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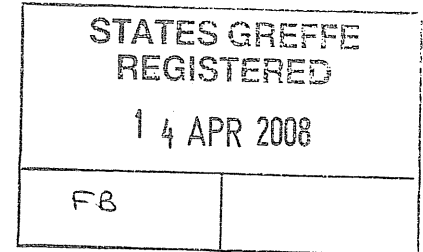
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11th April 2008

Deputy P D J Ryan
Chairman
Corporate Services Panel
Scrutiny Office
States Greffe
Morier House
St Helier
JE11DD



Our Ref: RT/cw

Dear Deputy Ryan

RE: PROPOSED STAMP DUTY ON SHARE TRANSFER TRANSACTIONS

Further to your recent letter with regard to the above proposition, I would like to make the following comments:

- 1/ Has the Deputy of St Martin any idea of projected income from this tax and if so what the figures are?
- 2/ How did he get this information, as no contact was made with my office with regard to the number or scale of transactions?
- 3/ Has he considered the implications of imposing stamp duty on commercial share transfer transactions and the effect on the investment market?
- 4/ Has he undertaken any feasibility study whatsoever?

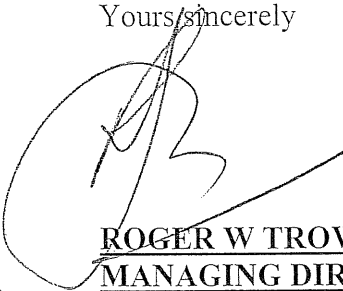
To attempt to impose stamp duty on commercial transactions is a non-starter. Potential investors will either find other ways of purchasing investment property or go elsewhere.

Residential share transfer transactions are usually apartments where historically the only way to sell was by share transfer because the 'States' failed to provide a flying freehold law for many years. The majority of share transfer transactions are for apartments at the lower end of the property market and usually purchased by

youngsters entering the property market for the first time or by elderly people looking to retire and 'scale -down'. Both of these groups find the non-imposition of stamp duty to be of great benefit as neither of them can afford to be profligate with their money. It is obvious, therefore, where this proposed new tax will have the most effect. What a 'caring' government we have. The 'double whammy' is then to see that the tax only applies to purchasers who have the right to occupy. This then will exempt non-Jersey investors to the detriment of locals. Hardly the way for a modern caring government to deal with their young people who are the 'future' of the Island.

The draft law is ill conceived, morally inept and should be rejected.

Yours sincerely

A handwritten signature in black ink, appearing to be 'R. W. Trower', written over a large, light-colored circular scribble or stamp.

ROGER W TROWER F.N.A.E.A. F.I.C.B.A.
MANAGING DIRECTOR