
FINAL NOTICE

To: Daniel Edwin Robert Pugh

Month/Year of Birth: April 1990

Dated: 26 June 2026

ACTION

1. For the reasons set out in this Final Notice, the Authority has decided to make an order prohibiting Mr Pugh from performing any function in relation to any regulated activity carried on by an authorised person, exempt person or exempt professional firm, pursuant to s56 of the Act.
2. The Authority gave Mr Pugh the Decision Notice, which notified Mr Pugh of the Authority's decision to take the action specified above.
3. Mr Pugh has not referred the matter to the Tribunal within 28 days of the date on which the Decision Notice was given to him.
4. Accordingly, the Authority hereby makes the prohibition order as set out in paragraph 1 above against Mr Pugh. The prohibition order takes effect from the date of this Final Notice.

REASONS FOR THE ACTION

5. Between 1 March 2019 and 31 August 2020, Mr Pugh conspired to defraud investors by way of an investment fund, which functioned as a Ponzi scheme.
6. On 21 July 2025, Mr Pugh was tried and convicted for the following offences: one count

of conspiracy to defraud contrary to common law; two counts of contravening the general prohibition by carrying on a regulated activity in the United Kingdom whilst being neither an authorised or exempt person; and one count of contravening the general prohibition on communicating a financial promotion in the United Kingdom by, in the course of business, inviting or inducing people to engage in investment activity whilst not being an authorised person, and where the communication was not approved by an authorised person.

7. On 6 October 2025 Mr Pugh was sentenced to a total of 7 years and 6 months imprisonment. In addition, he was disqualified from acting as a director by way of a Court Order for a period of 8 years, starting from the date he is released from prison.
8. On the basis of the facts and matters set out in this Notice, it appears to the Authority that Mr Pugh is not a fit and proper person to perform any function in relation to any regulated activity carried on by an authorised person, exempt person or exempt professional firm. Mr Pugh's conviction demonstrates a clear and serious lack of honesty and integrity such that he is not fit and proper to perform regulated activities. In concluding that it is appropriate to impose the prohibition order as set out at paragraph 1, the Authority has had regard to all relevant circumstances, including the relevance and materiality of the offence, and the severity of the risk posed by Mr Pugh to consumers and to confidence in the UK financial system. The Authority considers that it is appropriate to take this action to advance its consumer protection and integrity objectives (sections 1C and 1D of the Act, respectively).

DEFINITIONS

9. The definitions below are used in this Decision Notice (and in the Annex):

"the Act" means the Financial Services and Markets Act 2000;

"the Authority" means the Financial Conduct Authority;

"the Company" means Investments Imperial Limited (dissolved as of 1 March 2022);

"the Decision Notice" means the Decision Notice given to Mr Pugh dated 18 May 2026;

"ENFG" means the Enforcement Guide;

"FIT" means the Authority's 'Fit and Proper Test for Employees and Senior Personnel', forming part of the Handbook;

"the Handbook" means the Authority's Handbook of rules and guidance;

"Mr Pugh" means Daniel Edwin Robert Pugh;

"the RDC" means the Regulatory Decisions Committee of the Authority (see further under Procedural Matters below); and

"the Tribunal" means the Upper Tribunal (Tax and Chancery Chamber).

RELEVANT STATUTORY AND REGULATORY PROVISIONS

10. The statutory and regulatory provisions relevant to this Final Notice are set out in the

Annex.

FACTS AND MATTERS

11. Between 1 March 2019 and 31 August 2020, Mr Pugh engaged in fraudulent business, misleading consumers into investing into an investment fund, which functioned as a Ponzi scheme operated by the Company, of which Mr Pugh was a director.
12. Investors were informed that their monies would be invested on their behalf on the FOREX and commodity markets and that they would be paid daily profits from interest generated on their investment. However, the scheme instead used capital paid into the scheme by other investors to pay out any interest that fell due, thereby deceiving all the investors in the scheme. Despite having represented to investors that the Company would not charge any management fees, but that it would instead draw income from the investments only if the daily rate of interest exceeded 1.4%, Mr Pugh drew profits directly from the money handed over to the scheme by other investors.
13. A total of 238 identified investors paid a combined total of £1,339,336.06 into the investment scheme, and the total losses to investors are currently calculated at approximately £676,914.
14. On 21 July 2025, Mr Pugh was tried and convicted at Southwark Crown Court for the following offences: one count of conspiracy to defraud contrary to common law; two counts of contravening the general prohibition by carrying on regulated activity in the United Kingdom whilst being neither an authorised or exempt person contrary to Section 23 of the Act; and one count of contravening the general prohibition on communicating a financial promotion in the United Kingdom by, in the course of business, inviting or inducing people to engage in investment activity whilst not being an authorised person, and where the communication was not approved by an authorised person, contrary to Section 25 of the Act. The prosecution was brought against Mr Pugh by the Authority.
15. For these offences, on 6 October 2025, Mr Pugh was sentenced to 7 years and 6 months imprisonment for the first offence of conspiracy to defraud and 12 months for each of the offences committed under the Act (to be served concurrently). In addition, he was disqualified from acting as a director by way of a Court Order, pursuant to section 2 of the Company Directors Disqualification Act 1986, for a period of 8 years, starting from the date he is released from prison. At the sentencing hearing, the judge made the following remarks regarding Mr Pugh's conduct:
 - (a) Between 1 March 2019 and 31 August 2020, Mr Pugh "*conspired ... to defraud investors...*" in an investment scheme which was operated "*... as a Ponzi scheme.*"
 - (b) Mr Pugh's conduct was aggravated by "*... persistent and knowing breaches of the financial regulatory framework...*".
 - (c) Mr Pugh deceived investors by "*...paying any interest that fell due to investors from the capital paid by other investors, rather than from profits derived from trading...*".
 - (d) The conspiracy to defraud offence was considered to be at the highest level of culpability due to its "*...significant planning and fraudulent activity conducted over a sustained period of time...*" and the fact that it involved "*...a large number of victims*", for whom the consequences are "*...marked and that quite apart from the*

pure financial loss, they feel acute shame and embarrassment for becoming the victim of fraud”.

- (e) Mr Pugh was found to have *“...personally received payments totalling some £96,005 from the [the Company] bank account”,.*
- (f) *“Even after the FCA froze [the] trading account on 23 August 2020, you successfully persuaded many investors that the FCA’s intervention in the scheme was the reason why any losses were incurred”.*
- (g) *“...The efforts to persuade investors of the legitimacy of the scheme were highly successful.”*
- (h) *“In my judgment our evidence to the jury that you had not seen the email [from the FCA that stated the Company must cease all activity immediately] lacked all credibility and in any event your evidence to the jury generally contained lies and was rejected by them. It follows that from that date (at the very latest) you were continuing to do as you did in flagrant and deliberate breach of the advice given”.*
- (i) The conduct of Mr Pugh also had *“additional serious aggravating features”*. Specifically: *“(i) The very serious aggravating feature of three deliberate and knowing FSMA offences committed in the course of this offending; (ii) Steps taken to prevent victims from assisting or supporting the prosecution – by deliberate deception and misrepresentation of the true position”.*
- (j) The judge was invited to *“take account of the fact that you [Mr Pugh] admitted during your interview under caution that you previously worked in a boiler room fraud [...] prior to the commission of these offences”* on the basis that it would be *“inappropriate for you [Mr Pugh] to be sentenced on the basis that he had no history of financial misconduct prior to committing these offences.”* The Judge when asked not to take account of this concluded: *“...I can see no good reason in law or common sense not to.”*

LACK OF FITNESS AND PROPRIETY

- 16. FIT 1.3.1G states that the Authority will have regard to a number of factors when assessing an individual’s fitness and propriety. FIT 1.3.1BG states that the most important factors include the individual’s honesty, integrity and reputation.
- 17. The facts and serious nature of Mr Pugh’s offences, in particular his having been convicted of a serious dishonesty offence, shows he lacks honesty and integrity. As a result, the Authority considers that Mr Pugh is not a fit and proper person to perform regulated activities.

Prohibition

- 18. ENFG 5.1.1G provides that the power to prohibit an individual will be exercised by the Authority to achieve its statutory objectives, which include both securing an appropriate degree of protection for consumers and protecting and enhancing the integrity of the UK financial system.

19. ENFG 5.4.1G provides that when considering making a prohibition order against an individual who is not an authorised person, the Authority will consider the risk posed by the individual, and may prohibit the individual where it considers this is appropriate to achieve one or more of its statutory objectives.
20. Taking into account the nature of the offences Mr Pugh participated in, the convictions arising from his participation, and his lack of fitness and propriety due to his dishonesty and lack of integrity, the Authority considers it is appropriate to prohibit Mr Pugh from performing any function in relation to any regulated activity carried on by an authorised person, exempt person or exempt professional firm.

PROCEDURAL MATTERS

21. This Final Notice is given to Mr Pugh in accordance with section 390(1) of the Act. The following paragraphs are important.

Decision maker

22. The decision which gave rise to the obligation to give this Final Notice was made by the Chair of the RDC. The RDC is a committee of the Authority which takes certain decisions on behalf of the Authority. The members of the RDC are separate to the Authority staff involved in conducting investigations and recommending action against firms and individuals. Further information about the RDC can be found on the Authority's website:

<https://www.fca.org.uk/about/committees/regulatory-decisions-committee-rdc>.

Publicity

23. Sections 391(4), 391(6) and 391(7) of the Act apply to the publication of information about the matter to which this notice relates. Under those provisions the Authority must publish such information about which this notice relates as the Authority considers appropriate. The information may be published in such manner as the Authority considers appropriate. However, the Authority may not publish information if such publication would, in the opinion of the Authority, be unfair to you or prejudicial to the interests of consumers or detrimental to the stability of the UK financial system.
24. The Authority intends to publish such information about the matter to which this Final Notice relates, as it considers appropriate.

Authority Contacts

25. For more information concerning this matter generally, Mr Pugh should contact Rollo Quinault at the Authority (direct line: 020 7066 0253 or by email: rollo.quinault@fca.org.uk).

Jeremy Parkinson
Manager
Financial Conduct Authority, Enforcement and Market Oversight

ANNEX

RELEVANT STATUTORY PROVISIONS

1. The Authority's operational objectives are set out in section 1B(3) of the Act and include securing an appropriate degree of protection for consumers (section 1C of the Act) and protecting and enhancing the integrity of the UK financial system (section 1D of the Act).
2. Section 56(1) of the Act provides:

"The [Authority] may make a prohibition order if it appears to it that an individual is not a fit and proper person to perform functions in relation to a regulated activity carried on by:

 - (a) an authorised person,
 - (b) a person who is an exempt person in relation to that activity, or
 - (c) a person to whom, as a result of Part 20, the general prohibition does not apply in relation to that activity."

RELEVANT REGULATORY PROVISIONS

3. In exercising its power to make a prohibition order, the Authority must have regard to guidance published in the Handbook and in regulatory guides, such as ENFG. The relevant main considerations in relation to the action specified above are set out below.

The Enforcement Guide

4. The Authority's policy in relation to exercising its power to issue a prohibition order is set out in Chapter 5 of ENFG.
5. ENFG 5.1.1G explains the purpose of prohibition orders in relation to the Authority's regulatory objectives.
6. ENFG 5.2 sets out the Authority's general policy on making prohibition orders. In particular:
 - (a) ENFG 5.2.1G states that the Authority will consider all relevant circumstances, including whether enforcement action has been taken against the individual by other enforcement agencies, in deciding whether to make a prohibition order;
 - (b) ENFG 5.2.3G states that the Authority has the power to make a range of prohibition orders depending on the circumstances of each case; and
 - (c) ENFG 5.2.4G states that the scope of a prohibition order will depend on, among other things, the reasons why the individual is not fit and proper and the severity of risk he poses to consumers or the market generally.
7. ENFG 5.3.2G sets out the matters which the Authority may take into account when deciding whether to make a prohibition order against an approved person. These include: whether the individual is fit and proper to perform functions in relation to regulated

activities (noting the main assessment criteria set out in FIT 2.1, 2.2 and 2.3) (ENFG 5.3.2G(2)); the relevance and materiality of any matters indicating unfitness (ENFG 5.3.2G(5)); the length of time since the occurrence of any matters indicating unfitness (ENFG 5.3.2G(6)); and the severity of the risk which the individual poses to consumers and to confidence in the financial system (ENFG 5.3.2G(8)).

8. ENFG 5.4.1G states that where the Authority is considering whether to make a prohibition order against someone who is not an approved person, the Authority will consider:
 - (a) the level of the risk posed by the individual, and may prohibit him where it considers that it is appropriate to achieve one or more of the Authority's statutory objectives; and
 - (b) all the relevant circumstances of the case, which may include, but are not limited to, the factors set out in ENFG 5.3.2G.

The Fit and Proper Test for Employees and Senior Personnel (FIT)

9. FIT sets out the criteria that the Authority will consider when assessing the fitness and propriety of a candidate for a controlled function, and may consider when assessing the continuing fitness and propriety of approved persons.
10. FIT 1.3.1BG(1) states that the most important considerations when assessing the fitness and propriety of a person to perform a controlled function include that person's honesty, integrity and reputation.
11. FIT 2.1.1G provides that in determining a person's honesty, integrity and reputation, the Authority will have regard to all relevant matters including, but not limited to, those set out in FIT 2.1.3G.
12. In relation to convictions for criminal offences, FIT 2.1.1AG states that: If any staff being assessed under FIT has a conviction for a criminal offence, the firm should consider the seriousness of, and circumstances surrounding, the offence, the explanation offered by the convicted person, the relevance of the offence to the proposed role, the passage of time since the offence was committed and evidence of the individual's rehabilitation.
13. FIT 2.1.3G provides a list of (non-exhaustive) matters to which the Authority will have regard when determining a person's honesty, integrity and reputation. These include:
 - (1) whether the person has been convicted of any criminal offence; this must include, where provided for by the Rehabilitation Exceptions Orders to the Rehabilitation of Offenders Act 1974 or the Rehabilitation of Offenders (Northern Ireland) Order 1978 (as applicable), any spent convictions; particular consideration will be given to offences of dishonesty, fraud, financial crime or an offence under legislation relating to companies, building societies, industrial and provident societies, credit unions, friendly societies, banking, other financial services, insolvency, consumer credit companies, insurance, consumer protection, money laundering, market manipulation and insider dealing, whether or not in the United Kingdom;
 - (4) whether the person is or has been the subject of any proceedings of a disciplinary or criminal nature, or has been notified of any potential proceedings or of any investigation which might lead to those proceedings;

- (5) whether the person has contravened any of the requirements and standards of the regulatory system or the equivalent standards or requirements of other regulatory authorities (including a previous regulator), clearing houses and exchanges, professional bodies, or government bodies or agencies; and
- (12) whether the person has ever been disqualified from acting as a director or disqualified from acting in any managerial capacity.