

AM03

Notice of administrator's proposals



Companies House

For further information, please
refer to our guidance at
www.gov.uk/companieshouse

1 Company details

Company number	0	9	7	0	3	7	9	5
Company name in full	Viola Money (Europe) Limited							

→ Filling in this form

Please complete in typescript or in
bold black capitals.

2 Administrator's name

Full forename(s)	James Robert
Surname	Bennett

3 Administrator's address

Building name/number	c/o Interpath Ltd
Street	10 Fleet Place
Post town	London
County/Region	
Postcode	E C 4 M 7 Q S
Country	

4 Administrator's name ①

Full forename(s)	Edward George
Surname	Boyle

① Other administrator

Use this section to tell us about
another administrator.

5 Administrator's address ②

Building name/number	c/o Interpath Ltd
Street	10 Fleet Place
Post town	London
County/Region	
Postcode	E C 4 M 7 Q S
Country	

② Other administrator


Use this section to tell us about
another administrator.

AM03
Notice of Administrator’s Proposals

6 Statement of proposals

<input checked="" type="checkbox"/>	I attach a copy of the statement of proposals	
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7 Sign and date

Administrator's Signature	Signature ✕  ✕									
Signature date	<table><tr><td>^d 0</td><td>^d 9</td><td>^m 0</td><td>^m 2</td><td>^y 2</td><td>^y 0</td><td>^y 2</td><td>^y 2</td></tr></table>	^d 0	^d 9	^m 0	^m 2	^y 2	^y 0	^y 2	^y 2	
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AM03

Notice of Administrator's Proposals



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	Jojo Bowman
Company name	Interpath Ltd
Address	5th Floor, 130 St Vincent Street
	Glasgow
Post town	G2 5HF
County/Region	
Postcode	
Country	
DX	
Telephone	Tel +44 (0) 115 666 0266



Checklist

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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.



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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

Joint Special Administrators' proposals

Viola Money (Europe) Limited - in Special
Administration

8 February 2022

Deemed delivered: 9 February 2022

Being Alert to Scams

All customers should remain alert to the possibility of fraud. If you are cold called by someone claiming to be from Viola Money, Viola Black, Viola Business, Interpath Advisory or the FCA, please end the call and call the Joint Special Administrators on +44 (0)203 989 2733. More information about this can be found on the FCA website at <https://www.fca.org.uk/consumers/protect-yourself-scams>.

Notice to customers and creditors

This document sets out the objectives of the Special Administration and explains how the Joint Special Administrators (JSAs) propose to achieve them.

This document also details why the Company entered Special Administration, and the distribution and dividend prospects of customers and creditors.

You will find other important information in the document such as details of the first meeting of customers and creditors and the proposed basis of our remuneration.

A glossary of the abbreviations used throughout this document is attached (Appendix 6).

Answers to frequently asked questions and a glossary of insolvency terms can be found on the following website, <http://www.vmoney.ia-insolv.com>. We hope this is helpful to you.

Please also note that an important legal notice about this statement of proposals is attached (Appendix 7).

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1 Executive summary

Viola Money (Europe) Limited (in Special Administration) (company number 09703795) ("the Company"/ "VMEL") is an electronic money institution that also provided payment services.

The Joint Special Administrators ("JSAs") were approached by the FCA to consider an appointment as the FCA had serious concerns about the operation of the Company.

The FCA placed a restriction on the Company's operations on 14 December 2021.

The FCA applied to the Court for the Company to be placed in special administration and for James Bennett and Ed Boyle to be appointed as JSAs. The Court made the order (Court Reference 2021-002402) placing the Company in Special Administration on 21 December 2021 (Section 3 provides further details on the background and events leading to the Special Administration).

The Special Administration is subject to the Payment and Electronic Money Institution Insolvency Special Administration Regulations 2021 ("the Regulations"). This is the first appointment made under the Regulations that were introduced in 2021 to facilitate the handling of failed Payment and Electronic Money Institutions.

A key priority of our work is to identify and take control of both customer funds and funds belonging to VMEL held at various financial institutions. Additionally, the JSAs have collated the Company's records to perform a reconciliation of customer funds. Our work to date has identified:

Almost all customer funds that we have identified are subject to account freezing orders ("AFOs") which currently prevent them from being moved into the control of the JSAs.

The records of the Company are inaccurate and incomplete – for example, the Company does not appear to have previously performed a customer funds reconciliation and customer account balances per the Company records significantly differ to the actual balances held at financial institutions.

Our future strategy will depend on obtaining sufficient funding to complete the Special Administration. We are also considering third party funding options.

Should funding for the Special Administration be available, a key part of our future strategy will be to review transaction history to determine the correct customer account balances to adjudicate claims. Subject to the findings of our reconciliation work, we may identify claims against third parties and/or make other recoveries.

Should only limited funding be available in the Special Administration, our strategy is likely to be to move the Company into Compulsory Liquidation.

At this stage we are corresponding with various police forces and other authorities regarding the AFOs. Following our appointment, the enforcement authorities cannot, amongst other things, apply for and/or obtain a recovery order, deliver a forfeiture notice or apply for and/or obtain a forfeiture order; and/or apply for and/or obtain an extension to an existing freezing order, without permission of the Court and/or our consent. Our discussions with the NCA will be important to

determine the timing and quantum of funds which will form the customer funds pool(s).

In line with the relevant legislation, we are required to identify customer funds and they are to be distributed amongst customers only. Costs of distributing the customer funds are to be deducted from the customer funds. There are obligations on the house funds to top up the customer funds subject to there being sufficient house funds. At this point there are insufficient house funds to top up any deficiency in the customer funds (Section 4 provides further detail on our Strategy and the progress of the administration to date).

It is currently uncertain whether we will be able to make a distribution to customers, and should we be able to make a distribution it is not yet clear how long this might take. This reflects that the customer funds are largely not currently controlled by the JSAs (Section 5 – Distributions and Dividend prospects).

It is not yet clear whether there are any preferential claims to be agreed in the estate and if so whether any dividend will become available for preferential creditors such as employees. (Section 5 – Distributions and Dividend prospects).

It is highly unlikely that there will be any dividend available for unsecured creditors from the house funds (Section 5 – Distributions and Dividend prospects).

Approval of the JSAs' proposals will be sought from customers and creditors at a creditors' meeting on 25 February 2022. We would recommend that a Creditors' Committee be established as we anticipate there are likely to be matters that would benefit from the assistance of a Creditors' Committee. (Section 7 – Approval of proposals).

The JSAs intend to draw fees based on a time costs basis. However at this stage of the process it is not possible to estimate what the fees for the duration of the Special Administration will be. Accordingly we are not seeking the approval of the fees of the Special Administration at this time. (Section 8 – Joint Special Administrators' remuneration, expenses and pre-administration costs).

It is not yet clear what the planned exit route of the Special Administration will be. The options are dissolution or exit via Compulsory Liquidation. (Section 6 – Ending the Special Administration).

This document in its entirety is our statement of proposals. A summary list of the proposals is shown in Section 9 together with all relevant statutory information. Unless stated otherwise, all amounts in the proposals and appendices are stated net of VAT.

A handwritten signature in black ink, reading 'James Bennett', with a long horizontal flourish extending to the right.

James Bennett
Joint Special Administrator

Being Alert to Scams

All customers should remain alert to the possibility of fraud. If you are cold called by someone claiming to be from Viola Money, Viola Black, Viola Business, Interpath Advisory or the FCA, please end the call and call the Joint Special Administrators on +44 (0)203 989 2733. More information about this can be found on the FCA website at <https://www.fca.org.uk/consumers/protect-yourself-scams>.

2 Priority of objectives

Regulation 12 of the Regulations defines the objectives of the Special Administration.

As per regulation 12,

- Objective 1 is to ensure the return of relevant funds (i.e. customer funds) –
 - (a) As soon as reasonably practicable in accordance with the regulations, or
 - (b) Promptly, in the case of post-administration receipts.
- Objective 2 is to ensure timely engagement with payment system operators, the Payment Systems Regulator and the Authorities.
- Objective 3 is to either –
 - (a) Rescue the institution as a going concern, or
 - (b) Wind it up in the best interests of the creditors.

The JSAs are required to prioritise the order of work on each objective as they see fit in order to achieve the best result overall for customers and creditors.

The JSAs are required to set out how they have and intend to prioritise the objectives. Our priority since the commencement of the special administration has been and remains to secure and then return the relevant funds to customers as soon as reasonably practicable (Objective 1) before winding the Company up in the best interests of creditors (Objective 3). In terms of Objective 2, we have notified the Payment Systems Regulator of our appointment and we will continue to work with the FCA (and, to the extent requested, with the Payment Systems Regulator, HM Treasury and the Bank of England) to facilitate any actions they propose to take in accordance with Regulation 35 of the Regulations.

3 Background and events leading to the Special Administration

3.1 Background information

The Company was incorporated as V-Wallet (Europe) Limited on 27 July 2015 and changed its name to Viola Money (Europe) Limited on 14 May 2019. The Company was authorised as an electronic money institution by the FCA in November 2018. This authorisation meant the Company had permission to issue electronic money and provide payment services.

The Company had two main products:

- Viola Black – targeting individuals with the provision of an e-money current account and prepaid debit card. We understand the Company determined this product was not profitable and it has been closed to new customers since around October 2020.
- Viola Business – targeting SMEs with the provision of an e-money account and payment related services, offering accounts primarily in GBP and EUR and providing payments through Faster Payments, SEPA and Swift, as well as providing some FX services. The service included bulk payment services.

Customers could manage their accounts through an app and web browser. The Company did not have any direct relationships with payment system operators and instead used third party financial institutions to provide account and payment services. We are aware that the Company held safeguarding accounts with ClearBank Ltd (UK) and AH LHV Pank (Estonia) (“LHV”), as well as receiving payment and FX services through Transactive Systems UAB (Lithuania) and IFX (UK) Ltd (UK) and prepaid debit card services from VFX Financial PLC (UK).

There were 9 staff working for the Company as at the date of appointment.

The shareholders of the Company are Stephen John Davies (90.5%) and David Barclay (9.5%). David Barclay and Mary-Ann Townsend are directors of the Company and are also the persons responsible for the management of its electronic money.

3.2 Funding and financial position of the Company

As an authorised e-money institution the Company has a regulatory capital requirement of £350,000.

The Company’s financial accounts for the year ended 30 September 2018 were unaudited micro-accounts. Small company accounts were prepared and audited for the years ended 30 September 2019 and 30 September 2020. Those accounts are summarised below:

Viola Money (Europe) Limited- Income Statement		
£'000	Y/e 30/09/2020	Y/e 30/09/2019
Turnover	1,209	102
Cost of Sales	(830)	-
Gross Profit	379	102
Administrative Expenses	(220)	(102)
Profit before tax	158	-
Tax on profit	(44)	-
Profit for the financial year	115	-

Viola Money (Europe) Limited- Balance Sheet		
£'000	30/09/2020	30/09/2019
Current assets		
Debtors	3	147
Cash at bank	3,126	297
	3,129	444
Creditors		
Amounts falling due within 1 year	2,665	94
Net current assets	465	350
Total assets less current liabilities	465	350
Capital and reserves		
Share capital	350	350
Retained earnings	115	-
	465	350

The Company's accountants have confirmed that they did not keep an accounting system and understand the Company would compile its financial accounts on an annual basis. We have seen some monthly profit and loss summaries for FY21, however we have not yet obtained any underlying records to support the figures.

Companies House records show that the Company had previously issued one charge to a third party that provided certain facilities, however this charge was satisfied on 1 April 2021. No charges remain outstanding as at the date of Special Administration.

3.3 Events leading to the Special Administration

On 22 October 2021, ClearBank notified both the Company and the FCA that it had decided to terminate its agreement for the provision of banking services to the Company with immediate effect. The reasons given by ClearBank included that following a review of the Company's activity they had noted:

Unusual payment requests;

Financial crime typologies; and

An inability for the Company to adequately and effectively monitor transactions.

As a result of ClearBank's actions in terminating its services, all funds held at ClearBank by the Company were frozen by ClearBank. At this point ClearBank held £7.3m across 522 accounts, including both customer and house accounts.

On 29 October 2021, LHV gave notice to the Company that it was giving 60 days' notice that it was also terminating its agreement with the Company for the provision of banking services.

On 2 November 2021, the Regulatory Decisions Committee of the FCA ("the RDC") issued a First Supervisory Notice ("the FSN") to the Company which imposed various requirements on the Company, including not to conduct any regulated payments or electronic money activities and not to deal with its own assets, except for transactions of less than £5,000 made in the ordinary course of the business.

The Company engaged White & Case LLP to provide legal support in response to the FCA's decision and the FCA's ongoing investigations. The Company made written and oral representations seeking to suspend the effect of the FSN. On 8 November, the FCA rescinded the requirements of the FSN. The FCA continued to investigate the Company and continued to liaise with management and request various further documentation.

The Company continued to liaise with ClearBank to arrange the transfer of funds held at ClearBank. On 19 November 2021, £2.3m was transferred from ClearBank to LHV.

On 25 November 2021, LHV provided the Company with notice that it terminated the agreement to provide banking services with immediate effect and that further transactions would only be permitted for unwinding purposes. At this point, all remaining funds held by the Company at LHV appear to have been transferred to the Company's accounts at IFX and Transactive.

On or around 8 December 2021, Mr Barclay, the CEO and director of the Company, is understood to have resigned with immediate effect, although he was still reported as a director on Companies House.

On 14 December 2021, the FCA imposed requirements on the Company for a second time. Again these required the Company to cease all regulated electronic money and payment services. The FCA continued to investigate the Company and sought information from the Company and other third parties.

Interpath were approached by the FCA on 16 December 2021 to understand if individuals from Interpath would be willing to be put forward as proposed JSAs.

4 Strategy and progress of the Special Administration to date

4.1 Strategy to date

Strategy

As the JSAs had no prior involvement with the business, our key work to date has been to obtain an understanding of the business, secure the Company's assets, secure the Company's books and records and reconcile the customer funds. This has included:

Securing and protecting all Company books and records, in particular digital copies of transactional and associated data;

Liaising with financial institutions who provided customer accounts and hold customer accounts/funds in order to confirm account balances, obtain transaction history and identify whether the funds are subject to any restrictions;

Perform a reconciliation of the customer funds to the extent that the Company and third-party records allow;

Identify potential funds available to the JSAs in order to be able to fund and implement any proposed strategy;

Deal with customer and creditor queries and concerns via a dedicated mailbox (vmoney@interpathadvisory.com) and phoneline (+44 (0)203 989 2733);

Deal with staff and potential preferential and unsecured claims; and

Review regulatory requirements as per the Regulations and Rules.

It remains unclear what funding will become available for the JSAs to pursue their strategy.

4.2 Customer funds reconciliation

In accordance with Regulation 13 of the Regulations we sought to reconcile the customer funds immediately following our appointment "using the method adopted by the institution when it last carried out a reconciliation" in order to identify and settle any shortfall. However, we have not been able to identify any previous reconciliation of customer funds. Therefore in accordance with Regulation 13(4) of the Regulations we were not required to carry out an initial reconciliation immediately after our appointment.

Nonetheless we will need to reconcile the customer funds in due course in order to establish the claims of each customer. The absence of any previous reconciliation makes reconciling the customer funds challenging. In addition, we have noted large discrepancies in the Company's records and a large number of transfers and payments in

the lead up to the Special Administration which are not reflected in the Company's records.

An amount of c.£5.0m remains held at ClearBank that is subject to various AFOs obtained by HMRC, Leicestershire Police and West Midlands Police. These funds primarily appear to relate to customer funds. As a result of the AFOs, these funds cannot currently be secured or controlled by the JSAs. Equally, as a result of the moratorium applied to the Company as a result of the appointment of the JSAs, the enforcement authorities cannot, amongst other things, apply for and/or obtain a recovery order, deliver a forfeiture notice or apply for and/or obtain a forfeiture order; and/or apply for and/or obtain an extension to an existing freezing order, without permission of the Court and/or our consent. We are corresponding with the various relevant agencies but in order to be efficient and ensure a consistent approach is achieved, we have reached out to request that we are invited to a single meeting in which all the relevant agencies attend.

We are aware that in November 2021 a customer of the Company obtained a court order in Estonia for certain Company accounts held in LHV to be restricted pursuant to their customer claim being repaid in full. However LHV have confirmed the account balance is only €1k. We are liaising with the customer regarding the court order.

We are not aware of any other security interest being held by third parties in respect of customer funds.

In order to progress our reconciliation work, we anticipate the next step is to reconcile the Company's records to the account transaction histories provided by each of the relevant financial institutions.

The Company adopted the segregation method for safeguarding customer funds, with safeguarded accounts held at ClearBank and LHV. However, both ClearBank and LHV terminated the provision of services to the Company in October 2021 and November 2021 respectively, meaning the Company had no compliant operational safeguarding accounts at the date of the Special Administration.

The Regulations provide various obligations on the house fund to top up the customer fund(s) where any deficiency in the customer fund(s) exists. At this point we are yet to determine the quantum that is required to be topped up or the extent to which there are sufficient house funds available to perform any top up.

4.3 Company records

A key challenge we have encountered to date has been obtaining an understanding of the business and securing information:

Management in place at the date of our appointment appears to have a limited understanding of the business operations;

The customer transaction records held by the Company appear to be incomplete and inaccurate, with material transactions occurring in the lead up to the Special Administration that are not recorded;

We have identified no records of the Company having previously performed a customer funds reconciliation; and

The last financial accounts were for the financial year ending 30 September 2020 and are small company accounts with limited disclosures.

We have therefore liaised with various parties to gather information and develop our understanding of the business, including the financial institutions that provided banking and other payment services (being ClearBank, LHV, IFX and Transactive), the Company's legal advisers (White & Case), staff, customers, creditors, the statutory accountants, the Company's accountant and various enforcement agencies.

We have engaged forensic technology specialists to assist with the capture and interrogation of the Company's electronic records.

We are also in the process of obtaining all historical transactional data from each of ClearBank, LHV, IFX and Transactive. This consists of more than 2,000 accounts.

4.4 Asset realisations

There have been no realisations from the date of our appointment to the date of this report.

Comments on potential sources of realisations are provided below.

Freehold/Leasehold property

The Company operated from leased premises at Chesterfield, however employees had been working from home since 2020.

We have recently gained access to the premises and are undertaking an assessment of the value of the lease and any Company assets therein.

Debtors

We have established that the Company lent funds to two third parties. Analysis is ongoing to determine the details of these arrangements and whether these amounts may be recoverable.

Cash at bank/customer funds

As detailed above, c.£5.0m of cash balances have been identified at ClearBank. However these funds are all subject to AFOs and therefore at this stage cannot be secured or controlled by the JSAs. These funds primarily appear to relate to customer funds. We are liaising with the relevant third parties to consider whether the funds can be made available to the Special Administration.

Further amounts of circa £0.2m have been identified across IFX and Transactive which are being transferred to bank accounts established by the JSAs. However restrictions remain on the use of those funds.

As noted, the records of the Company appear to be inaccurate and incomplete and therefore it is uncertain whether the funds being secured relate to customer funds or Company funds. In addition, due to the termination of services by ClearBank and LHV in October 2021 and November 2021 respectively, Company and customer funds appear to have been co-mingled and transferred to alternative non-safeguarding accounts held by the Company at Transactive and IFX.

We are required by law to distribute the customer funds in a single currency and the JSAs have determined that GBP is the most appropriate currency as the majority of customer funds identified as being held by the Company as at the date of our appointment are held in GBP. To the extent there are any funds available to distribute, distributions from the house funds are legally required to be made in GBP. Therefore the JSAs intend to convert any foreign currency funds received into their control into GBP.

IP/IT platforms

We have secured the Company's IT platform and will consider whether any party may be interested in acquiring it.

Investigations

We have identified several matters that require further investigation and which may give rise to an action which could be taken against third parties to increase recoveries for customers and/or creditors.

However, prior to progressing these matters, we are likely to need to confirm that there is funding available to perform the investigation work to better understand any potential claim. Subsequently, if a claim was identified, we would also need to confirm that there is funding available to pursue the claim.

The Company had certain insurance policies in place which expired as at 30 January 2022. We have given notice to the insurer of potential claims and expect to pursue these claims in the coming weeks.

If you wish to bring to our attention any matters which you believe to be relevant, please do so by writing to Susan Casey at Interpath Advisory, 319 St Vincent Street, Glasgow G2 5AS, United Kingdom or via email to vmoney@interpathadvisory.com.

4.5 Regulatory matters

The Financial Conduct Authority

We have provided regular updates to the FCA in relation to a number of matters including customer communications and our work relating to customer funds.

We have provided the FCA with the information which it has requested relating to the Company and its customers. This is an ongoing process which we expect to continue for the duration of the Special Administration.

We will continue to co-operate with the FCA throughout the Special Administration.

The Payment Services Regulator

In line with Objective 2, we notified the Payment Services Regulator of our appointment. However we do not anticipate any ongoing interest in the case by the Payment Services Regulator as the Company was reliant on third parties for accessing the payment systems.

Financial Services Compensation Scheme

Money held with EMIs, such as the Company, is not covered by the FSCS and therefore we have not liaised with the FSCS.

Other agencies

Several agencies have flagged interest in both the Company and its customers, including obtaining AFOs in relation to a number of bank accounts. We continue to liaise with these parties to respond to their information requests and to discuss how the AFOs should be handled in the Special Administration.

5 Distribution and Dividend prospects

5.1 Financial position of the Company

The Regulations require that as we have not received a Statement of Affairs from the directors, that we provide details of the financial position of the Company at the latest practicable date which must not be earlier than the date on which the Company entered Special Administration.

As flagged, the records of the Company are incomplete and the latest financial position statement that we have found for the Company is the audited financial accounts as at 30 September 2020. We therefore provide the below based on the limited information known at this point.

Viola Money (Europe) Limited- Balance Sheet		
£'000	22/12/2021 (£m estimated)	30/09/2020 (£m audited)
Current assets		
Debtors	Unknown	0.0
Cash at bank	5.3	3.1
	Unknown	3.1
Creditors		
Amounts falling due within 1 year	30.0	2.6
Net current assets	Unknown	0.5
Total assets less current liabilities	Unknown	0.5
Capital and reserves		
Share capital	350	0.4
Retained earnings	Unknown	0.1
	Unknown	0.5

5.2 Customers

The Regulations provide that customer funds are pooled on Special Administration and are to be distributed to customers on a pari passu basis. Costs of distributing the customer funds are required to be deducted from the customer funds before being distributed. The Regulations also provide that under certain criteria, amounts may be required to be transferred from the house funds to the customer funds (to the extent there are house funds available).

The Regulations also require that customer funds that relate to the issuance of e-money should be in a separate pool to customer funds that relate to payment services unrelated to the issuance of e-money. It appears the Company may have provided both of these services to customers and therefore two separate customer pools may exist. However, as previously highlighted the Company's records are incomplete and inaccurate and do not appear to separately report these activities. Furthermore funds appear to have been co-mingled. Should we anticipate that we will be in a position to distribute funds to

customers, we will need to further consider the requirement for there to be two separate pools.

As detailed, the JSAs have not yet been able to secure any material balance of customer funds. It is therefore currently uncertain whether there will be a distribution to customers from the customer funds.

5.3 Secured creditors

We are not aware at this time of any secured claims against the Company.

5.4 Ordinary preferential creditors (employees)

Claims from employees in respect of (1) arrears of wages up to a maximum of £800 per employee, (2) unlimited accrued holiday pay and (3) certain pension benefits, rank preferentially (in advance of floating charge holders and ordinary unsecured creditors) and in priority to other preferential creditors (see 5.4 below). These claims are therefore referred to as "ordinary preferential creditors".

We are currently reviewing all staff documentation available and seeking legal advice as to whether or not the individuals working for the Company will have a claim as they were paid by a connected entity.

It is uncertain whether there will be a dividend to ordinary preferential creditors.

5.5 Secondary preferential creditors (HMRC)

Claims from HMRC in relation to PAYE and employees' National Insurance contributions ('NIC') rank preferentially, but secondary to the employee ordinary preferential creditors above. These claims are therefore referred to as "secondary preferential creditors".

The amount of secondary preferential claims is currently unknown.

Based on current estimates, it is uncertain whether there will be a dividend to secondary preferential creditors.

5.6 Unsecured creditors

Based on current estimates, it is highly unlikely that there will be a dividend to unsecured creditors.

This is primarily due to the Company being thinly capitalised with few realisable assets, as well as there likely being an obligation to top up the customer funds from the house funds as required under the Regulations. The top up obligation is payable in priority to any distribution to unsecured creditors.

Due to incomplete records being available, the JSAs are currently unable to determine the Company's net assets.

6 Ending the Special Administration

6.1 Exit route from Special Administration

We consider it prudent to retain all of the options available to us, as listed in Section 8, to bring the Special Administration to a conclusion in due course.

However, at this stage, assuming we identify sufficient funding for the Special Administration, we anticipate that the most likely exit route will be dissolution.

6.2 Discharge from liability

We will seek approval from the Court that we will be discharged from liability in respect of any action as JSAs upon the filing of our final receipts and payments account with the Registrar of Companies.

Discharge does not prevent the exercise of the Court's power in relation to misfeasance action against us.

See Section 8 for details regarding the decision by physical meeting.

7 Approval of proposals and creditors' and customers' meeting

7.1 Customers' and Creditors' meeting

Notice of a physical meeting of customers and creditors to be held at 11:00am on 25 February 2022 at Osborne Clarke, One London Wall, Barbican, London EC2Y 5EB is attached to the covering letter. We are convening this meeting in order to present our statement of proposals.

Customers or creditors who wish to attend the meeting remotely will be provided with details of how to join in advance of the meeting.

Proxy forms are available at vmoney.ia-insolv.com for your use. If you wish to vote at the meeting, please return your completed statement of claim **if not already provided** which must be received by 12 noon on 24 February 2022 in order to be counted. Any proxies that are intended to be used must be submitted to us by the date of the meeting. Please return your statement of claim and proxy to us via email at vmoney@interpathadvisory.com.

Creditors 'Committee

A Creditors' Committee will be formed if the customers and creditors decide that one should be formed, and sufficient creditors and customers are willing to act. The minimum number of Committee members is three and the maximum is five. We would expect that a Creditors' Committee consists of representatives of both customers and creditors, however we will consider the nominations at the meeting.

Function of the Creditors' Committee

The Creditors' Committee represents the interests of customers and creditors as a whole, rather than the interests of certain parties or individuals.

Its statutory function is to help us to discharge our functions as JSAs.

If a Creditors' Committee is formed it is for that body to approve, for instance:

- the basis and quantum of our remuneration;
- the allocation of costs between the customer funds pool(s) and the house funds; and
- the drawing of Category 2 expenses.

Members of the Creditors' Committee are not remunerated for their time. Other than potentially receiving travel expenses, they receive no payment from the Company.

7.2 Decisions

Customers and creditors will be asked to vote on the following proposed resolutions at the requisitioned physical meeting of creditors and customers:

Resolution 1: For the acceptance of the JSA's proposals as circulated; and

Resolution 2: For the establishment of a Creditors' Committee (if there are sufficient customers and creditors willing to act).

Resolutions 1 and 2 will be considered as two single resolutions at the combined meeting. Customers will vote separately from creditors on each of the resolutions, and the resolutions will be approved on a simple majority by the value of claims. Please note that a resolution will only be approved if each of the classes of customers and creditors have voted in favour.

If a Creditors' Committee is not formed then the proposed decisions in Section 8, which would have been considered by the Creditors' Committee, will be voted on by the customers and creditors:

Resolution 3: For the Joint Special Administrators' remuneration be drawn on the basis of time properly given by them and the various grades of their staff in accordance with the charge-out rates as set out in the statement of proposals, unless and until a Creditors' Committee determines that the basis should be changed;

Resolution 4: For the expenses for services provided by the Joint Special Administrators (defined as Category 2 expenses in SIP 9) be charged in accordance with Interpath Advisory's policy as set out in Appendix 4; and

Resolution 5: For all unpaid pre-administration costs, as set out in Appendix 3, be paid as an expense of the administration.

Please note, there will not be an opportunity to discuss your individual circumstances or holdings at the meeting and your interests will not be harmed in any way if you do not attend.

7.3 Decisions

Should you wish to vote on the resolutions, you must complete and return a Claim Form (using either the 'Claim Form – Customers' or 'Claim Form – Creditors' available to download at vmoney.ia-insolv.com) to the JSAs' office by email at vmoney@interpathadvisory.com.

Please note:

- Claim forms should be returned to the JSAs' office by email by no later than 12 noon on 24 February 2022, being the last business day before the first meeting.
- If you do not wish to attend the first meeting in person but would still like to vote on the Proposals (or if you represent a limited company or other corporation), you must complete and return a specific proxy form (using either the 'Specific Proxy – Customers' or 'Specific Proxy – Creditors' attached to the cover letter and available

to download from vmoney.ia-insolv.com) to the JSAs' office by email by no later than 12 noon on 24 February 2022.

The specific proxy form enables you to nominate a proxy to vote on your behalf at the first meeting. You may nominate the chair of the meeting (who will be one of the JSAs) or any other person who is attending the meeting. You can direct how that person votes on your behalf by providing voting instructions on the specific proxy form or, alternatively, you can allow them to vote at their discretion.

Please ensure you sign the specific proxy form and submit a claim form for your vote to be valid.

If you are signing the specific proxy form and claim form on behalf of a company, or another person, you must also provide documentary evidence to show why you have authority to sign on its/their behalf.

Creditors intending to vote by proxy in advance of the meeting should vote on all 5 resolutions.

You do not have to vote or attend at the first meeting and if you choose not to do so, that will not affect your claims in the Special Administration. Once approved, however, the Proposals are binding on all customers and Creditors; including those not present or represented at the meeting. For this reason, it is important that customers and creditors carefully consider the JSAs' Proposals and whether and, if so, how they wish to vote.

Further guidance on the conduct of the meeting and voting is set out in the 'Guide to the first meeting' available at vmoney.ia-insolv.com.

8 Joint Special Administrators' remuneration, expenses and pre-administration costs

8.1 Approval of the basis of remuneration and expenses

The basis on which the JSAs draw their fees remains uncertain. We would normally propose to draw our fees based on a time costs basis, however, at this stage of the process where the Special Administrators' strategy remains uncertain, the appropriate basis of remuneration is also uncertain.

We anticipate a Creditors' Committee shall be formed, in which case we shall liaise with the Creditors Committee to determine the appropriate basis of our remuneration.

If a Creditors' Committee is not formed, the creditors and customers represented at the meeting in person or by proxy will be asked to vote on the proposed decisions with regards to our pre-administration costs and expenses and drawing of Category 2 expenses. In due course, once our strategy for the Special Administration is better known we shall then issue a fee report and request a decision of customers and creditors to agree the basis of our remuneration.

Time costs

From the date of our appointment to 17 January 2022, we have incurred time costs of £187,457. These represent 352 hours at an average rate of £532 per hour.

Expenses

Please note that the drawing of Category 2 expenses must be approved in the same manner as the basis of our remuneration. Accordingly, no **Category 2** expenses have been paid during the period.

We have incurred Category 2 expenses of £8,400 during the period. Please see further details in Appendix 3.

Additional information

We have attached (Appendix 3) an analysis of the time spent, the charge-out rates for each grade of staff and the expenses paid directly by Interpath for the period from our appointment to 17 February 2022. We have also attached our charging and expenses recovery policy.

8.2 Pre-administration costs

The only pre-administration costs incurred have been in relation to preparing for the appointment of the JSAs. These costs reflect time spent planning for and preparing to accept this Special Administration appointment. Our time included signing a consent to act and agreement of statement of prior professional relationships, reviewing the FCA's draft witness statement in advance of the Court hearing, a briefing call with FCA and

preparation of a note of the same, liaison with our proposed lawyers from Osborne Clarke and our Forensic Technology consultants. These costs are set out in Appendix 4.

We consider that the pre-administration costs were incurred in respect of Objective 1 and Objectives 2 and 3 equally and will therefore require the approval of the creditors and customers in the event a Creditors' Committee is not formed.

9 Summary of proposals

In addition to the specific itemised proposals below, this document in its entirety constitutes our proposals.

We propose the following:

Special Administration objectives

To pursue the Special Administration objectives:

- 1) Objective 1 - to ensure the return of customer funds as soon as reasonably practicable;
- 2) Objective 2 – ensure timely engagement with the FCA, the Payment Systems Regulator and other payment bodies.
- 3) Objective 3 - to wind up the Company in the best interests of creditors.

General matters

To continue to do everything that is reasonable, and to use all our powers appropriately, in order to maximise returns to customers and creditors and the realisation from the assets of the Company in accordance with the objectives as set out above;

To investigate and, if appropriate, to pursue any claims the Company may have to the extent there is funding available in the Special Administration to perform such activities;

To identify and arrange funding to perform investigations and pursue any claims the Company may have;

To move customer funds collected on behalf of customers into bank accounts controlled by us in and to convert the funds into GBP.

Creditors' Committee

To seek the election of a Creditors' Committee, to consult with it regarding significant issues in the Special Administration and to seek resolutions from it where appropriate;

To hold regular meetings of the Creditors' Committee to discuss progress in the Special Administration and to seek fee approvals (where required).

Distributions

To make distributions to the customers from the appropriate customer pool(s) of customer funds when funds are reconciled and where funds allow;

To make distributions to the unsecured creditors from the house estate if funds become available, and to apply to the Court for authority to do so, where applicable.

Ending the Special Administration

We might use any or a combination of the following exit route strategies in order to bring the Special Administration to an end:

petition the Court for a winding-up order placing the Company into compulsory liquidation and to consider, if deemed appropriate, appointing us, James Bennett and Ed Boyle, as Joint Liquidators of the Company without further recourse to creditors or alternatively appointing the Official Receiver as the Liquidator. Any action required or authorised under any enactment to be taken by us as Joint Liquidators may be taken by us individually or together;

File notice of move from Special Administration to dissolution with the Registrar of Companies if, (a) the company no longer holds relevant funds, and (b) we consider that liquidation is not appropriate because (1) no dividend will become available to creditors, and (2) there are no other outstanding matters that require to be dealt with in liquidation. The Company will be dissolved three months after the registering of the notice with the Registrar of Companies.

Joint Special Administrators' remuneration and pre-administration costs

We propose that:

As contemplated by Rule 163(2)(b) our remuneration will be drawn on the basis of time properly given by us and the various grades of our staff in accordance with the charge-out rates included in Appendix 3, unless and until a Creditors' Committee determines that the basis should be changed. Costs and expenses of dealing with and distributing customer funds will be paid out of the customer funds;

Category 2 expenses (as defined in Statement of Insolvency Practice 9) will be charged and drawn in accordance with Interpath Advisory's policy as set out in Appendix 3;

Unpaid pre-administration costs to be an expense of the Special Administration.

Discharge from liability

We propose that we will be discharged from liability under Paragraph 98 of Schedule B1 of the Act as modified by Regulation 37 upon our appointment as JSAs ceasing to have effect at a time specified by the Court and, subject to any order to the contrary that the Court might make, immediately upon our appointment ceasing to have effect.

Appendix 1 Statutory information

Company and Trading name	Viola Money (Europe) Limited
Date of incorporation	27 July 2015
Company registration number	09703795
Previous registered office	6a Napier Court, Barlborough, Chesterfield S43 4PZ
Present registered office	10 Fleet Place, London, EC4M 7QS
Company Directors	David Barclay, who has a 9% shareholding in the Company Mary-Ann Townsend
Special Administration appointment	The Special Administration appointment granted in High Court of Justice, CR-2021-002402 of 2021
Appointor	FCA application to Court
Date of appointment	21 December 2021
Joint Special Administrators	James Bennett and Ed Boyle
Purpose of the Special Administration	To achieve the Objectives as set out in Section 12 of the Payment and Electronic Money Institution Insolvency Regulations 2021.
Functions	The functions of the Joint Special Administrators are being exercised by them individually or together in accordance with Paragraph 100(2).
Prescribed Part	The Prescribed Part is not applicable on this case as there is no floating charge, and therefore the JSAs do not propose to make an application under section 176A(5) of the Insolvency Act 1986.
Application of EU Regulation	These proceedings will be COMI proceedings as defined in the Insolvency (England and Wales) Rules 2016.

Appendix 2 Joint Special Administrators' receipts and payments account

There have been no receipts and payments to date as the JSAs have not received any cash into the Special Administration bank accounts.

Interpath has funded the payment of £4,200 to Starlink UK to assist with the provision of Company information.

Appendix 3 Joint Special Administrators' fees estimate

Basis of remuneration

The Regulations require that the JSAs are entitled to receive remuneration as follows:

- 1) To be paid out of the Company's own funds for services given:
 - a) In respect of the pursuit of Objective 2 (timely engagement with Regulators and Payment Systems) and 3 (winding up the Company); and
 - b) As a consequence of a failure by the Company to safeguard relevant funds; and
- 2) To be paid out of the customer funds for services given in respect of the pursuit of Objective 1 (return customer funds).

The basis of remuneration in both cases above must be fixed based on one or more of the following basis:

- 1) As a percentage of the value of the property which the JSAs have to deal; or
- 2) By reference to the time properly given by the JSAs and their staff; or
- 3) As a set amount.

As the strategy of the Special Administration is currently unclear, it is not possible to estimate or determine the appropriate basis for fees at this stage. Once a clear strategy can be put in place, we will issue a fee report to the Creditors' Committee for approval. Alternatively, should no Creditors' Committee be created, we shall issue a fee report to creditors and customers for approval.

Joint Special Administrators' charging policy

The time charged to the Special Administration is by reference to the time properly given by us and our staff in attending to matters arising in the Special Administration. This includes work undertaken in respect of in-house Interpath Advisory tax, VAT, data, IT, regulatory and employee specialists.

Our policy is to delegate tasks in the Special Administration to appropriate members of staff considering their level of experience and requisite specialist knowledge, supervised accordingly, so as to maximise the cost effectiveness of the work performed. Matters of particular complexity or significance requiring more exceptional responsibility are dealt with by senior staff or us.

A copy of "A Creditors' Guide to Joint Administrators Fees" from Statement of Insolvency Practice 9 ('SIP 9') produced by the Association of Business Recovery Professionals is available at: <https://www.r3.org.uk/technical-library/england-wales/technical-guidance/fees/more/29113/page/1/guide-to-administrators-fees/>

If you are unable to access this guide and would like a copy, please contact Sharon Turner on 0118 214 5935.

Hourly rates

Set out below are the relevant discounted hourly charge-out rates for the grades of our staff actually or likely to be involved on this Special Administration. Time is charged by reference to actual work carried out on the Special Administration, using a minimum time unit of six minutes.

All staff who have worked on the Special Administration, including cashiers and secretarial staff, have charged time directly to the Special Administration and are included in the analysis of time spent. The cost of staff employed in central administration functions is not charged directly to the Special Administration but is reflected in the general level of charge-out rates.

Interpath Advisory

Hourly rates (GBP)

Staff Type:	Discounted rate
Managing Director	695
Director	640
Associate Director	575
Manager	460
Assistant Manager	320
Associate	235
Support	45

* rates applicable to 31 December 2022

The charge-out rates used by us might periodically rise (for example to cover annual inflationary cost increases) over the period of the Special Administration. In our next statutory report, we will inform creditors of any material amendments to these rates.

Policy for the recovery of expenses

Where funds permit, the officeholders will seek to recover both Category 1 and Category 2 expenses from the estate. For the avoidance of doubt, such expenses are defined within SIP 9 as follows:

Expenses: These are any payments which are neither an office holder's remuneration nor a distribution to a creditor or a member. Expenses also includes disbursements which are payments first met by the office holder, and then reimbursed to the office holder from the estate.

Category 1 expenses: These are payments to persons providing the service to which the expense relates who are not an associate of the office holder. These may include, for

example, advertising, room hire, storage, postage, telephone charges, travel expenses, and equivalent costs reimbursed to the officeholder or his or her staff.

Category 2 expenses: These are payments to associates or which have an element of shared costs. They may include shared or allocated costs that can be allocated to the appointment on a proper and reasonable basis, for example, business mileage.

Associates: are defined in the insolvency legislation but also extends to parties where a reasonable and informed third party might consider there would be an association between the third party and the office holder or their firm.

Category 2 expenses charged by Interpath Restructuring include mileage. This is calculated as follows:

Mileage claims fall into three categories:

Use of privately-owned vehicle or car cash alternative – 45p per mile.

Use of company car – 60p per mile.

Use of partner's car – 60p per mile.

For all of the above car types, when carrying Interpath passengers an additional 5p per mile per passenger will also be charged where appropriate.

We have incurred the following expenses during the period 21 December 2021 to 17 January 2022:

Starlink UK	-	8,400	-	-	8,400
Total	NIL	8,400	NIL	NIL	8,400

Starlink UK provided consultancy services to aid the provision of Company information to the JSAs. As at 17 January 2022, £4,200 was paid directly to Starlink UK by Interpath and a further £4,200 had been incurred but not yet billed. None of these costs have yet been repaid by the estate.

We have the authority to pay Category 1 expenses without the need for any prior approval from the creditors of the Company.

Category 2 expenses are to be approved in the same manner as our remuneration.

Narrative of work carried out for the period 21 December 2021 to 17 January 2022

The key areas of work have been:

Statutory and compliance	<p>collating initial information to enable us to carry out our statutory duties, including customer and creditor information, details of assets, accounts and information relating to the licences;</p> <p>providing initial statutory notifications of our appointment to the Registrar of Companies, banks, EMIs, EMD agents, creditors, customers and other stakeholders, and advertising our appointment;</p> <p>issuing reactive press releases and posting information on a dedicated web page;</p> <p>arranging bonding and complying with statutory requirements;</p> <p>ensuring compliance with all statutory obligations within the relevant timescales.</p> <p>reviewing and seeking legal advice on the requirements of the Regulations, particularly as this is the first case subject to the Regulations.</p>
Strategy documents, Checklist and reviews	<p>formulating, monitoring and reviewing scenarios which impact the Special Administration strategy;</p> <p>briefing of our staff and the authorities on the Special Administration strategy and matters in relation to various work-streams;</p> <p>regular case management and reviewing of progress, including regular team update meetings and calls;</p> <p>meeting with management, former employees and stakeholders to review and update strategy and monitor progress;</p> <p>reviewing and authorising junior staff correspondence and other work;</p> <p>dealing with queries arising during the appointment;</p> <p>reviewing matters affecting the outcome of the Special Administration;</p> <p>allocating and managing staff/case resourcing and budgeting exercises and reviews;</p> <p>liaising with legal advisors regarding the various instructions, employment matters and ongoing litigation;</p> <p>complying with internal filing and information recording practices, including documenting strategy decisions.</p>
FCA liaison	<p>providing written and oral updates to representatives of the FCA regarding the progress of the Special Administration and case strategy.</p>
Cashiering	<p>setting up Special Administration bank accounts and dealing with the Company's pre-appointment accounts;</p> <p>ensuring separate Special Administration bank accounts and reconciliation processes for the various estates;</p> <p>agreeing Interpath funding for urgent consultancy work in order to obtain Company information;</p> <p>ensuring compliance with appropriate risk management procedures in respect of receipts and payments.</p>
Tax	<p>gathering initial information from the Company's records in relation to the taxation position of the Company;</p> <p>submitting relevant initial notifications to HM Revenue and Customs;</p> <p>liaising with Company accountants to confirm that the Company was not VAT registered;</p> <p>reviewing the Company's pre-appointment corporation tax position.</p>
Shareholders	<p>providing notification of our appointment.</p>
General	<p>reviewing time costs data and producing analysis of time incurred which is compliant with Statement of Insolvency Practice 9;</p> <p>Responding to information requests where legally obliged to do so.</p>
Asset realisations	<p>collating information from the Company's records regarding the assets;</p> <p>liaising with numerous banks, EMIs and EMD agents in order to locate, recover, and reconcile various estates;</p> <p>seeking legal advice in relation to certain uncollectable assets;</p> <p>seeking legal advice on overseas jurisdictions in relation to restrictions over certain funds;</p> <p>liaising with the third parties regarding debtor recoveries;</p> <p>Performing high level review of potential matters to investigate further;</p> <p>Giving notice of claims to insurer.</p>
Property matters	<p>reviewing the Company's leasehold property, including review of leases;</p> <p>performing a site visit to inspect the property and identify any Company assets and records.</p> <p>communicating with landlord regarding rent, property occupation and other issues;</p> <p>performing land registry searches.</p>

Sale of business	dealing with queries from interested parties; identifying and securing records required for any sale of IT systems discussions with Company staff to understand IT systems and potential for any sale.
Health and safety	liaising with health and safety specialists in order to manage all health and safety issues and environmental issues, including ensuring that legal and licensing obligations are complied with; liaising with the Health and Safety Executive regarding the Special Administration and ongoing health and safety compliance.
Open cover insurance	arranging ongoing insurance cover for the Company's business and assets; liaising with the post-appointment insurance brokers to provide information, assess risks and ensure appropriate cover in place; assessing the level of insurance premiums.
Employees	making the staff redundant to the extent that they were employed by the Company and dealing with queries from employees regarding various matters relating to the Special Administration and their employment; dealing with statutory employment related matters, including statutory notices to employees and making statutory submissions to the relevant government departments; holding employee briefing meetings to update employees on progress in the Special Administration and our strategy; issuing questionnaires for staff to complete and seeking legal advice to understand the employment status of the employees; dealing with issues arising from employee redundancies, including statutory notifications and liaising with the Redundancy Payments Office; ensuring security of data and assets held by employees.
Customers and claims	performing a customer funds reconciliation based on the records available. drafting and circulating our proposals; convening and preparing for the meeting of creditors and customers; creating and updating the list of customers; responding to enquiries from customers regarding the Special Administration and submission of their claims; reviewing completed forms submitted by customers, recording claim amounts and maintaining claim records.
Creditors and claims	drafting and circulating our proposals; convening and preparing for the meeting of creditors and customers; creating and updating the list of unsecured creditors; responding to enquiries from creditors regarding the Special Administration and submission of their claims; reviewing completed forms submitted by creditors, recording claim amounts and maintaining claim records.
Investigations/ Directors	reviewing Company and directorship searches and advising the directors of the effect of the Special Administration; liaising with management to request the Statement of Affairs and other Company information.

Time costs

SIP 9 Pre-Administration costs

Pre-Administration costs (18/12/2021 to 21/12/2021)						
	Hours				Time Cost (£)	Average Hourly Rate (£)
	Managing Director/ Director	Manager	Administrator	Support	Total	
Appointment documents	7.10	6.00			13.10	7,557.00
Planning for the appointment and liaison with the FCA	9.50	3.50	1.50		14.50	8,445.00
Total	16.60	9.50	1.50	0.00	27.60	16,002.00

SIP 9 –Time costs analysis

SIP 9 – Time costs analysis (21/12/2021 to 17/01/2022)							
	Hours				Time Cost (£)	Average Hourly Rate (£)	
	Managing Director/ Director	Manager	Administrator	Support			Total
Administration & planning							
Bankrupt/Director/Member							
Notification of appointment	3.70	4.00		6.60	14.30	6,320.00	441.96
Cashiering							
Customer General Cashiering		0.60			0.60	276.00	460.00
General (Cashiering)		0.80		2.60	3.40	1,264.00	371.76
General							
Books and records	17.30			2.20	19.50	12,326.00	632.10
Customer Fees & WIP		0.80			0.80	368.00	460.00
Fees and WIP		0.90		0.80	1.70	670.00	394.12
Statutory and compliance							
Appointment and related formalities	3.00	11.30			14.30	7,340.50	513.32
Appointment documents	3.50	5.00			8.50	4,732.50	556.76

SIP 9 – Time costs analysis (21/12/2021 to 17/01/2022)

	Hours				Time Cost (£)	Average Hourly Rate (£)
	Managing Director/ Director	Manager	Administrator	Support		
Checklist & reviews	10.50	11.00	3.20	24.70	13,386.50	541.96
FCA Liaison	23.00	4.20		27.20	17,570.50	645.97
Day 1 correspondence	6.00	7.00		13.00	8,695.00	668.85
Statutory receipts and payments accounts	1.30			1.30	903.50	695.00
Strategy discussions and documents		8.20	2.90	11.10	3,686.50	332.12
Tax						
Post appointment corporation tax			0.50	0.50	160.00	320.00
Creditors						
Creditors and claims						
Customer correspondence	13.60	12.70	12.30	38.60	19,032.00	493.06
Customer funds distribution	1.10			1.10	764.50	695.00
General correspondence	2.00		6.20	8.20	3,374.00	411.46
Legal claims	4.00	1.00		5.00	3,240.00	648.00
Statutory reports	0.80	1.50	0.70	3.00	1,483.50	494.50
Employees						
Correspondence	9.50	4.70	12.30	26.50	11,752.00	443.47
Pensions reviews		0.40	2.40	2.80	875.50	312.68
General analysis						
General						
Team update meetings	13.60	13.60	4.70	31.90	16,618.00	520.94
Investigation						
Directors						
Correspondence with directors	8.50		1.10	9.60	6,259.50	652.03
Directors' questionnaire / checklist		11.30		11.30	5,198.00	460.00
Investigations						
Correspondence re investigations		4.80	2.30	7.10	2,944.00	273.80
Data Preservation		2.50		2.50	1,437.50	575.00
Realisation of assets						
Asset Realisation						
Appointed rep matters	0.90	2.10		3.00	1,542.00	514.00

SIP 9 – Time costs analysis (21/12/2021 to 17/01/2022)

	Hours					Time Cost (£)	Average Hourly Rate (£)
	Managing Director/ Director	Manager	Administrator	Support	Total		
Cash and investments	12.00				12.00	8,015.50	667.96
Customer funds reconciliation	12.10				12.10	7,848.50	648.64
Insurance	9.00		4.40		13.40	7,608.00	567.76
Sale of business	0.40				0.40	278.00	695.00
Realisation of assets							
Customer bank matters	14.70				14.70	9,441.00	642.24
Trading							
Employee Matters / PAYE		1.00	6.75		7.75	2,046.25	264.03
Total in period	170.50	109.40	71.95	0.00	351.85	187,456.75	532.77
Brought forward time (appointment date to SIP 9 period start date)						0.00	0.00
SIP 9 period time (SIP 9 period start date to SIP 9 period end date)						351.85	187,456.75
Carry forward time (appointment date to SIP 9 period end date)						351.85	187,456.75

All staff who have worked on this assignment, including cashiers and secretarial staff, have charged time directly to the assignment and are included in the analysis of time spent. The cost of staff employed in central administration functions is not charged directly to the assignment but is reflected in the general level of charge out rates.

All time shown in the above analysis is charged in units of six minutes.

Appendix 4 Joint Special Administrators' expenses estimate

As the strategy of the Special Administration is unclear due to the uncertainty of whether sufficient funding exists, it is not possible to estimate all of the expenses at this stage. We will provide further updates on our expenses estimate in future reports to creditors and customers.

Summary of Expenses from appointment			
Expenses (£)	Narrative	Costs to 17 January 2022 (unpaid) (£)	Initial Total Estimates (£)
Cost of realisations			
Pre-administration: Interpath Advisory	1	16,002	16,002
Pre-administration: Legal fees & disbursements	2	9,426	9,426
Post-administration: Osborne Clarke legal fees and disbursements	3	73,000	Uncertain
Post-administration: Cobalt Legal (Estonia) legal fees and disbursements	4	3,000	6,800
Agents fees & disbursements	5	-	2,500
Forensics - Forensic Risk Alliance	6	51,000	Uncertain
Insurance	7	-	2,500
Bank charges	8	-	5,000
Storage costs	9	-	1,500
Statutory advertising	10	-	300
TOTAL			Uncertain

Note 1 – Pre-administration: Interpath Advisory

Certain work was undertaken by us prior to our appointment with a view to placing the Company into special administration. Please refer to Sections 3.3 and 8.2 above for further details. The payment of unpaid pre-administrations costs as an expense of the Special Administration is subject to the same approval as our remuneration, as outlined in Section 8 above.

Note 2 – Pre-administration: Legal fees and disbursements

Certain work was undertaken by Osborne Clarke prior to our appointment with a view to placing the Company into special administration. Please refer to Sections 3.3 and 8.2 above for further details. The payment of unpaid pre-administrations costs as an expense of the Special Administration is subject to the same approval as our remuneration, as outlined in Section 8 above.

Note 3 – Post-Administration: Osborne Clarke legal fees and disbursements

Osborne Clarke have been engaged to provide us with legal advice on various legal matters that are expected to arise throughout the course of the Special Administration including but not limited to advising on the impact of the AFOs, supporting in the review and investigation of potential claims the Company may have and advising on compliance by the JSAs when performing the Special Administration.

Note 4 – Post-Administration: Cobalt Legal legal fees and disbursements

Cobalt Legal have been engaged to advise us on legal matters that relate to the Company in Estonia, as required from time to time.

Note 5 – Agents' fees & disbursements

Our valuation agents, John Pye, have valued the office furniture and equipment at the Company's office, and the JSAs are in the process of establishing a strategy for these assets.

Note 6 – Forensic Risk Alliance

As detailed in Section 8.3, the JSAs have engaged forensic specialists to carry out the collection and interrogation of electronic books and records.

Note 7 – Insurance

Costs of open cover insurance required during the course of the Special Administration.

Note 8 – Bank charges

Charges anticipated in relation to various transactions over the course of the Special Administration.

Note 9 – Storage costs

Charges anticipated in relation to the storage of the Company's books and records.

Note 10– Statutory advertising

Charges anticipated in relation to advertising our appointment in the relevant publications, as is required under statute.

Appendix 5 Statement of Affairs, including creditor and customer list

We have written to both David Barclay and Mary-Ann Townsend as the directors of the Company as reported on Companies House to request they complete and return a Statement of Affairs.

David Barclay has advised he resigned as a director of the Company on 8 December 2021 and no longer has access to the material required to complete a Statement of Affairs in any meaningful way.

Mary Ann Townsend advised that she is not aware of the information requested within the Statement of Affairs as her role was primarily the Money Laundering Regulations Officer for the Company.

As such we have not received a Statement of Affairs to date.

In line with the requirements of the Regulations, we have provided a list of the Company's creditors and customers. Please note:

As we have not identified any accounting system being used by the Company, the list of the Company's creditors has been collated by the JSAs after making reasonable enquiries.

The list of customers is per the Company's system as at the date of our appointment. However, we are aware that the Company's records are incomplete and inaccurate therefore the customer balances may be incorrect. At this stage we have not performed sufficient work to confirm the appropriate adjustments to correct the customer balances. Further, we have received 52 customer claim forms totalling £29.2m as at 31 January 2022. We do not currently have the records available to be able to adjudicate these claims, however we note there are significant differences between some claims and the balances on the Company systems.

The Company's system did not include postal addresses for customers and as such we have identified them as unknown in each case. The business communicated with customers via email and as such the JSAs will continue to communicate in this manner.

Company Customers

#	Customer name	Postal address	Balance (£ equivalent)
1	2015 SECURITY SERVICES LTD	Unknown	17.88
2	7C Global Ltd - FX	Unknown	281,000.98
3	888 MPS Limited	Unknown	6,069.31
4	9296 1028 Quebec Limited	Unknown	0.79
5	AB GIVEAWAYS LIMITED	Unknown	70.95
6	ABD Drylining Services Ltd	Unknown	3,017.34
7	Able Limited	Unknown	488,055.27
8	AC WEB Limited	Unknown	52.55
9	Acheron Pte. Ltd	Unknown	59,460.45
10	Aeron Limited	Unknown	100.00
11	Aerontech Ltd	Unknown	1,109.55
12	AES LUX UK	Unknown	201.25
13	AFJ PMS LTD	Unknown	172.90
14	Agatan Ltd	Unknown	65,482.68
15	Alamaro Enterprises d o o	Unknown	45,257.86
16	Altera International Ltd	Unknown	23,648.28
17	Aqua Index LLC	Unknown	17,298.42
18	Ark Metals and Recycling Ltd	Unknown	68.92
19	ARTSINTHEEAST LTD	Unknown	85,716.42
20	Asher Investments Limited	Unknown	74.50
21	ASTLEY CONTRACTS LTD	Unknown	31,078.52
22	ASTONIA HOLDINGS LIMITED	Unknown	2,119.85
23	Avant Trading KFT	Unknown	0.30
24	AVENCIA DIGITAL LTD	Unknown	66,828.51
25	B Z Invest S R O	Unknown	4,020.43
26	Bakaal Worldwide Ltd	Unknown	5,644.84
27	Baltic Consulting Group Ltd	Unknown	2.34
28	Begtell Sp ZOO	Unknown	63.87
29	BENTLEY BROTHERS HAULAGE LIMITED	Unknown	0.18
30	Bespoke Home and Kitchens Limited	Unknown	15,536.18
31	Beta Synergy Ltd	Unknown	25,887.89
32	Bhur Limited	Unknown	3.20
33	BLCM Osauhing	Unknown	11.37
34	Blockfort Ltd	Unknown	4,279.57
35	Blue Dot Wealth Ltd	Unknown	972.09
36	Blue Fin Trading Enterprises Limited	Unknown	108,292.90
37	BMG Steel	Unknown	549.49
38	BOGANI and CO LIMITED	Unknown	2.00
39	Bramble International Limited	Unknown	15,293.24
40	Building Works Are Us Limited	Unknown	119,003.65
41	C&B Futures DMCC	Unknown	75.00
42	CALLKEY SYSTEMS LIMITED	Unknown	1,037,197.82

43	CANNWELL LIMITED	Unknown	5.57
44	CAPITAL MANAGEMENT GROUP LTD	Unknown	714,668.65
45	Cash To Card TCI Limited	Unknown	248,323.41
46	Cashixir Limited	Unknown	582,491.54
47	CASU PRO SERVICES LTD	Unknown	0.95
48	CCA Services UK Limited Limited	Unknown	855,734.42
49	CH Hannah Ltd	Unknown	1,478.55
50	Chipic Consultancy LTD	Unknown	18,154.79
51	Circle Global Ltd	Unknown	276.36
52	Citihex Ltd	Unknown	129.10
53	Clear Horizon Trading Limited	Unknown	222,524.31
54	CLTS Technologies Ltd	Unknown	1,848.51
55	Company Resources Ltd	Unknown	193.25
56	CONDOR CAPITAL MARKETS LTD	Unknown	11,528.87
57	Consultancy Capital Ltd	Unknown	391.56
58	Contax Limited	Unknown	359.83
59	Convex Holding Ltd	Unknown	11,821.22
60	CORAD DRYLINING SERVICE LTD	Unknown	23.42
61	Cover Appliance Limited	Unknown	1.29
62	Cover Team Direct Ltd	Unknown	3,386.82
63	CPU Electronics Trading LLc	Unknown	262.11
64	CS MANAGEMENT SERVICES LTD	Unknown	0.44
65	CTT LLC	Unknown	5,001.24
66	CUCOS PRO DEVELOPMENT LTD	Unknown	0.94
67	Currency Central Ltd	Unknown	152.50
68	D and D Venture Project Ltd	Unknown	0.83
69	Dartsoft Trading Technologies Limited	Unknown	0.25
70	Decentat Development Limited	Unknown	0.74
71	DELIGHT ALL BUSINESS LIMITED	Unknown	3,696.06
72	Digisilo Limited	Unknown	2.77
73	Digital LLC	Unknown	174.00
74	Dishford Ltd	Unknown	2,049.70
75	Disruptive Blockchain Worldwide Ltd	Unknown	593.83
76	Distride Catering International Limited	Unknown	442.24
77	DOMESTIC PROTECTION LTD	Unknown	10.00
78	Downsview Holdings Limited	Unknown	0.96
79	DP DRYWALL SERVICES Ltd	Unknown	0.85
80	Drainage Doctor Ltd	Unknown	22.52
81	DVP DRYLINING SERVICES LTD	Unknown	3,948.33
82	Dymond Ventures LLC	Unknown	1.00
83	EasyEX OU	Unknown	1,150,549.17
84	Eco Recycling Group Ltd	Unknown	20,532.39
85	ELESTA TRADE LTD	Unknown	8.49
86	EMONEY247 LIMITED	Unknown	331.21
87	Energy Capital Group	Unknown	1.60

88	Environ Trading Company sro	Unknown	35,940.39
89	EPAY247 Ltd	Unknown	2,035.03
90	ESSENTIAL GROCERIES LTD	Unknown	1,885.00
91	European Bonded Services SL	Unknown	465.00
92	Eves Advisory Ltd	Unknown	308.64
93	EXACT DATA TRADING CO LTD	Unknown	5,743.28
94	Excalibur Group Ltd	Unknown	1.37
95	Excel Tech KFT	Unknown	0.84
96	Exclusive Home Services Ltd	Unknown	56.26
97	Farkas Wholesale and Impex B V	Unknown	140,508.17
98	Feeding The World	Unknown	4.51
99	Fides Global Ltd	Unknown	20.00
100	Flamingo Law	Unknown	4.81
101	Flat Dog Limited	Unknown	317.21
102	FLOTEWORKS LIMITED Amuse Me	Unknown	17.32
103	Fom Consultants Ltd	Unknown	16,579.51
104	Fully Protected Ltd	Unknown	0.03
105	FXGlory LTD	Unknown	29,510.59
106	Galaxy Trading FZE	Unknown	11,825.40
107	Gamox Ltd	Unknown	9,966.19
108	Get Lippy Facial aesthetics	Unknown	842.85
109	GJM CLIENT LTD	Unknown	216.00
110	Global Gate Financial Services GmbH	Unknown	85.61
111	Glow Management Limited	Unknown	19.65
112	Go Green Light Limited	Unknown	111.43
113	Green Energy Links UK Ltd	Unknown	724.64
114	GREEN LEAF BATHROOMS LIMITED	Unknown	0.32
115	Green Nile Ltd	Unknown	26,189.27
116	Green Rocket Ltd	Unknown	0.24
117	Hak Vol Handels GmbH	Unknown	3,260.78
118	HCFS GLOBAL LLC	Unknown	2,979.23
119	HENCEFORTH LTD	Unknown	8,835.58
120	Herbal Brands Ltd	Unknown	8,698.97
121	Hermes of Mayfair Ltd	Unknown	26.91
122	HOME DRAINAGE PROTECTION SERVICE LTD	Unknown	2,000.88
123	HOME GUARD ONE LIMITED	Unknown	38.99
124	HOMES and BEYOND LTD	Unknown	46,439.45
125	HYPERSTAR MEDIA LTD	Unknown	0.18
126	Ibero Botanica Ltd	Unknown	2,471.06
127	IC Enterprise Ltd	Unknown	0.12
128	Ice Quotes Ltd	Unknown	0.88
129	IGT LTD	Unknown	0.52
130	IMPERIAL RECYCLING LTD	Unknown	24.88
131	Indoswed AB	Unknown	688.67
132	Inteen SP ZOO	Unknown	292.17

133	Interco Invest Group AB	Unknown	1,775.62
134	Invisible Group Limited	Unknown	6,831.00
135	iQuoto International Limited	Unknown	52,654.51
136	Iryan Solutions AB	Unknown	3,745.39
137	Isle of Man Bullion Limited	Unknown	99.50
138	ISSUANCE SCHEME LIMITED	Unknown	12.76
139	Japurk Ltd	Unknown	11.04
140	JD Wholesale Limited	Unknown	518,957.27
141	JDH SOLUTIONS AND RESOURCES LTD	Unknown	9,931.91
142	Jelson Trading Limited	Unknown	130.36
143	JM Global Logistics Ltd	Unknown	0.22
144	JNB FZ LLC	Unknown	613.95
145	Jovito Limited	Unknown	40.77
146	JUST KETTLES LIMITED	Unknown	1,366.78
147	Jutt B V B A	Unknown	192,885.85
148	Kezs bargain busters ldt	Unknown	23.50
149	Kitsilano NV	Unknown	18,660.84
150	KJS Group Ltd	Unknown	0.22
151	KK Trade Limited	Unknown	31,866.87
152	Kompass Solutions GmbH	Unknown	- 11.41
153	Lab Logistics Ltd	Unknown	1.29
154	LANGS HOLDINGS LIMITED	Unknown	50.79
155	LAPIDUS SOLUTIONS LTD	Unknown	0.80
156	Le Comptoir Des Caraibes	Unknown	322,137.09
157	Legacy 369 Limited	Unknown	25.00
158	LHL LOGISTICS LIMITED	Unknown	3,949.61
159	Liquidity Solutions Global Ltd	Unknown	2,225.48
160	Livil Limited	Unknown	136.06
161	LKH Trading Ltd	Unknown	796,103.53
162	LNG Trading Ltd	Unknown	4.12
163	LSK Marketing Limited	Unknown	1,003.59
164	Lux Electric AB	Unknown	1,366.68
165	LVV DIGITAL SERVICES LTD	Unknown	186.36
166	M and M DRYWALL SERVICES LTD	Unknown	0.90
167	M and M Investment FZE LLC	Unknown	42,297.00
168	M J Group Services A B	Unknown	34.05
169	MADELLO CAPITAL LTD	Unknown	31.73
170	MAHONEY CONTRACTS AND SERVICES LTD	Unknown	2,717.68
171	MAJARU DECORATING LTD	Unknown	64.32
172	Mandarax Europa Sro	Unknown	1.24
173	Mandarax S R O	Unknown	1.82
174	MAYAN BLOCK LTD	Unknown	577.76
175	MC Trade	Unknown	12.18
176	MEDIA CITY INTERNATIONAL LIMITED	Unknown	61,271.97
177	Menago S P Zoo	Unknown	4,121.55

178	Metagora	Unknown	23,748.31
179	MGN GLOBAL SOLUTIONS LIMITED	Unknown	1,852.50
180	Millers Music Supplies Limited	Unknown	301.33
181	Miltech Trading EOOD	Unknown	4,563.24
182	MINI TRADE LTD	Unknown	279.38
183	Misori S P Zoo	Unknown	2,090.82
184	MNR Investment Group SL	Unknown	298,281.36
185	MODUS METALS LLC	Unknown	140.00
186	Morgan Motor Oil GMBH	Unknown	0.61
187	MPL Trading SRL	Unknown	2,505.96
188	N W CATERING LTD	Unknown	4.20
189	NATIONAL WHOLESALE LTD	Unknown	10,246.00
190	Nationwide Capital Limited	Unknown	31.52
191	Nebula Engineering Ltd	Unknown	982,902.60
192	Neil Construction Ltd	Unknown	11.90
193	Ninetysix Group Limited	Unknown	4.50
194	Normask Group Ltd	Unknown	3.04
195	Northfield International Limited	Unknown	724.76
196	Notarie Entreprenad AB	Unknown	9.96
197	NOVUM ORDO LIMITED	Unknown	0.56
198	Novus Limited	Unknown	217,695.18
199	NTS GROUP LONDON LTD	Unknown	380.06
200	NTSD Management Ltd	Unknown	8.09
201	NWK Logistics Limited	Unknown	49.50
202	NWK Strength and Conditioning Ltd	Unknown	1.16
203	Olympus Developments Limited	Unknown	90.00
204	Omegapro Services Ltd	Unknown	8,454.61
205	One MD Services LTD	Unknown	0.99
206	Onyxion Development Limited	Unknown	4,014.50
207	Orangestake Ltd	Unknown	26.24
208	Otranio Ltd	Unknown	42.13
209	PAY BY SMS LIMITED	Unknown	13.06
210	PAYE Group Ltd	Unknown	1,084.67
211	Paysir Limited	Unknown	1,230.85
212	Peerow Ltd	Unknown	3.45
213	Peezie Ltd	Unknown	308.94
214	Pelayoil Espana S L	Unknown	2,949,847.97
215	People Services Solution Ltd	Unknown	521,012.85
216	Peterleefour Limited	Unknown	10.00
217	PHI Trading Limited	Unknown	170.14
218	Pink Start Limited	Unknown	23,994.72
219	Pipe Maintenance International Limited	Unknown	103.23
220	Polo Ventures Ltd	Unknown	25.11
221	Pomelo Limited	Unknown	3,105.75
222	PP MOTOR HOMES LTD	Unknown	12.08

223	PREMIUM DEALS LTD	Unknown	0.87
224	Prestige Home Services Ltd	Unknown	0.26
225	Prime Agro Ecological Technology Co Ltd	Unknown	851,175.52
226	Private Major S A	Unknown	1,223,510.38
227	Prof Organised Commodity Assets Acct Two	Unknown	1,000.00
228	Profelco Information Technologies Ltd	Unknown	4,256.04
229	Purecog Holdings Limited	Unknown	39.90
230	PXP Financial Limited	Unknown	434,504.97
231	Qualilog SRO	Unknown	349.00
232	R M I Group Limited	Unknown	15,140.12
233	Rapid Finance Limited	Unknown	90.50
234	RBA HOME CARE SOLUTIONS LTD	Unknown	0.29
235	RD AIR LTD	Unknown	0.67
236	Rebels Salon Limited	Unknown	1,306.60
237	Rectory Financial Services Limited	Unknown	3.88
238	Redberries Trading Ltd	Unknown	1,008.97
239	Replicat Hosting Ltd	Unknown	387.60
240	Rexpromost SRO	Unknown	368.87
241	Reynolds Inc Limited	Unknown	31.42
242	RHINO SHIELD LTD	Unknown	11.72
243	Rivalz Investments Ltd	Unknown	1,095.38
244	Riverstone Estates PLC	Unknown	349.76
245	RLC and Partners Limited	Unknown	77.03
246	Rosenbridge Digital Holdings Ltd	Unknown	0.87
247	Ryker Development Limited	Unknown	1,170.41
248	S E Exiopeia CY Ltd	Unknown	161.65
249	Sarissa Group Limited	Unknown	255,621.38
250	Sawell Holdings Ltd	Unknown	16.61
251	SBI SOLUTIONS LIMITED	Unknown	2.00
252	Sent Technology Limited	Unknown	0.19
253	Shuttle Developments Ltd	Unknown	68,787.80
254	SILVER BELL GROUP LTD	Unknown	3.58
255	Simple Fruit and Veg Ltd	Unknown	15.37
256	SJR IT CONSULTANTS LTD	Unknown	19,319.01
257	Slims Place Ltd	Unknown	11,137.80
258	SM MCR Enterprise Limited	Unknown	0.01
259	SMART FINTECH LIMITED	Unknown	298,843.05
260	SME B2B GROUP LTD	Unknown	5.00
261	Smith Vehicle Rental Limited	Unknown	24,591.34
262	Snowy Pay Limited	Unknown	1,153,445.50
263	Solemar Services Limited	Unknown	321.33
264	Sparkle IT Solutions Ltd	Unknown	17.74
265	Sprocess online Limited	Unknown	3.83
266	SPS CLAIMS LIMITED	Unknown	1,025.78

267	Ssozi Corp Ltd	Unknown	4.84
268	Star Freight Forwarding Ltd	Unknown	57,379.06
269	Stration Property Limited	Unknown	0.94
270	STUDIO REVOLT DOO	Unknown	610.32
271	Suga Limited	Unknown	61.50
272	Super Saver Corporation Ltd	Unknown	941.96
273	Swift Construction Services Ltd	Unknown	74.75
274	TAKE ACTION FOR YOUR HOME LTD	Unknown	0.07
275	TARA HOLDINGS LIMITED	Unknown	4,974.03
276	TeaPayment Ltd	Unknown	2,112.77
277	Tech Traders Limited	Unknown	22.24
278	Techno Elek S R O	Unknown	15.00
279	THINGAMEJIGS LLP	Unknown	0.50
280	TITANIUM FINANCIAL TECHNOLOGY	Unknown	1,021.51
281	Tonybet Osauhing	Unknown	7,171.93
282	TOP WATCH TRADING LIMITED	Unknown	500.00
283	Total Recruitment Services Ltd	Unknown	21,589.02
284	TRADE HG LTD	Unknown	121,679.00
285	TRADE LEAP LIMITED	Unknown	6,232.05
286	Trade X Uk Group Ltd	Unknown	252.38
287	Tradeco Malta Ltd	Unknown	0.27
288	Trans Oriental Trading Limited	Unknown	129,654.00
289	Transic Spolka ZOO	Unknown	9,337.94
290	Trilonde Ltd	Unknown	2,072.03
291	Triple M Trading Eood	Unknown	820.57
292	Truffles Champagne Bar Ltd	Unknown	7.80
293	UAB Morendis LT	Unknown	42.65
294	UK Appliance Cover Limited	Unknown	49.11
295	UK HOME CARE COVER LIMITED	Unknown	3,003.28
296	UK RECOVERY TEAM LTD	Unknown	1,239.97
297	UNICORN SHIPPING LIMITED	Unknown	500.00
298	United Nations Of Wine Incorporated	Unknown	1,952.89
299	UR Trade Global LLC	Unknown	35,675.78
300	VALKYRIE SECURITY HOLDINGS LTD	Unknown	1,755.00
301	Varanium PTE LTD	Unknown	900.00
302	Varanium Technologies	Unknown	84.85
303	VDF Services Limited	Unknown	34,227.50
304	VEGA CAPITAL LONDON LTD	Unknown	708,746.64
305	VELLSON SOLUTIONS LIMITED	Unknown	18.67
306	VGP SERVICES LIMITED	Unknown	50.79
307	Viaam Holdings Limited	Unknown	219.31
308	Vital Pharma Limited	Unknown	0.40
309	Von Der Heyden Group Services Limited	Unknown	1,006.13
310	Von der Heyden Yachting Limited	Unknown	1,022.90
311	VPTRADING AND WHOLESALE LTD	Unknown	13.50

312	VRS HEALTH SUPPLEMENTS LIMITED	Unknown	79.67
313	VTL UK Ltd	Unknown	3,569.72
314	VVRP Tech Limited	Unknown	311.65
315	Wallter UAB	Unknown	2,792,423.54
316	Wayfarer Enterprise Limited	Unknown	1,569,816.39
317	Webtitude Ltd	Unknown	1,190.48
318	Well Management Limited	Unknown	8.30
319	WENDAN CONSTRUCTION LTD	Unknown	0.60
320	Wesltrade Ltd	Unknown	34,952.43
321	Your Home Care Services Ltd	Unknown	0.16
322	Zayah Limited	Unknown	3,379.18
323	204 customers who are individuals		5,448,274.86
Total			29,251,565.16

Note:

Customer balances not in GBP have been converted to GBP using the Bank of England Spot Exchange Rate as at 21 December 2021.

We have not disclosed the names and addresses of those customers who are individuals in accordance with the rules.

There have been a small number of customers who have submitted a claim but whose account balance per the Company records is £nil. For completeness, these customers have been included in the list above based on the value stated in their claim form. We have not adjudicated these claims.

Company Customers

Creditor name	Postal address	Balance (£)
3CX	11 Bressenden Place, SW1E 5BY, London	0.00
4stop	Thürmchenswall 69, Köln, Germany	0.00
AWS (Amazon Web Services)	1 Principal Place, Worship Street, London, EC2A 2FA	4,312.10
Complymatic	8-10 Grosvenor Gardens, London SW1W 0DH	0.00
Datakom	4 Old Field Rd, Pencoed, Bridgend CF35 5LJ	0.00
EDF Energy	90 Whitfield Street, London, W1T 4EZ	176.74
Fernie Greaves	1 Bawtry Gate, Tinsley, Sheffield S9 1UD	68.37
Google Domains, Google Workspace	Google LLC 1600 Amphitheatre Parkway, Mountain View, CA 94043	0.00
Mailchimp	675 Ponce De Leon Ave NE, Suite 5000, Atlanta, GA 30308	95.99
Microsoft Office 365	One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland	0.00
Mosslake Limited	48 Leighton Gardens, London, NW10 3PT	3,784.85
Perception Accounting	Andrew James House, Bridge Road, Ashford, Kent TN23 1BB	0.00
Prompt Creative Consultancy Ltd	63 Bamborough Close, Southwater, West Sussex, RH13 9XG	0.00
Snipe-IT	Grokability Inc., 3960 West Point Loma Blvd, Suite H69, San Diego, CA 92110, USA	583.88
Starlink UK	18 Watersmeet, St Mary's Island, Kent, ME4 3HB	0.00
Stephen Hill Partnership Ltd	139-141 Watling St, Gillingham ME7 2YY	3,600.00
TalkTalk	PO Box 674, Salford, M5 0NJ	150.36
Team Orion Limited	Apartment 215, PLATFORM_, Crawley, RH10 1DJ	500.00
UptimeRobot	Regent House, Office 21, Bisazza Street, Sliema SLM1640, Malta	0.00
The Uzel Family Pension Scheme	Acre House, 11-15 William Road, London, NW1 3ER	3,090.00
VFX Financial	Second Floor (61-66) 65 London Wall, London, EC2M 5TU	0.00
White & Case LLP	5 Old Broad St, London, EC2N 1DW	43,855.94
Total		60,218.23

Note:

We have not been able to identify a creditor ledger in the Company's records. Instead the above list is based on our discussions with staff, a review of Company records and communications received from creditors.

Potential creditors we have identified are listed above - a balance is included only where these creditors have submitted a claim form to date.

We are not aware of any security being held by any of these creditors.

Appendix 6 Glossary

AFO	Account freezing order
ClearBank	ClearBank Limited
Company / VMEL	Viola Money (Europe) Limited- in Special Administration
Court	The High Court of Justice
Creditors' Committee	A committee of customers and creditors in accordance with the Regulations and Chapter 8 of the Payment and Electronic Money Institution Insolvency (England and Wales) Rules 2021
Customer funds/ Relevant funds/Safeguarded funds pool	Money held on behalf of customers in various financial institutions as E-money or for payment services
Customers	Users or holders (as defined in the Regulations)
E-money	Electronic Money
EMD agent	An appointed representative under the Electronic Money Directive
EMI	Electronic Money Institution
EU Regulation	Regulation (EU) 2015/848 of the European Parliament and of the Council of 20 May 2015 on insolvency proceedings as it forms part of domestic law on and after exit day
FCA	Financial Conduct Authority

FRA	Forensic Risk Alliance Limited
FSN	First Supervisory Notice
House funds/House estate/Company assets/Institution's estate	Assets owned by the Company
Joint Special Administrators/JSAs/we/our/us	James Bennett and Ed Boyle
IFX	IFX (UK) Limited
Interpath/Interpath Advisory	Interpath Limited
LHV / LHV Pank	AS LHV Pank
MLRO	Money Laundering Reporting Officer
NCA	National Crime Agency
Osborne Clarke	Osborne Clarke LLP
RDC	Regulatory Decisions Committee
Schedule B1	Schedule B1 of the Insolvency Act 1986
Transactive	Transactive Systems UAB
UK	United Kingdom

Any references in these proposals to sections, paragraphs, regulations and rules are to Sections, Paragraphs and Rules in The Payment and Electronic Money Institution Insolvency Regulations 2021 and the Payment and Electronic Money Institution Insolvency (England and Wales) Rules 2021 respectively.

Appendix 7 Notice: About this statement of proposals

This statement of proposals ('proposals') has been prepared by James Bennett and Ed Boyle, the Joint Special Administrators of Viola Money (Europe) Limited – in Special Administration (the 'Company'), solely to comply with their statutory duty under paragraph 49 of Schedule B1 to the Insolvency Act 1986 as applied and modified by the Regulations to lay before creditors and customers a statement of their proposals for achieving the purposes of the Special Administration, and for no other purpose. It is not suitable to be relied upon by any other person, or for any other purpose, or in any other context.

These proposals have not been prepared in contemplation of them being used, and are not suitable to be used, to inform any investment decision in relation to the debt of or any financial interest in the Company.

Any estimated outcomes for creditors and customers included in these proposals are illustrative only and cannot be relied upon as guidance as to the actual outcomes for creditors and customers.

Any person that chooses to rely on these proposals for any purpose or in any context other than under paragraph 49 of Schedule B1 to the Insolvency Act 1986 as applied and modified by the Regulations does so at their own risk. To the fullest extent permitted by law, the Joint Special Administrators do not assume any responsibility and will not accept any liability in respect of these proposals.

James Robert Bennett and Edward George Boyle are authorised to act as insolvency practitioners by the Institute of Chartered Accountants in England & Wales.

We are bound by the Insolvency Code of Ethics.

The Officeholders are Data Controllers of personal data as defined by the Data Protection Act 2018. Personal data will be kept secure and processed only for matters relating to the appointment. For further information, please see our Privacy policy at – www.interpathadvisory.com/privacy-insolvency.

The Joint Special Administrators act as agents for the Company and contract without personal liability. The appointments of the Joint Special Administrators are personal to them and, to the fullest extent permitted by law, Interpath Ltd does not assume any responsibility and will not accept any liability to any person in respect of these proposals or the conduct of the Special Administration.

www.interpathadvisory.com

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