.00
Uncertain	Debtors (Suspended Fees)	NIL	NIL
		<u>1,028,427.57</u>	<u>1,028,427.57</u>
	COST OF REALISATIONS		
	Specific Bond	800.00	800.00
	Preparation of S. of A.	1,500.00	1,500.00
	Office Holders Fees	241,815.06	241,815.06
	Office Holders Expenses	1,316.83	1,316.83
	External Mailing costs	7,373.77	7,373.77
	Insurance advisory costs	1,837.50	1,837.50
	Agents Fees Clumber Consultancy	300.00	300.00
	Agents Fees Ardentia Consulting	435.00	435.00
	Legal Fees (Foot Anstey)	139,742.90	139,742.90
	Legal Disbursements (Foot Anstey)	378.84	378.84
	Statutory Advertising	67.00	67.00
	SIPP Administration advisor fee	100,000.00	100,000.00
		<u>(495,566.90)</u>	<u>(495,566.90)</u>
	UNSECURED CREDITORS		
Uncertain	Trade & Expense Creditors	NIL	NIL
Uncertain	HM Revenue & Customs	NIL	NIL
(21,950,000.00)	Consumer Claims	NIL	NIL
(34,558,912.90)	Contingent consumer claim	NIL	NIL
Uncertain	Other contingent consumer claims	NIL	NIL
		<u>NIL</u>	<u>NIL</u>
	DISTRIBUTIONS		
600.00	Preference Shareholders	NIL	NIL
62,500.00	Ordinary Shareholders	NIL	NIL
		<u>NIL</u>	<u>NIL</u>
(55,729,686.62)		<u>532,860.67</u>	<u>532,860.67</u>
	REPRESENTED BY		
	Vat Receivable		98,133.88
	Bank Account		499,726.79
	Vat Payable		(65,000.00)
			<u>532,860.67</u>

Joint Administrators' Final Progress Report

**The Lifetime SIPP Company Ltd –
In Administration**

15 March 2019

THE LIFETIME SIPP COMPANY LIMITED - IN ADMINISTRATION

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- 7** Ending the Administration

APPENDICES

- A** Receipts and Payments Account for the Period from 29 September 2018 to 15 March 2019
- B** Cumulative Receipts and Payments Account for the Period from 29 March 2018 to 15 March 2019
- C** Time Analysis for the Period from 29 September 2018 to 15 March 2019
- D** Cumulative Time Analysis for the Period from 29 March 2018 to 15 March 2019
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- F** Additional information in relation to Joint Administrators' Fees, Expenses & Disbursements

THE LIFETIME SIPP COMPANY LIMITED - IN ADMINISTRATION

1 Introduction

- 1.1 Ryan Davies and I were appointed Joint Administrators of The Lifetime SIPP Company Ltd ("the Company") on 29 March 2018. The appointment was made by the Director, Robin Hooper on 29 March 2018.
- 1.2 This Administration has been handled by Kingston Smith & Partners LLP at Devonshire House, 60 Goswell Road, London EC1M 7AD. The Joint Administrators' contact details are by phone on 020 7566 4020 or via email at lifetime@kingstonsmith.co.uk. The Administration is registered in the High Court Of Justice Business And Property Courts In Bristol, under reference number 84 of 2018.
- 1.3 Information about the way that we will use, and store personal data on insolvency appointments can be found at <https://www.kingstonsmith.co.uk/kspllp-gdpr/>. If you are unable to download this, please contact us and a hard copy will be provided to you.
- 1.4 The trading address of the Company was 25 Marsh Street, 8th Floor, Bristol BS1 4AQ.
- 1.5 The registered office of the Company is Devonshire House, 60 Goswell Road, London EC1M 7AD and its registered number is 02455807.
- 1.6 As the Administration has now completed following its conversion to Liquidation, I am required to provide a Progress Report covering the period since my last report which ended on 28 September 2018. This is my Final Report in the Administration and covers the period from 29 September 2018 to 15 March 2019 ("the Period") and should be read in conjunction with my earlier proposals report and any previous progress reports which have been issued. The Joint Administrators will now convert to Liquidation and creditors' claims will be unaffected by this Statutory requirement.

2 Progress of the Administration

- 2.1 As noted previously, the statutory objective pursued in the Administration was the **second objective** being achieving a better result for the Company's creditors as a whole than would be likely if the Company were wound up (without first being in Administration). In addition to the pursuance of this statutory objective, the Joint Administrators have duties imposed by insolvency and other legislation, some of which may not have provided any financial benefit to creditors.
- 2.2 This section of the report provides creditors with an overview of the progress made in the Period, both in terms of the statutory objective, but also work which is required of the Joint Administrators under other related legislation.
- 2.3 At Appendix A is my Receipts and Payments Account covering the period of this report together with a cumulative Receipts and Payments Account from the date of my appointment to the conclusion of the Administration at Appendix B.

Administration (including statutory compliance & reporting)

- 2.4 As noted previously, the Joint Administrators must comply with certain statutory obligations under the Insolvency Act 1986 and other related legislation. Details about the work undertaken in this regard has been outlined previously and I would confirm that in the final period of the Administration, the only matters that have affected the costs in this area to any particular extent are dealing with calls for numerous creditors providing updates on case progression
- 2.5 Where the overall costs of statutory compliance work or reporting to creditors has exceeded the initial estimate, it will usually be because the duration of the case has taken longer than anticipated, possibly due to protracted asset realisations, which have in turn placed a further statutory reporting requirement on the Joint Administrators.

THE LIFETIME SIPP COMPANY LIMITED - IN ADMINISTRATION

- 2.6 As noted in my initial fees estimate/information, this work has not necessarily brought any financial benefit to creditors, but is work required on every case by statute.

Trading

- 2.7 As detailed in my previous report no trading took place following my appointment. However, significant interaction with c2,000 SIPP holders who had 'tainted' SIPPs was required. The majority of the Company's business had been transferred prior to our appointment, however certain SIPPs had not fully transferred. As such, we liaised with a number of parties in order to transfer the administration of these SIPPs to a new provider, with the relevant licensing. These SIPPs relate to the Interactive Investor SIPP, the Trustnet SIPP, and the Telegraph Investor SIPP. This matter is ongoing.

Realisation of Assets

Sale of SIPPs

- 2.8 The Company operated 4,746 SIPPs, these SIPPs were split into three separate tranches with Tranches 1 and 2 comprising of untainted liquid SIPPs and Tranche 3 being tainted/illiquid SIPPs. Tranche 1 consists of 1,892 SIPPs, Tranche 2 consists of 836 SIPPs and Tranche 3 consists of 2,018 SIPPs ("the SIPPS").
- 2.9 As detailed in my earlier reports, a Settlement and Transfer Agreement ("the Agreement") was entered into on 4 May 2018 with Hartley Pensions Limited ("HPL") whereby a consideration of £325,000 plus VAT together with HPL's agreement that all claims they may have or a "related party" (which includes group companies) may have against the Company including a claim for management services of c£565k be settled and compromised. The settlement was reciprocal.
- 2.10 Included in the Agreement was ongoing support from HPL staff members in assisting the Joint Administrators with the management and administration of consumer claims and other SIPP related queries received. This agreement was documented in an Administration and Management Services Agreement ("AMAS") also dated 4 May 2018. The AMAS requires the Joint Administrators to pay HPL a monthly service charge for a total of 9 months from its commencement unless terminated earlier. The total amount payable under the AMAS for the period was £100k plus VAT and these funds were held in my solicitors' client account, and have been paid on a monthly basis following receipt of invoices and time narratives. All payments have now been made.

Cash at Bank

- 2.11 At the date of administration the Company's bank account held funds of £698,126.28. As such the Company's bankers were contacted immediately for the funds to be transferred. In addition to the cash at bank, funds totalling £7,172.40 were held in the Company's solicitor's client account. Accordingly cash at bank totalling £705,298.68 has been received.

Creditors (claims and distributions)

- 2.12 Further information on the outcome for creditors in this case can be found at section 4 of this report. The Joint Administrators are not only required to deal with correspondence and claims from unsecured creditors, but also those of any secured and preferential creditors of the Company. This may involve separate reporting to any secured creditor and dealing with distributions from asset realisations caught under their security, most typically a debenture as well as dealing with the general handling of communications with stakeholders, such as customers and suppliers.
- 2.13 Claims from preferential creditors typically involve employee claims and payments made on behalf of the Company by the Redundancy Payments Service following dismissal.

THE LIFETIME SIPP COMPANY LIMITED - IN ADMINISTRATION

- 2.14 The above work will not necessarily bring any financial benefit to creditors generally, however the Joint Administrators are required by statute to undertake this work. Similarly, if a distribution is to be paid to any class of creditor, work will be required to agree those claims and process the dividend payments to each relevant class of creditor. The more creditors a company has, the more time and cost will be involved by the Joint Administrators in dealing with those claims.
- 2.15 I consider the following matters worth noting in my Report to creditors at this stage:
- There are approximately 3,600 unsecured creditor claims in this case with a value per the director statement of affairs of c£56.5 million.
 - There are no secured creditors in this case.
 - I anticipate claims from preferential creditors totalling nil.

Investigations

- 2.16 You may recall from my earlier progress reports to creditors that some of the work the Joint Administrators were required to undertake was to comply with legislation such as the Company Directors' Disqualification Act 1986 (**CDDA 1986**) and Statement of Insolvency Practice 2 – *Investigations by Office Holders in Administration and Insolvent Liquidations* and may not necessarily bring any financial benefit to creditors, unless those investigations revealed potential asset recoveries that could have been pursued for the benefit of creditors.
- 2.17 My report on the conduct of the Directors of the Company to the Department for Business, Energy & Industrial Strategy under the CDDA 1986 was submitted during the first period of the Administration and is confidential.

Case Specific Matters

Financial Conduct Authority ("FCA") involvement

- 2.18 Due to the Company being regulated by the FCA, we provided updates to the FCA as required regarding the progression of this case whilst complying with the necessary reporting requirements. Our communication with the FCA is ongoing.

Financial Ombudsman Service ("FOS")

- 2.19 Since appointment, the Joint Administrators have been in dialogue with the FOS regarding the Company's ongoing complaints procedures. During the period a significant number of complaints from consumers have been submitted to the FOS. The FOS in turn have requested the relevant information from the Company in order to assist the Consumers with their claims.
- 2.20 With the assistance of HPL we have been liaising directly with the FOS to ensure complaints are dealt with efficiently and that, if appropriate, the relevant claims are then made to the FSCS (see below). This information has been compiled and forwarded to the FOS in a timely manner.

Financial Services Compensation Scheme ("FSCS")

- 2.21 The FSCS was advised on the position of the Company immediately upon administration. As such, constant communication has been required in order to progress the claims of the creditors so that payments can begin to be made.
- 2.22 The FSCS has confirmed that they are satisfied the Company is not in a position to meet the claims against it and are prepared to accept claims from the Company's creditors.

THE LIFETIME SIPP COMPANY LIMITED - IN ADMINISTRATION

- 2.23 However, we have been informed by the FSCS that the Company has yet to be deemed in Default due to one of the pre-conditions for a Declaration of Default that there needs to be at least one eligible claim against the Company to conclude the claims process. Until a claim has completed the process the Company will not be declared in Default and no payments will be made to the Creditors by the FSCS until a default is declared.
- 2.24 To date 304 creditors have submitted claims with the FSCS. These claims are currently being investigated and reviewed by the FSCS and will be adjudicated upon in due course. It is possible that the majority of the 2018 claim will be submitted to the FSCS so it is clear that the process will be on-going for some time. Indeed, it is expected that this administration, on transferring to Liquidation, may take several years to be concluded.
- 2.25 It was discussed with the FSCS whether the claims received in the Administration could be passed directly to the FSCS in a bulk exchange. The FSCS confirmed that this was not possible and that each individual creditor would be required to submit their claim online. In order to claim through the FSCS creditors will be required to complete an online form submission at the following address <https://claims.fscs.org.uk/PreScreening/EnterDetails>

Joint class action – "Freedom Bay"

- 2.26 As previously advised, Forsters Solicitors are undertaking a class action against Freedom Bay. The SIPPs in which the action pertains to have been transferred to HPL, as such the Company holds no interest in this action.

Interactive Investor Trading Limited ("II")

- 2.27 I was advised by II's solicitor that their 28 Scheme members' had claims for tax relief on in specie contributions that had occurred pre-administration. Legal advice was sought regarding the relief at source ("RAS") claims. Extensive communication was entered into with HMRC requesting all files relating to the RAS claims be forwarded so they could be reviewed. These files have been reviewed by our solicitors and we are now seeking an appropriate alternative party who would be prepared to take on responsibility for both the wind down of these SIPPs and progress the proper treatment of the claims.

KPMG Tesco Compensation Scheme

- 2.28 A number of members were due compensation under the above scheme. Accordingly, legal advice was sought and the relevant Determination Notices were required to be signed, in conjunction with the Scheme's Trustee, in order to release the compensation.

Insurers' solicitors' requests

- 2.29 Following our enquiries of insurers regarding cover and a block notification made by the Company prior to our appointment, requests from the Company's previous insurers, acting via their agents Beale & Co, were received to provide further specific information from the Company's records. This information would in turn be used by the insurers to determine coverage under the policy for claims made. Given the Company's current position we have been advised to leave the issue open pending the determination of the position of creditors either through FSCS compensation or distribution.

Companies House Charges

- 2.30 There are a number of charges registered at Companies house which appear to have been granted by the Company. Following enquiry, the Charges registered relate to assets held by the Company for and on behalf of the SIPPs. We are considering further whether the assets continue to be controlled by the Company and if not we consider that deeds of release can be filed in respect of the charges.

THE LIFETIME SIPP COMPANY LIMITED - IN ADMINISTRATION

Hartley Assistance

- 2.31 As detailed above in section 2.10 an AMAS was entered into with HPL in order for them to provide ongoing support through the administration. HPL have assisted the Joint Administrators as agreed and to date funds totalling £100,000 have been paid to HPL for their assistance under the terms of the AMAS.

Grant Thornton

- 2.32 We recently received correspondence from Grant Thornton who are investigating possible antecedent transactions in another insolvency. They had found reference in a schedule to a document to secured borrowers which lists, among others, SIPP assets held by the Company. We have established that the assets listed were part of the transfer to Hartley and have therefore put Grant Thornton in touch direct.

Burges Salmon

- 2.33 We were contacted by Burges Salmon who act for the FSCS in connection with enquiries they were making regarding the Harlequin scheme and an asset known as Merrick Beach Resort. We were required by statute to provide information in response to their requests and have done so. We have received no further correspondence from them.

Unrealised Assets

- 2.34 I would confirm that all assets have now been realised and the cumulative Receipts and Payments Account at Appendix B reflects the final position on both realisations achieved and payments made during the course of the Administration. This includes details of all expenses and disbursements incurred and paid by the Joint Administrators to date.
- 2.35 Appendix A reflects the receipts and payments made during the Period only.

3 Outcome for Creditors

- 3.1 An Outcome Statement as at 15 March 2019 is attached at Appendix E.

Secured Creditors

- 3.2 We do not believe that there are any secured creditors of the Company as envisaged by the insolvency legislation as the charges registered are as explained at 2.30 above.

Preferential Creditors

- 3.3 As detailed previously, it was determined that the Company's employees had transferred to Wilton UK Group as per the CAPA under the Transfer of Undertakings (Protection of Employment) Regulations ("TUPE").
- 3.4 Accordingly, the Company did not employ any staff as at the date of Administration and therefore should not be subject to any preferential claims. There are no known preferential creditors.

Unsecured Creditors

- 3.5 The Company has c2,000 SIPP members which have a tainted aspect to their SIPP holdings. Whilst the SIPP operation has transferred to HPL the SIPP members may have a claim against the Company as at the date of the administration and based on current estimates it is believed that these claims could total in excess of £50,000,000.

THE LIFETIME SIPP COMPANY LIMITED - IN ADMINISTRATION

3.6 Due to the large number of individuals involved in this case, significant time is required to deal with creditor claims. As detailed above, HPL staff members have been assisting us for a period of nine months to assess claims from consumers, and to liaise with the FOS and the FSCS as appropriate in relation to complaints, claims and data access requests. For the first few months after our appointment, we were, naturally, inundated with calls and emails from conscious consumers. Whilst we have tried to deal with each request on an individual basis, the sheer volume of enquiries was high and we apologise if we did not manage to contact all those that made contact with us. We are still dealing with such enquiries and are happy to assist should you contact us. Indeed, HPL have assisted us in dealing with such requests.

3.7 I understand that the FSCS will pay compensation on claims that fall within their compensation scheme with their maximum award limited to £50,000 per consumer. As the FSCS responds to claims it will take an assignment of the claim and be subrogated into the creditors shoes in the Administration and claim as an unsecured creditor. We are in contact with the FSCS and will continue to liaise with HPL and the FSCS to progress these claims for as long as is necessary. It is hoped that eventually the FSCS will take assignment of the majority of the claims directly.

4 Joint Administrators' Remuneration

4.1 The basis of the Joint Administrators' fees was fixed in the Administration by reference to the time properly spent by them and their staff in managing the Administration. My fees estimate/information was originally provided to creditors when the basis of my remuneration was approved and was based on information available to me at that time

4.2 My time costs for the Period are £47,383.65. This represents 147.93 hours at an average rate of £320.31 per hour. Attached as Appendix C is a Time Analysis which provides details of the activity costs incurred by staff grade during this final period in respect of the costs fixed by reference to time properly spent by me in managing the Administration. A narrative explanation of the work undertaken by the Joint Administrators during the Period can be found at section 2 of this report.

4.3 Attached as Appendix D is a cumulative Time Analysis for the period from the date of my appointment to 15 March 2019 which provides details of my total time costs in the Administration. These time costs total £250,518.71 which represents 777.02 hours at an average rate of £322.40 per hour.

4.4 I would confirm that £241,815.06 plus disbursements of £1,316.83 has been drawn against my accrued time costs, which is below the level of the fees estimate approved by creditors.

4.5 You will recall that I provided creditors with my fees estimate prior to the agreement of the basis of my remuneration as time costs. I now consider that the fee estimate I previously provided for the Administration is insufficient to complete my duties as a result of:

- The Company's affairs requiring more extensive administration than previously anticipated. This is due to a number of case specific matters which were unknown at the time of my initial estimate. These matters have taken considerable time to deal with.
- Dealing with the claims and queries of the Company's creditors has taken more time than initially anticipated. This is due to the majority of the Company's creditors consisting of consumer creditors and as such more assistance has been required with each claim. There continues to be significant delays in working through the processes with the FSCS and I estimate that our work in dealing with claims will not be concluded for several years. As an example. Only c300 out of the c2,000 claims have been lodged with the FSCS and to date, none have been assigned.

4.6 As a result, my revised fees estimate is set out below and this includes the additional costs involved in handling the Liquidation over the next few years. I am seeking a decision to

THE LIFETIME SIPP COMPANY LIMITED - IN ADMINISTRATION

approve this by correspondence from the creditors originally responsible for approving the basis of my remuneration. In this case, that is the unsecured creditors.

Joint Administrators' Revised Fee Estimate

Category of work	Estimated Number of Hours	Average blended charge out rate £	Estimated cost £
Administration (inc statutory compliance & reporting)	347.00	335.85	116,540
Realisation of assets	92.00	363.48	33,440
Creditors (claims & distributions) *	397.25	284.76	113,120
Investigations	196.00	293.37	57,500
Trading (where applicable)	55.00	352.73	19,400
Total estimated fees			£340,000

- 4.7 Where the total fee agreed has not yet been drawn and the Company is exiting into Liquidation, please note that the balancing fee will be drawn in the subsequent Liquidation.
- 4.8 Attached at Appendix F is additional information in relation to the Joint Administrators' fees and the expenses and disbursements incurred in the Administration.
- 4.9 A copy of 'A Creditors' Guide to Administrators' Fees' is available on request or can be downloaded from www.ks.co.uk/creditors-guides-fees/.

5 Creditors' rights

- 5.1 Within 21 days of the receipt of this report, a secured creditor, or an unsecured creditor (with the concurrence of at least 5% in value of the unsecured creditors) may request in writing that the Joint Administrators provide further information about his remuneration or expenses (other than pre-administration costs) which have been itemised in this progress report.
- 5.2 Any secured creditor, or an unsecured creditor (with the concurrence of at least 10% in value of the unsecured creditors) may within 8 weeks of receipt of this progress report make an application to court on the grounds that, in all the circumstances, the basis fixed for the Joint Administrators' remuneration is inappropriate and/or the remuneration charged or the expenses incurred by the Joint Administrators, as set out in this progress report, are excessive.

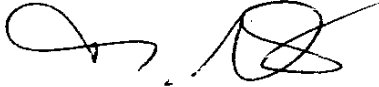
6 Ending the Administration

- 6.1 A copy of the notice bringing the Administration to an end and moving the Company into Creditors' Voluntary Liquidation is enclosed with this report, which has been sent to the Registrar of Companies for filing. Once this notice is registered, the Company will be in Liquidation and I would confirm that I will become the appointed Joint Liquidator, as agreed in my earlier proposals.
- 6.2 As Joint Liquidator, I will be required to report to creditors on the progress of the Liquidation within two months of the anniversary of my appointment. If a dividend is to be declared sooner, I will write to creditors to provide appropriate details in the intervening period.
- 6.3 If any creditors have not yet submitted their Proof of Debt, please ensure this is forwarded to my office as soon as possible in order that your claim can be admitted for dividend purposes.
- 6.4 I would confirm that the basis of my remuneration as Liquidator will be in accordance with the above revised fee estimate to be agreed by creditors. My fees estimate for the work I anticipate will be required in the Liquidation and details of the expenses I anticipate will be, or are likely to be, incurred will be forwarded to creditors for approval in due course.

THE LIFETIME SIPP COMPANY LIMITED - IN ADMINISTRATION

- 6.5 The Joint Administrators will be discharged from liability under Paragraph 98(3) of Schedule B1 to the Insolvency Act 1986 immediately upon their appointment as Joint Administrators ceasing to have effect.

For and on behalf of
The Lifetime SIPP Company Ltd

A handwritten signature in black ink, appearing to be 'IAN ROBERT', written over a horizontal line.

IAN ROBERT
Joint Administrator

**The Lifetime SIPP Company Ltd
(In Administration)**

Joint Administrators' Summary of Receipts and Payments

	Statement of affairs £	From 29/09/2018 To 15/03/2019 £	From 29/03/2018 To 15/03/2019 £
RECEIPTS			
Cash at Bank	716,126.28	0.00	705,298.68
Data Access requests		0.00	50.00
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SIPP Administration	Uncertain	0.00	325,000.00
Debtors (Suspended Fees)	Uncertain	0.00	0.00
Trade & Expense Creditors	Uncertain	0.00	0.00
HM Revenue & Customs	Uncertain	0.00	0.00
Other contingent consumer claims	Uncertain	0.00	0.00
Preference Shareholders	600.00	0.00	0.00
Ordinary Shareholders	62,500.00	0.00	0.00
Vat Payable		0.00	65,000.00
		<u>25.48</u>	<u>1,095,717.57</u>
PAYMENTS			
Computer Services		0.00	690.00
Website Maintenance		0.00	1,600.00
Specific Bond		380.00	800.00
Preparation of S. of A.		0.00	1,500.00
Office Holders Fees		45,000.00	241,815.06
Office Holders Expenses		0.00	1,316.83
External Mailing costs		0.00	7,373.77
Insurance advisory costs		1,837.50	1,837.50
Agents Fees Clumber Consultancy		0.00	300.00
Agents Fees Ardentia Consulting		0.00	435.00
Legal Fees (Foot Anstey)		20,705.50	139,742.90
Legal Disbursements (Foot Anstey)		0.00	378.84
Statutory Advertising		0.00	67.00
SIPP Administration advisor fee		55,000.00	100,000.00
Consumer Claims	(21,950,000.00)	0.00	0.00
Contingent consumer claim	(34,558,912.90)	0.00	0.00
Vat Receivable		24,584.60	98,133.88
		<u>147,507.60</u>	<u>595,990.78</u>
BALANCE - 15 March 2019		<u>(147,482.12)</u>	<u>499,726.79</u>
MADE UP AS FOLLOWS			
Bank Account		(81,482.12)	499,726.79
Foot Anstey (Client Account)		(66,000.00)	0.00
		<u>(147,482.12)</u>	<u>499,726.79</u>

THE LIFETIME SIPP COMPANY LIMITED - IN ADMINISTRATION

Appendix B

Cumulative Receipts and Payments Account for the Period from 29 March 2018 to 15 March 2019

**The Lifetime SIPP Company Ltd
(In Administration)**

Joint Administrators' Summary of Receipts and Payments

	Statement of affairs £	From 29/03/2018 To 15/03/2019 £	From 29/03/2018 To 15/03/2019 £
RECEIPTS			
Cash at Bank	716,126.28	705,298.68	705,298.68
Data Access requests		50.00	50.00
Bank Interest Gross		368.89	368.89
SIPP Administration	Uncertain	325,000.00	325,000.00
Debtors (Suspended Fees)	Uncertain	0.00	0.00
Trade & Expense Creditors	Uncertain	0.00	0.00
HM Revenue & Customs	Uncertain	0.00	0.00
Other contingent consumer claims	Uncertain	0.00	0.00
Preference Shareholders	600.00	0.00	0.00
Ordinary Shareholders	62,500.00	0.00	0.00
Vat Payable		65,000.00	65,000.00
		<u>1,095,717.57</u>	<u>1,095,717.57</u>
PAYMENTS			
Computer Services		690.00	690.00
Website Maintenance		1,600.00	1,600.00
Specific Bond		800.00	800.00
Preparation of S. of A.		1,500.00	1,500.00
Office Holders Fees		241,815.06	241,815.06
Office Holders Expenses		1,316.83	1,316.83
External Mailing costs		7,373.77	7,373.77
Insurance advisory costs		1,837.50	1,837.50
Agents Fees Clumber Consultancy		300.00	300.00
Agents Fees Ardentia Consulting		435.00	435.00
Legal Fees (Foot Anstey)		139,742.90	139,742.90
Legal Disbursements (Foot Anstey)		378.84	378.84
Statutory Advertising		67.00	67.00
SIPP Administration advisor fee		100,000.00	100,000.00
Consumer Claims	(21,950,000.00)	0.00	0.00
Contingent consumer claim	(34,558,912.90)	0.00	0.00
Vat Receivable		98,133.88	98,133.88
		<u>595,990.78</u>	<u>595,990.78</u>
BALANCE - 15 March 2019		<u>499,726.79</u>	<u>499,726.79</u>
MADE UP AS FOLLOWS			
Bank Account		499,726.79	499,726.79
		<u>499,726.79</u>	<u>499,726.79</u>

THE LIFETIME SIPP COMPANY LIMITED - IN ADMINISTRATION

Appendix C

Time Analysis for the Period from 29 September 2018 to 15 March 2019

The Lifetime SIPP Company Limited

Summary of Fees and Expenses

From 29/09/2018 to 15/03/2019

Time Costs

The following is a summary of the time costs incurred by the Office Holder and his staff in the administration of this matter. It should be read in conjunction with the Office Holder's Report for the period referred to above.

Work Activity	Partner Hrs	Manager / Supervisor Hrs	Administrator Hrs	Total Hrs	Time Costs (£)	Average Costs (£)
Administration & Planning	30.18	4.08	19.67	53.93	18,160.33	336.74
Case Planning/Information	12.00			12.00	5,040.00	420.00
General Admin/Billing/Filing	0.08	0.92	11.67	12.67	2,700.01	213.10
Pensions Administration	16.00	0.17		16.17	6,783.33	419.50
Post Appointment VAT & CTax	0.85	1.00	4.42	6.27	1,635.33	260.82
Statutory filing with Court, Companies	1.25			1.25	525.00	420.00
Books & Records administration		1.33		1.33	506.66	380.95
Strategy reviews/Checklists/Diary		0.67	2.33	3.00	719.99	240.00
Dealing with company/Debtor re			1.25	1.25	250.01	200.01
Investigations	2.83	2.75	1.75	7.33	2,585.00	352.66
Information capture/initial	1.58			1.58	665.00	420.89
Litigation - document review	1.25		1.75	3.00	875.00	291.67
Other scheduling & information		0.83		0.83	316.67	381.53
Strategy, planning, meetings and		1.92		1.92	728.33	379.34
Realisation of Assets	2.00	1.67	0.67	4.33	1,606.66	371.05
Cash & Bank balances/VA contribs &	0.58	0.75	0.67	2.00	663.33	331.67
Debtors & Claims	0.08			0.08	35.00	437.50
Identification, securing, insuring &	1.33	0.83		2.17	876.66	403.99
Pensions/Policies		0.08		0.08	31.67	395.88
Creditors	22.50	19.33	39.75	81.58	24,746.67	303.34
Claims/Proofs	0.08	5.08	12.67	17.83	4,500.00	252.38
Correspondence/Preparation of	22.42	14.25	27.08	63.75	20,246.67	317.59
Trading		0.75		0.75	284.99	379.99
Management of Operations		0.75		0.75	284.99	379.99
Grand Total:	57.52	28.58	61.83	147.93	47,383.65	

Notes

1 All costs are shown excluding VAT and include an element of undrawn work in progress. It should also be noted that the office holder's fees and other expenses included in his Abstract Receipts and Payments, will include irrecoverable VAT, where the insolvent was not formerly registered for VAT.

2 The number of hours shown have been rounded to two decimal places.

Disbursements

Category 1 Disbursements

These are out of pocket expenses which are directly attributable to the case. These are charged to the case and billed as funds allow.

Category 2 Disbursements

These are costs which are allocated to the case, where no direct costs are applicable. In this case, category 2 disbursements have been charged to the case as detailed in the report.

THE LIFETIME SIPP COMPANY LIMITED - IN ADMINISTRATION

Appendix D

Cumulative Time Analysis for the Period from 29 March 2018 to 15 March 2019

The Lifetime SIPP Company Limited

Summary of Fees and Expenses

From 29/03/2018 to 15/03/2019

Time Costs

The following is a summary of the time costs incurred by the Office Holder and his staff in the administration of this matter. It should be read in conjunction with the Office Holder's Report for the period referred to above.

Work Activity	Partner Hrs	Manager / Supervisor Hrs	Administrator Hrs	Other Hrs	Total Hrs	Time Costs (£)	Average Costs (£)
Administration & Planning	152.68	17.67	79.50		249.85	86,721.98	347.10
Books & Records administration	8.50	2.83			11.33	4,646.66	410.12
Case Planning/Information	62.25	0.25	0.33		62.83	26,306.67	418.70
Cashiering - set-up, maintenance &	2.58				2.58	1,085.00	420.54
Dealing with company/Debtor re	18.58	0.50	9.58		28.67	9,911.69	345.72
General Admin/Billing/Filing	0.58	1.75	40.08		42.42	8,893.31	209.65
Pensions Administration	33.83	0.58	0.83		35.25	14,598.33	414.14
Post Appointment VAT & CTax	1.27	2.33	7.25		10.85	2,883.66	265.78
Set-up Administration/IPS/Initial	3.25	0.17	2.25		5.67	1,878.33	331.28
Statutory filing with Court, Companies	12.92	3.92	4.75		21.58	7,863.33	364.38
Strategy reviews/Checklists/Diary	8.92	5.33	14.42		28.67	8,655.00	301.88
Investigations	26.33	35.25	13.33		74.92	27,121.67	362.01
Information capture/initial	4.92	3.50	0.17		8.58	3,428.34	399.57
Litigation - document review	17.50		8.08		25.58	8,966.67	350.53
Other scheduling & information	2.00	3.67			5.67	2,233.33	393.89
Retrieval, review & analysis of debtors	1.92				1.92	805.00	419.27
SIP 2 review & CDDA reporting		1.75	3.50		5.25	1,365.00	260.00
Strategy, planning, meetings and		26.33	1.58		27.92	10,323.33	369.75
Realisation of Assets	50.67	16.83	10.42		77.92	29,759.99	381.93
Cash & Bank balances/VA contribs &	1.08	1.75	3.92		6.75	1,903.31	281.97
Debtors & Claims	4.42		2.08		6.50	2,271.66	349.49
Identification, securing, insuring &	1.33	4.42			5.75	2,238.33	389.27
Pensions/Policies	33.00	0.42	0.42		33.83	14,101.67	416.84
Tangible Assets - plant, motors,	10.83		4.00		14.83	5,350.00	360.76
Intangible Assets - Goodwill,		10.25			10.25	3,895.02	380.00
Trading	25.83	4.33	3.33		33.50	13,163.31	392.93
Management of Operations	25.83	4.33	3.33		33.50	13,163.31	392.93
Creditors	50.92	88.00	180.25	21.67	340.83	93,751.76	275.07
Claims/Proofs	7.83	30.08	92.50	21.42	151.83	36,065.90	237.54
Correspondence/Preparation of	43.00	57.58	87.75	0.25	188.58	57,524.20	305.04
Secured/Finance Creditors &	0.08				0.08	35.00	437.50
Employees/ERA scheme admin		0.17			0.17	63.33	372.53
Other Distributions (inc to members)		0.17			0.17	63.33	372.53
Grand Total:	306.43	162.08	286.83	21.67	777.02	250,518.71	

Notes

1 All costs are shown excluding VAT and include an element of undrawn work in progress. It should also be noted that the office holder's fees and other expenses included in his Abstract Receipts and Payments, will include irrecoverable VAT, where the insolvent was not formerly registered for VAT.

2 The number of hours shown have been rounded to two decimal places.

Disbursements

Category 1 Disbursements

These are out of pocket expenses which are directly attributable to the case. These are charged to the case and billed as funds allow.

The Lifetime SIPP Company Limited

Summary of Fees and Expenses

From 29/03/2018 to 15/03/2019

Category 2 Disbursements

These are costs which are allocated to the case, where no direct costs are applicable. In this case, category 2 disbursements have been charged to the case as detailed in the report

THE LIFETIME SIPP COMPANY LIMITED - IN ADMINISTRATION

Appendix E

Outcome Statement as at 15 March 2019

Appendix D

Estimated Outcome Statement as at 15 March 2019

Unencumbered Assets

Cash at Bank	705,299	
Sale of Administration of SIPPs	325,000	
Data Access requests	50	
Bank Interest	651	
	-	1,031,000

Less Costs

Joint Administrators' Fees	(340,000)	
Joint Administrators' Disbursements	(2,000)	
Solicitors Fees (Foot Anstey)	(180,000)	
Miscellaneous trading costs	(5,000)	
External mailing costs	(15,000)	
SIPP Administration advisor fee	(100,000)	
Other Costs - Sundry	(10,000)	
		(652,000)

Amount available for Unsecured Creditors

379,000

THE LIFETIME SIPP COMPANY LIMITED - IN ADMINISTRATION

Appendix F

Additional Information in Relation to the Joint Administrators' Fees, Expenses & Disbursements

1 Staff Allocation and the Use of Sub-Contractors

- 1.1 The general approach to resourcing our assignments is to allocate staff with the skills and experience to meet the specific requirements of the case.
- 1.2 The constitution of the case team will usually consist of a Partner, a Manager, and an Administrator or Assistant. The exact constitution of the case team will depend on the anticipated size and complexity of the assignment and the experience requirements of the assignment.
- 1.3 On this case we are proposing to use the services of the following sub-contractors

Service(s)	Provider	Basis of fee arrangement	Cost to date
On-going support with Creditor complaints and administration services	Hartley Pensions Ltd	Monthly Charge for 9 months totalling £100,000	£100,000

2 Professional Advisors

- 2.1 On this assignment, we used the professional advisors listed below. We have also indicated alongside, the basis of our fee arrangement with them.

Name of Professional Advisor	Basis of Fee Arrangement
Foot Anstey (legal advice)	Hourly rate and disbursements
Marsh Limited (insurance)	Risk Based Premium plus time costs
Clumber Consultancy (Pension scheme advice)	Set Fee

- 2.2 Our choice was based on our perception of their experience and ability to perform this type of work, the complexity and nature of the assignment and the basis of our fee arrangement with them.

3 Joint Administrators' Expenses & Disbursements

- 3.1 The estimate of expenses (including disbursements) which were anticipated at the outset of the Administration was provided to creditors when the basis of my fees were approved, a copy of which is set out below:

Expense	Estimated cost £
<i>Solicitors' costs for dealing with the sale of the administration of SIPP, validity of appointment and various miscellaneous legal matters including regulatory advice</i>	100,000.00
<i>Statutory advertising</i>	207.00
<i>Specific penalty bond</i>	800.00
<i>External storage of company's books and records</i>	1,000.00
<i>Case related travel & subsistence</i>	1,150.00
<i>Management and Services Agreement</i>	100,000.00
Category 2 disbursements charged by the firm:	
<i>IPS Licence</i>	90.00
<i>Business mileage</i>	108.66

THE LIFETIME SIPP COMPANY LIMITED - IN ADMINISTRATION

Summary of Joint Administrators' expenses

- 3.2 Details of the expenses paid by the Joint Administrators during the Period can be found in the Receipts and Payments account at Appendix A. An outline of the total expenses paid during the Administration can be found in the Receipts and Payments account at Appendix B.
- 3.3 Below are details of any expenses or disbursements which remain unpaid at the date of this report and will be discharged in the subsequent Liquidation in due course:

	Paid in prior period £	Paid in the period covered by this report £	Incurred but not paid to date £	Total anticipated cost £
Solicitors' costs (Foot Anstey)	119,037.40	20,705.50	c8,000.00	180,000.00
Legal Disbursements (Foot Anstey)	378.84	Nil	Nil	378.84
Agents Fees (Clumber Consultancy)	300.00	Nil	Nil	300.00
Agents Fees (Ardenta Consulting)	435.00	Nil	Nil	435.00
Statutory advertising	67.00	Nil	Nil	207.00
Specific penalty bond	420.00	380.00	Nil	800.00
External storage of books & records	Nil	Nil	Nil	1,000.00
External mailing costs	7,373.77	Nil	Nil	7,373.77
Third Party telephone services	439.31	Nil	Nil	439.31
Case related travel & subsistence	877.52	Nil	Nil	877.52
SIPP Administration advisor fee	45,000.00	55,000.00	Nil	100,000.00
Computer Services	690.00	Nil	Nil	690.0
Website Maintenance	1,600.00	Nil	Nil	1,600
Insurance	Nil	1,837.50	Nil	2,500
Category 2 disbursements				
Business mileage	108.66	-	Nil	108.66
IPS Licence	Nil	Nil	90.00	90.00

- 3.4 Category 1 disbursements do not require approval by creditors. The type of disbursements that may be charged as a Category 1 disbursement to a case generally comprise of external supplies of incidental services specifically identifiable to the case, such as postage, case advertising, invoiced travel and external printing, room hire and document storage. Also chargeable, will be any properly reimbursed expenses incurred by personnel in connection with the case.
- 3.5 Category 2 disbursements do require approval from creditors. These are costs which are directly referable to the appointment in question but are not payments which are made to an independent third party and may include shared or allocated costs that can be allocated to the appointment on a proper and reasonable basis such as internal room hire, document storage or business mileage. Details of Category 2 disbursements charged by this firm (where appropriate) were provided at the time the Joint Administrators' fees were approved by creditors.

THE LIFETIME SIPP COMPANY LIMITED - IN ADMINISTRATION

4 Charge-Out Rates

- 4.1 Kingston Smith & Partners LLP's current charge-out rates effective from 1 May 2017 are detailed below. Please note this firm records its time in minimum units of 5 minutes.

General Practice Rates

	Per Hour £
Partner	420
Licensed Insolvency Practitioner	380
Senior Manager	355
Manager	330
Other Senior Professionals	
Supervisor/Assistant Manager	295
Senior Administrator	260
Administrator	200
Junior Administrator	160
Support Staff	
Experienced Cashier	280
Cashier	210
Support	130