

Alan Hiddleston HAJ
18/12/23

DISOBEDIENCE OF THIS ORDER IS A CONTEMPT OF COURT WHICH IF YOU ARE AN INDIVIDUAL IS PUNISHABLE BY IMPRISONMENT OR IF YOU ARE A BODY CORPORATE IS PUNISHABLE BY SEQUESTRATION OF YOUR ASSETS AND BY IMPRISONMENT OF ANY INDIVIDUAL RESPONSIBLE

IN THE CROWN COURT SITTING AT SOUTHWARK

No. of 2023

Before His Honour Judge Hiddleston sitting in Private



Dated this 18th day of December 2023

**IN THE MATTER OF (1) THE BARONESS MICHELLE GEORGINA MONE
AND (2) DOUGLAS ALAN BARROWMAN**

Defendants

AND

IN THE MATTER OF THE PROCEEDS OF CRIME ACT 2002

**RESTRAINT ORDER MADE BY CONSENT
PROHIBITING DISPOSAL OF ASSETS**

THIS ORDER IS ADDRESSED TO:

- (1) The Baroness Michelle Georgina Mone ("the First Defendant")
- (2) Douglas Alan Barrowman ("the Second Defendant")
- (3) Chester Ventures Limited (a company incorporated in the Isle of Man)
- (4) Bagshaw Limited (a company incorporated in the Isle of Man)
- (5) Breck Limited (a company incorporated in the Isle of Man)
- (6) Preaban Limited (a company incorporated in the Isle of Man)
- (7) Knox House Trustees (UK) Limited (a company incorporated in the United Kingdom)
- (8) Manalah (PTC) Limited (a company incorporated in the British Virgin Islands)
- (9) Quantum Nominees Limited (a company incorporated in the Isle of Man)

(Parties 1-2, collectively “the Defendants”)

(Parties 3-9, collectively “the Respondents”)

PENAL NOTICE

If you, the Defendants and/or any of the Respondents, disobey this Order you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized. Any other person who knows of this Order and assists in or permits a breach of this Order or otherwise frustrates its purpose may also be held to be in contempt of court and may be imprisoned, fined or have their assets seized.

Similarly, if you, the Defendants and/or any of the Respondents breach any of the undertakings given either in Paragraphs (E) or (F) of this Order or in Schedule 3 to this Order, you may be held in contempt of court and may be imprisoned, fined or have your assets seized. Any other person who knows of the undertakings given and recorded in this Order and assists in or permits a breach of any of them may also be held in contempt of court and may be imprisoned, fined or have their assets seized.

RECITALS TO THIS ORDER

UPON:

1. The application of the Crown Prosecution Service (“**CPS**”) issued on 28 April 2023 for a restraint order against Baroness Michelle Georgina Mone (“**the 1st Defendant**”) and identified others (“**the Baroness Mone Application**”);
2. The Court making an interim restraint order by consent on the Baroness Mone Application, without a hearing on 31 May 2023 (“**the IRO**”) restraining the 1st and 2nd Defendant, Knox House Trustees Limited (a company incorporated in the Isle of Man), Perree (PTC) Limited (a company incorporated in the British Virgin Islands), Bagshaw Limited (a company incorporated in the Isle of Man), Chester Ventures Limited (a company incorporated in the Isle of Man), Breck Limited (a company incorporated in the Isle of Man), Preaban Limited (a company incorporated in the Isle of Man), Rebecca

Mone, Declan Mone, Bethany Mone, Duncan Allan, Isobel Allan, Soldaldo (PTC) Limited (a company incorporated in the British Virgin Islands), Manalah (PTC) Limited (a company incorporated in the British Virgin Islands), APVCO (39) Limited (a company incorporated in the British Virgin Islands) and LM Yachts Limited (a company incorporated in the Isle of Man), from dealing with identified assets;

3. The IRO being made by the Court on the basis recorded in Recital B and Schedule A to the IRO, namely that the IRO was intended to be in force for a limited period pending negotiations by the Parties for a final restraint order (to apply to the conclusion of any criminal proceedings);
4. The application of the CPS issued on 22 June 2023 for a restraint order against Douglas Alan Barrowman (“**the 2nd Defendant**”) and others (“**the Barrowman Application**”, **and together with the Baroness Mone Application, the “Restraint Applications”**);
5. The undertakings given by Chester Ventures Limited, Quantum Directors Limited, Quantum Nominees Limited, Knox House Trustees UK Limited, Preaban Limited, Breck Limited, Bagshaw Limited, Voirrey Coole, Rebecca Duke, Huw Lloyd Jones and Arthur Lancaster to the CPS and to the Court as set out in Schedule 3 herein (which shall, for the avoidance of doubt, continue or be susceptible to discharge in accordance with their terms, and shall otherwise be unaffected by the variation or discharge of this Order);
6. The 1st and 2nd Defendants having executed the declarations of trust set out in Schedule 4 herein in respect of certain assets to which this Order applies, such declarations being intended to ensure that in the event of the conviction of one or other of the Defendants, any interest held by the Defendant who is not convicted vests in the convicted Defendant, and if both are convicted, the assets vest in the manner set out in the declarations;
7. Manalah (PTC) Limited having:
 - a. in accordance with clause 8 of the Keristal Trust deed dated 7 September 2020 having by deed executed on 6 December 2023 declared that from the date of the

deed the proper law of the Keristal Trust shall be the law of England and Wales;
and

b. in accordance with clause 8 of the Cronk Trust deed dated 7 September 2020 having by deed executed on 6 December 2023 declared that from the date of the deed the proper law of the Cronk Trust shall be the law of England and Wales;
and

c. thereafter on the 6 December 2023 resigning as trustee of the Cronk Trust and Keristal Trust, and Knox House Trustees (UK) Limited being appointed as trustee of the said trusts;

8. Manalah (PTC) Limited, as sole trustee of The Ballakew Trust, having released (i) the property known as Ballakew Estate or Ballakew Farm, Braaid Road, St Marks, Isle of Man, IM9 3AP, title no. 43-00502 from a charge registered against that property on 31 January 2017 and (ii) the 2nd Defendant from all and any liability for the loans previously secured by that charge; and

9. The Parties' intention by this Order is that it should represent a final restraint order on the Baroness Mone Application and the Barrowman Application, to apply to the conclusion of any criminal proceedings, subject to paragraphs 29 and 30 of this Order.

IMPORTANT NOTICE TO THE DEFENDANTS AND RESPONDENTS

This Order prohibits you from dealing with all or some of your assets. It is subject to the exceptions contained in the Order. You should read it carefully. You have a right to ask the Court to vary or discharge the Order.

THE CONSENT ORDER

A. This is a Restraint Order made by consent against the Baroness Michelle Georgina Mone (“the First Defendant”), Douglas Alan Barrowman (“the Second Defendant”) and others

("the Respondents") by His Honour Judge Hiddleston on the application of the Crown Prosecution Service ("the Prosecutor" or "the CPS"). The Judge read the joint Note to the Court from counsel for the CPS (Mr Talbot KC, Miss Hughes and Mr Hoyle), counsel for the Defendants (Mr Lewis KC and Ms Kapila) and the Respondents (acting through their directors) as to the agreed basis for the consent order and accepted the undertakings set out in paragraphs (E) and (F) of this Order and **Schedules 1 and 3** at the end of this Order.

- B. The Note explained to the Court: (i) that the negotiations between the parties had resulted in a formal agreement as to steps to be taken in relation to certain assets; (ii) that the IRO had been varied by agreement between the parties on 5 December 2023 to enable those steps to be taken; (iii) that the CPS was satisfied that the agreed steps had been taken; and accordingly (iv) that the Court was invited to accept certain undertakings (set out at paragraphs (E) and (F) of this Order and Schedules 1 and 3), to make a Final Restraint Order in the terms set out herein ("**the FRO**"), and to discharge the IRO .
- C. This Order was made on the papers without a hearing.
- D. This Order replaces the IRO (which Order is discharged) and finally disposes of the CPS's applications for restraint against the Defendants and the Respondents and asset disclosure orders, subject to the liberty to apply set out below. It is made expressly without prejudice to:
- (i) the CPS position in the Restraint Applications that the trust structures are ineffective, invalid and do not operate in accordance with their ostensible terms (should it be relevant to advance such arguments in the future); and
 - (ii) the ability of the CPS to seek Confiscation Orders in a higher amount than the value of the assets subject to the FRO, and (subject to the non-challenge undertaking at paragraph (E)(v) below), that of the Defendants to contest confiscation or argue that the relevant benefit should be assessed at a lesser figure in confiscation proceedings.

E. Baroness Michelle Georgina Mone and Douglas Alan Barrowman by this recital to this Order each undertake to the Court and to the CPS that:

- (i) to the best of each of their knowledge and belief, the information set out in Schedule 5 as to the ownership structure of the assets subject to this Order and the identity of the persons in such structures is accurate, as at 6 December 2023;
- (ii) any change to the identity of any natural person identified in Schedule 5 as a director or shareholder of a corporate entity will be notified to the CPS: (a) where possible, 5 working days in advance of the proposed change; and (b) in any event, within 5 working days following such change being filed with the relevant Companies Registry; and (c) that a copy of this order will be provided to any such new director appointed or any such new shareholder prior to becoming a new director and/or shareholder as the case may be;
- (iii) with the exception of changes falling within paragraph (ii), neither of them will take any step directly or indirectly to alter or change the ownership structure, trust structures, or identity of any persons therein or procure or encourage any other person to do so, without the prior written agreement of the CPS;
- (iv) to the best of each of their knowledge and belief, save insofar as previously declared, there are no third party rights, security rights or claims to the assets listed in paragraph 1 of the Order, and that no such rights will be created after the date of this Order save as permitted by the terms of the Order more generally;
- (v) each of them will not challenge, or will not procure any challenge to be made, to the efficacy or lawfulness of the steps taken after the conclusion of the IRO but prior to this Order (as referred to in paragraph (B)) which were taken as part of reaching agreement with the CPS as to the final terms of this Order;
- (vi) they will not act together with each other and/or with any other beneficiary of the Cronk or Keristal Trusts to alter the terms of the said trusts or their beneficial interests thereunder, without the prior written agreement of the CPS; and

- (vii) in the event that a legal claim is made to any of the assets listed in paragraph 1 of the Order, they will notify the CPS within 5 working days of the date on which they become aware of the claim or claims, providing at the same time details of the claim or claims.
- F. Knox House Trustees (UK) Ltd by this recital to this Order undertakes to the Court and to the CPS that it will not alter the proper law of jurisdiction clause of any trusts over the property presently held within the Cronk Trust and/or Keristal Trust of which it is trustee whether by use of an express power within the trust, declaring new trusts of the property within the trusts or otherwise.
- G. For the avoidance of doubt, the undertakings at paragraphs (E) and (F) above shall be unaffected by the variation or discharge of this Order. In the event that the Order is discharged, those undertakings shall continue until released by the Court, either by agreement with the CPS, or following an application by the Defendants. The circumstances in which the CPS will give such agreement include the following:
- (i) The National Crime Agency or CPS has given notice in writing to the Defendants that no action is to be taken against either of them in relation to any offence arising out of the investigation that led to this Order; or
 - (ii) At the final conclusion of any criminal proceedings initiated against either of the Defendants or both of them for any offence arising out of the investigation that led to this Order, neither of them has been convicted of any such offence; or
 - (iii) The CPS has given notice in writing to the Defendants that it no longer intends to make or pursue any claim in any restraint or confiscation proceedings under the Proceeds of Crime Act 2002 that the assets listed in paragraph 1 of the Order are comprised in either of their realisable property.

DISPOSAL OF OR DEALING WITH ASSETS

1. The Defendants must not in any way dispose of, deal with or diminish the value of any of the following assets or (where the assets are in England and Wales) remove them from England and Wales:
 - a. Two bank accounts held with [REDACTED] account numbers [REDACTED] the name of Lady Michelle Mone OBE.
 - b. A bank account with [REDACTED] account number [REDACTED] held in the joint names of Lady Mone and Douglas Barrowman.
 - c. Two bank accounts with [REDACTED] and [REDACTED] in the name of Douglas Barrowman.
 - d. Ten private wealth management accounts with [REDACTED], numbered [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] in the name of the Keristal Trust, or Manalah (PTC) Limited or Soldaldo (PTC) Limited in the name of the Cronk Trust. Upon written confirmation from the CPS, Goldman Sachs International shall be permitted to place these accounts into the name of Douglas Barrowman, whereupon they are to remain restrained in accordance with the terms of this Order.
 - e. The real property known as the Ballakew Estate or Ballakew Farm, Braaid Road, St Marks, Isle of Man, IM9 3AP, title no. 43-00502 registered in the sole name of Douglas Barrowman.
 - f. Any and all company shares held by either or both of them legally or beneficially in Chester Ventures Limited (an Isle of Man company) and 4 Chester Square, London, SW1W 9HH title number 397100) registered in its

name (and the proceeds of sale thereof (subject to the permission in paragraph 9 below)).

- g. Any and all company shares held by either or both of them legally or beneficially in Bagshaw Limited (an Isle of Man company) and 15 Park Circus, Glasgow, G3 6AX, title number GLA 121727 registered in its name and 19 Park Circus, Glasgow, G3 6BE, title numbers GLA237207 and GLA237208.
 - h. Any and all company shares held by either or both of them legally or beneficially in Breck Limited (an Isle of Man company) and Ground Floor Flat and Flat 1 at 6 Park Circus, Glasgow, G3 6AX, title numbers GLA210249 and GLA 210250 and 7 Park Circus, Glasgow, G3 6AX, title number GLA172922, both registered in its name.
 - i. Any and all company shares held by either or both of them legally or beneficially in Preaban Limited (an Isle of Man company) and 5 Park Circus, Glasgow, G3 6AX, title number GLA210251 and Flats 0/1, 1/1 and 2/1 at 20 Park Circus, Glasgow, G3 6BE, title numbers GLA240709, GLA240710, and GLA240711 all registered in its name.
 - j. Any and all legal and beneficial rights declared and/or conferred on them by deeds of trust entered into by them and set out in Schedule 4.
2. An updated valuation of each of the assets set out in paragraph 1 shall be provided to the CPS by the Defendants or the Respondents (as the case may be) on the anniversary each year of the valuations provided to the CPS' counsel by the Defendants' counsel by email dated 2 November 2023. The updated valuations shall be in substantially the same form as the valuations provided in that email. Within 14 days of the receipt of any such updated valuation, the CPS shall be entitled to instruct an independent valuation in respect of an asset or assets (at its own expense), and the Defendants or the Respondents (as the case may be) shall provide access to the relevant asset(s) or documents concerning the asset(s) as may be required for the independent valuer to conduct that exercise.

3. Subject to paragraph 9 herein, Chester Ventures Limited (an Isle of Man company) (i) must not in any way deal with 4 Chester Square, London, SW1W 9HH, title number 397100 registered in the name of Chester Ventures Limited and (ii) must make such payments to Coutts and Company (an unlimited company no 36695) in respect of any and all loans secured upon the said 4 Chester Square to ensure that at no time does the value of the said bank's security over 4 Chester Square exceed £5,000,000.
4. Bagshaw Limited (an Isle of Man company) must not in any way deal with:
 - a. 19 Park Circus, Glasgow, G3 6BE, title numbers GLA237207 and GLA237208 in the name of Bagshaw Limited, and
 - b. 15 Park Circus, Glasgow, G3 6AX, title number GLA121727 registered in the name of Bagshaw Limited.
5. Breck Limited (an Isle of Man company) must not in any way deal with:
 - a. Ground Floor and Flat 1 at 6 Park Circus, Glasgow, G3 6AX, respective title numbers GLA210249 and GLA 210250; and
 - b. 7 Park Circus, Glasgow, G3 6AX, title number GLA172922.
6. Preaban Limited (an Isle of Man company) must not in any way deal with:
 - a. 5 Park Circus, Glasgow, G3 6AX, title number GLA210251; and
 - b. Flats 0/1, 1/1 and 2/1 at 20 Park Circus, Glasgow, G3 6BE, respective title numbers GLA240709, GLA240710 and GLA240711.
7. Knox House Trustees (UK) Limited (a United Kingdom company) must not in any way deal with:
 - a. the shares in each of the companies at paragraphs 3-6 above;

- b. the real property at paragraphs 3-6 above;

Save that in respect of Chester Ventures Limited and 4 Chester Square, Knox House Trustees (UK) Limited shall not be prohibited from acting consistently with paragraph 9 below and the relevant undertakings regarding 4 Chester Square contained in Schedule 3.

- 8. Save as agreed in writing with the CPS or provided for by this Order, Bagshaw Limited, Preaban Limited, Breck Limited, Chester Ventures Limited, Quantum Nominees Limited and Knox House Trustees (UK) Limited shall maintain the current ownership and management and control structures in respect of the real property restrained by this Order and any entitlement, rights or interests to the proceeds of sale of any of the restrained property (whether direct or through the shares or securities of any intermediary company or entity), such structure being set out in Schedule 5 to this Order.

EXCEPTIONS TO THIS ORDER

- 9. Chester Ventures Limited may sell 4 Chester Square on the following conditions:
 - a. The proposed sale price and name and address of the proposed purchaser is notified in writing to the CPS no later than 14 days before exchange of contracts (unless any shorter time is agreed in writing by the CPS);
 - b. The sale on behalf of Chester Ventures Limited is conducted by English solicitors regulated by the Solicitors Regulatory Authority (the name and address of which is notified to the CPS forthwith upon instruction) (the “Selling Solicitors”);
 - c. The net proceeds of sale (as defined at paragraph 9d) are held by the Selling Solicitors to the Order of this Court or as otherwise agreed with the CPS;

- d. The “net proceeds of sale” are the funds remaining from the gross sum obtained from the buyer of 4 Chester Square, after (i) payment of a sum not exceeding £5,000,000 to discharge the mortgage from Coutts and Company (an unlimited company no 36695); (ii) payment of a sum to Orillia Developments Limited (such sum to be agreed with the CPS in advance in writing); and (iii) payment of any costs of sale (including, but not limited to, conveyancing costs, estate agents’ fees, search fees and charges) in relation to which the CPS has given prior consent in writing;
- e. The Selling Solicitors undertake to the Court and to the CPS to hold the said net proceeds of sale to the Order of this Court (or as agreed with the CPS) in an interest bearing bank account in the United Kingdom.

Tenancies and Rental Income

10. Bagshaw Limited, Preaban Limited and Breck Limited may create tenancies in respect of 5 Park Circus, Glasgow, G3 6AX (title number GLA210251), Ground Floor and Flat 1 at 6 Park Circus, Glasgow, G3 6AX (respective title numbers GLA210249, and GLA210250), 7 Park Circus, Glasgow, G3 6AX (title number GLA172922), 15 Park Circus, Glasgow, G3 6AX (title number GLA121727), 19 Park Circus, Glasgow, G3 6BE (title numbers GLA237207 and GLA237208) and Flats 0/1, 1/1 and 2/1 at 20 Park Circus, Glasgow, G3 6BE (respective title numbers GLA240709, GLA240710 and GLA 240711) provided that the term of any tenancy does not exceed 12 months.
11. For the avoidance of doubt, the prohibition in paragraphs 4-7 above on dealing with 5 Park Circus, Glasgow, G3 6AX (title number GLA210251), Ground Floor and Flat 1 at 6 Park Circus, Glasgow, G3 6AX (respective title numbers GLA210249 and GLA 210250, 7 Park Circus, Glasgow, G3 6AX (title number GLA172922), 15 Park Circus, Glasgow, G3 6AX (title number GLA121727), 19 Park Circus, Glasgow, G3 6BE (title numbers GLA237207 and GLA237208) and Flats 0/1, 1/1 and 2/1 at 20 Park Circus, Glasgow, G3 6BE (respective title numbers GLA 240709, GLA240710 and GLA240711) apply to the real property only. Any rental income from these properties is

not restrained and there is no restriction on the use to which this income may be put. Further, the properties may be managed and maintained in the ordinary course of business without requiring any variation of this Order.

Power to vary this Order by agreement

12. The Defendants and any of the Respondents may agree with the Prosecutor that this Order be varied but any such agreement must be in writing.

PROSECUTOR'S REPORTING REQUIREMENT

13. The Prosecutor must report on the progress of the investigation every 3 months by way of a further statement to be served on the court and on the Defendants. This reporting requirement shall cease if and when proceedings are started against either Defendant for any offence arising out of the investigation.

COSTS

14. The parties are to bear their own costs of these proceedings up to the date of this Order.

INTERPRETATION OF THIS ORDER

15. A person who is an individual who is ordered not to do something must not do it themselves or in any other way. They must not do it through others acting on their behalf or on their instructions or with their encouragement.
16. A person which is not an individual which is ordered not to do something must not do it itself or by its directors, officers, partners, employees or agents or in any other way.
17. Reference to the "First Defendant" or the "1st Defendant" means The Baroness Michelle Georgina Mone (and any other name used by her).

18. Reference to the “Second Defendant” or the “2nd Defendant” means Douglas Alan Barrowman (and any other name used by him).
19. Reference to the “Defendants” means both The Baroness Michelle Mone and Douglas Alan Barrowman.
20. Reference to the “Respondents” mean those persons numbered (3) to (9) on page 1 of this Order.

SERVICE OF THIS ORDER

21. The CPS has permission to serve this Order (and any other document in these restraint proceedings) on the Defendants and the Respondents outside the jurisdiction pursuant to r.33.10(1) of the Criminal Procedure Rules. Pursuant to r.4.8 of the Criminal Procedure Rules, such service may be effected by email, service shall be effective as of the date and time of transmission of the email:

- a. The Defendants: [REDACTED]
- b. Chester Ventures Limited: [REDACTED]
- c. Bagshaw Limited: [REDACTED]
- d. Breck Limited: [REDACTED]
- e. Preaban Limited: [REDACTED]
- f. Knox House Trustees (UK) Limited: [REDACTED]
- g. Manalah (PTC) Limited: [REDACTED]
- h. Quantum Directors Limited: [REDACTED]

- i. Quantum Nominees Limited: [REDACTED]
- j. Voirrey Coole: [REDACTED]
- k. Timothy Eve: [REDACTED]
- l. Rebecca Duke: [REDACTED]
- m. Huw Lloyd Jones: [REDACTED]
- n. Arthur Lancaster: [REDACTED]

PARTIES OTHER THAN THE DEFENDANTS AND ANY OTHER PERSON TO WHOM THIS ORDER IS ADDRESSED

Effect of this Order

- 22. It is a contempt of court for any person notified of this Order knowingly to assist in or permit a breach of this Order. Any person doing so may be sent to prison, fined, or have their assets seized. They are also at risk of prosecution for a money-laundering offence.

Set off by banks

- 23. This Order does not prevent any bank from exercising any right of set off it may have in respect of any facility which it gave to either or both the Defendants before it was notified of the Order.

Existing charges

- 24. This Order does not prevent any financial institution or other charge holder from enforcing or taking any other steps to enforce an existing charge it has in respect of a property or properties so secured, providing that the said financial institution gives

written notice to the Defendants, the CPS and any other affected third party no later than 21 days before any such application is made. If any evidence is to be relied upon in support of any such application, the substance of it must be communicated to the CPS in advance.

Enforcement in Scotland and Northern Ireland

25. This Order has effect in Scotland and in Northern Ireland and may be enforced there if it is registered under the Proceeds of Crime Act 2002 (Enforcement in Different Parts of the United Kingdom) Order 2002.

Persons outside the United Kingdom

26. The terms of this Order do not affect or concern anyone outside the jurisdiction of this court, Scotland or Northern Ireland SAVE:
- a. The Defendants and any of the Respondents, or the officer or agent appointed by power of attorney of such a person;
 - b. any person who—
 - i. is subject to the jurisdiction of this court, Scotland or Northern Ireland,
 - ii. has been given written notice of this Order at their residence or place of business within the jurisdiction of this court, Scotland or Northern Ireland, and
 - iii. is able to prevent acts or omissions outside the jurisdiction of this court, Scotland or Northern Ireland which constitute or assist in a breach of the terms of this Order; and
 - c. any other person only to the extent that this Order is declared enforceable by or is enforced by a court in that country or state.

Assets located outside England and Wales, Scotland and Northern Ireland

27. Nothing in this Order shall, in respect of assets located outside England and Wales, Scotland and Northern Ireland, prevent any person other than the Defendants and Respondents from complying with–
- a. what it reasonably believes to be its obligations, contractual or otherwise, under the laws and obligations of the country or state in which those assets are located or under the proper law of any contract to which it is a party; and
 - b. any orders of the courts of that country or state, provided that reasonable notice of any application for such an order is given to the Prosecutor.

DISCHARGE OF ORDER / APPLICATION TO VARY

28. The order made by this Court by consent on the 31st May 2023 is discharged.
29. The Parties have liberty to apply:
- a. to give effect to the terms of this Order or to police (non) compliance with the same; and
 - b. in the event that there is a material change to the total value of the assets listed in paragraph 1 (or their replacements or realised value), as calculated by reference to the annual revaluation exercise set out above and having regard to section 69 of POCA 2002, specifically:
 - i. if the total asset value falls below £65m, the CPS can apply for the Defendants to bring additional assets within the scope of this Order, so as to bring the total asset value to a sum no less than £75m; and

- ii. if the total asset value increases beyond £85m, the Defendants can apply to release assets from the scope of this Order, provided that the total asset value of the remaining assets is a sum no less than £75m.

For the avoidance of doubt, any change to the total value of the assets that does not fall within sub-paragraphs (i) or (ii) above is not a “material change” for the purposes of paragraph 29(b), and does not give either Party liberty to apply.

30. Nothing in this Order, or the basis upon which it is made, prevents or inhibits the CPS from:
 - a. In the event of a prosecution, putting the case against any criminal defendant in any way appropriate;
 - b. In the event of a conviction, making such application for any confiscation order against any person on any basis appropriate, and making such application to this Court for a variation of this Order accordingly;
 - c. Following any determination in any confiscation proceedings, making such application to this Court for a variation of this Order as is appropriate by reference to any finding by the Court in such confiscation proceedings.

COMMUNICATIONS WITH THE COURT AND PROSECUTOR

All communications to the court about this Order should be sent to Southwark Crown Court, 1 English Grounds (off Battlebridge Lane), Southwark, SE1 2HU, quoting the Defendants’ names and the case number. The office is open between 9am and 5pm Monday to Friday. The telephone number is 020 7522 7200.

All communications to the Prosecutor about this Order should be sent to CPS Proceeds of Crime, Crown Prosecution Service, 102 Petty France, Westminster, London, SW1H 9EA, or by email to CPSPOC@cps.gov.uk, quoting the Defendants' names and the reference set out below. The office is open between 9 a.m. and 5 p.m. Monday to Friday. The telephone number is 0113 341 4855.

Prosecutor's reference: URN 87010240721C

SCHEDULE 1

UNDERTAKINGS GIVEN TO THE COURT BY THE PROSECUTOR

1. The Prosecutor will serve a copy of this Order upon the Defendants and the Respondents.
2. Anyone notified of this Order will be given a copy of it save for Schedules 2 to 5 inclusive by the Prosecutor.
3. The Prosecutor will pay the reasonable costs of anyone other than the Defendants and Respondents which are incurred as a result of this Order including the costs of finding out whether that person holds any of the Defendants' assets, save that the Prosecutor will not without an order of the court be obliged to pay any legal or accountancy costs so incurred unless the Prosecutor first gives its consent in writing.

SCHEDULE 2
INDEMNITY GIVEN BY DOUGLAS ALAN BARROWMAN TO (1) MANALAH
(PTC) LIMITED; (2) KNOX HOUSE TRUSTEES (UK) LIMITED

SCHEDULE 3

UNDERTAKINGS GIVEN TO THE CPS AND THE COURT BY:

**(1) CHESTER VENTURES LIMITED, QUANTUM DIRECTORS LIMITED,
QUANTUM NOMINEES LIMITED, VOIRREY COOLE, REBECCA DUKE, HUW
LLOYD JONES, KNOX HOUSE TRUSTEES (UK) LIMITED AND ARTHUR
LANCASTER**

**(2) PREABAN LIMITED, BRECK LIMITED, BAGSHAW LIMITED, QUANTUM
DIRECTORS LIMITED, VOIRREY COOLE, REBECCA DUKE, HUW LLOYD
JONES, KNOX HOUSE TRUSTEES (UK) LIMITED AND ARTHUR LANCASTER**

SCHEDULE 4
DECLARATIONS OF TRUST MADE BY THE DEFENDANTS

SCHEDULE 5
OWNERSHIP, MANAGEMENT AND CONTROL STRUCTURES RELATING TO
THE PROPERTY TO WHICH THIS RESTRAINT ORDER APPLIES