

Somerford Grove Renters
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8 November 2024
By web form with email copies to our MPs

Compliance and Targeting
Investigations and Enforcement Services
Insolvency Service
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Background

We are members of a tenants association, which has been involved in bringing tribunal claims against various companies in the 'Yianis' Group, all of which are beneficially owned by Monaco-based British billionaire property developer and landlord John Christodoulou. The tribunal claims, some of which are ongoing, all relate to the failure of specific landlord companies to obtain licences in order to let properties as 'houses in multiple occupation' (HMO licences). Failure to obtain such licences, where required, is a criminal offence under UK housing law, which also entitles tenants to apply to a tribunal for a rent repayment order (RRO) under the Housing and Planning Act 2016 ch 4.

Somerford Grove Renters helped tenants file a total of 21 claims for RROs with the First Tier Tribunal. One case against Simpson House 3 Ltd was ultimately awarded £24,060 by the Upper Tribunal in 2022, but to date has not been paid despite multiple attempts at enforcement. Sixteen other cases are awaiting a hearing. The companies have been dissolved and ownership of the buildings that were rented to the tenants were transferred to new companies with identical structures, making judgement and enforcement against these companies impossible. We believe these actions were taken as part of an orchestrated scheme to defraud tenants, as judgment creditors of Yianis Group companies, and to frustrate the Tribunal.

Osserman and others v Somerford House 3 Ltd

The first case to be taken to the tribunal was our own: Simpson House 3 Ltd v Osserman and others 2022 (LON/00AM/HMF/2020/0236). The tribunal stayed 16 related cases pending the resolution of our case, as the cases were all similar in terms of their fact pattern and the relevant legal issues. Our case was decided in our favour by the First Tier Tribunal on 21 July 2021 and the landlord company, Simpson House 3 Ltd, initially ordered to repay rent in an amount of £18,420.96. The landlord company appealed, obtaining a stay of the First Tier Tribunal's decision, in part, on the basis that the company had a 'substantial asset' and no intention to transfer it away. We cross-appealed. The landlord's appeal was withdrawn shortly before it was due to be heard. Our cross-appeal, which was heard on 28 April 2022 was successful, and the order against the landlord company increased to £24,060. The landlord company did not appear before the Upper Tribunal, and has paid neither the £24,060 it owes us, nor its outstanding tribunal fees.

Despite the statements made in seeking a stay of the FTT's decision, and without notice to the tribunal or to us, the landlord company, Simpson House 3 Ltd, transferred its 'substantial asset', the freehold of Simpson House, the property to which our tribunal claim relates, to a new entity, Simpson Assets 3 Ltd, which had been created on 28 November 2022. Simpson House 3 Ltd was later struck off the register of companies due to a failure to make required filings, our RRO remaining unpaid. We have applied for the company to be restored to the register, and have been informed that the Secretary of State will not oppose this application, which is due to be heard on 8 February 2024 in the County Court of Central London.

Our complaint

We are complaining to the Insolvency Service because it is clear that the restructuring of the companies involved in these disputes was undertaken in order to frustrate the enforcement of Tribunal RRO decisions. Having been unsuccessful before the FTT, and having obtained a stay based on an appeal that was subsequently withdrawn, the directors of Simpson Assets 3 Ltd transferred its only asset to another recently-formed entity with an almost identical name and the same directors. A similar pattern of conduct, involving the same directors, can be seen with respect to the following companies:

Tribunal references- LON/00AM/H	Defendant company	Directors	New company	Directors of new company

MF/2020/				
0236	Simpson House 3 Ltd	HADJIIOANNOU, Lambros CHRISTOU, Christopher (resigned 8th September 2022)	Simpson Assets 3 Ltd	HADJIIOANNO U, Lambros CHRISTOU, Christopher
0179 0198 0202 0230 0241 0286 0287	Simpson House 3 Ltd	HADJIIOANNOU, Lambros CHRISTOU, Christopher (resigned 8th September 2022)	Simpson Assets 3 Ltd	HADJIIOANNO U, Lambros CHRISTOU, Christopher
0157 0184 0232 0234 0284 0288 0289 0290 0293	Somerford Assets 3 Ltd	HADJIIOANNOU, Lambros CHRISTOU, Christopher (resigned 8th September 2022)	Stoke Newington Assets 3 Ltd	HADJIIOANNO U, Lambros CHRISTOU, Christopher

We submit that this case should be investigated by the Insolvency Service. Such an investigation would be in the public interest. While the fraud complained of in these cases is not itself complex, the extent of the corporate structure employed and the need to pursue company and insolvency law remedies in respect of each individual entity, puts the task beyond that of a community association of private renters with limited resources. The conduct of the companies in question, acting through their directors, is a clear abuse of limited liability. Members of the public should be entitled to be confident that fraudulent and sharp practice of the kind complained of cannot be carried out with impunity, and that the orders of courts and tribunals cannot be ignored with impunity, merely because a defendant has deep pockets and an extensive corporate structure at his disposal. Similarly, members of the public should be entitled to expect that company directors act with probity and according to their duties under company law, including their duties to creditors in the vicinity of insolvency, and that they do not engage in activity that appears to closely resemble unlawful 'phoenixing',

carrying on the business of an insolvent company, free of its debts, in a new but similarly-named entity.

Accordingly, we ask that the Insolvency Service:

1. Investigate the circumstances surrounding the transfer of assets away from companies with established or highly probable RRO liabilities in respect of the following entities:
 - a. Simpson House 3 Ltd, owner of Simpson House, transferred to Simpson Assets 3 Ltd
 - b. Somerford Assets 3 Ltd, owner of Olympic House, transferred to Stoke Newington Assets 3 Ltd
2. Consider whether the transfer of assets in any of these cases is liable to be reversed as a transaction in fraud of creditors, wrongful trading, or fraudulent trading under relevant legislation, in order that the assets transferred away may be made available to meet creditors' claims
3. Consider whether the directors, Lambros Hadjiioannou and Christopher Christou, contravened their duties under s 172(3) of the Companies Act 2006 and the principle established in *West Mercia Safetywear v Dodd* in transferring assets away from the companies facing established or highly probably liabilities in the following cases:
 - a. LON/00AM/HMF/2020/0236
 - b. LON/00AM/HMF/2021/0179
 - c. LON/00AM/HMF/2021/0198
 - d. LON/00AM/HMF/2021/0202
 - e. LON/00AM/HMF/2021/0230
 - f. LON/00AM/HMF/2021/0241
 - g. LON/00AM/HMF/2021/0286
 - h. LON/00AM/HMF/2021/0287
 - i. LON/00AM/HMF/2021/0157
 - j. LON/00AM/HMF/2021/0184
 - k. LON/00AM/HMF/2021/0232
 - l. LON/00AM/HMF/2021/0234
 - m. LON/00AM/HMF/2021/0284
 - n. LON/00AM/HMF/2021/0288
 - o. LON/00AM/HMF/2021/0289
 - p. LON/00AM/HMF/2021/0290
 - q. LON/00AM/HMF/2021/0293
4. Consider whether the conduct of the directors, Lambros Hadjiioannou and Christopher Christou, in

- a. Transferring assets away from companies facing established or highly probably liabilities; and/or
- b. Purporting to appeal the FTT decision in *Osserman* in order to obtain a stay, arguably in order to facilitate the transfer away of assets; and/or
- c. Failing to make required filings for Simpson House 3 Ltd and Somerford Assets 3 Ltd, despite their knowledge of the company's liability and of the fact it had been stripped of its assets; and/or
- d. Acting as directors of new, similarly-named companies (Simpson Assets 3 Ltd and Stoke Newington Assets 3 Ltd), carrying on the business of companies that had been stripped of their assets and left with their liabilities

amounts to unfit conduct as contemplated by the Company Directors Disqualification Act 1986, and whether remedies should be sought in respect of this unfitness.

5. Consider whether the directors Lambros Hadjiioannou and Christopher Christou were directly involved in the day-to-day running and maintenance of the buildings as suggested by the evidence in the first FTT case *Osserman v Simpson House Ltd 3*.
6. Consider whether John Christodoulou, the ultimate beneficial owner of all of the companies named in this complaint, acted as a shadow director of some or all of the companies complained of, and should share responsibility with the formally appointed directors as such

We believe that a fair outcome would include:

- Steps to ensure the payment of the outstanding £24,060 in the *Osserman* case [2022] UKUT 164 (LC).
- Steps to ensure that the defendant companies in the outstanding tribunal matters have assets on hand to meet any RROs that are made against them (these are due to be heard in November 2024).
- Orders or undertakings in respect of unfit conduct by Lambros Hadjiioannou, Christopher Christou, and, if appropriate, John Christodoulou, that would compensate for harm caused and protect the public from such conduct in the future
- A referral to the Criminal Investigation Team, if appropriate.

The companies are:

- [Simpson House 3 Ltd](#) - Company number 08579416
- [Somerford Assets 3 Ltd](#) - Company number 08579419

The directors are:

- [Lambros Hadjiioannou](#) - director of all the companies, gave evidence in the FTT case
- [Christopher Christou](#) - director of all of the companies, [registered as a solicitor](#), resigned from directorship of Simpson House 3, 2, 1 and Somerford Assets 3, 2 and 1 on 8 September 2022 (after the cases had been submitted) but remains director of the other companies.

The owner of both companies is [John Christodoulou](#).

Both companies have a registered address of 4th Floor Charles House, 108-110 Finchley Road, London, England, NW3 5JJ and previously responded to email at ls3@yianis.com

We have been involved in litigation against these companies that has been a matter of public interest (examples of national media coverage below).

Background

[Olympic House](#), [Simpson House](#) and [St John's Court](#) are three buildings around the street Somerford Grove in Hackney, London that have been converted into flats, and are 100% owned through different companies by [John Chistodoulou](#), a Monaco-based British Billionaire property developer. There are approximately 141 flats within these buildings.

During the Covid-19 pandemic, tenants in these flats formed a tenants association, Somerford Grove Renters, to advocate on issues surrounding disrepair, fire safety, and financial hardship. Members of the tenants association faced vindictive treatment from the Landlord for their advocacy, including being subjected to revenge evictions, as reported in [national press](#).

On 1 October 2020, Hackney Council confirmed that none of the Somerford Grove flats had an HMO licence, despite Hackney having brought in borough wide [additional licensing requirements](#). Approximately 40 of these flats were in violation of Hackney's licensing requirements as they qualified as HMOs, e.g. were occupied by 3 or more people in 2 or more households. These flats were therefore eligible to claim Rent Repayment Orders against the relevant companies, as per s.40(3) of the Housing and Planning Act 2016 (unlicensed house in multiple occupation).

Somerford Grove Renters helped tenants file a total of 21 Rent Repayment Orders with the First Tier Tribunal. One case against Simpson House 3 Ltd was ultimately awarded

£24,060 by the Upper Tribunal, but to date has not been paid despite multiple attempts at enforcement. Sixteen other cases are awaiting a hearing. The companies have been dissolved and ownership of the buildings that were rented to the tenants were transferred to new companies with identical structures, making judgement and enforcement against these companies impossible. We believe these actions were taken as part of an orchestrated scheme to defraud tenants and frustrate the Tribunal.

Below, we set out the timeline of events surrounding these cases.

Timeline

- **17 June 2021** - A hearing took place remotely at the First Tier Tribunal (London Residential Property Chamber) for two of the cases in Simpson House (against the company Simpson House 3 Ltd). One (Viet Tran's case) failed because it was 1 day out of time (1 year since he moved out). The other case for Jordan Osserman, Daniel Mapp and Foivos Dousos succeeded and they were awarded £18,420.96 in a [verdict handed down by Judge Tagliavini on 21 July 2021](#) (plus 300 costs in a [subsequent amendment](#)). Simpson House 3 Ltd were represented by Jonathan Manning and Robin Stewart at Anthony Gold. The residents were represented by Michael Sprack.
- **26 June 2021 - 3 December 2021** - 18 other cases were filed with the FTT by 56 residents or former residents for RROs: 7 in Simpson House (against Simpson House 3 Ltd), 9 in Olympic House (against Somerford Assets 3 Ltd) and 2 in St John's Court (against Reverie Estates SR Ltd). The cases were placed on hold by the FTT pending the outcome of the Osserman case.
- **3 August 2021** - Anthony Gold [wrote to the FTT](#) requesting a stay pending an appeal to the Upper Tribunal stating, "Our client owns a substantial asset (it is the freeholder of the land registered under title NGL283199 upon which Flat 8 Simpson House is situated). It has no intention of disposing of that asset at this time."
- **12 August 2021** - The [stay was granted](#) with no mention of interest, despite Osserman et al asking the judge for it to accrue during the stay.
- **9 September 2021 and 28 October 2021** - Anthony Gold [applied to appeal](#) and then Osserman et al [applied to cross appeal](#) the verdict to the Upper Tribunal.
- **24 December 2021** - Somerford Assets 3 Ltd transferred the freehold of Olympic House to Stoke Newington Assets 3 Ltd. Rental contracts were changed and tenants were instructed to pay rent to a new bank account over the following months. We believe this was an attempt to evade payment of the pending RRO judgements.
- **1 March 2022** - Simpson House 3 Ltd transferred the freehold of Simpson House to a new company, Simpson Assets 3 Ltd. This means they no longer owned the

'substantial asset' which was part of their successful argument for why the FTT should grant a stay on payment to us. They did not inform the FTT of this disposal. Simpson Assets 3 Ltd was established on 28 November 2022, suggesting that plans for the transfer were underway considerably before the freehold transfer. It had an identical ownership structure (ultimately 100% owned by John Christodoulou) and the same two directors (Lambros Hadjiioannou and Christopher Chrisou). Tenants were told to start paying rent to a new bank account owned by Simpson Assets 3 Ltd immediately.

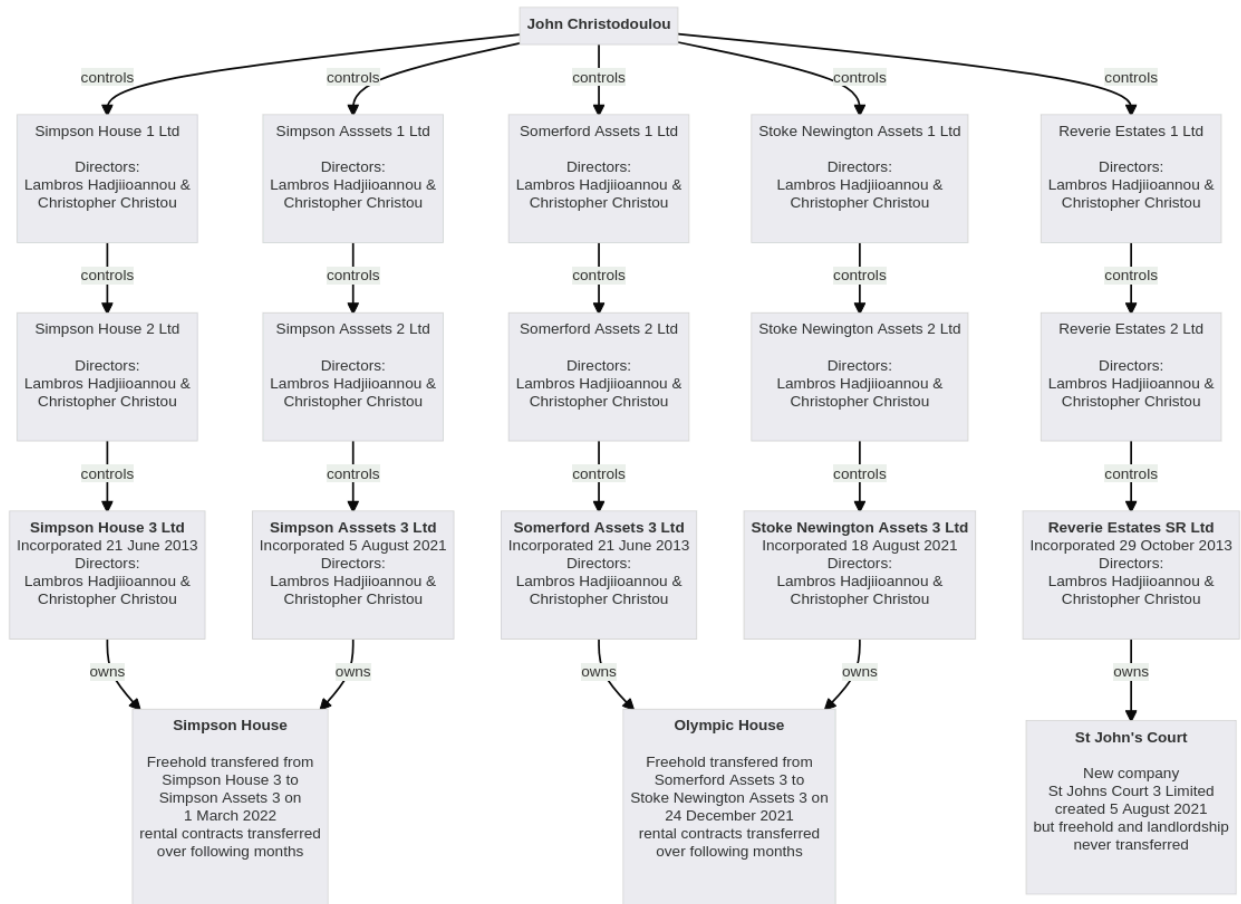
- **29 March 2022** - We wrote to Robin Stewart at Anthony Gold to alert him to the fact that the landlord appeared to be transferring rental agreements to a new company.
- **6 April 2022** - Anthony Gold ceased representation of Simpson House 3 Ltd in the Osserman, Dousos, Mapp case, but did not inform us that they had withdrawn from representing Simpson House 3 Ltd in any of the other cases.
- **7 April 2022** - Simpson House 3 withdrew their appeal at the Upper Tribunal.
- **25 April 2022** - We wrote to Anthony Gold again asking if Robin Stewart was representing Christodoulou's companies, including Simpson House 3 Ltd. Later that day, he replied to say that henceforth Anthony Gold would not represent Simpson House 3 or Somerford Assets 3, but would continue to represent Reverie Estates SR. A new company called St John's Court 3 Ltd was created on 5 August 2021 but ownership was never transferred. We believe this is either because there was a mistake in the structure of Reverie Estates SR and ownership, or because the disrepair in St John's Court meant a mortgage could not be obtained.
- **28 April 2022** - Our cross appeal went ahead without anybody from John Christodoulou's firms present. We were represented by Michael Sprack again. The Upper Tribunal [verdict](#) by Martin Rodger QC increased the award and was highly critical of the landlord for pulling out of the case at the last minute. The judge increased the award to £22,500 and then added costs, taking the total owed to £24,060.
- **6 September 2022** - After sending many demands we sent a [statutory demand](#) for the amount owed but had no reply. The UT confirmed they had still not received payment of court fees from Simpson House 3 Ltd. Hackney Council also issued a fixed penalty notice in respect of Osserman's flat and have not received payment. We decided we would wait for the other 16 cases to have decisions from the FTT before we pursued the money as we were out of options for enforcing our judgement and hoped that having additional successful judgements would make enforcement more viable. Anthony Gold was still engaging over the 2 St John's Court cases and negotiating towards settlement.

- **5 December 2022** - Barbara Spencer-Devonish of Hackney Council's Private Sector Housing team confirmed that licences cannot be transferred to new companies and that no new applications have been received so the *new companies appear to also be breaking HMO laws*. We believe this is the case as of today and in addition there are several flats that have never had a licence and require one.
- **9 December 2022** - After months of negotiation over the 2 St John's Court cases, Robin Stewart moved from an initial offer of 25% of a year's rent to saying that the landlord was no longer contesting these cases, and agreeing to pay 100% (£51,855.49), which they did a week later. Their decision followed a letter where we demanded Osserman's case be paid before we would settle the St John's Court cases at 80%. This suggests that the people responsible were unwilling to pay the debt owed on the Osserman judgement, even if it reduced the amount they had to pay for the St Johns Court cases.
- **28 March 2023** - The SRA [did not uphold a complaint](#) we made about Anthony Gold stating there was no intention of moving the assets *that was known to Robin Stewart of Anthony Gold* when the landlord then did just that. Even if their lawyers did not know they were planning to move the ownership of the buildings the directors presumably did.
- **5 April 2023** - We received court directions for the 16 remaining FTT cases (after entering a complaint with the tribunal president about the long delay in setting a date) saying they would be heard on the papers by Judge Martyński in the week starting 31 July 2023.
- **21 July 2023** - Marc Sutton of the tenants association discovered when looking at Companies House records that Simpson House 3 Ltd and Somerford Assets 3 Ltd had been dissolved for not filing annual returns. He wrote to the FTT about this.
- **1 August 2023** - Judge Martynski [wrote](#) saying there was no point in proceeding given the companies had been dissolved, and put the cases on hold for 2 months while we tried to revive the companies.
- **8 August 2023** - We filed 2 cases for [Simpson House 3](#) and [Somerford Assets 3](#) with the Bankruptcy and Restoration Court to restore the companies to the register and paid the 600 pound court fees.
- **20 September 2023** - We received a court date of 8 February 2024 in the Central London County Court (Bankruptcy) to restore the companies, which was adjourned to 19 September 2024, after an objection by the director Lambros Hadjiioannou which was rejected. We informed the FTT of this and asked the cases to be heard once they are restored.
- **17 November 2023** and **26 December 2023** - The Treasury Secretary wrote to us informing us that she will not oppose the Application to restore the companies to the register. We are sending 600 pounds in fees to the Registrar of Companies

and the undertaking required to proceed with the restoration to enable Judge Martynski to hear the cases.

- 27 September 2024 - The County Court at Central London restored both companies to the register to allow the FTT to hear the remaining cases. We signed an undertaking to inform the County Court when the cases have been heard to re-dissolve the companies. **So it is urgent that the Insolvency takes action while the companies are restored to the register.**

Appendix Company Structure



All of these companies are ultimately owned by John Christodoulou.

Landlord - companies with Company House links

- [Simpson House 3 Ltd](#) - Previous owner of Simpson House
- [Simpson Assets 3 Ltd](#) - New owner of Simpson House
- [Somerford Assets 3 Ltd](#) - Previous owner of Olympic House
- [Stoke Newington Assets 3 Ltd](#) - New owner of Olympic House
- [Reverie Estates SR Ltd](#) - Owner of St John's Court

Landlord - people with Company House links

- [Yiannakis 'John' Christodoulou](#) - Monaco based billionaire, owns 100% of the buildings through the company structure
- [Lambros Hadjiioannou](#) - director of all the companies, gave evidence in the FTT case

- [Christopher Chrisou](#) - director of all of the companies, [registered as a solicitor](#), resigned from directorship of Simpson House 3, 2, 1 and Somerford Assets 3, 2 and 1 on 8 September 2022 but remains director of the other companies.

Residents

- London Renters Union - helped organise tenants, 110 residents are members.
- [Somerford Grove Renters](#) - group within London Renters union for the buildings around Somerford Grove.
- Jordan Osserman, Marc Sutton, Daniel Mapp, Foivos Dousos - residents of Flat 8 Simpson House until evicted under s.21 in April 2021 which the Mayor of Hackney called a revenge eviction. They brought the original FTT case along with Viet Tran from Flat 10. Marc Sutton was not listed in the FTT case as he was not on the rental agreement but the judge said in court he was allowed to live there as he was married to Jordan Osserman and paid rent and he was assigned a portion of the winnings from the other tenants.
- The tenants awaiting FTT judgements in Olympic House are Moritz Herle, Andres Bravo, Lauren Moore, Emily Caton-Thick, Subhani Rawat, Grace Hockley, Poppy Hamilton, Ellie Bryant, Harriet Bayfield, Shaliz Navab, Dafni Trent, Jana Tauschinski, Louis Gee, Jesus Galicia Valentin, Lara Metcalf, Lewis Bailey, Yasmin Sharman, Ramia Sharman, Tymofii Maksymenko, Alisa Oleva, Santiago Jose Carbon Viera, Tomas Ruzicka, Zdenek Ruzicka, Matei David, Matthew MacGregor, Max Turner, Marcelina Janiszewska, Michal Salaga, Lilla E Juhasz.
- The tenants awaiting FTT judgements in Simpson House are Christopher M Keene, Samuel J Mooney, Daniel Morris, Matthew Oliver, Selene Mortimore Damian, Tom Dillon, Rob Holliday, James Thistlethwaite, Georgina Court, Elena Malara, Gianluca Pucci, Mikael Metthey, George Knight, Aengus Ryan, Jesse Koppi, Daniel Miodrag, Blair Young, Roland Chanin-Morris, Oscar Kohlert Moos, Sune Soegaard Hansen, Dominic Owen Durham.
- The tenants who received settlement in St John's Court are Lawrence Lakshmanan, Lisa Mallon, Jose Panadero, Ben Ellis, Alexia Marmara, Rebekah Bide, Luke Cassar, Victoria Hatcher.

Media

- 30 October 2022 - [The Times: Our billionaire landlord owes us £24,000 in rent repayments.](#)
- A full timeline of media coverage and political support is at <https://somerfordgroverenters.com/timeline>