

Office of the Arbiter for Financial Services
First Floor
St Calcedonius Square
Floriana
FRN1530
Malta

Re: Justin Harris, Director, Chase Belgrave, Dreikonigstrasse 31a, Zurich 8002, Switzerland.

I am writing to The Office of the Arbiter for Financial Services as you regulate operations in Malta, which is where my pension is held through an investment with Justin Harris and Chase Belgrave, using the services of STM Malta and Royal London 360.

After exhausting the complaint process with STM Malta they directed me to you. I enclose my complaint dealing the process and, specifically, the application form detailing with STM Malta the risk profile.

The investments taken were outside of this profile and STM Malta do not feel they have any responsibility. I enclose their final letter as well as confirmation of the 25 euro fee paid.

Referencing your organization was designed to give us confidence in our decision. We do not feel that confidence was well placed and ask you to investigate how you allow Mr Justin Harris to be connected to your organization. Further all of the regulatory organisations have also been contacted in this matter as well as various newspapers

In 2014 we sought to transfer our UK Company Pensions Schemes to a QROPS regulated scheme based upon the advice of Mr Justin Harris of Chase Belgrave. Based upon this event and his subsequent advice we wish to raise a complaint and request sanctions placed against Mr Justin Harris and Chase Belgrave.

On March 16th 2014 Mr Justin Harris sent a spreadsheet ([Appendix 1](#)) stating that :

“ looking back on the GAM returns vs the Chase Belgrave portfolio returns, there's a stark difference. The GAM portfolio is unlikely to even reach 7% per year”

The spreadsheet clearly shows growth figures of between 7% and 9%.

On March 20th 2014 Mr Justin Harris wrote:

“All the investments have risk of default on capital and income like any investment including stocks and bonds. We consider the risk of the investments chosen to be medium/low”

On March 25th 2014 we completed a Financial Risk profile ([Appendix 2](#)). The question reads
What is your attitude to Financial Risk.

We replied as follows:

Cautious (accepting lower growth and income to protect capital).

Of the 3 risk options this is the lowest risk option available.

On July 2nd 2014, Justin Harris submitted his pension recommendations which were classed as a risk profile of 4 out of 10. In comparison a mutual fund of 50 blue chip equities would be a 5 out of 10 and debentures of those same 50 blue chip companies would be 3 out of 10 (Appendix 3).

Based upon this it was felt Mr Justin Harris fully understood our aversion to risk and our cautious approach. His predicted target for growth was again quoted at 9%.

On July 3rd 2014 we raised queries regarding the investment approach and stressing how important it was to not lose this money as “this is the only money we have in the world”.

Mr Justin Harris again assured us he was on top of this.

After the investment went live it immediately went backwards. We queried this several times with exactly the same response.

“There's no action I'd recommend taking on your portfolios”

In June 15th 2017 we were advised that one of Mr Justin Harris's recommendations had lost 90% of its investment. When this was questioned the response was.

“clearly very disappointing however it's one investment within the portfolio, the portfolio is down 30% having recovered about +8% since the start of the year. We expect the remainder of the 30% gap to be fully closed by the end of the year.”

After a full and frank conversation with Mr Justin Harris on June 16th 2017 he sent an e mail stating the following:

“If, under my advice, your portfolio doesn't increase by that 7% between now and the end of the year (around 6 months), I will resign as your IFA and pay you £15000. That is my confidence. “

Come the end of the year the fund had actually decreased below the figure in June and continued to drop. When we tried to contact Mr Justin Harris it became very difficult to contact him and as a result he did not officially resign until February 2nd 2018, by which time the fund had continued to drop further.

His resignation was conditional on signing a non disclosure clause (Appendix 3). We had no choice but to sign it. Mr Justin Harris made no mention of this condition of resigning in June 2017 but held us to ransom.

Despite his promise of June 17th Mr Justin Harris did not honor his agreement until over a month later.

The fund has continued to fall and as Mr Justin Harris did not structure the plan correctly STM Malta are forced to sell parts of the fund to fund fees.

This is an accurate timeline of the events which now lead us to today.

At present the fund is down over 33% and based upon this I ask the following questions:

Mr Justin Harris is a Regulated Advisor and connected to your company in some way, shape or form, such is why I am sending this to you.

- 1) How can Mr Justin Harris quote figures of 9% based upon a cautious outlook and manage to lose 33% in less than 4 years. Would it be fair to assume he invested in products that are clearly outside the cautious risk profile clearly stated on the paperwork
- 2) How can Mr Justin Harris be supported by your organization based upon such behavior
- 3) How can Mr Justin Harris refuse to resign as an IFA, despite the investments being placed in instruments which exceed the risk profile by some margin.
- 4) How can Mr Justin Harris only resign on condition we sign a non disclosure agreement

Based upon the above I ask that you investigate Mr Justin Harris to explore the questions I have raised.

I do not feel these are the actions of a professional and competent advisor and feel that an investigation be carried out on Mr Justin Harris's actions as well as any sanctions that can be taken against him.

I await your reply