

Case No: 12587-2024

BEFORE THE SOLICITORS DISCIPLINARY TRIBUNAL
IN THE MATTER OF THE SOLICITORS ACT 1974 (as amended)
AND IN THE MATTER OF:

SOLICITORS REGULATION AUTHORITY LIMITED

Applicant

and

MR JOE MORGAN

Respondent

(DRAFT) RESPONDENTS RESPONSE TO STATEMENT PURSUANT TO RULE 14 (1) OF THE
SOLICITORS (DISCIPLINARY PROCEEDINGS RULES) 2019

I am Joe Morgan, the Respondent in this matter.

1. In the Rule 14 Statement, the Applicant states: ***“Details of the Google Cloud services upon which the Respondent relies have been extracted from the Google Cloud website and are set out at [MJC3 p23 – 27 and p49 - 54]. A further explanation from a Google Cloud Specialist is at [MJC3 p50 - 51]. By way of explanation, Google provide two AI products: Gemini (an experimental generative AI product) and Google Cloud. Google Cloud comprises a global offering of Google services which include storage and “Document AI Documentation” as separate or related service”.***

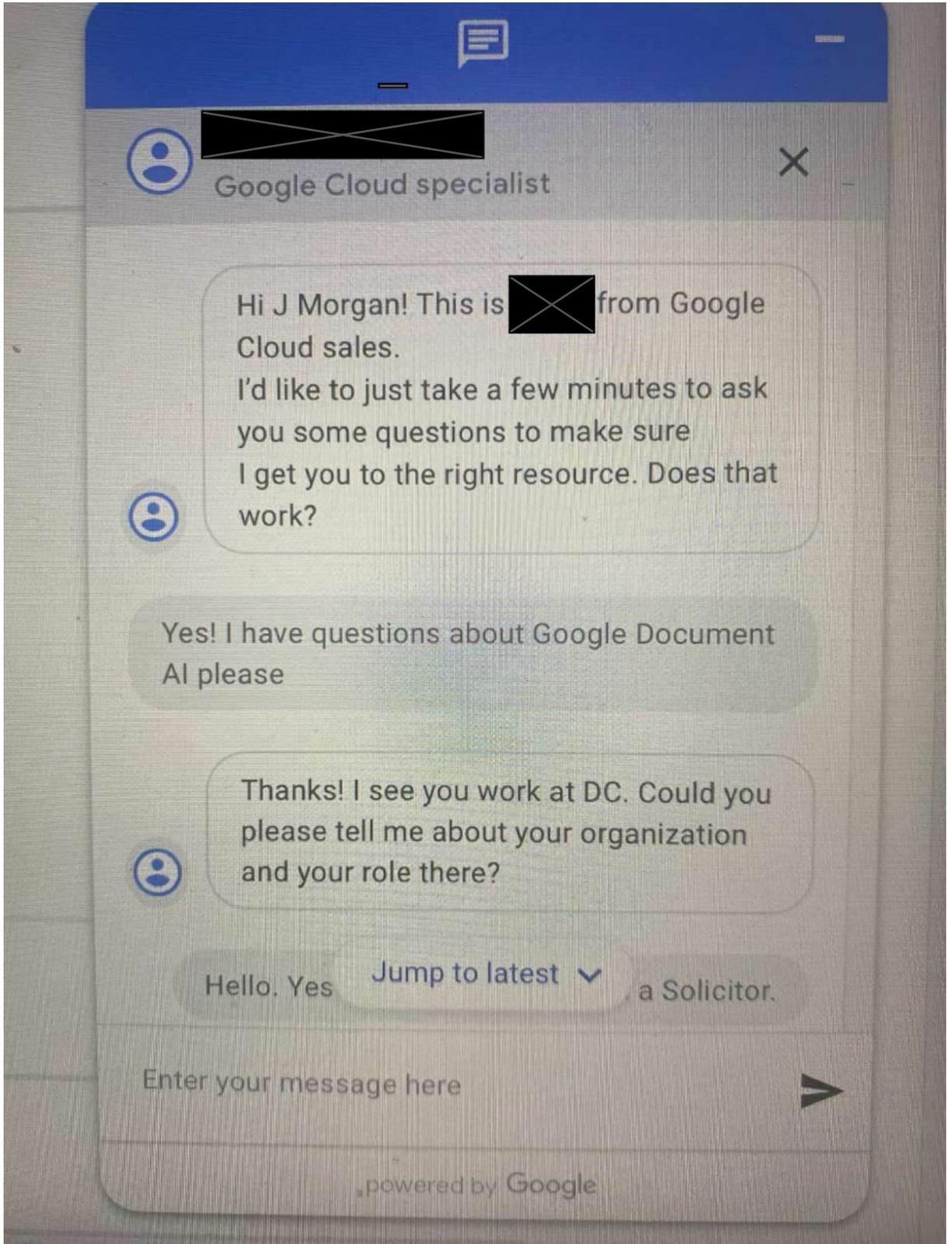
2. In the Rule 14 Statement, the Applicant also states: ***“As confirmed by Google Cloud Specialist, the results of a Google Document AI process do not substitute for sight of an original document and specifically do not check that the document is original”.***

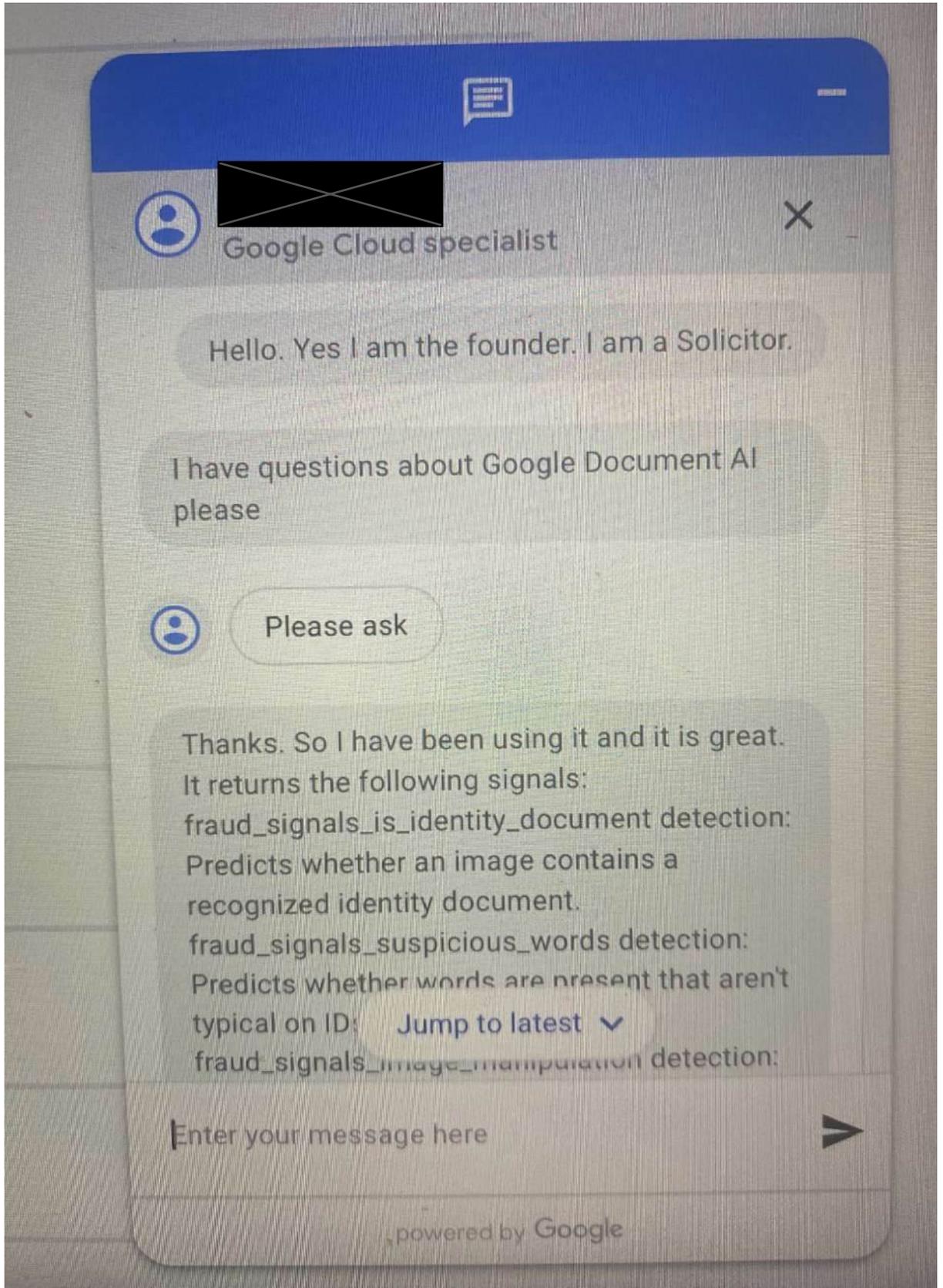
3. Firstly, as I have repeatedly mentioned in previous correspondence and statements, I do not ‘rely’ on Google Document AI. It is merely one part of my extremely thorough process. The full process was set out in my response to the Rule 12 Statement.

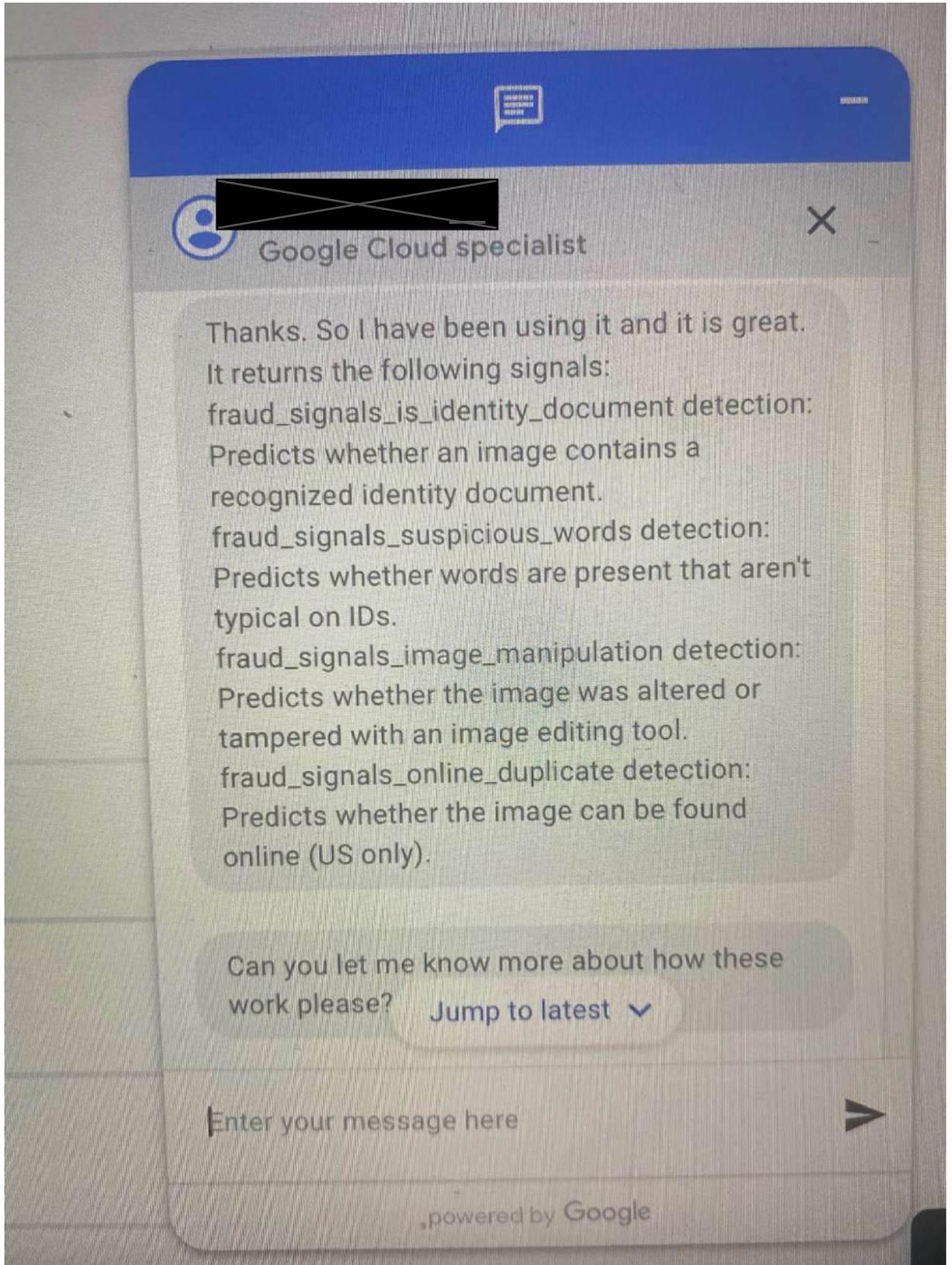
4. I would say that there seems to have been a misunderstanding by the Applicant as to the scope and use of the Google Document AI technology. Google Document AI has been repeatedly proven through tests to be able to detect fraud / forgery / tampering / etc in documents. This is to a far higher measure than could be achieved by any human manually.

5. would also say that through having thoroughly researched the technology and all surrounding literature, and thorough having manually installed the technology into my own website, it is a highly technical area that is therefore open to misinterpretation.

6. To clarify matters, I have contacted Google Cloud myself. I set out the conversation below:





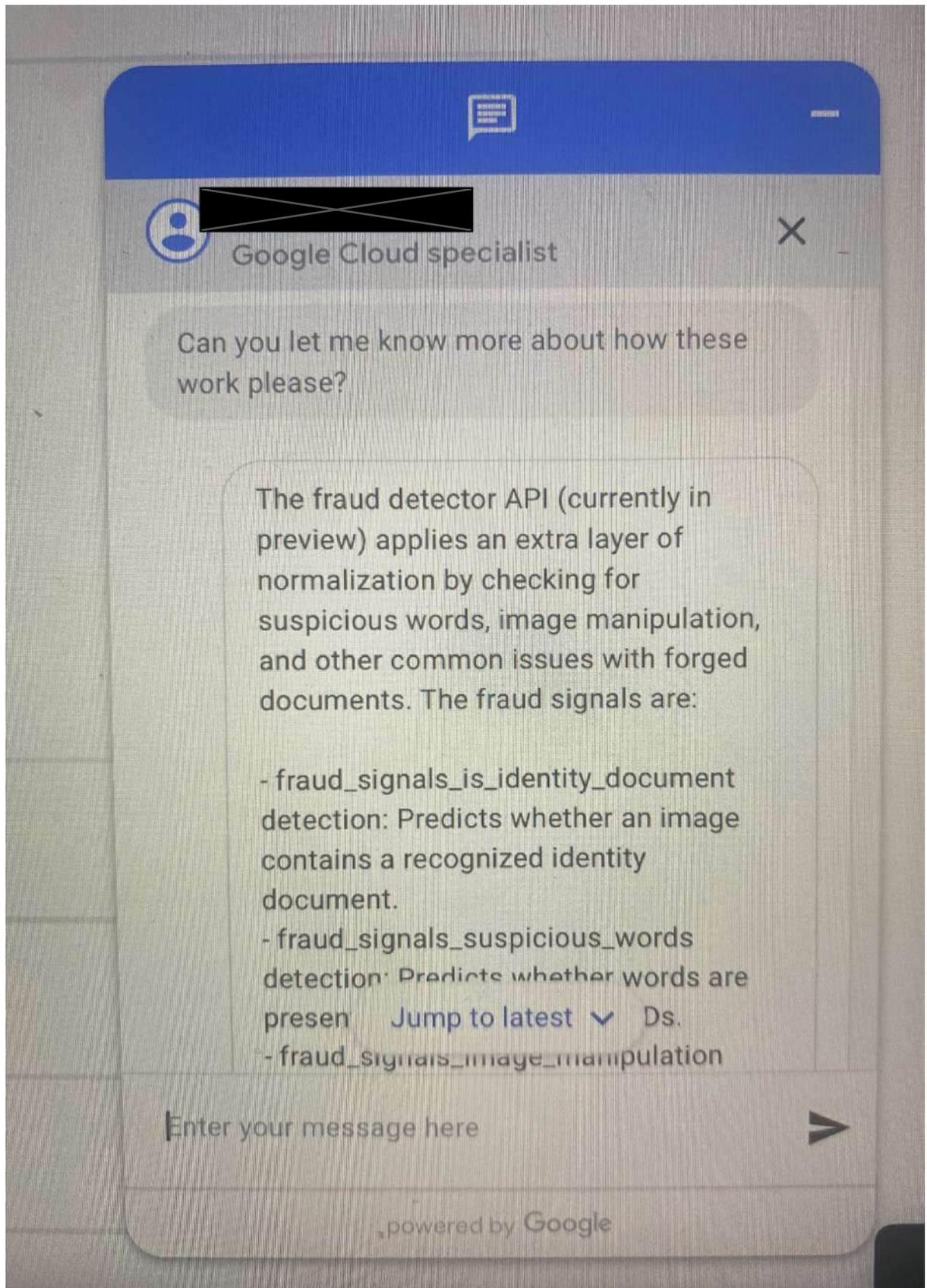


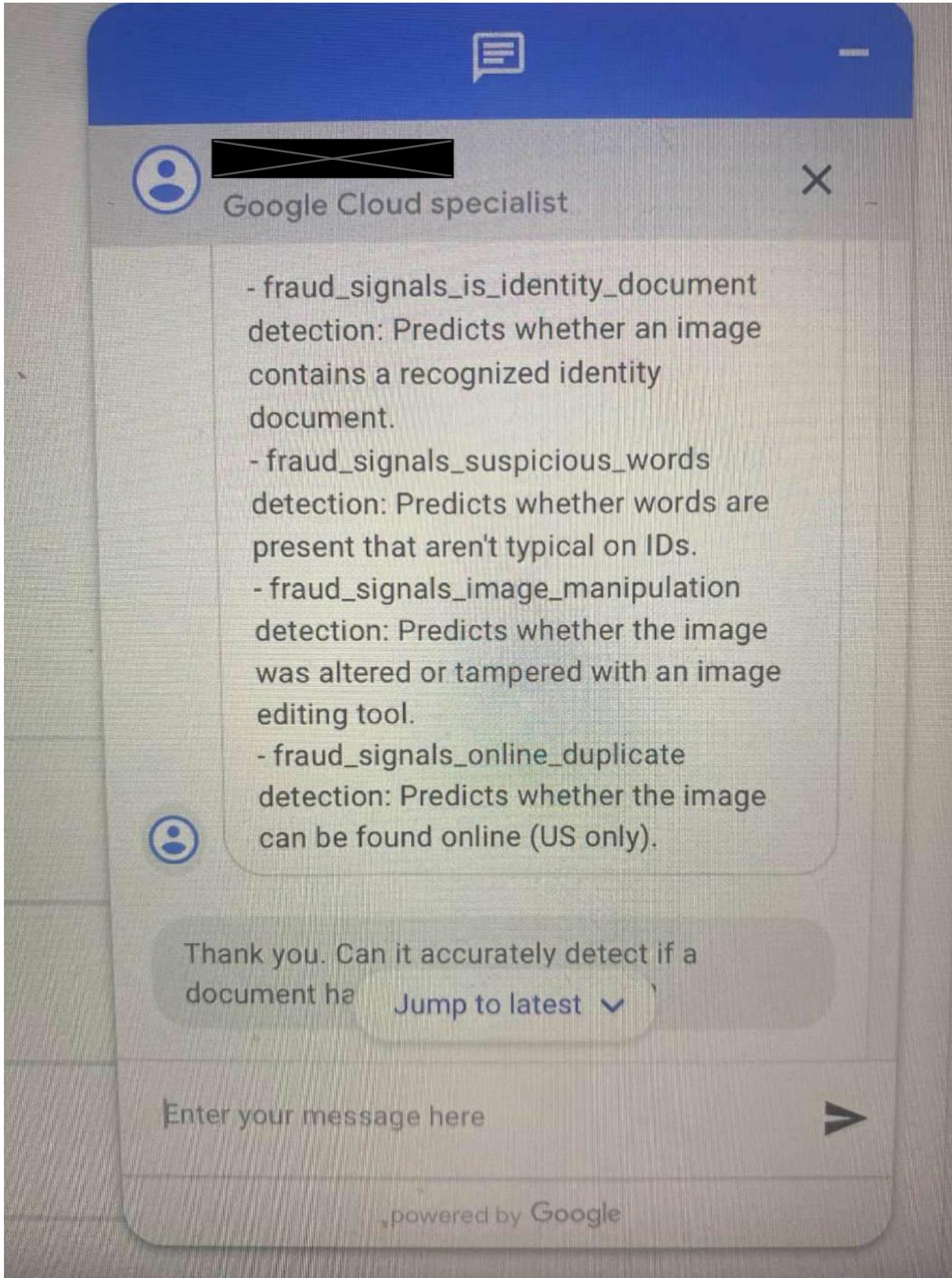
7. As can be seen, the Google Document AI has several extremely powerful and beneficial features. Most importantly, it can accurately detect the following:
 fraud_signals_is_identity_document detection: Predicts whether an image contains a recognized identity document.

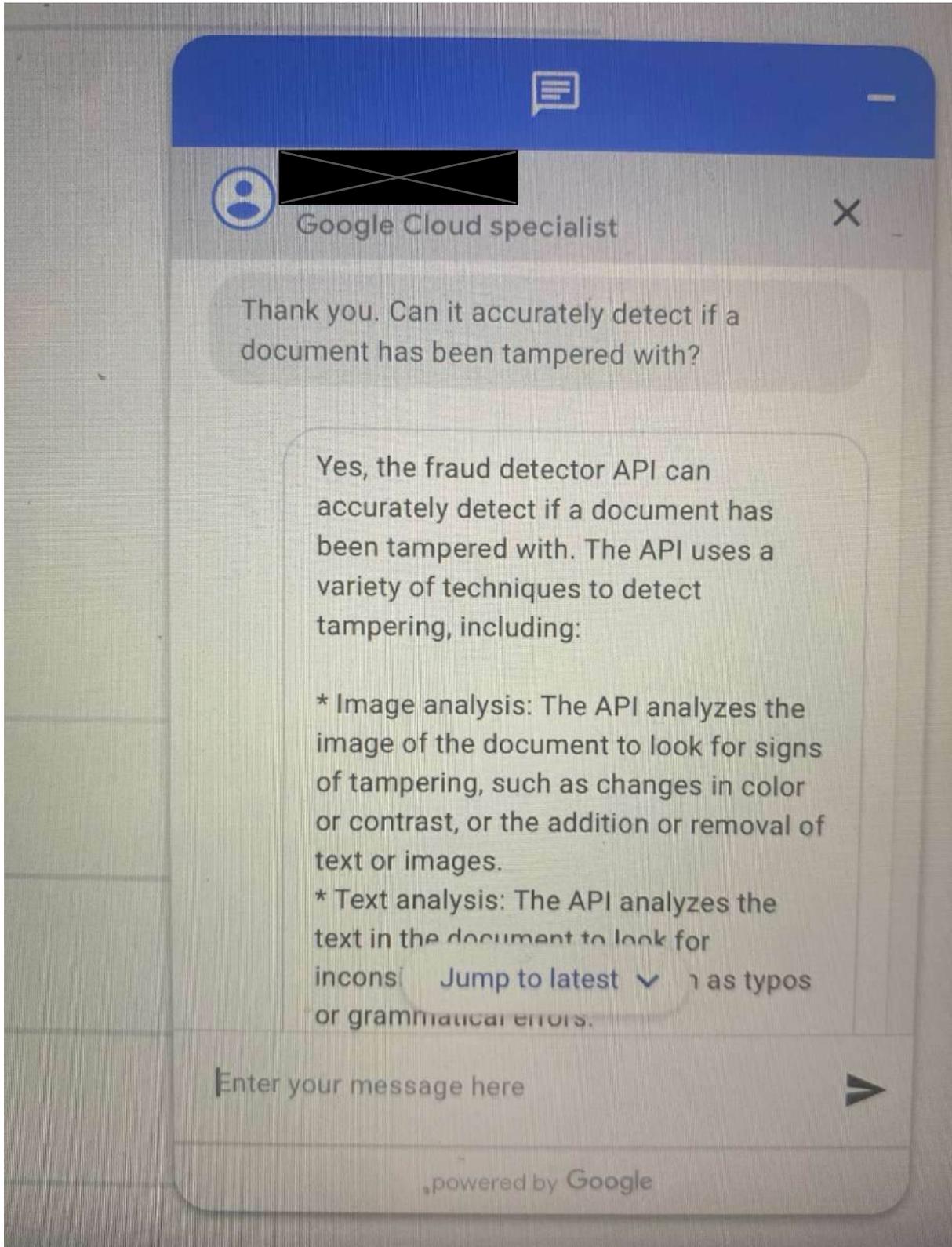
fraud_signals_suspicious_words detection: Predicts whether words are present that are not typical on IDs.

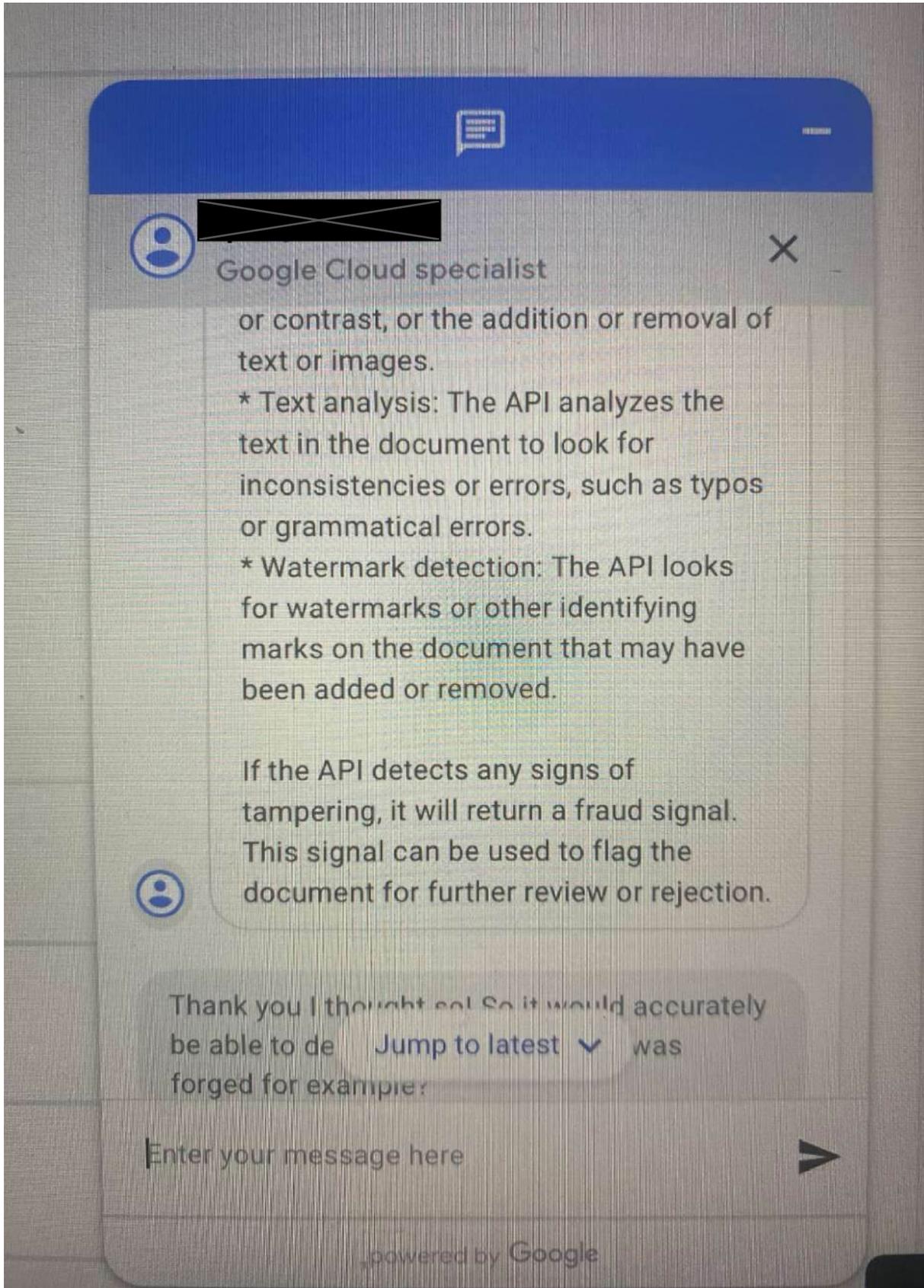
fraud_signals_image_manipulation detection: Predicts whether the image was altered or tampered with an image editing tool.

fraud_signals_online_duplicate detection: Predicts whether the image can be found online.









8. Here I asked the Google Cloud Specialist: ***“Can it accurately detect if a document has been tampered with?”***. The Google Cloud Specialist replied: ***“Yes, the fraud detector API can***

accurately detect if a document has been tampered with. The API uses a variety of techniques to detect tampering, including:

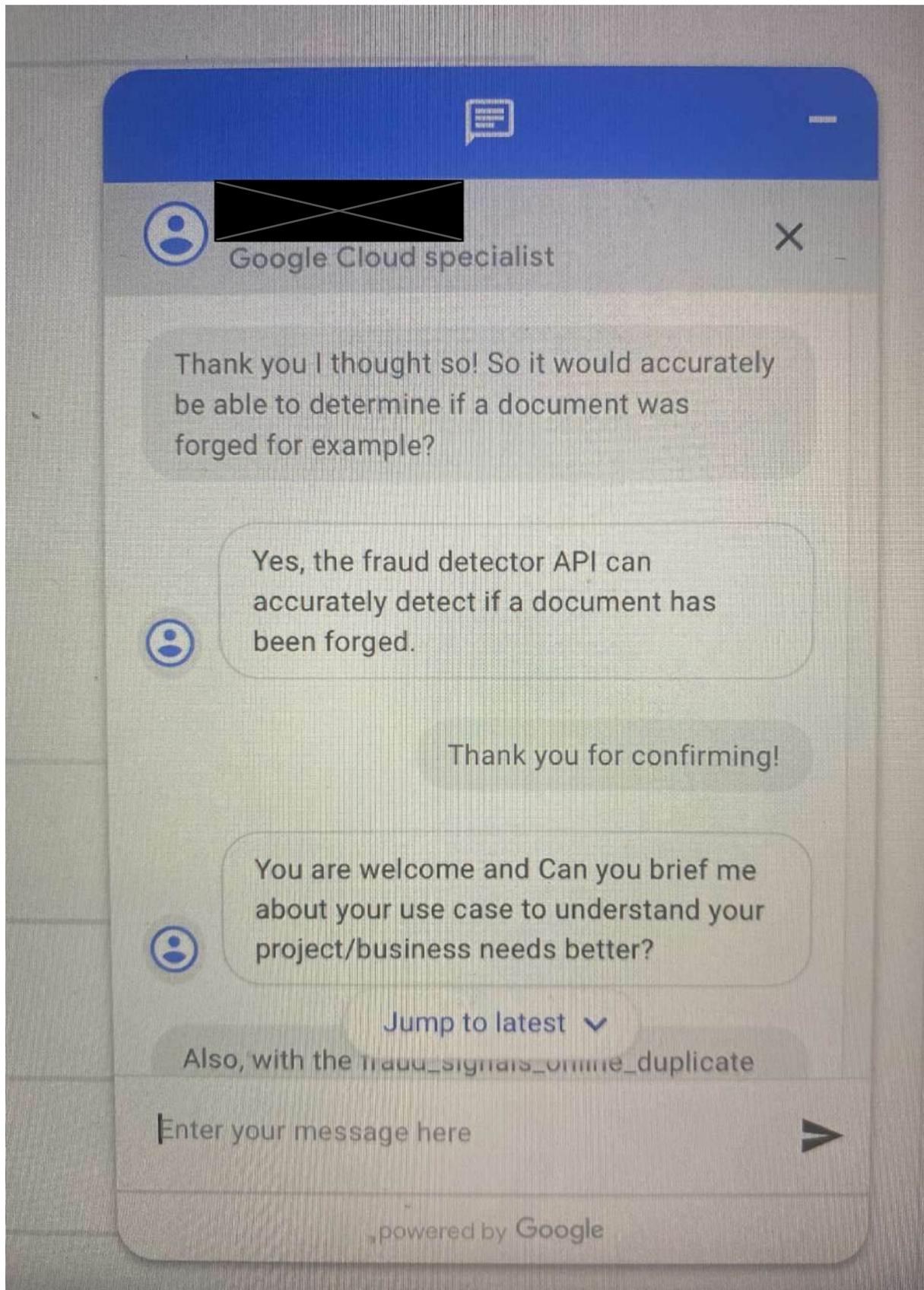
**Image analysis: The API analyzes the image of the document to look for signs of tampering, such as changes in color or contrast, or the addition or removal of text or images.*

**Text analysis: The API analyzes the text in the document to look for inconsistencies or errors, such as typos or grammatical errors.*

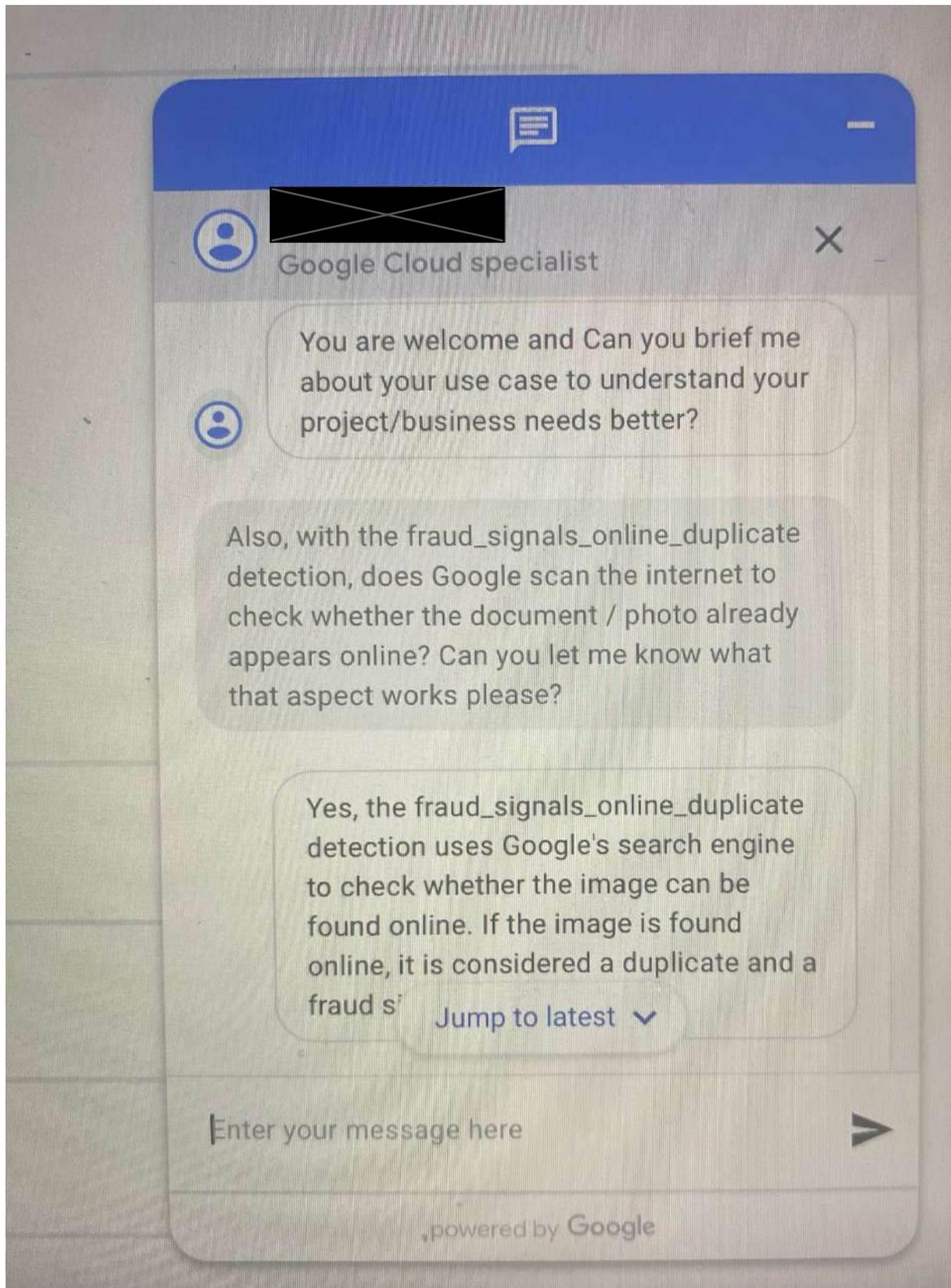
**Watermark detection: The API looks for watermarks or other identifying marks on the document that may have been added or removed.*

If the API detects any signs of tampering, it will return a fraud signal.

This signal can be used to flag the document for further review or rejection”.

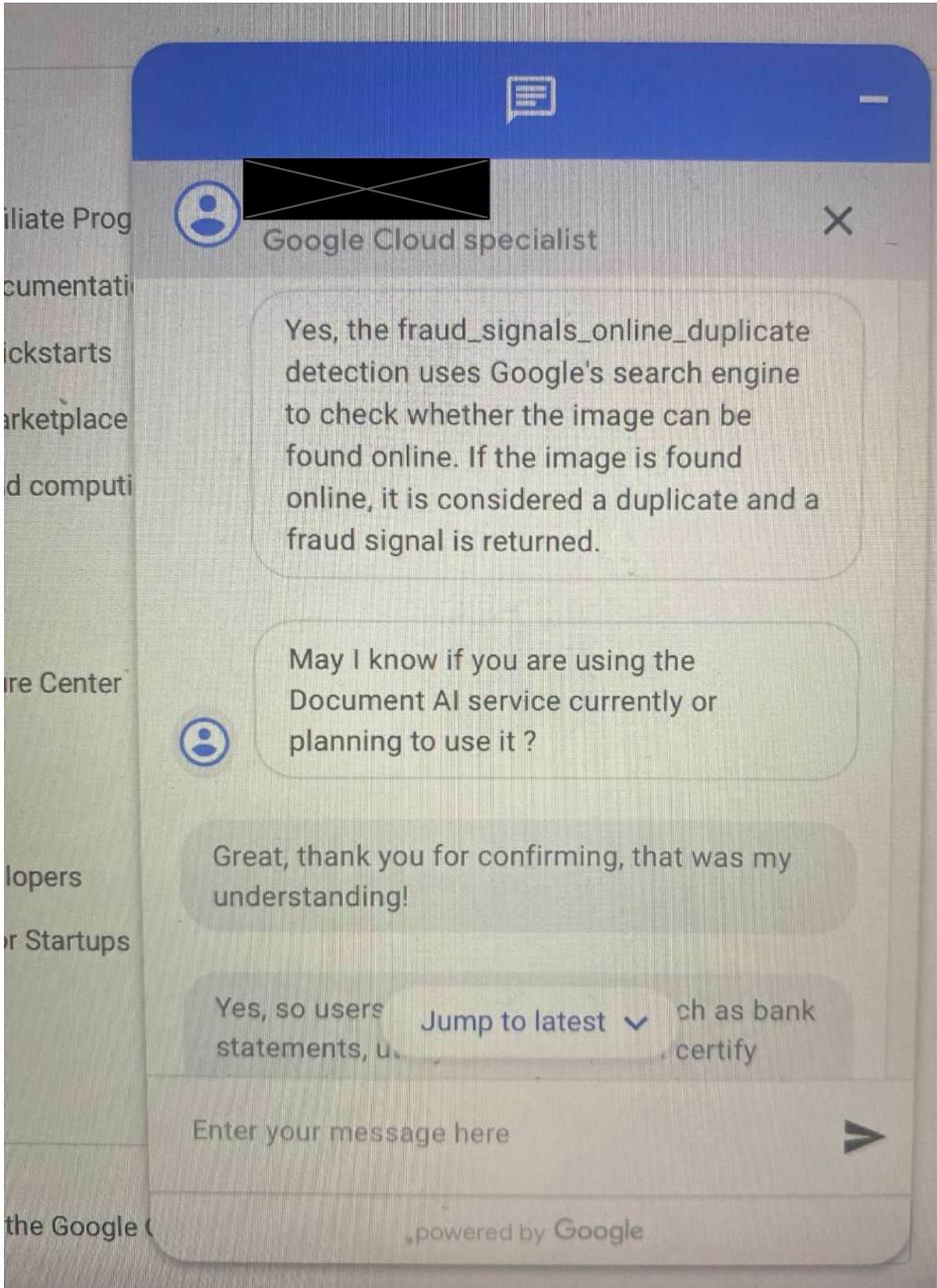


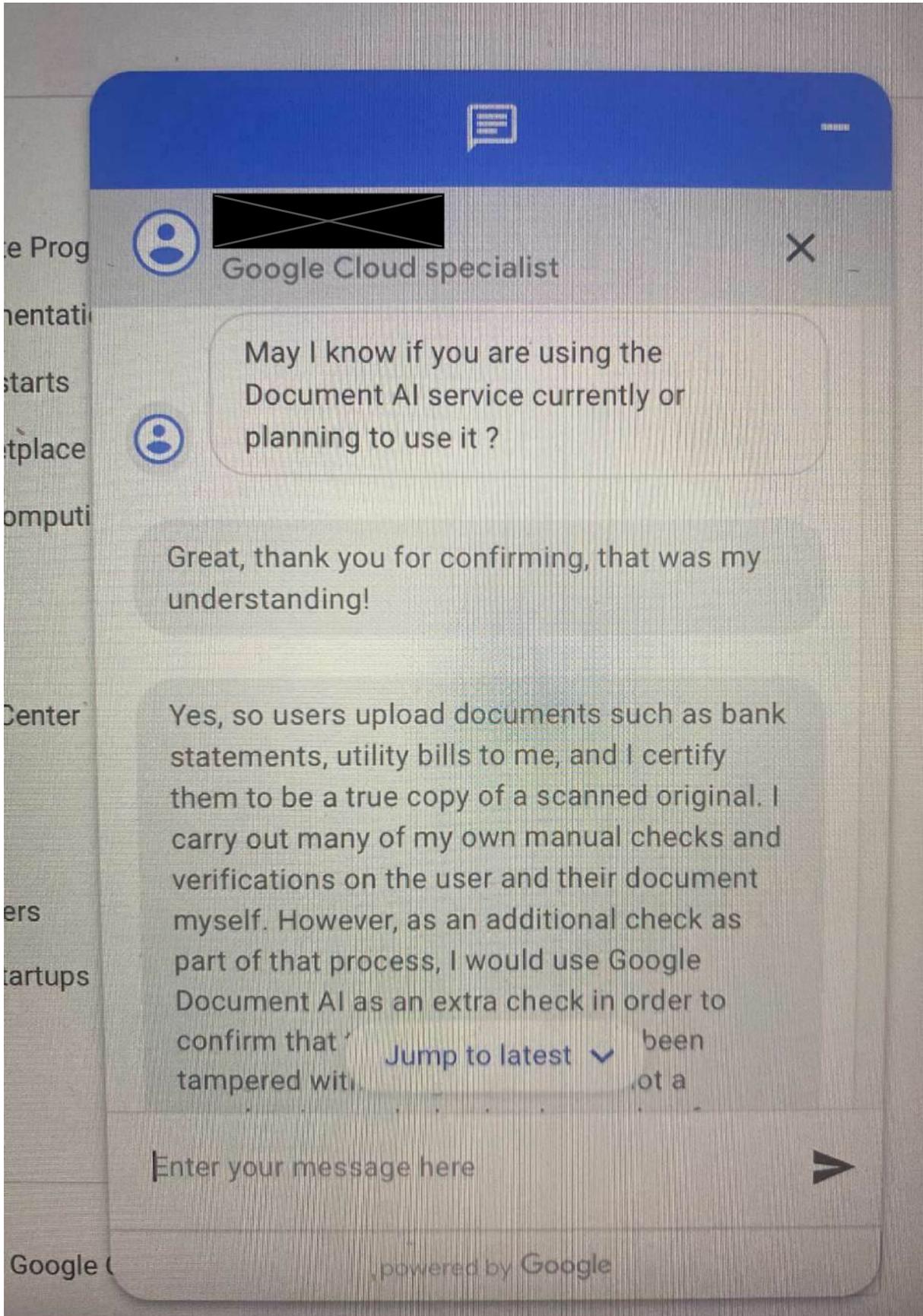
9. Here I asked: ***“So (Google Document AI) would accurately be able to determine if a document was forged for example?”***. The Google Cloud Specialist responded: ***“Yes, the fraud detector API can accurately detect if a document has been forged”***.

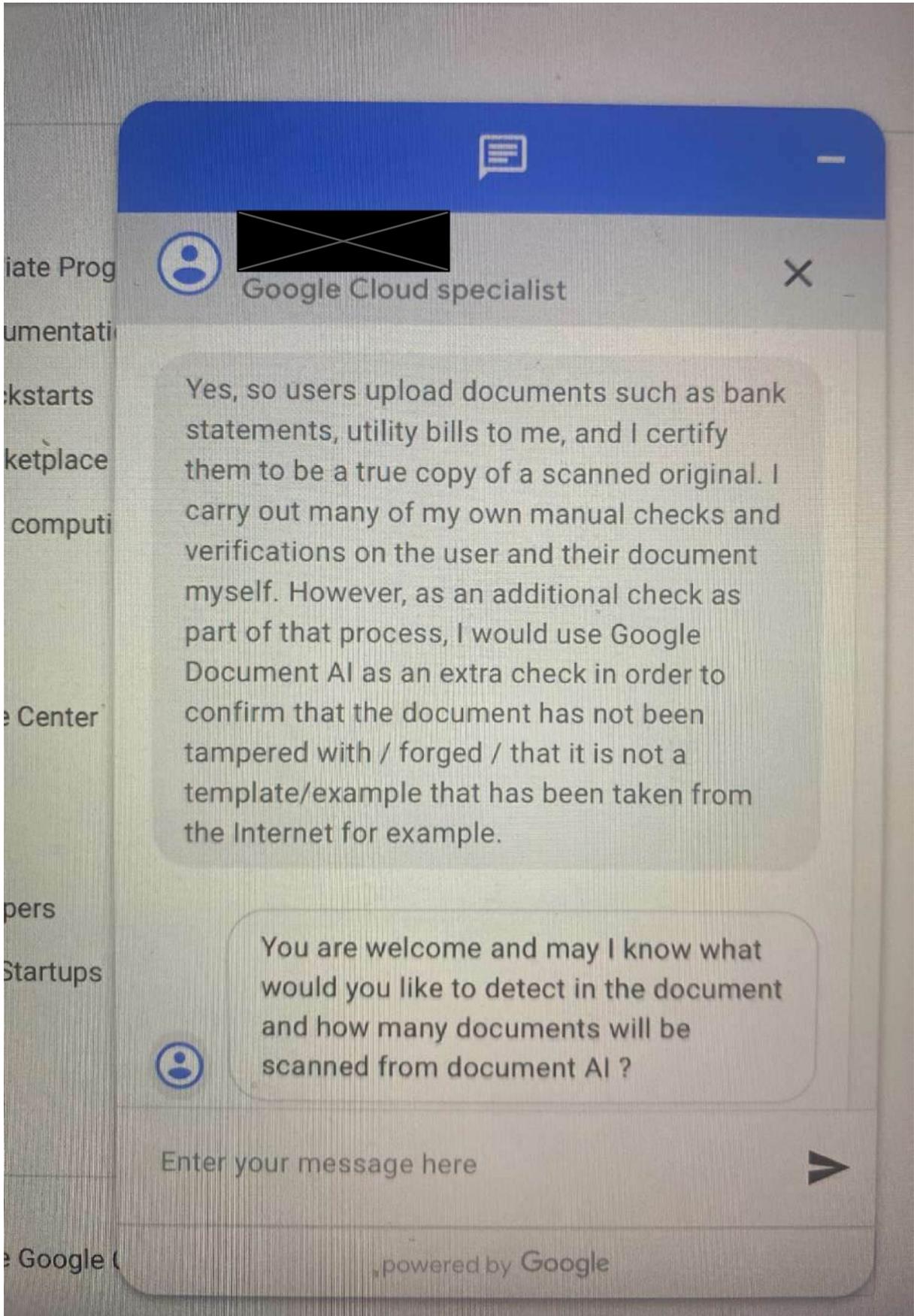


10. Here I asked: ***“Also, with the fraud_signals_online_duplicate detection, does Google scan the internet to check whether the document / photo already appears online?...”***. The Google Cloud Specialist responded: ***“Yes, the fraud_signals_online_duplicate detection***

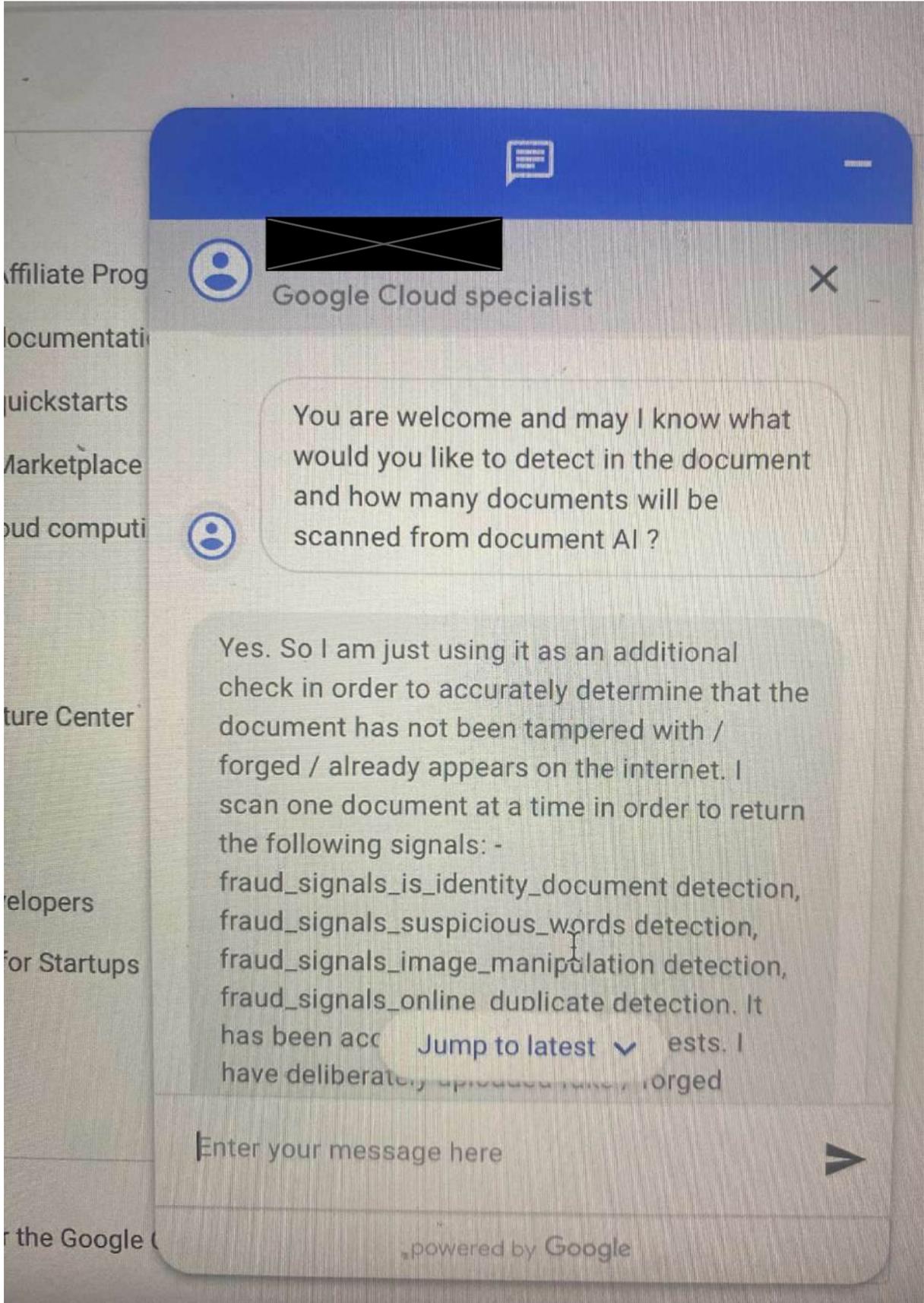
uses Google's search engine to check whether the image can be found online. If the image is found online, it is considered a duplicate...”.

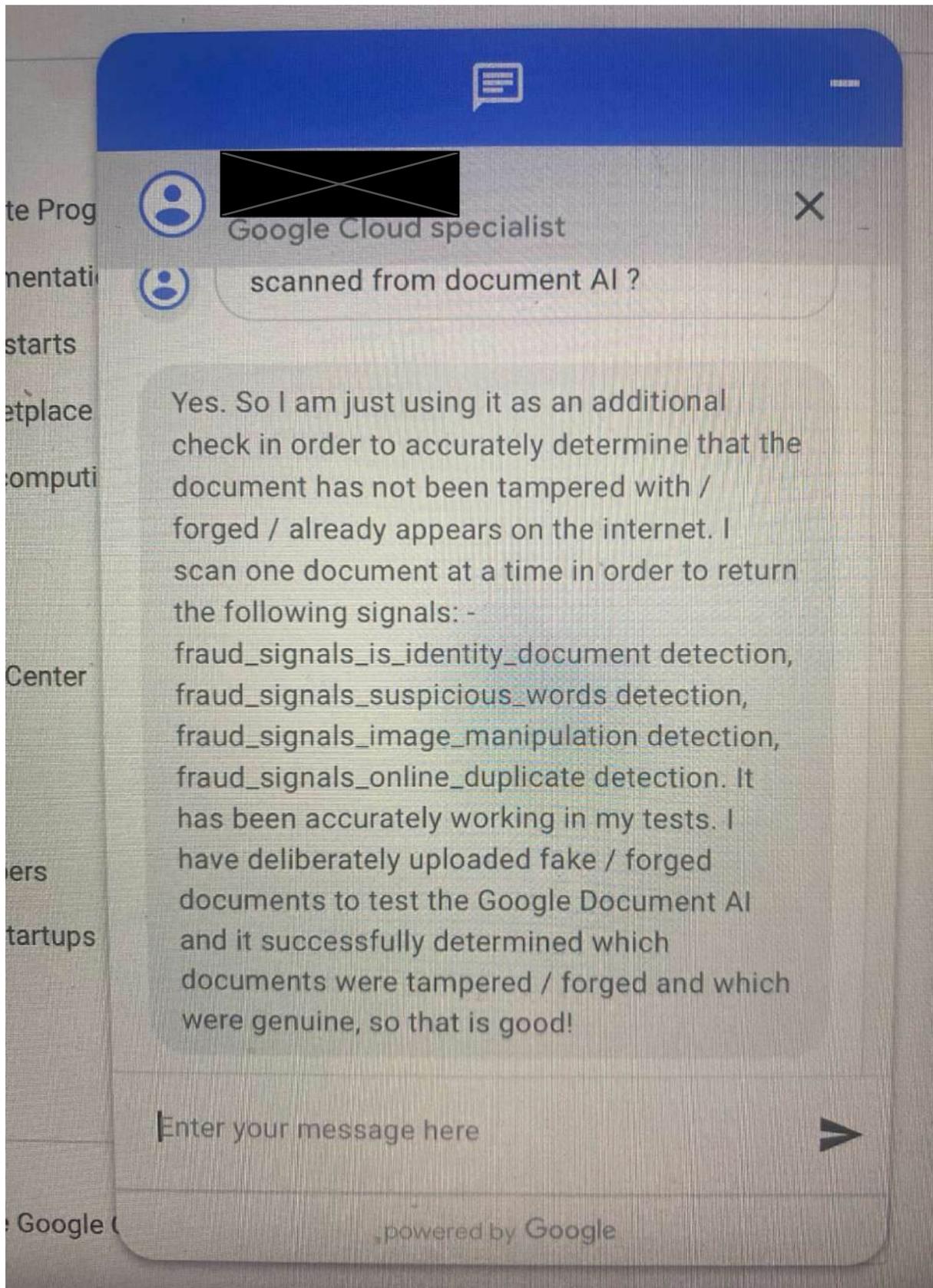






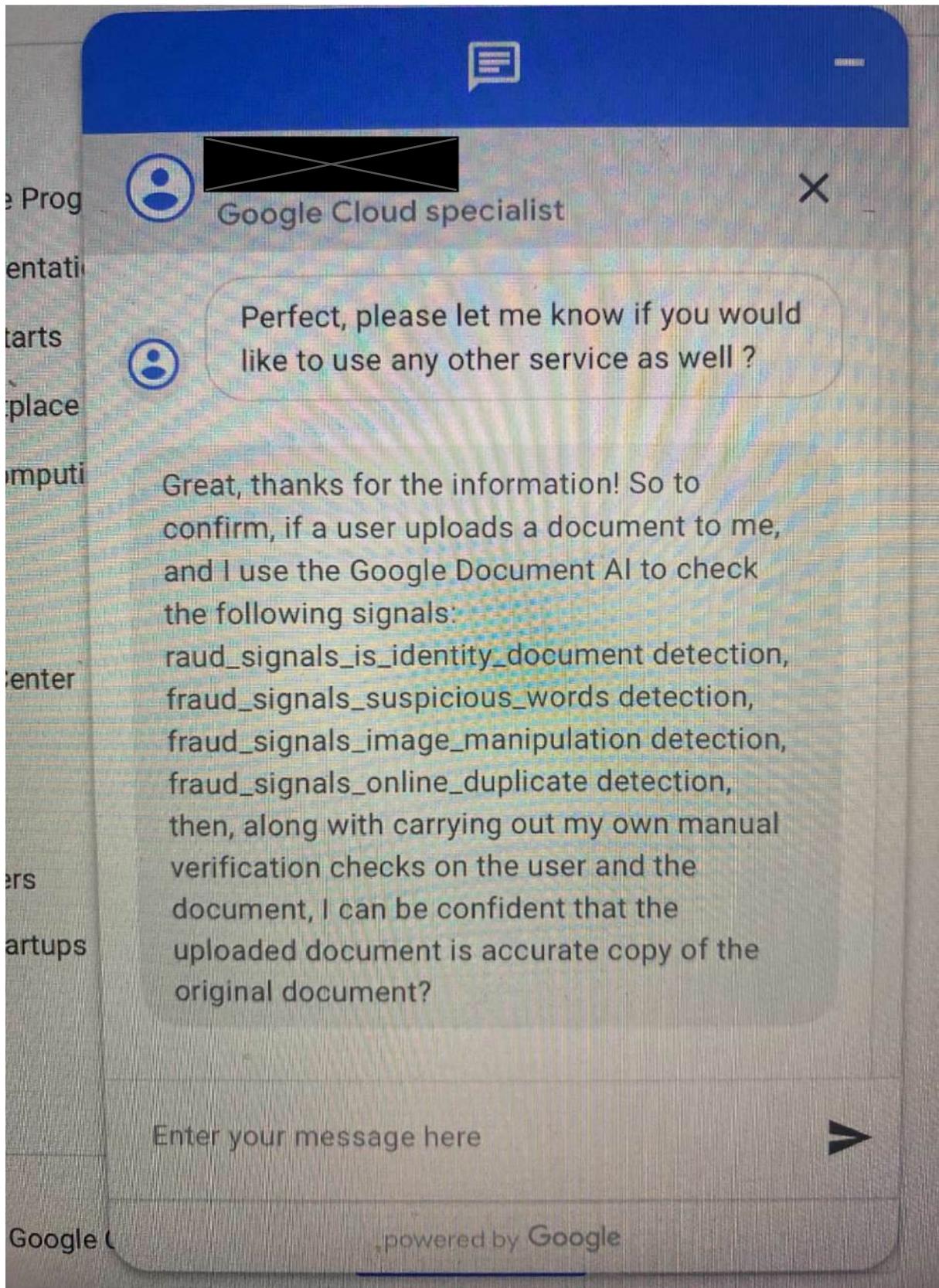
11. Here I described to the Google Cloud Specialist how I use Google Document AI as an additional part of my thorough and extensive manual verification checks of the client and the document. I stated: ***“Yes, so users upload documents such as bank statements, utility bills to me, and I certify them to be a true copy of a scanned original. I carry out many of my own manual checks and verifications on the user and their document myself. However, as an additional check as part of that process, I would use Google Document AI as an extra check in order to confirm that the document has not been tampered with / forged / that it is not a template/example that has been taken from the Internet for example”.***





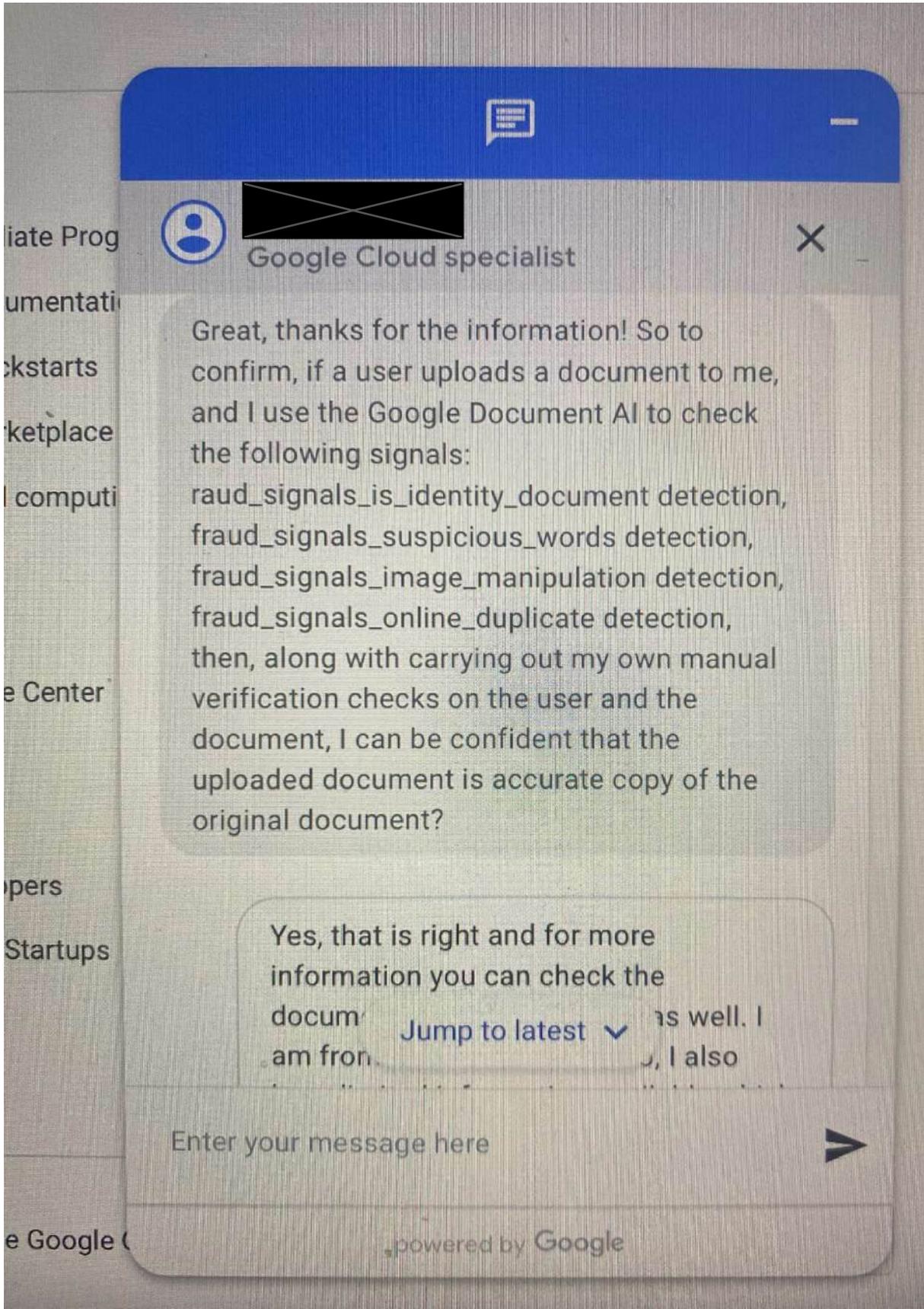
12. Here I further explained to the Google Cloud Specialist: ***“So I am just using it as an additional check in order to accurately determine that the document has not been***

*tampered with / forged / already appears on the internet. I scan one document at a time in order to return the following signals: -
fraud_signals_is_identity_document detection, fraud_signals_suspicious_words detection, fraud_signals_image_manipulation detection, fraud_signals_online_duplicate detection. It has been accurately working in my tests. I have deliberately uploaded fake / forged documents to test the Google Document AI and it successfully determined which documents were tampered / forged and which were genuine, so that is good!"*

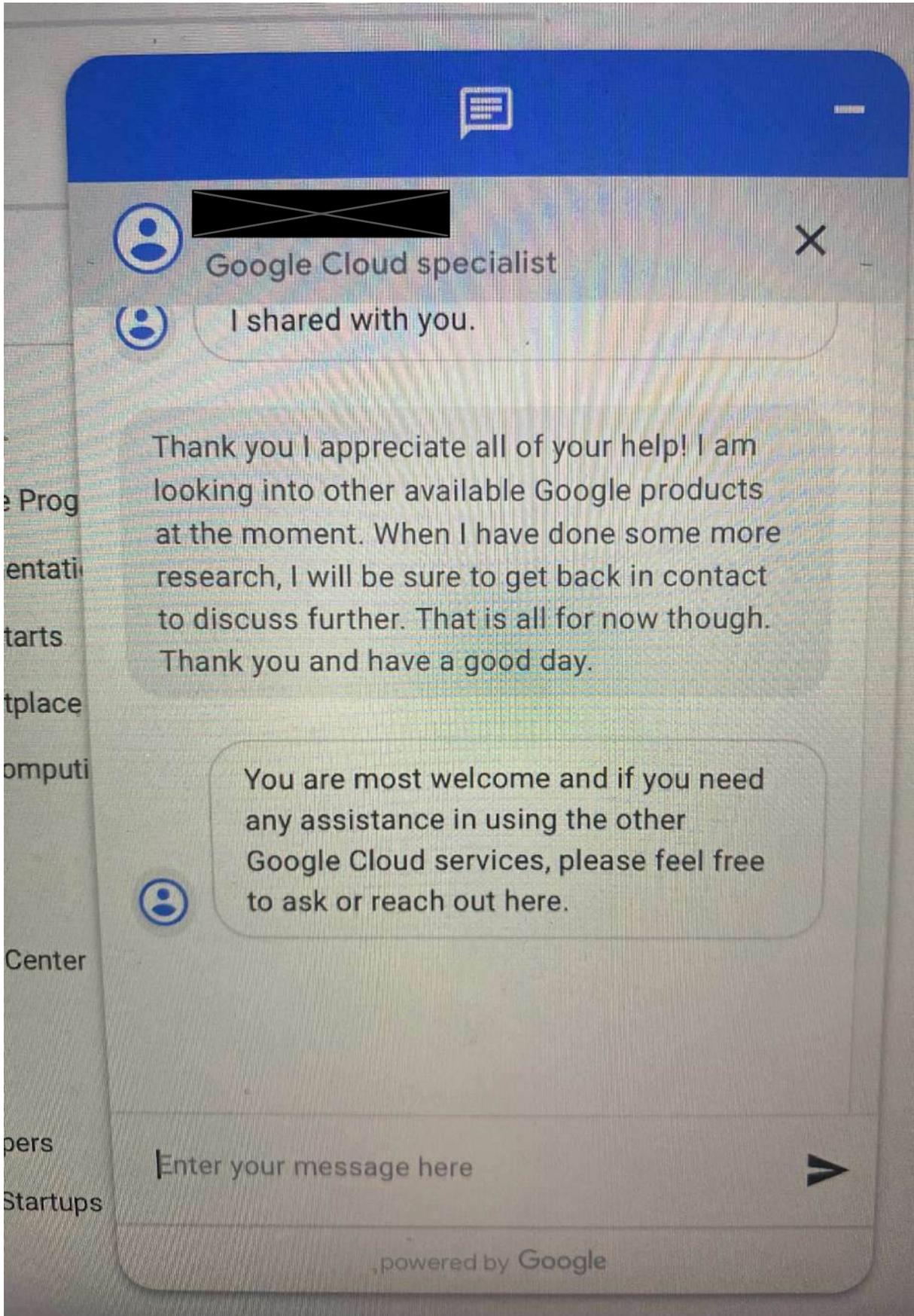


13. Here, I specifically asked the Google Cloud Specialist: ***“So to confirm, if a user uploads a document to me, and I use the Google Document AI to check the following signals:***

raud_signals_is_identity_document detection, fraud_signals_suspicious_words detection, fraud_signals_image_manipulation detection, fraud_signals_online_duplicate detection, then, along with carrying out my own manual verification checks on the user and the document, I can be confident that the uploaded document is accurate copy of the original document?".



14. To this, the Google Cloud Specialist confirmed: **“Yes, that is right...”**.



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15. In conclusion, the Google Cloud Specialist has confirmed that, if a user uploads a document to me, and I use the Google Document AI to check the following signals: raud_signals_is_identity_document detection, fraud_signals_suspicious_words detection, fraud_signals_image_manipulation detection, fraud_signals_online_duplicate detection, then, along with carrying out my own manual verification checks on the user and the document, I can be confident that the uploaded document is accurate copy of the original document.

16. I would reiterate again, that I do not 'rely' on Google Document AI. It is simply a (very powerful and useful) part of my very thorough process. The whole thorough process was set out in detail in my Response to the Rule 12 Statement and in my previous correspondences to the Applicant.

17. DRAFT

18. DRAFT

Statement of Truth

I believe the contents of this statement are true.



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Joe Morgan
Dated this 14 October 2024