

IN THE SOLICITORS DISCIPLINARY TRIBUNAL

IN THE MATTER OF THE SOLICITORS ACT 1974 (AS AMENDED)

BETWEEN

THE SOLICITORS REGULATION AUTHORITY LIMITED

Applicant

AND

JASPAL SINGH

Respondent

ANSWER

1. This is the Respondent's Answer to the Rule 12 statement dated 27 November 2025.
2. The Respondent denies the allegations made against him on the basis that the matters in issue do not amount to professional misconduct in circumstances where he had a consensual relationship with Person A.

Preliminary Issue - Disclosure Failures

3. In his response to the SRA's Notice recommending referral to this honourable Tribunal, the Respondent raised concerns about disclosure of key documents including the diary that Person A claims to have maintained and the complete run of WhatsApp messages. The Respondent highlighted that the documents and events produced had been cherry picked and did not accurately reveal the consensual nature of the relationship between Person A and the Respondent and Person A's active participation in furthering the relationship.
4. The Applicant was aware of the existence of the diary upon receipt of Person A's complaint dated 18 January [REDACTED] [X21]. The complaint speaks of the diary as a current document and offers the Applicant the opportunity to review the entire run of WhatsApp and SMS messages

[X23]. There is no indication that the Applicant ever sought to inspect or secure the preservation of the diary, nor that it inspected the full run of WhatsApp and SMS messages.

5. Person A asserts in the complaint that she contacted the SRA and Citizens Advice in June [REDACTED] and was advised to make a complaint but she waited until the end of her case to do so. Leaving aside that this must be an error as Person A had not even met the Respondent in June [REDACTED] the decision by Person A to delay making her complaint by around seven months caused prejudice to the Respondent in responding to it. The Applicant failed to take steps to mitigate that prejudice by immediately securing the evidence it was told was available as at January [REDACTED]. That was a serious and now irremediable failure in the investigation which renders these proceedings unfair.
6. Person A also indicates that she was assisted in preparing her complaint by Person B [X2 para 2]. Person A indicates that she lives with her family and is required to let them know where she is at all times [X4 para 12]. She says [REDACTED] that her life experience is very limited because of the way she was protected by her family. In these circumstances, the involvement of Person B – Person A's [REDACTED] – in preparing this complaint requires more explanation than (to paraphrase) 'He helped collate evidence and supported me in drafting but this is my evidence'. Had the original documents been provided for inspection, the impact of the involvement of **Person B** in collating documents and assisting in drafting the complaint could be assessed by reference to contemporaneous documents. However the documents have been destroyed and the extent to which evidence has been curated or influenced – whether deliberately or through well-meaning discussion/intervention - cannot properly be tested. Person A's text messages from early in the relationship show varying levels of flirtation, encouragement, declarations of love and devotion and gratitude. The stark contrast from that position to "ghosting" the Respondent in June [REDACTED] without explanation and characterising the relationship as inappropriate calls for explanation, particularly in light of the acknowledged involvement of Person B in preparing the complaint.
7. The Respondent was notified of the SRA investigation, in broad terms, on 29 March [REDACTED] just over two months after the complaint had been filed. However, the SRA had not disclosed the complaint itself, nor the witness statement it obtained in October [REDACTED] (apparently without asking for the underlying documents) by **12 April** [REDACTED] [X188], around 15 months after the complaint was made and almost two years after the end of the relationship. The witness

statement was finally disclosed after another year in April [REDACTED]. Accordingly, the Respondent was not informed of the claimed existence of a diary as the evidence on which the complaint against him was prepared for more than two years. He was deprived of the opportunity to inspect the same while the events were fresh in his mind. Shortly after the Respondent was made aware of the diary's existence, he sought inspection – or at least confirmation that the SRA had inspected the diary itself.

8. The Applicant spent a total of just 20 hours investigating the complaint [X212]. It confirmed on 13 June [REDACTED] that it did not have the diary. [X215] The Respondent believes that the Applicant has not seen the diary and took no steps to secure it.
9. The Respondent's response to the SRA Notice placed disclosure squarely in issue and indicated that there were good reasons why the diary needed to be verified and produced for inspection [X217]. These included that the Respondent's medical records included reference to auditory hallucinations and memory problems. In those circumstances, it was plainly obvious that any original contemporaneous documents would be of heightened relevance.
10. Further, there were obvious issues with dates and events in Person A's witness statement which cast doubt on the accuracy of the report and her witness statement. These include:-
 - a. Paragraph 5 of the witness statement [X3] states that Person A was diagnosed with **health issues** in early [REDACTED]. This does not appear in her medical records
 - b. Paragraph 5 also states that Person A was prescribed [REDACTED] in around August [REDACTED] when in fact the date from medical records was 14 October [REDACTED]. This is particularly strange because the report gives this date as September/October [REDACTED]
 - c. Both of these points should have been clear to Person A who not only had copies of her medical records from the ET proceedings but also prepared a detailed chronology which did not mention [REDACTED] at all during early [REDACTED] stating instead that the issues were [REDACTED].
 - d. The incident at paragraph 6 was not recorded at all in the detailed chronology provided to the Respondent on 24 September [REDACTED]
 - e. The alleged events of 3 December [REDACTED] – the most serious of all the allegations – take up a single line in the Report referencing Person A's first kiss but transform into 5 paragraphs in the witness statement alleging inappropriate touching and arguable

lack of consent. No WhatsApp messages – or documents of any kind are disclosed between 10 November [REDACTED] and 7 December [REDACTED] covering this critical event. Further, Person A's witness statement confirms at paragraph 30 [X9] that person A loved the Respondent and considered that they were in a relationship. This is specifically relevant to allegations 1.2 and 1.3.

- f. At X94, the headline states that events occurred in October [REDACTED] rather than February [REDACTED] as appears from the snippets immediately following.
- g. X112 shows a call lasting more than 2 hours from Person A to the Respondent at 23.44 on 11 May [REDACTED] Paragraph 60 of Person A's statement [X16] asserts that Person A met with the Respondent in person on 11 May to discuss costs. There is no mention of the lengthy call. Person A states that there was a call on 12 May which does not appear on the disclosed call records.
- h. X113 contains an exchange of messages on 30 May which jump from 30 May to 12 June. This is inconsistent with the final paragraph on page X30 which includes reference to messages on 1 June [REDACTED]

11. These discrepancies are highlighted because they cast doubt on Person A's ability to accurately and consistently transcribe and/or cross reference the information she has provided and indicate cherry-picking of evidence. Were the original documents available for independent review, this issue would be addressed by simply referring back to the contemporaneous material. However, the Respondent has been permanently deprived of the opportunity to consider contemporaneous material and is faced with an account which contains inconsistencies on its face and which is acknowledged to have been prepared with the input of a third party with influence over Person A – **Person B**

12. Despite the Respondent's position and the obvious relevance of the missing documents, the Applicant elected to issue a rule 12 statement in which it confirms, for the first time, that the diary and the omitted WhatsApp and SMS messages have now been destroyed. Notably, this includes **all** flirtatious and unsolicited messages sent by Person A to the Respondent which supports the Respondent's view that the disclosed documents are deliberately one-sided.

13. It is the Respondent's position that the destruction of contemporaneous documents is clearly prejudicial to his case in circumstances where he does not deny a relationship but where he states that Person A was at least an equal party to the relationship, indeed, the Respondent

has disclosed to the SRA photos and videos of herself serenading the Respondent and blowing kisses which he recalls were unsolicited and that she sent frequent flirty messages. His case is and has always been that the relationship was mutual and driven by Person A's clear indications of interest. The Respondent recalls that Person A sought a relationship with an [REDACTED] man due to her stated perception that women are treated better by the [REDACTED] community than by her own community. His recollection is that she had been engaged three times in the past and was not as inexperienced as is now suggested. Furthermore, Person A was plainly intelligent and was actively working to commence a [REDACTED] having left a job which was logically a high risk role. The Respondent does not seek to cast aspersions on Person A in taking these points. It is apparent that Person A has had serious issues and the Respondent hopes that she is finding her way back to full health. The contemporaneous messages that are available indicate that Person A's most serious symptoms – [REDACTED] – arose from around February [REDACTED] which is outside of the period of the allegations. The Respondent was clearly supportive of Person A. However, it is sadly common for people to re-write the history of relationships to paint their own role in the best light, including minimising their role in actions and choices which they later regret. This is a recognised feature of memory bias.

14. The Respondent will say that the investigation was incomplete and obviously flawed. The failure to obtain and secure original evidence is material and prejudicial. It is not possible to remedy that prejudice and, as a result, it is not now possible for the Respondent to have a fair trial.
15. That position is compounded by the fact that the Respondent is ill. [REDACTED]
[REDACTED] He did not retain WhatsApp messages, nor did he keep notes of private and intimate conversations he was having with a romantic partner. Accordingly, he cannot look to his own records to make good the prejudice that he has suffered because the Applicant failed to secure the records which would have been available to it had it acted promptly. The Respondent has been affected by the Applicant's solicitors sending a communication to the general email address at his firm which has caused speculation and rumours to circulate in his office and added to his difficulties.

Answer

16. The Respondent's primary position is that the allegations against him should be permanently stayed as it is not possible for him to receive a fair trial in the circumstances for the reasons set out above.
17. The Respondent will say that the Applicant failed in its obligation to act accountably and transparently when it failed to secure documentary evidence available to it. Its decisions during the investigation stage caused irredeemable prejudice which cannot be cured by oral evidence and cross examination.
18. If, contrary to the Respondent's primary submission, the Tribunal concludes that the prejudice caused by the destruction of contemporaneous evidence can be ameliorated sufficiently to permit a fair trial – or if the Applicant is able to produce the missing documents – the Respondent will submit as follows:-
19. As to Allegation 1.1:
 - a. The Respondent did not know of any relevant vulnerability factors until at least 21 October [REDACTED]. He disputes Person A's wholly undocumented account of what was said on 24 September [REDACTED].
 - b. On 24 September [REDACTED] Person A discussed with the Respondent her personal interests, including her interest in [REDACTED] religion and [REDACTED] music;
 - c. Person A was [REDACTED] years old and had been working in a customer facing [REDACTED] role at [REDACTED] for several years. She had directly confronted her line manager on several occasions about issues at work. She had meticulously prepared a lengthy chronology of events supporting the issues she raised. It mentioned neither [REDACTED] health concerns nor [REDACTED].
 - d. There is no evidence of any improper pressure being placed on Person A.
 - e. The Respondent was not in a position of authority over Person A. He had no control over her career, or her decisions.
 - f. It is accepted that the Respondent sent Person A a WhatsApp message on 7 October [REDACTED] [X185]. There is nothing inappropriate within the text message. It is a neutral request to call. Person A responded 10 minutes later with a blushing emoji. That is a widely known flirtatious response and a demonstration of interest.

- g. The message from the Respondent was at 17.05 pm. Person A's response was just 10 minutes later. A phone call (of which no records are disclosed) is said to have been made the same day but there is no indication of whether or not it was after Person A's texted response.
 - i. If the call was said to have taken place between the two messages, the necessary implication is that the call was very short and the flirtatious message from Person A indicates that what was discussed was welcome to her.
 - ii. If the call is said to have taken place later that day, it is an inescapable conclusion that the first flirtatious message was sent by Person A.

Neither (i) nor (ii) above is consistent with any suggestion that the Respondent's indication of interest was unwelcome or inappropriate. For the avoidance of doubt, the Respondent accepts that there was a phone call and that the relationship developed quickly. He cannot recall the precise course of events as to whether the call was before or after the text.

- h. By 8 October [REDACTED] (around 25 hours after the initial text), the Respondent sent Person A a video of him performing a [REDACTED] song. The Respondent will say that the video was sent because Person A expressed interest in seeing it. Her response [X40] was enthusiastic and flirtatious.
- i. Person A states that the Respondent's request for "mine treat" on 8 October [REDACTED] refers to a picture of her in her old work uniform because he wanted to see her in a skirt. The Respondent will give the context as Person A having told him that she liked the picture, felt confident in the uniform, and that it was one of her favourite pictures. By definition, a work uniform is something appropriately formal which Person A would have worn in public. There is no suggestion that the Respondent asked for any type of risqué photo. Person A's messages continue to be flirtatious.
- j. The Respondent uses the term "[REDACTED]" on 8 October [REDACTED] and "[REDACTED]" from 14 October [REDACTED] in text messages. His evidence is that such terms are a common form of general endearment within the [REDACTED] community. While informal, the terms are respectful and in common usage more as figures of speech than declarations of status.
- k. X44 highlights the cherry picking of messages. It starts with arrangements being discussed for the first in person meeting between the Respondent and Person A which could fairly be described as a date. It takes place 4 days after the initial call. However

the exchange does not include who suggested meeting up, nor the initial discussions around it.

l. The exchange at x45-X46 shows Person A highlighting that she has updated her profile picture and, unprompted, seeking the Respondent's approval.

m. The overarching tone of the messages is reciprocal with Person A driving the relationship and offering assurance to the Respondent when he expresses doubts – see, for example X75 and onwards.

20. The Respondent will say that there is no evidence of him trying to take unfair advantage of Person A, nor to abuse his position. She was an equal and active participant in a relationship which was consensual. Despite the cherry picking of evidence, there is no evidence of improper pressure or improper suggestions. Where Person A indicates mental health concerns, the Respondent reacts supportively and encourages her to believe that better days are coming.

21. Person A's employer specifically rejected any claim based on [REDACTED] health. The employment claim was settled on the basis of [REDACTED].

22. It follows that the factual basis of Allegation 1.1 is not made out in that the Respondent did not know and could not have been expected to know that Person A was vulnerable. The Respondent does not accept that Person A's version of events is complete or accurate. Not only is the account of what was discussed at the first meeting untrue, Person A did not discuss or mention her [REDACTED] to the Respondent as alleged and her account of the alleged code phrase "Asda Midnight" is specifically challenged. The Respondent will say that his response of "???" upon the use of the phrase in January [REDACTED] [X90] confirms his unfamiliarity with the phrase as she now purports it to mean. It is the Respondent's case that this phrase signified Person A's desire to live independently and have the freedom to go to "Asda at midnight *to buy ice-cream*" without having to ask or report to anybody, i.e. her family. This does not support the suggestion relied upon by the Applicant that the Respondent was aware of Person A's vulnerability. He was not. There is no other basis advanced for suggesting that the relationship was inappropriate. There is no rule of conduct which prevents a solicitor from pursuing a consensual personal relationship with a client.

23. Accordingly, allegation 1.1 is denied in full.

24. As to Allegation 1.2, this suffers from the same issues concerning alleged knowledge of vulnerability.

25. The Respondent has always accepted that there was a consensual relationship between himself and Person A. He accepts that some of the particulars specified occurred in the course of that relationship but denies that they were inappropriate.
26. The following factual particulars are denied:
- a. 1.2.3 is denied insofar as it relates to alleged discussion of [REDACTED]. The Respondent accepts that he held Person A's hand on occasion.
 - b. 1.2.4 is denied insofar as it asserts that holding Person A's hand was without permission. The Respondent will say that physical contact was expressly consensual.
 - c. 1.2.9 is denied in that the Respondent did not ask Person A to sit on his lap as alleged.
27. The Respondent accepts that the balance of the particulars occurred as a matter of fact but denies that the actions described were inappropriate in circumstances where they were not unwanted and were part of an acknowledged consensual relationship.
28. As to Allegation 1.3, the Respondent denies the alleged factual basis for the allegation and relies specifically on Person A's message of 8 December [REDACTED] [X80] which clearly states "thank you for respecting me and my respect". The Respondent will explain that what she meant by "my respect" was her honour (as a [REDACTED] woman) and was confirming that he had never had physical contact without her consent. This - together with the preceding messages - is inconsistent with the allegation made. There is a very notable gap in the disclosed WhatsApp messages from 10 November [REDACTED] at X72 to 7 December [REDACTED] at X74.
29. The Respondent accepts that he was in a consensual relationship with Person A and that he had hoped for the relationship to develop on a mutual basis. It follows that the second limb of sexual motivation – ie the pursuit of a future sexual relationship was part of the Respondent's motivation. However, all indications were that the relationship was mutual and that Person A was encouraging the impression that the relationship would develop along those lines. On the unusual facts of this case, it is denied that sexual motivation should be treated as an aggravating factor.

Russell Cooke LLP

9 February 2026