

Amended Rule 12 statement dated 7 October 2025**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

RYAN SEAN JACK WILLIAMS
(SRA ID: 487784)Respondent

**AMENDED STATEMENT PURSUANT TO RULE 12 (2) OF THE SOLICITORS
(DISCIPLINARY PROCEEDINGS RULES) 2019**

I, John Henry Tippett-Cooper, am a Solicitor employed by Capsticks Solicitors LLP, 1 St George's Road, London, SW19 4DR. I make this Statement on behalf of the Applicant, the Solicitors Regulation Authority Limited ("the SRA").

The allegations

1. The allegations made by the SRA against the Respondent, Ryan Sean Jack Williams, are that as a solicitor, while in practice as a Partner at SBP Law ("the Firm"):

1.1 He made comments that were offensive, inappropriate and/or discriminatory, in that:

1.1.1 In or around March 2021, he said to Colleague A words to the effect that Jewish people *'don't suffer from antisemitism and only have security outside of synagogues because they have lots of money and can pay for security and police,'* and/or

1.1.2 On 15 October 2021, at a Firm party, he referred to an individual in a boxing match using words to the effect of *'tall, large nigger,'* and/or

- 1.1.3 On 15 October 2021, at a Firm party, he repeatedly used the term ‘*nigger*’, and/or
- 1.1.4 On 15 October 2021, at a Firm party, he said to Colleague A words to the effect of ‘*racism to Jews doesn’t exist, antisemitism doesn’t exist, you’re all on top*’, and/or
- 1.1.5 On 10 December 2021, at a Firm Christmas party, he said to Colleague A words to the effect of ‘*you only got your job because you are Jewish*’, and/or
- 1.1.6 On 10 December 2021, at a Firm Christmas party, he said to Colleague A words to the effect of ‘*you Jewish people think you’re better than everyone else*’, and/or
- 1.1.7 On 10 December 2021, at a Firm Christmas party, he said to Colleague B words to the effect of ‘*did you see Colleague J’s [REDACTED] big Jew hands*’.

And in doing so breached one or more of Paragraph 1.1 and 1.5 of the SRA Code of Conduct for Solicitors, RELs and RFLs 2019 (“the SRA Code of Conduct”), and one or more of Principles 2, 5 and 6 of the SRA Principles 2019 (“the 2019 Principles”).

The facts and matters relied on in support of this allegation are set out in paragraphs **5 to 57** below.

- 1.2. He made comments that were inappropriate, unwanted and/or sexual either to, or about his colleagues:
 - 1.2.1. On 15 October 2021, at a Firm party, he asked Colleague C whether he was sleeping with Colleague D, and he said to Colleague C words to the effect that Colleague D was ‘*the best one here*’, and/or
 - 1.2.2. On 15 October 2021, at a Firm party, he told a group of colleagues that he had told Colleague C that he should have sex with Colleague D. Specifically, the Respondent is alleged to have said that he had told Colleague C words to the effect of ‘*what are you waiting for you just need to bend her over*’ or ‘*just bend her over and fuck her*’, and/or
- [REDACTED]
- 1.2.4. On 10 December 2021, at a Firm Christmas party, he said to Colleague A words to the effect of ‘*you know you want me*’, and/or
- [REDACTED]

[REDACTED]

And in doing so breached one or more of Paragraph 1.1 and Paragraph 1.5 of the SRA Code of Conduct, and one or more of Principles 2, 5 and 6 of the 2019 Principles.

The facts and matters relied on in support of this allegation are set out in paragraphs **81 to 112** below.

- 1.3. He touched several of his colleagues in an inappropriate, unwanted and/or sexual manner:

[REDACTED]

1.3.2. On 10 December 2021, at a Firm Christmas party, he touched Colleague F's bottom, and/or

1.3.3. On 10 December 2021, at a Firm Christmas party, he slapped Colleague B's inner thigh and/or pinched Colleague B's bottom.

And in doing so breached one or more of Paragraph 1.1 and Paragraph 1.5 of the SRA Code of Conduct, and one or more of Principles 2, 5 and 6 of the 2019 Principles.

The facts and matters relied on in support of this allegation are set out in paragraphs **104 to 117** below.

- 1.4. In addition, allegations 1.2 and 1.3 are advanced on the basis that the Respondent's conduct was sexually motivated. This is alleged as an aggravating feature of the Respondent's conduct but are not an essential ingredient in proving the allegations. For further particulars, see paragraph **133** below.

Appendices and Documents

2. I attach to this Statement the following appendices:

Appendix 1: Relevant Rules and Regulations

Appendix 2: **Amended** Anonymisation Schedule

3. I attach to this statement a bundle of documents, marked "Exhibit JHT1" to which I refer in this statement. Unless otherwise stated, the page references ("[JHT1, p.x]") in this statement relate to documents contained in that bundle.

4. The bundle is divided into the following sections:

Section A: Notice Recommending Referral of Conduct to the Tribunal

Section B: Evidence

Section C: Relevant Standards and Regulations

Section D: Relevant Law

Section E: Decision Making Framework

Section F: Other relevant documents relied upon by the SRA

Professional Details

Respondent

5. The Respondent was born [REDACTED]. He was admitted to the Roll on 15 January 2013. At the time of the misconduct, he was one of the partners in the Firm, based in the Firm's office in London, where he practised in litigation.
6. He is currently recorded as working at Healys LLP. The Respondent's practising certificate is free from conditions.

The facts and matters relied upon in support of the allegations

Background

7. On 7 February 2022, a self-report from the Respondent was made via his representatives, Kingsley Napley LLP. This report set out that his employer, SBP Law ("the Firm") had begun an investigation into alleged conduct by the Respondent and statements were taken from staff [JHT1, p.45]. The Respondent resigned and left the Firm on 28 February 2022 [JHT1, p.6 and 70-71].
8. The SRA received a report from **Colleague J** [REDACTED], the managing partner of the Firm on 28 February 2022 [JHT1, p.6 and 46-66]. This report concerned a local investigation by the Firm into allegations that the Respondent had made anti-Semitic comments in the workplace in March 2021 and behaved inappropriately either at, or following, two work social events. One event was the 'summer party' for staff, in fact on 15 October 2021, and

the other event was the Christmas party for the staff of the Firm on 10 December 2021 [JHT1, p.6].

Guidance on use of social media and offensive communications 7 February 2019

9. At the material time of these allegations in 2021, the obligations on the Respondent to not engage in communication that is offensive, derogatory or inappropriate whether in nature, tone or content was set out in the SRA's Principles and Code of Conduct, supported by guidance issued by the SRA dated 7 February 2019 [JHT1, pp.268-270] and on 25 November 2019 with a warning notice (first published on 24 August 2017) [JHT1, pp.289-295].
10. Whilst the alleged conduct of the Respondent did not take place on social media but in person, it was incumbent upon him to conduct his behaviour and words in accordance with the expectations set out in the Principles, supported by the SRA's guidance and warning notice.

Guidance on the SRA's approach to equality, diversity and inclusion 17 July 2019

11. At the material time of these allegations, the obligations on the Respondent were to carry out his role in a way that encourages equality of opportunity and respect for diversity, being inclusive in all that he did. These obligations were set out in the SRA's Principles and Code of Conduct, supported by guidance [JHT1, p.261].
12. The guidance sets out that solicitors are responsible for upholding the reputation of the profession in professional and personal life and for treating people fairly and with dignity and respect. They are responsible for making sure personal views are not imposed on and do not have a negative impact on others [JHT1, p.262].

Allegation 1 – offensive, inappropriate and/or discriminatory comments

Allegation 1.1.1 (anti-Semitic comments in March 2021)

13. The SRA relies on paragraphs 5 to 12 above. Additionally, the SRA relies upon the following facts and matters.
14. In her statement, Colleague A recalled that the Respondent was working with her on a case sometime between March and June 2021 and the client worked for a Jewish security charity, providing security for Jewish charity events. The Respondent also knew that Colleague A was Jewish, this being an important part of her identity [JHT1, p.135, paragraph 6].

15. Colleague A recalled that the Respondent said that anti-Semitism “*does not exist*” and that public funds were wasted on protecting synagogues that are never attacked [JHT1, p.135, paragraph 7].
16. Colleague A felt angry and upset by comments made by the Respondent. She considered them to be anti-Semitic. She was offended and belittled [JHT1, p.136, paragraph 8]. Colleague A did attempt to challenge the Respondent with her own experience as a Jewish person. This was difficult to do as he was her boss, a partner and allocated her work [JHT1, p.136, paragraph 9].
17. Colleague A also set out her recollection of this conversation with the Respondent as part of an internal investigation by the Firm in her statement dated 7 January 2021. She recalled that the Respondent had remarked something along the lines of: “*Jewish people don’t suffer from antisemitism, and they only have security outside Synagogues because they have lots of money and can pay for security and police*” [JHT1, p.145, paragraph 16]. Colleague A sent an email to Colleague J [REDACTED], Colleague K [REDACTED] (partner) and Michael Segen (partner) on 13 December 2021 where she recalled anti-Semitism in the office by the Respondent [JHT1, p.159].

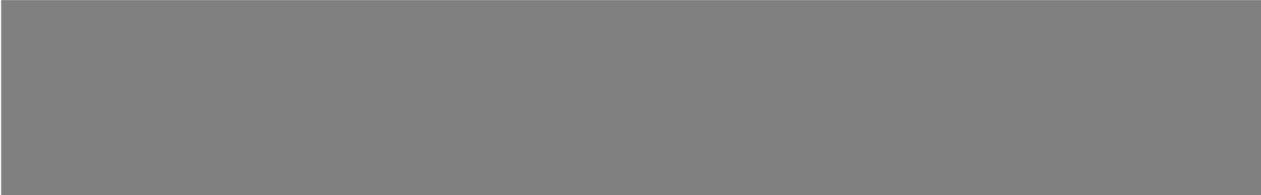
The Respondent’s response to Allegation 1.1.1

18. The Respondent stated that he was in the office with Colleague A one day in March 2021 and they discussed a case regarding a Jewish community centre. The Respondent described that he had to go through multiple security checks that he felt were excessive. The Respondent recalled Colleague A explaining why such checks would be needed, given attacks on Jewish people. The Respondent was not aware of this and that was the end of the conversation as he recalled [JHT1, p.29, paragraph 19].
19. The Respondent stated that he later did some research on the topic and found videos of children being attacked. He apologised to Colleague A for previously saying security at the community centre was excessive [JHT1, p.29, paragraph 20].
20. The Respondent denied the comments as alleged at 1.1.1 above [JHT1, pp.29-30, paragraph 20].

Allegation 1.1.2 and allegation 1.1.3 (use of the word “nigger” at the Firm’s party on 15 October 2021)

21. The SRA relies upon paragraphs 5 to 20 above. Additionally, the SRA relies upon the following facts and matters.

22. Colleague B stated that the Firm organised a “summer party” on 15 October at the Equestrian Centre in East Finchley which was run by one of the Senior Partners, Michael Segen. The event involved food and drinks and was paid for by the firm [JHT1, p.75, paragraph 7]. She exhibits the email inviting staff to this event [JHT1, p.84].
23. After the lunch, a group of Firm colleagues got cabs to a nearby pub in East Finchley at around 7pm [JHT1, p.75, paragraph 8].
24. Colleague B recalled that the Respondent did not seem too drunk on arrival at the pub but that he wanted to drink a lot. He bought shots and waited for others to arrive [JHT1, p.75, paragraph 9].
25. It is alleged that after a debate on race [JHT1, p.136, paragraph 13 and p.113, paragraph 9], Colleague A recalled the Respondent started saying “Nigger” repeatedly and “fuck you spoon” loudly and so others could hear, once a black colleague, Colleague I, had left the pub. Colleague A stated the Respondent directed the words to describe an opponent he was fighting in a charity boxing match and that he described him as a “tall, large, nigger” [JHT1, pp.137-138, paragraph 18].



30. It is alleged that the Respondent was heard by Person G referring to an individual he was due to fight in a charity boxing match as a “nigger” at least 3 times. These comments made the rest of the group visibly uncomfortable, exchanging looks of shock [JHT1, p.161, paragraph 6].
31. Person G was the partner of Colleague A and he later joined the group at the pub. It is alleged that he also witnessed racist and aggressive behaviour by the Respondent. Person G recalled that the Respondent was noticeably drunk when he arrived, being loud and slurring his words [JHT1, p.160, paragraph 4].
32. The Respondent became more drunk than the rest of the group, became increasingly loud and aggressive and occasionally lost his balance [JHT1, p.160, paragraph 5]. He was also throwing pizza around the pub garden [JHT1, pp.160-161, paragraph 5].
33. On many occasions throughout the night, Person G heard the Respondent make sexually aggressive and racist comments [JHT1, p.161, paragraph 6]. It is alleged that his evidence supports the allegation that the Respondent referred to his boxing match opponent as a “nigger”. Person G heard this at least 3 times [JHT1, p.161, paragraph 6].
34. At the end of the evening, Person G recalled also the Respondent was incredibly drunk, had urinated on his clothes and could not get off the floor. The Uber driver did not want to take him home [JHT1, p.161, paragraph 10]. The comments made by the Respondent made Person G feel very uncomfortable and he was shocked that a lawyer, let alone a partner in a firm would behave like that in public and with junior colleagues [JHT1, p.161-162, paragraph 11].
35. Colleague C recalled that at the pub it was clear that the Respondent wanted to stay out and he bought shots for the group to drink [JHT1, p.95, paragraph 80]. In his statement he set out that a conversation about race took place [JHT1, p.95, paragraph 9].
36. Colleague C left the pub at around 11.30 and by this point, he stated, the Respondent was drunk, boisterous and louder than normal [JHT1, p.96, paragraph 12].
37. Later the following week, Colleague C recalled that the Respondent spoke to him in the office saying he did not recall much from the night at the pub, that he had injured his foot and had drunk too much [JHT1, p.96, paragraph 13].
38. WhatsApp messages from Colleague C in a group chat, regarding these allegations are exhibited by Colleague A at JHT1, p.151. They read “*was he still going on about racism etc*” and “*He’s an awful drunk*”. It is alleged that these messages relate to the Respondent’s conduct in the pub garden and support allegations 1.1.2 and 1.1.3 made by the SRA.

39. Colleague J [REDACTED] set out in the Firm's report to the SRA that he recalled the Respondent drunkenly talking about a future charity boxing match at the Christmas party on 10 December 2021 and that he would wipe the floor with his opponent [JHT1, p.50].
40. As alleged, the Respondent referred to an individual, who he was due to fight at an upcoming charity boxing match, as a "tall, large nigger" on 15 October 2021. The term "nigger" is a racist slur and is used to refer to people of black ethnicity. It is widely accepted that the use of such a term is offensive, inappropriate and discriminatory. Due to the meaning of this term, it is regarded as being offensive, inappropriate and discriminatory.

The Respondent's response to allegations 1.1.2 - 1.1.3

41. The Respondent denied making any reference to a charity boxing match at either the summer or Christmas parties. He has no recollection of discussing it with Colleague J [REDACTED] [JHT1, p.30, paragraphs 22 – 23]. He recalls previously mentioning to colleagues he had thought about participating in a boxing match, but does not recall speaking to colleagues at either the summer or Christmas parties [JHT1, p.30, paragraph 22].
42. The Respondent denied ever using the term "nigger" and stated he would never use this word. He alleged potential conflict and collusion in evidence from the witnesses [JHT1, p.31, paragraphs 33-34].

Allegations 1.1.4- 1.1.7 (anti-Semitic comments made at the Firm's parties on 15 October 2021 and 10 December 2021)

43. The SRA relies upon paragraphs 5 to 42 above. Additionally, the SRA relies upon the following facts and matters.
44. It is alleged that on 15 October 2021 at the summer party the Respondent made anti-Semitic comments to Colleague A using words to the effect of: "racism to Jews doesn't exist, antisemitism doesn't exist, you're all on top" [JHT1, p.137, paragraph 14].
45. It is alleged on 10 December 2021 at the Firm's Christmas party, the Respondent said to Colleague A "you only got your job because you are Jewish" [JHT1, p.139, paragraph 27] and "you Jewish people think you're better than everyone else" [JHT1, p.139, paragraph 27].
46. Colleague C also recalled that the Respondent said that Colleague A "only got her job because she was Jewish" and that this was a reference to Colleague A working for Colleague J [REDACTED] before and they were both Jewish [JHT1, p.96, paragraph 11].

47. It is alleged by the SRA that these comments contain reference to common anti-Semitic tropes, depicting power of Jews as collective, selecting Colleague A for her job as she was Jewish, and denying the existence of anti-Semitism.
48. Colleague A considered these comments to be anti-Semitic as a Jewish person. She understood the Respondent to mean that Jewish people control everything, which is a wide stereotype [JHT1, p.137, paragraph 114]. She felt small and insignificant as the Respondent was telling her that the history of her community did not exist [JHT1, p.137, paragraph 15].
49. It is alleged by the SRA that due to the words selected by the Respondent, the amount of times he made such comments, the Jewish recipient of them, the manner in which he made the comments and some in a public setting, he displayed anti-Semitism to a Jewish person and Jewish people. Colleague A felt that he hated her. He looked at her with disgust [JHT1, p.139, paragraph 28].

Allegation 1.1.7 (anti-Semitic comment made at the Christmas party)

50. The SRA relies upon paragraphs 5 to 49 above. Additionally, the SRA relies upon the following facts and matters.
51. Colleague B set out in her statement to the SRA that on 10 December 2021, at the Firm's Christmas event, the Respondent saw Colleague J [REDACTED] bring Colleague B a drink and once he had gone, the Respondent said, "did you see Colleague J's [REDACTED] big Jew hands". There was music playing in the bar but she stated that she could hear clearly what the Respondent had said because he said it close to her ear and she then turned away. No one else was part of the conversation. She was aware that Colleague J [REDACTED] was Jewish [JHT1, p.77, paragraph 19].
52. Colleague B described telling Colleague A what had been said when they went out for a cigarette. Colleague A told Colleague B that it was not appropriate and that she was offended by what the Respondent has said about Colleague J [REDACTED]
53. Colleague A set out in her statement that Colleague B told her about the comment made by the Respondent to Colleague B about Colleague J's [REDACTED] hands. She described feeling a small sense of relief as she realised that the Respondent must hate all Jewish people and not just her. Colleague A was offended by the comment and had an issue with the term "Jew" rather than "Jewish". The former being an aggressive and derogatory term. Colleague A also felt that the Respondent had made fun of her religion by referring to anti- Semitic depictions of what Jewish people look like, which she found offensive [JHT1, p.140, paragraph 32].

Anti-Semitism

54. It is alleged that comments made by the Respondent regarding Jewish people were objectively anti-Semitic and further that he intended them to be anti-Semitic. The recognised definitions below support this allegation.

55. The UK Government formally adopted a working definition, as put forward by the International Holocaust Remembrance Alliance (“IHRA”), of anti-Semitism as follows:

“Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities.” [JHT1, p.296]

56. As part of that definition, the Government adopted IHRA’s 11 contemporary examples of anti-Semitism [JHT1, pp.298-302]. These include:

Making mendacious, dehumanizing, demonizing, or stereotypical allegations about Jews as such or the power of Jews as collective — such as, especially but not exclusively, the myth about a world Jewish conspiracy or of Jews controlling the media, economy, government or other societal institutions. [JHT1, p.300]

57. The Oxford English Dictionary defines anti-Semitism as “hostility to or prejudice against Jews”. The Oxford Dictionary gives as its meaning “hatred of and hostility toward the Jews”. The Collins dictionary defines it as “hostility to and prejudice against Jewish people”. All three dictionary definitions therefore combine hatred, hostility and/or prejudice against or towards Jews/Jewish people, as does the stem of the IHRA definition¹.

The Respondent’s response to Allegations 1.1.4 to 1.1.7

58. In relation to Allegation 1.1.4, the Respondent denied that he said this or words to this effect [JHT1, p.32, paragraph 38].

59. In relation to Allegation 1.1.5, the Respondent denied that he said this or words to this effect. He recalled a conversation about her father arranging the job for her [JHT1, pp.32-33, paragraph 39].

60. In relation to Allegation 1.1.6, the Respondent denied that he said this and set out that it was not in his character [JHT1, p.33, paragraph 43].

¹ The Tribunal may further be assisted by considering the definitions used by the Tribunal in its previous decisions of SRA v Mahmood [11625-2017] and SRA v Husain [12463-2023].

61. In relation to Allegation 1.1.7, the Respondent denied that he said this. He did remember saying something along the lines of “Colleague J [REDACTED] has big hands”, which was a reference to his generosity as the Respondent was grateful for his increased earnings [JHT1, p.33, paragraph 44]. Colleague B misheard or misunderstood [JHT1, p.34, paragraph 45].

Nexus to practice

62. The Respondent made offensive, inappropriate and/or discriminatory comments either to, or in the presence of, his colleagues. Additionally, some of those comments were made about his colleagues Colleague A and Colleague J [REDACTED]. These comments were in the workplace and/or after two Firm social events with colleagues. The SRA guidance note on sexual misconduct of 1 September 2022 sets out that moving to a pub or restaurant with parties that breakaway from the wider group of colleagues does not always break the link. The working relationship remains even if the misconduct takes place in other premises [JHT1, p.280].

Breaches relating to allegations 1.1.1 – 1.1.7

63. It is alleged by the SRA that any and all comments the Respondent made in the workplace to Colleague A and on 15 October and on 10 December were offensive, inappropriate and/or discriminatory.

64. As set out at paragraph 1.1.4, above the Respondent unfairly and prejudicially stereotyped Colleague A and Jewish people as having lots of money, being “at the top” and thinking they are better than everyone else. It is inferred that he was implying that Jewish people are at the top of society. Stereotyping an individual, or a group of people, based on their religious faith and/or ethnicity, is offensive, inappropriate, discriminatory and here, anti-Semitic.

65. It is alleged that the Respondent referred to Colleague J [REDACTED] as a “Jew” within what is perceived to be an insult. It may be appropriate to refer to someone as being a “Jew”, if someone is referring to a person’s religious faith and/or ethnicity. However, using the term in a hostile manner is offensive, inappropriate and discriminatory.

66. As alleged, the Respondent referred to an individual, who he was due to fight at an upcoming charity boxing match, as a “tall, large nigger” on 15 October 2021. The term “nigger” is a racist slur and is used to refer to people of black ethnicity. It is widely accepted that the use of such a term is offensive, inappropriate and discriminatory. Due to the meaning of this term, it is regarded as being offensive, inappropriate and discriminatory.

67. It is alleged that the Respondent unfairly and prejudicially said to Colleague A that she was only employed by the Firm because she is Jewish. Suggesting that she was only employed by the Firm because she is Jewish is offensive, inappropriate and discriminatory. The implication of the comment is that Colleague A had an unfair advantage because of religion and/or ethnicity.

Paragraph 1.1 of the SRA Code of Conduct

You do not unfairly discriminate by allowing your personal views to affect your professional relationships and the way in which you provide your services.

Paragraph 1.5 of the SRA Code of Conduct

You treat colleagues fairly and with respect. You do not bully or harass them or discriminate unfairly against them. If you are a manager you challenge behaviour that does not meet this standard.

68. The Respondent's conduct breached Paragraph 1.1 of the SRA Code of Conduct as, by making discriminatory comments either to, or in the presence of, his colleagues, he allowed his personal views to affect his professional relationships. It is evident that his comments affected his professional relationships as, several of the individuals who witnessed the Respondent make the comments regarded the comments as being either offensive or inappropriate.

69. Colleague A stated that she regarded some of the comments made by the Respondent to be anti-Semitic. Such discriminatory comments call into question his ability to treat colleagues and clients who are of different religions and ethnicities fairly in his professional practice.

70. It is alleged that this conduct breached Paragraph 1.5 of the SRA Code of Conduct as, by making offensive, inappropriate and discriminatory comments about his colleagues, he failed to treat them fairly and with respect. Additionally, by exhibiting this type of behaviour, the Respondent acted in direct contradiction to the obligation that paragraph 1.5 of the SRA Code of Conduct put on him as a manager of the Firm to challenge such behaviour.

71. As set out in the SRA guidance on equality, diversity and inclusion solicitors are expected to be inclusive in everything they do [JHT1, p.261]. The Respondent's comments contradict the very notion of inclusion, showing discrimination and rather than challenging such behaviour, it is alleged that he perpetuated it.

Principle 5 SRA Principles (integrity)

72. By using anti-Semitic words and racist slurs, the Respondent failed to act with integrity, i.e. with moral soundness, rectitude and steady adherence to an ethical code. In *Wingate v Solicitors Regulation Authority v Malins [2018] EWCA Civ 366*, it was said that integrity connotes adherence to the ethical standards of one's own profession. A solicitor acting with integrity would never have used the words, as alleged. The Respondent therefore breached Principle 5 of the SRA Principles 2019.
73. The Respondent made offensive, inappropriate and/or discriminatory comments about people of black ethnicity and Jewish people within a professional setting. In doing so, he has failed to adhere to the higher ethical standards that society expects from solicitors, and he has failed to act with integrity. A solicitor of integrity, acting in accordance with the high ethical standards of the profession would not behave in this way.

Principle 2 of the SRA Principles 2019

You act in a way that upholds public trust and confidence in the solicitors' profession and in legal services provided by authorised persons.

74. The conduct alleged also amounted to a breach by the Respondent of the requirement to behave in a way which maintains the trust placed by the public in him and in the provision of legal services.
75. Members of the public should be able to place their trust in solicitors. Any behaviour which undermines this trust damages not only the regulated person, but also the solicitors' profession as a whole.
76. The SRA guidance on public trust and confidence (in conjunction with the topic guide on the use of social media and offensive communications) also explains that, if an individual sends offensive and discriminatory communications, they are likely to have breached the requirement to uphold public trust and confidence. Although, the alleged comments here were in person, rather than via electronic or written communications, due to the nature of the comments that the Respondent made, the guidance is still relevant to this matter.
77. It is alleged that the Respondent made offensive, discriminatory and/or inappropriate comments about people of black ethnicity and Jewish people within a professional setting. In doing so, he failed to act with integrity and adhere to the higher ethical standards that society expects from solicitors. If the public was aware of his, it would damage the public's trust in the solicitors' profession and the provision of legal services by authorised persons.

78. It is evident that the Respondent's actions would damage the public trust as, within the witness statement from Person G, he stated he was frankly quite shocked that someone who works in the legal profession, let alone a partner of a firm would behave like that, especially in the public eye and in front of junior colleagues. He ought never to have said these offensive words to his colleagues.

79. Public confidence in the Respondent, in solicitors and in the provision of legal services is likely to be undermined by the words he used towards Jewish and black people, as alleged. The Respondent therefore breached Principle 2 of the SRA Principles.

Principle 6 of the SRA Principles

You act in a way that encourages equality, diversity and inclusion

80. The Respondent made offensive, inappropriate and/or discriminatory comments about people of black ethnicity and Jewish people, and some of the comments were made about Jewish people who were his colleagues. Therefore, his conduct cannot be seen to encourage equality, diversity and inclusion. In fact, he has acted in direct contradiction to the obligations Principle 6 of the SRA Principles put on him. A solicitor is expected to take steps to encourage equality of opportunity and respect for diversity, being inclusive [JHT1, p.261]. The Respondent's behaviour directly contradicted the guidance.

Allegations 1.2 (inappropriate, unwanted sexual comments) and 1.3 (inappropriate, unwanted sexual touching)

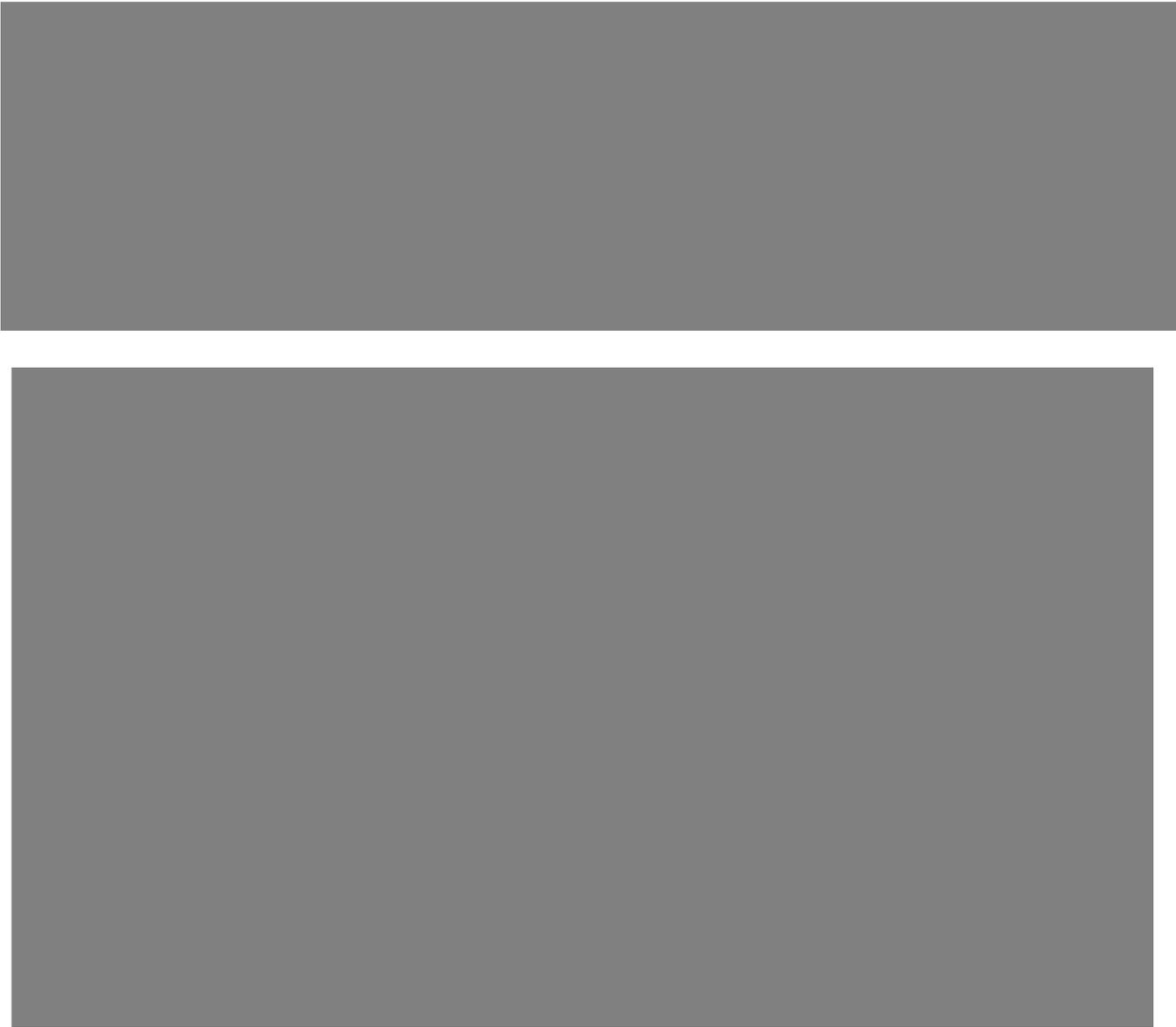
Allegations 1.2.1 to 1.2.2 (inappropriate sexual comments made on 15 October 2021) – Colleagues C and D

81. The SRA relies on paragraphs 5 to 62 above. Additionally, the SRA relies upon the following facts and matters.

82. It is alleged by the SRA that the Respondent made inappropriate and unwanted sexual comments about and to female colleagues at the pub on 15 October 2021.

83. Colleague C set out in his statement that he was at the bar in the pub with the Respondent on 15 October 2021 and the Respondent began talking about a junior colleague, Colleague D whom Colleague C was close to. The Respondent asked if there was anything going on and said that Colleague D was the *'best one here'* [JHT1, p.95, paragraph 5].

84. Colleague C felt annoyed by the comments and hoped no one could hear as they were inappropriate. He did not challenge the Respondent but changed the subject [JHT1, p.95, paragraph 6].

85. The SRA's Guidance on Sexual Misconduct lists criteria regarding gravity when assessing such conduct. Demeaning third parties or "rating staff and/or commenting on their appearance" and comments about sex life aggravate the gravity of conduct [JHT1, p.275]. The Respondent enquired about the nature of their relationship and regarded Colleague D as the "*best one here*" [JHT1, p.95, paragraph 5]. These are significant aggravating factors of sexual misconduct.
86. It is further alleged by the SRA that the Respondent said after Colleague C left that he had told Colleague C earlier in the day words to the effect of "*what are you waiting for you just need to bend her over*" or "*just bend her over and fuck her*". Colleague A recalled him saying this and she had since confirmed this with Colleague C [JHT1, p.138, paragraph 21] and in her statement to the Firm [JHT1, p.145, paragraph 15].
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Response to allegations by the Respondent regarding 1.2.1- 1.2.2

95. The Respondent accepted that he spoke to Colleague C about his relationship with Colleague D and whether they were romantically involved. Colleague C was coy. The Respondent asked if they had slept together. He saw Colleague C as a friend **[JHT1, p.35, paragraph 47]**.
96. The Respondent said Colleague D seemed nice and was the best one there in terms of being suited for Colleague C **[JHT1, p.35, paragraph 48]**.
97. The Respondent denied saying Colleague C should bend Colleague D over a table but admitted saying they should sleep together. The Respondent was intoxicated and meant no harm. He could appreciate that he should have had no such discussion **[JHT1, p.35, paragraph 51]**.
98. The Respondent did not recall saying the words in allegation 1.2.2 and would be surprised if he did **[JHT1, p.36, paragraph 52]**.

² Understood to be a reference to "Most Valued Players"

Allegations 1.2.4 (inappropriate, unwanted sexual comments made on 10 December 2021) – Colleague A

100. The SRA relies upon paragraph 5-99 above. Additionally, the SRA relies upon the following facts and matters.
101. It is alleged that Colleague A was at the Be At One bar after the Firm Christmas party at the Dorchester Hotel on 10 December 2021 and the Respondent said to her words to the effect of “*you want me*”. This made her feel annoyed and degraded, given his earlier anti-Semitic comments, she wanted to avoid the Respondent. She pulled her top up as she felt uncomfortable **[JHT1, p.140, paragraph 30]**.
102. On her way to take Colleague D to the station, Colleague A spoke to Colleague E on the phone who said that the Respondent was being sent home by **Colleague K** (a fellow partner) for being a “*perv*”. When she returned to the bar she discussed what had happened to her colleagues with them **[JHT1, p.140, paragraphs 31-32]**.
103. Colleague A also set out her recollection of this allegation to the Firm on 7 January 2021 **[JHT1, p.144, paragraph 8]** and of being made aware of other allegations against the Respondent arising from his behaviour at the Christmas party **[JHT1, p.144, paragraph 9]**. She did not drink alcohol and was not drinking at either event **[JHT1, p.144, paragraph 7]**.
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Allegation 1.3.2 (inappropriate, unwanted sexual touching) – Colleague F

110. The SRA relies upon paragraph 5-109 above. Additionally, the SRA relies upon the following facts and matters
111. It is alleged that also on 10 December 2021 at the Firm's Christmas party, the Respondent touched Colleague F's bottom.
112. She stated that at Be At One bar, the Respondent was slurring his words and his eyes did not look open [JHT1, p.104, paragraph 7]. Later in the evening, the Respondent reached down and pinched her bottom. There was no one else near enough to her to have done this [JHT1, p.104, paragraph 10]. Colleague F was utterly shocked as it came out of nowhere [JHT1, p.105, paragraph 12]. She went upstairs with Colleague H and told him what had happened. Then she left [JHT1, p.105, paragraph 13].
113. After speaking with colleagues later she realised that the Respondent had been inappropriate with other colleagues so told them what happened [JHT1, p.105, paragraph 14].
114. Colleague H also set this out in a statement to the Firm [JHT1, p.59, paragraphs 4 and 7].

Allegation 1.3.3 (inappropriate, unwanted sexual touching) – Colleague B

115. The SRA relies upon paragraph 5-113 above. Additionally, the SRA relies upon the following facts and matters.
116. It is alleged that the Respondent slapped Colleague B on the thigh and pinched her bottom as set out at 1.3.3. She set out in her statement that she was on the lower level of the bar, Be At One, after the Firm's Christmas lunch on 10 December 2021. Colleague D had

knocked a table and the drinks on it. Whilst she was patting herself dry, Colleague B stated that the Respondent used his left hand to slap her inner thigh quite hard [JHT1, p.77, paragraph 23]. It was not accidental as he had to move his hand from his side to deliberately slap her thigh area [JHT1, p.77, paragraph 24].

117. Colleague B stated that the force made her jolt and that it was an odd thing to do as he made contact at the top of her inner thigh, close to her crotch area [JHT1, p.78, paragraph 24]. She did not feel comfortable with the Respondent who did not seem very drunk at this point. She went to the bar [JHT1, p.78, paragraph 25].
118. A little time later Colleague B was dancing with others, the Respondent seemed more drunk and out of nowhere he pinched her bum, she turned around and he was the only one close enough as there was plenty of space [JHT1, p.78, paragraph 26].
119. Colleague B stated that the Respondent used his left hand to pinch her right bum cheek, it was quick as she moved away from him. She gave him a look to say she was not happy with him and was shocked [JHT1, p.78, paragraph 28]. She told her colleagues outside what had happened, they explained what had happened to them and Colleague K told them it would be dealt with and sent the Respondent home [JHT1, p.78, paragraph 29].
120. Colleague B also recalled these events in her statement to the Firm on 21 December 2021 [JHT1, p.81, paragraphs 5-6].

Response by the Respondent regarding allegations 1.2.4- [redacted] and [redacted] 1.3.2 – 1.3.3

121. In response to Allegation 1.2.4 the Respondent denied saying these words to Colleague A on 10 December 2021.



123. In response to Allegations 1.2.2, the Respondent did not recall touching Colleague F's bottom. He has poor hearing so may have leaned in to hear her and may have had his hand resting on her lower back or waist area, not her bottom [JHT1, p.37, paragraph 60].
124. In response to Allegation 1.3.3, the Respondent stated that he may have made contact with her leg. He believed it was her knee not her inner thigh. There was no sexual intention. He had no recollection of pinching anyone's bottom [JHT1, p.36, paragraphs 58-59].

Breaches

Allegations 1.2.1- 1.2.4 [REDACTED] and [REDACTED] 1.3.2 and 1.3.3

125. It is alleged that the Respondent breached paragraph 1.5 of the SRA Code of Conduct.

You treat colleagues fairly and with respect. You do not bully or harass them or discriminate unfairly against them.

126. It is further alleged that the Respondent breached Principles 2, 5 and 6 of the SRA Principles as regards Allegations 1.2 and 1.3 in their entirety.

127. The Respondent made inappropriate, unwanted and/or sexual comments either to, or about, his colleagues and/or touched several of his colleagues in an inappropriate, unwanted and/or sexual manner. He had been given no indication that such comments or touching was welcomed or consensual.

128. This conduct breached Paragraph 1.5 of the SRA Code of Conduct as he sexually harassed his colleagues and, by doing so, he failed to treat his colleagues with respect. They felt uncomfortable and degraded.

Principle 5 of the SRA Principles (integrity)

129. By making inappropriate sexual comments and/or touching colleagues inappropriately, unwantedly and/or sexually the Respondent failed to act with integrity, i.e. with moral soundness, rectitude and steady adherence to an ethical code. In *Wingate v Solicitors Regulation Authority v Malins [2018] EWCA Civ 366*, it was said that integrity connotes adherence to the ethical standards of one's own profession. A solicitor acting with integrity would never have used the words or behaved in this way, as alleged. The Respondent therefore breached Principle 5 of the SRA Principles 2019.

130. By exhibiting such behaviour, within a professional setting, the Respondent failed to adhere to the higher ethical standards that society expects from solicitors and he has failed to act with integrity. A solicitor of integrity, acting in accordance with the high ethical standards of the profession would not behave in this way.

Principle 2 of the SRA Principles 2019

You act in a way that upholds public trust and confidence in the solicitors' profession and in legal services provided by authorised persons.

131. The Respondent made inappropriate comments either to, or about, several of his colleagues. They were of a sexual nature and unwanted. He also touched several of his

colleagues in an inappropriate and/or sexual manner, when he had been given no indication that such touching was welcomed or consensual. All of the misconduct took place in a professional setting.

132. By exhibiting such behaviour, the Respondent has failed to act with integrity and adhere to the higher ethical standards that society expects from solicitors. If the public was aware of the Respondent's actions, it would damage the public's trust in the solicitors' profession and the provision of legal services by authorised persons.

Principle 6 of the SRA Principles

You act in a way that encourages equality, diversity and inclusion

133. It is alleged that the Respondent made inappropriate and/or sexual comments either to, or about, several of his female colleagues. They were of a sexual nature and unwanted. He also touched several of his female colleagues in an inappropriate and/or sexual manner, when he had been given no indication that such touching was welcomed or consensual. Therefore, his conduct cannot be seen to encourage equality, diversity and inclusion. In fact, he has acted in direct contradiction to the obligations Principle 6 of the SRA Principles put on him.

Nexus to practice

134. All of the alleged conduct arising from Allegations 1.2 and 1.3 occurred at social events that were arranged by the Firm, or at a social event that directly stemmed from a social event arranged by the Firm so the link to practice was not broken. The alleged conduct was towards colleagues. The comments were made publicly and to and/about colleagues. In any event, the SRA's Guidance on Sexual Misconduct dated 1 September 2022 states that:

"Sexual misconduct might also happen entirely outside of practice and not directly relate to the practice of the individual but might be so serious that we consider it raises a regulatory issue." [JHT1, p.272]

Allegation 1.4 - Sexual motivation

133. It is alleged that the Respondent's conduct in Allegations 1.2 and 1.3 was sexually motivated. This is alleged as an aggravating feature but not essential ingredient in proving the allegations. The only reasonable inference of the Respondent's motivation for such conduct is that it was sexually motivated, in that it was in pursuit of his own sexual gratification or in pursuit of a future sexual relationship (*Basson v General Medical Council* [2018] EWHC 505 (Admin)). The Respondent's conduct as alleged at 1.2 and 1.3 and as particularised, was of a sexual nature and sexually motivated within the meaning of the

term discussed by Foster J in *General Medical Council v Dr RH [2020] EWHC 2518 (Admin)*.

The SRA's investigation

134. The SRA has taken the following steps to investigate the allegations which it makes against the Respondent.
135. Following receipt of the report on behalf of the Respondent on 7 February 2022 and a report from the Firm on 28 February 2022, the SRA gathered witness evidence from the key witnesses, referred to in detail above.
136. On 24 October 2023, the Respondent was sent a Referral Notice **[JHT1, pp.1-20]**.
137. On 26 January 2024, the Respondent responded to the Notice **[JHT1, pp.25-41]**.
138. The response to allegations is set out above. The Respondent sets out his personal history, background and events leading up to the allegations at in his response **[JHT1, pp.26-28, paragraphs 9 to 15]**.
139. On 15 April 2024, an Authorised Decision Maker of the SRA decided to refer the conduct of the Respondent to the Tribunal **[JHT1, pp.283-288]**.

I believe that the facts and matters stated in this statement are true.



Signed:

John Tippett-Cooper

Date: ~~1 August 2024~~

Amended 08.10.25

BEFORE THE SOLICITORS DISCIPLINARY TRIBUNAL

IN THE MATTER OF THE SOLICITORS ACT 1974 (as amended)

AND IN THE MATTER OF:

SOLICITORS REGULATION AUTHORITY

Applicant

and

RYAN SEAN JACK WILLIAMS

Respondent

APPENDIX 1: RULES AND REGULATIONS

SRA Code of Conduct for Solicitors, RELs and RFLs 2019

Rule 1.1: You do not unfairly discriminate by allowing your personal views to affect your professional relationships and the way in which you provide your services.

Rule 1.5: You treat colleagues fairly and with respect. You do not bully or harass them or discriminate unfairly against them. If you are a manager you challenge behaviour that does not meet this standard.

SRA Principles 2019

Principle 2: You act in a way that upholds public trust and confidence in the solicitors' profession and in legal services provided by authorised persons

Principle 5: You act with integrity.

Principle 6: You act in a way that encourages equality, diversity and inclusion.