

FINAL NOTICE DATED 26 OCTOBER 2006

**ORIENTAL AND AFRICAN STRATEGIC ADVISORY SERVICES LTD ("OASAS")
AND MR JOHN WILLOUGHBY GILES CATCHPOLE ("MR CATCHPOLE")**

SUMMARY OF THE MATTER TO WHICH THE NOTICE RELATES

Date of issue: 26 October 2006

On 26 October 2006, the FSA decided to refuse an application made by Oriental and African Strategic Advisory Services Ltd ("OASAS") for approval of Mr John Willoughby Giles Catchpole ("Mr Catchpole") to perform the controlled functions of CF1 (Director), CF8 (Apportionment & Oversight) and CF26 (Customer Trading).

Mr Catchpole was one of two directors and one of two shareholders of a firm which was previously regulated by the FSA called Oriental & African Strategic Investment Services Ltd ("OASIS"). Prior to OASIS's regulation by the FSA, the SFA regulated OASIS from 1994.

On 14 April 2000 OASIS was issued with a Warning from SFA for a breach of SFA's Principle 9 (Internal Organisation) because of OASIS's inability to ensure that its business was carried on with regulatory requirements at all times and in particular, for it not having appropriate and effective compliance procedures which had resulted in unauthorised regulated activities being carried on. Mr Catchpole did not disclose this SFA warning when OASAS applied for his approval.

From March 2001 until April 2003, OASIS failed to pay its regulatory fee invoices, late regulatory return fees and late regulatory reporting fines. Payment was not made until 15 months after the FSA had obtained a County Court judgment in its favour and a month after a Decision Notice had been issued revoking OASIS' Part IV permission.

In March 2003 OASIS' Part IV permission was revoked for its failure to demonstrate that it had adequate financial resources despite repeated opportunities to do so. In November 2001 a FSA supervisory visit had found that OASIS's financial position was precarious and its financial records could not be relied upon. This discovery resulted in a protracted chain of correspondence between the FSA and Mr Catchpole on behalf of OASIS. The FSA repeatedly asked for information and evidence of OASIS's financial position. Mr Catchpole repeatedly failed to provide this information and attributed OASIS's financial weakness to outstanding debtors without being able to evidence the validity or recoverability of these debts.

The FSA's decision to revoke its Part IV permission was referred to the Financial Services and Markets Act Tribunal but OASIS had to withdraw its referral when it realised that it still could not demonstrate the adequacy of its financial resources.

Following the revocation of its Part IV permission, OASIS failed to pay its outstanding periodic fees until 17 months after the invoice was issued.

The FSA considers that the matters set out above demonstrate that Mr Catchpole has:

- (a) contravened the requirements and standards of the regulatory system in not ensuring that his firm: had adequate financial resources; paid its regulatory fees and fines on time and in full; and was open and co-operative with its regulator (FIT2.1.3G(5));
- (b) been a director of OASIS when its permission was cancelled (FIT2.1.3G(7));
- (c) been a director of OASIS when it received a SFA Warning for inadequate compliance procedures (FIT 2.1.3G(10))
- (d) failed to disclose the SFA Warning to the FSA and in his previous repeated failures to respond in a timely and satisfactory way in correspondence with the FSA he has not demonstrated a readiness and willingness to comply with the requirements and standards of the regulatory system (FIT 2.1.3G(13)); and
- (e) in his relationships with the FSA, he has not demonstrated an adequate understanding of what is required to perform governing and required functions as is evidenced by the cancellation of OASIS' Part IV permission; and the failure to pay regulatory fees and fines in full and on time (FIT2.2.1G(2)).

Mr Catchpole did not refer the matter to the independent Financial Services and Markets Tribunal.