

# Summary of investigation

November 2023 – February 2024

## Organisation or person investigated

Brooks Newmark & Co Ltd

## Matter(s) investigated

Whether Brooks Newmark or Brooks Newmark & Co Ltd (“Mr Newmark”) conducted unregistered consultant lobbying.

## Registrar’s decision

Based on third-party assurances provided, Mr Newmark has not conducted unregistered consultant lobbying in relation to the matter under investigation, whether as an individual or through a company.

## Summary of rationale for decision

Third-party assurances were provided that neither Mr Newmark nor Brooks Newmark & Co Ltd are or were registered for VAT.

Under the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014, registration under the Value Added Tax Act 1994 is one of three conditions that define consultant lobbying.

## Chronology

Date	Action
15 Nov 2023	Formal letter from the Registrar to Mr Newmark giving background on the requirement for registering and asking if his or his company’s activities fall within the criteria to be registered with particular reference to, but not limited to, communications with the Secretary of State for Health and Social Care on behalf of Worldlink Resources.
5 Dec 2023	Further letter from the Registrar, following no response from Brooks Newmark & Co Ltd.

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12 Dec 2023	Response from Carter-Ruck, Mr Newmark's representative, explaining that neither Mr Newmark nor his business are or were VAT-registered.
15 Dec 2023	Letter from the Registrar with a further query regarding payments.
15 Jan 2024	Letter from Carter-Ruck providing further background.
17 Jan 2024	Letter from the Registrar with a further query regarding VAT registration.
1 Feb 2024	Further letter from the Registrar, following no response.
1 Feb 2024	Letter from Shipleys, chartered accountants, via Carter-Ruck, explaining that payments made to Brooks Newmark & Co Ltd from an overseas company did not trigger a requirement for UK VAT registration.
8 Feb 2024	Letter from the Registrar concluding his investigation.

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Office of the Registrar of Consultant Lobbyists

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