

Sensitivity: General

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

---

---

**STATEMENT PURSUANT TO RULE 14 (1) OF THE SOLICITORS (DISCIPLINARY  
PROCEEDINGS RULES) 2019**

---

---

I, Michael James Colledge am a Solicitor employed by Blake Morgan LLP, New King's Court, Tollgate, Chandler's Ford, Eastleigh SO53 3LG and instructed by the Solicitors Regulation Authority Limited of The Cube, 199 Wharfside Street, Birmingham, B1 1RN. I make this Statement on behalf of the Applicant, the Solicitors Regulation Authority Limited ("SRA").

**Introduction**

1. The Applicant submits this Rule 14 Statement pursuant to a Memorandum of the Tribunal on 9 September 2024 and in consequence of Rule 14 (1) which permits that the Applicant may send supplementary statements to the Tribunal containing additional facts or matters on which the applicant seeks to rely.

**Appendices and Documents**

2. Appendix 1 to this Rule 14 Statement sets out the relevant rules applicable to this Rule 14 Statement.

Sensitivity: General

3. Also, I attach to this statement a bundle of documents, marked **MJC3** to which I refer in this statement. Unless otherwise stated, the page references (“**MJC# p#**”) in this statement relate to documents contained in that bundle. Where appropriate I also make reference to the exhibit MJC1 to the Rule 12 Statement of 5 April 2024 (“the Rule 12 Statement”).

### **The Facts**

4. Following the Tribunal’s certification of a case to answer in respect of the Rule 12 Statement, the Respondent has continued to certify documents contrary to both the Regulatory Settlement Agreement he entered into with the SRA on 18 August 2022 (“the RSA”) [**MJC1 p80-82**] and the Allegations numbered 1.2 and 1.3 in the Rule 12 Statement.
5. The Website continues to state that: “*DocumentCertifier is a revolutionary way to Certify Documents as a True Copy of the Original*” [**MJC3 p58**].
6. A further report to the SRA has confirmed that the Respondent continues to offer certification services with a copy of the relevant certificate attached in the email chain at [**MJC3 p6 - 7**]. The certificate states:

*“I hereby certify that I have seen and compared the original document and the photograph bears a true likeness of the individual to whom this certification relates”*

And

*“Checked and electronically signed by Joe Morgan ...”*

7. A subsequent letter was sent to the Respondent on 25 July 2024 enquiring as to the position of the Respondent’s continued certification of documents [**MJC3 p9**].
8. The Respondent replied on 19 August 2024 confirming that he continues to provide certification services and providing examples of certifications [**MJC3 p10**]. One such example of the Certifications [**MJC3 p12**] provided includes the following words at the top:

*“CERTIFIED COPY OF THE UTILITY BILL OF HEAD OFFICE ANOTHER PLC  
To whom it may concern,”*

And at the bottom (emphasis added):

Sensitivity: General

*"I hereby certify that this is a true copy of the scanned original Utility Bill of HEAD OFFICE ANOTHER PLC, of 10 EXAMPLE STRET, ANYTOWN, COUNTYSHIRE, A8B12 3CD, UK, as seen by me.*

...

*Checked and electronically signed by Joe Morgan*

...

*The original Document was uploaded, verified and certified electronically"*

9. Further questions were put to the Respondent [MJC3 p19-20] on the same day requesting confirmation that the Respondent had:

- 9.1. a copy of the original and scanned it himself; or

- 9.2. seen the original.

10. The Respondent requested more time to reply on 20 August 2024 and subsequently replied in full on 6 September 2024 [MJC3 p20].

11. The Respondent's reply asserts that he has had sight of the 'original' document and asserts that:

*"Again, I do indeed have sight of the original document when certifying. As previously stated, numerous times, the client uploads the original documents directly to me."*

12. This confirmation, is contradictory of itself, the Respondent has confirming that the only document seen by him is an uploaded electronic document which purports to be a scan of the original and which the client has uploaded. It is the Applicant's position that it is the scan of the document which is viewed then certified without a comparison process having been undertaken.

13. The Respondent relies upon an assertion that he uses "Google Document AI software (which is not at all the same thing as Google Cloud storage)" by way of a verification process: "to check the veracity of the uploaded documents. This checks that the document is original, untampered with, is not a sample, does not contain any suspicious words, does not appear anywhere on the internet, etc" [MJC3 p39]

14. 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.

15. 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.

### **Required information**

16. Pursuant to Rule 14 (3) the Applicant is required to provide:

- 16.1. A revised time estimate for the substantive hearing;
- 16.2. A revised schedule of the Society's costs incurred up to and including the date on which the Supplementary statement is sent
- 16.3. Any proposed directions for the future progression of the case.

17. In relation to the above, the Applicant has confirmed a revised time estimate in a certificate of readiness dated 24 September 2024 being a reduction of the hearing time to just one day. The Applicant's costs remain as set out in the Schedule of Costs dated 5 April 2024. The proposed directions for the future progression of the case remain as set out in the Tribunal's memorandum of 9 September 2024.

### **Conclusion**

18. This Rule 14 Statement is provided to set out additional facts arising between the period 25 July 2024 and 6 September 2024 and to address the fact inconsistencies and misunderstanding of the Respondent in respect of his assertion that he has 'seen' an original document in respect of each certification.

19. No further allegations are put to the Respondent in this Rule 14 Statement however for the avoidance of doubt allegations 1.2 and 1.3 of the Rule 12 Statement should now be read as continuing to the date of this Rule 14 Statement rather than the date of the Rule 12 Statement.

20. The Applicant relies upon rule 2.5 of the SRA Regulatory and Disciplinary Procedure Rules in making this Rule 14 Statement.

### **Statement of Truth**

I believe the contents of this statement are true.



Michael James Colledge

Dated this 30 September 2024

Sensitivity: General

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 JOSEPH DONALD DAVID MORGAN**

Respondent

---

---

**APPENDIX 1  
TO STATEMENT PURSUANT TO RULE 14 (1) OF THE SOLICITORS  
(DISCIPLINARY PROCEEDINGS RULES) 2019**

**RELEVANT RULES**

---

---

**SRA Regulatory and Disciplinary Procedure Rules**

*“2.5 The SRA may dispense with the giving of notice under rule 2.3 or 2.4 where:*

- (a) it intends to include a further allegation in a matter already subject to an application or ongoing proceedings before the Tribunal;*
- (b) it intends to make an application to the Tribunal in a case in which it is exercising its powers of intervention as a matter of urgency; or*
- (c) it is otherwise in the public interest to do so.”*