

SOLICITORS DISCIPLINARY TRIBUNAL

IN THE MATTER OF THE SOLICITORS ACT 1974

Case No. 11923-2019

BETWEEN:

SOLICITORS REGULATION AUTHORITY

Applicant

and

ALEX ROLF VAN DER ZWAAN

Respondent

Before:

Mr B. Forde (in the chair)

Mr R. Hegarty

Mr R. Slack

Date of Hearing: 13 June 2019

Appearances

There were no appearances. The matter was dealt with on the papers

JUDGMENT ON AN AGREED OUTCOME

Allegations

1. The allegation contained in the Rule 5 Statement against the Respondent made by the Solicitors Regulation Authority (“SRA”) was that on 3 November 2017, in an interview with the United States Special Counsel’s Office, he made false statements contrary to Section 1001(a)(2) of Title 18 of the United States Code in that he did wilfully and knowingly make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the executive branch of the Government of the United States. He pleaded guilty to the offence and was sentenced 3 April 2018. He thereby failed to:
 - 1.1 uphold the rule of law and the proper administration of justice; and/or
 - 1.2 act with integrity in breach of Principle 2 of the 2011 Principles; and/or
 - 1.3 behave in a way that maintains the trust the public places in her and the provision of legal services in breach of Principle 6 of the 2011 Principles.
2. Dishonesty was alleged as regards the allegation, however dishonesty was not an essential ingredient for the proof of the allegation.

Documents

3. The Tribunal had before it the following documents:-
 - Rule 5 Statement dated 4 February 2019
 - Respondent’s Answer (undated)
 - Statement of Agreed Facts, Admissions and Outcome dated 10 June 2019

Factual Background

4. The Respondent was born in 1984 and was admitted to the Roll in September 2009. He held current practising certificates from September 2009 to May 2019. On 23 May 2019, the Respondent’s practising certificate was revoked.
5. At all material times the Respondent was an associate at Skadden Arps Slate Meagher & Flom (UK) LLP in London. He worked for that firm from September 2007 until his employment was terminated by reason of gross misconduct in November 2017.

Application for the matter to be resolved by way of Agreed Outcome

6. The parties invited the Tribunal to deal with the allegations against the Respondent in accordance with the Statement of Agreed Facts, Admissions and Outcome annexed to this Judgment. The parties submitted that the outcome proposed was consistent with the Tribunal’s Guidance Note on Sanctions.

Findings of Fact and Law

7. The Applicant was required to prove the allegations beyond reasonable doubt. The Tribunal had due regard to the Respondent’s rights to a fair trial and to respect for his

private and family life under Articles 6 and 8 of the European Convention for the Protection of Human Rights and Fundamental Freedoms.

8. The Tribunal reviewed all the material before it and was satisfied beyond reasonable doubt that the Respondent's admissions were properly made.
9. The Tribunal considered its Guidance Note on Sanction (December 2018). In doing so the Tribunal assessed the culpability and harm identified together with the aggravating and mitigating factors that existed. The Respondent had admitted knowingly and intentionally providing false information to the United States Special Counsel's Office. Such conduct, as the Respondent admitted, was in clear breach of the Principles and was also dishonest. The Tribunal considered that given the serious nature of the Respondent's conduct, the only appropriate and proportionate sanction was to strike the Respondent off the Roll.
10. Having determined that the proposed sanction was appropriate and proportionate, the Tribunal granted the application for matters to be resolved by way of the Agreed Outcome.

Costs

11. The parties agreed that the Respondent should make a contribution to costs in the sum of £3,095.00. The Tribunal considered the costs application to be appropriate and proportionate, and ordered that the Respondent pay a contribution to the costs in the agreed amount.

Statement of Full Order

12. The Tribunal Ordered that the Respondent, ALEX ROLF VAN DER ZWAAN, solicitor, be STRUCK OFF the Roll of Solicitors and it further Ordered that he do pay the costs of and incidental to this application and enquiry fixed in the sum of £3,095.00.

Dated this 3rd day of July 2019
On behalf of the Tribunal


B. Forde
Chairman

Judgment filed
with the Law Society
on 03 JUL 2019

IN THE MATTER OF THE SOLICITORS ACT 1974

SOLICITORS REGULATION AUTHORITY

Applicant

ALEX ROLF VAN DER ZWAAN

Respondent

STATEMENT OF AGREED FACTS, ADMISSIONS AND OUTCOME

1. By its application dated 4 February 2019, and the statement made pursuant to Rule 5(2) of the Solicitors (Disciplinary Proceedings) Rules 2007 which accompanied that application, the Solicitors Regulation Authority ("the SRA") brought proceedings before the Solicitors Disciplinary Tribunal concerning the conduct of Alex Rolf van der Zwaan ("the Respondent").

The Allegation

2. The allegation made by the SRA against the Respondent was as follows:

On 3 November 2017, in an interview with the United States Special Counsel's Office ("OSC"), the Respondent made false statements contrary to Section 1001(a)(2) of Title 18 of the United States Code in that he did wilfully and knowingly make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the executive branch of the Government of the United States. He pleaded guilty to the offence and was sentenced on 3 April 2018.

He thereby failed to:

- 2.1 uphold the rule of law and the proper administration of justice in breach of Principle 1 of the SRA Principles 2011 ("the 2011 Principles"); and/or
- 2.2 act with integrity in breach of Principle 2 of the 2011 Principles; and/or

2.3 behave in a way that maintains the trust the public places in him and the provision of legal services in breach of Principle 6 of the 2011 Principles.

3. Dishonesty was alleged with respect to the allegation, but dishonesty was not an essential ingredient to prove the allegation.

Admissions

4. The Respondent admits that: -

4.1. On 3 November 2017 in an interview with the United States Special Counsel's Office he made false statements contrary to Section 1001(a)(2) of Title 18 of the United States Code in that he did knowingly and intentionally falsely state the following:

(1) His last communication with Gates was mid-August 2016, which consisted of an innocuous text message;

(2) His last communication with Kilimnik was in 2014 when he talked with Kilimnik about Kilimnik's family; and

(3) That he did not know why Skadden had not produced to the Special Counsel's Office an email dated 12 September 2016 email between him and Kilimnik

whereas he knew the correct position was

(1) In or about September 2016 he had spoken with both Gates and Kilimnik regarding the Tymoshenko report and had recorded those conversations.

(2) Prior to the November 2017 interview, he did not produce to Skadden and deleted and did not otherwise produce emails he possessed that he understood had been requested by either the Special Counsel's Office or Skadden or both.

4.2. He pleaded guilty to the offence and was sentenced on 3 April 2018 to 30 days imprisonment in the US and a fine of US \$20,000.

4.3. His conduct breached Principles 1, 2 and 6 of the SRA Principles 2011.

4.4. His conduct was dishonest.

Agreed facts

The following facts and matters are agreed between the SRA and the Respondent:

5. The Respondent was born on _____ and was admitted as a solicitor on 15 September 2009. His name remains on the Roll of Solicitors. He held an unconditional practising certificate from September 2009 to 22 May 2019, when his certificate was made subject to conditions, as a result of the offence to which he pleaded guilty detailed above. The Respondent's practising certificate was revoked on the 23 May 2019 upon his application under Regulation 10.2 (b) of the SRA Practising Regulations 2011.¹
6. Prior to today, the Respondent had a clean disciplinary record.
7. At all relevant times the Respondent was an associate at Skadden Arps Slate Meagher & Flom (UK) LLP ("Skadden") in London. He had begun working for Skadden as a trainee in September 2007. He remained at Skadden until they terminated his employment in November 2017 for gross misconduct relating to his admissions at paragraph 4.1 above. From 16 July 2018 until 22 May 2019 the Respondent worked at Discreet Law LLP in London. He is no longer employed at a law firm.
8. In 2012 Skadden Arps Slate Meagher & Flom LLP was instructed by the Ministry of Justice in Ukraine to prepare a report (which had been commissioned by the regime of Victor Yanukovich, the former President of Ukraine) on the trial and conviction of Yulia Tymoshenko, the former Prime Minister of Ukraine which had taken place in 2010 ("the Tymoshenko Report").
9. The Respondent assisted Gregory Craig (who was then a partner at Skadden Arps Slate Meagher & Flom from the Washington office) with fact finding and with the preparation of the Tymoshenko Report. The Respondent worked closely with Mr Craig, who generally attended the meetings in Ukraine with the Respondent. The Report was completed in 2012.

¹ Regulation 10.2 (b) of the SRA Practising Regulations 2011: The SRA may revoke a practising certificate or registration on the application of the person concerned

10. After a change of regime in Ukraine in 2014, Skadden received information requests from the Ukrainian Ministry of Justice relating to Skadden's work on the Tymoshenko Report.

11. In September 2016 Mr Rick Gates² (who worked for Mr Paul Manafort³) and Mr Konstantine Kilimnik⁴ contacted the Respondent:

11.1. During a telephone call with the Respondent in early September 2016, Mr Gates explained that Mr Kilimnik wanted to speak to him, and that Mr Kilimnik would be sending him certain documents relating to the Tymoshenko matter.

11.2. During a telephone call with the Respondent on 13 September 2016 Mr Kilimnik told the Respondent that a criminal investigation had been opened in Ukraine against Mr Manafort and Skadden. The Respondent recorded this call on a Dictaphone. Mr Kilimnik also sent the Respondent a copy of a Ukrainian court document which confirmed this and suggested that individual lawyers at Skadden might be targeted as part of the criminal investigation.

12. The Respondent called Mr Craig who was in Washington and relayed the conversation he had with Mr Kilimnik. Given his concerns that Skadden was not taking what the Respondent believed to be appropriate measures to address the situation unfolding in Ukraine, the Respondent recorded part of his call with Mr Craig on a Dictaphone. The Respondent then spoke to Mr Gates on the matter by telephone and recorded that conversation in full on a Dictaphone.

13. In 2017 the OSC commenced an investigation into the activities of the Russian government in connection with the 2016 US presidential election. Its investigation also considered the conduct of Mr Paul Manafort.

14. The OSC sought information from Skadden relating to Skadden's representation of the Ukrainian government in connection with the Report. The Respondent was asked by Skadden to collect relevant documents beginning on or about 11 October 2017 (as described at paragraph 16 below).

² Mr Gates was instructed by the Government of Ukraine before the change of regime. He subsequently worked with Mr Manafort for the Donald Trump presidential campaign in 2016.

³ Mr Manafort was instructed by the Government of Ukraine before the change of regime. He was adviser to President Yanukovich when the Tymoshenko report was commissioned. He subsequently served as campaign manager of the Donald Trump presidential campaign in 2016.

⁴ Mr Kilimnik was a former Russian military intelligence officer. He was instructed by the Government of Ukraine before the change of regime.

15. On or about 24 October 2017 the Respondent learned from Skadden that the OSC wished to interview him in connection with its ongoing investigation. The Respondent travelled to the US on 29 October 2017. The Respondent was initially represented in relation to this matter by the Office of the General Counsel of Skadden.
16. Prior to the interview, the Respondent was asked by Skadden to produce certain documents, including emails. In 2012 and 2013 he had corresponded with Mr Gates and Mr Manafort about the possibility of leaving Skadden to work directly for them. As a result, he did not flag all the responsive emails from his Skadden account and he deleted emails from his online personal email account about his prospective employment with Mr Gates and Mr Manafort. The Respondent's intention was to ensure Skadden did not find out about the communications concerning his prospective employment with Mr Gates and Mr Manafort. He also did not flag the email of 12 September 2016 between him and Mr Kilimnik⁵ because he was concerned this might lead to the discovery by Skadden of the recording he had made of his conversation with Mr Craig.
17. On 1 November 2017 the Respondent flew to Washington to be interviewed. The interview took place on 3 November 2017 with the OSC and FBI in Washington D.C. The Respondent was represented at the interview by the Office of the General Counsel at Skadden. At the interview, he was asked about his communication with Mr Gates and Mr Kilimnik but failed to disclose the September 2016 calls with Mr Gates and Mr Kilimnik because he thought that it would then emerge in Skadden's presence that he had made a recording of his conversation with Mr Craig. He was concerned that this might affect his employment with Skadden. He also said during the interview that he did not know why Skadden had not produced a September 2016 email between him and Kilimnik, when he knew that he had not produced the email.
18. Whilst no evidence has been provided the Respondent believes that he sent a member of Skadden's Office of the General Counsel the Kilimnik September 2016 email that the OSC had questioned him about within 1 hour of the interview ending.
19. Upon his return to London, the Respondent informed Skadden about additional information he had not disclosed in the interview. In the week commencing 6 November he began to collate information more thoroughly and send it on to Skadden's Office of the General

⁵ In this email, Mr Kilimnik asked the Respondent to contact him (Mr Kilimnik) using an encrypted messaging application

Counsel. On or about 7 November 2017, he provided the notes he had made of the calls in September 2016. A week later, on or about 15 November 2017 he provided Skadden partner David Kavanagh (and therefore Skadden) with the recordings of the conversations in September 2016. The information and documentation was then provided to the OSC. The Respondent also provided electronic devices to Skadden for production to the OSC. These included his work and personal cell phones (including old cell phones that were no longer in use), an iPad and his and Skadden's laptops (which the Respondent believes included copies of the emails deleted from his online personal email account referred to at paragraph 4.1 above and 27(1) below). He facilitated access to those devices by providing passwords (and offering his fingerprint) and at the OSC's request he signed multiple release forms to give Apple permission to recover information from a damaged iPhone.

20. As a result of the above the OSC required the Respondent to attend for a second interview. He returned to the US on 16 November 2017 and was due to be interviewed on 21 November 2017.
21. On 19 November 2017 Skadden ceased acting for the Respondent. The Respondent, with Skadden's assistance, engaged a separate representative to represent him instead of Skadden. His new representative, Cooley LLP, arranged for the interview date to be postponed. On 1 December 2017 the Respondent participated in a second interview with the OSC with his new representative, Cooley LLP, representing him. The Respondent accepted responsibility for his actions in his interview on 1 December 2017.
22. On 6 December 2017 Skadden made a report to the SRA stating that the Respondent's employment contract with them had been terminated on 22 November 2017 for gross misconduct as detailed in paragraph 7 above.
23. The OSC prosecuted the Respondent for the incorrect answers he had given during the first interview, detailed at paragraph 4.1 above. On 16 February 2018, the OSC filed an information in the US District Court for the District of Columbia alleging that the Respondent had provided false information to the OSC during the interview that took place on 3 November 2017. The Respondent pleaded guilty on 20 February 2018.
24. The Respondent was sentenced on 3 April 2018 to a fine of USD 20,000 and a term of imprisonment of 30 days.

25. Following the serving of his sentence and his return to the UK, on 2 July 2018 the Respondent made a report to the SRA in which he confirmed that he had pleaded guilty to the making of false statements when interviewed during the investigation.

Dishonesty

26. The Respondent's actions were dishonest in accordance with the test for dishonesty laid down by the Supreme Court in Ivey v Genting Casinos (UK) Ltd [2017] UKSC 67, which applies to all forms of legal proceedings:

"When dishonesty is in question the fact-finding tribunal must first ascertain (subjectively) the actual state of the individual's knowledge or belief as to the facts. The reasonableness or otherwise of his belief is a matter of evidence (often in practice determinative) going to whether he held the belief, but it is not an additional requirement that his belief must be reasonable; the question is whether it is genuinely held. When once his actual state of mind as to knowledge or belief as to facts is established, the question whether his conduct was honest or dishonest is to be determined by the fact-finder by applying the (objective) standards of ordinary decent people. There is no requirement that the defendant must appreciate that what he has done is, by those standards, dishonest".

27. At the time the Respondent provided false statements in the interview on the 3 November 2017 the actual state of his knowledge or belief concerning those actions was as follows:

- (1) The Respondent knew that prior to the interview when asked by Skadden to produce certain emails, he had failed to flag all the responsive emails from his Skadden account and deleted emails from his online personal email account.
- (2) The Respondent knew that the answers he gave to the OSC, concerning his last communications with Gates and Kilimnik, and the reasons why an email dated 12 September 2016 was not produced, were false. After the interview he disclosed this to Skadden. The information and the emails were then provided to the OSC to correct those answers. He pleaded guilty to the offence described at paragraph 4.1 above for which he was convicted and sentenced on 3 April 2018.

(3) The Respondent therefore knowingly and intentionally, provided false statements to the OSC in his interview with the OSC.

(4) The Respondent's conduct was deliberate. He made a conscious decision to make false statements in order to preserve his position at Skadden.

28. In light of the Respondent's knowledge and belief as set out above, the Respondent's actions in providing false statements to the OSC was dishonest by the objective standards of ordinary, decent people.

Mitigation

29. In mitigation the following is put forward by the Respondent and is not endorsed by the SRA:

1. The Respondent's incorrect answers brought no benefit to him and, save for the harm done to the reputation of the profession, have had no other adverse effect given that he corrected the position.

2. The decision the Respondent took at the end of the 3 November 2017 interview not to accurately answer questions was one the Respondent quickly regretted and sought to put right. The Respondent himself corrected the position shortly after the interview. He himself voluntarily came forward to correct what he had stated and this is what led to his conviction.

3. The Respondent's actions were completely out of character. His usual good character is shown by the references that have been provided on his behalf. He had a completely unblemished career and reputation prior to these events.

4. The Respondent graduated from King's College, London in 2006 with a first class honours degree having been elected President of the King's Students Law Society in his final year. He completed the LPC at BPP law school in Holborn.

5. Skadden did not directly respond to the information requests made by the Ukrainian Ministry of Justice (see paragraph 12 above) at that time which was of personal concern to the Respondent.

6. In 2015, the Ukrainian Prosecutor General charged Ukraine's former Minister of Justice, Oleksandr Lavrynovych, with embezzling approximately \$1,000,000 of state funds to pay Skadden in 2013. Around July 2015, the Ukrainian Prosecutor General asked the Ukrainian courts to permit the arrest of Mr Lavrynovych. Mr Lavrynovych was charged with misappropriating the money paid to Skadden in 2013 and it was alleged that such amounts were "spent unlawfully and baselessly on engaging a foreign firm in order to conceal the facts of criminal legislation violations by law enforcement authorities and courts while carrying out the inquiry and court proceedings of the Tymoshenko case."

7. The Respondent was personally concerned by these events, and he was similarly concerned that Skadden did not seem (in his view based on the limited information available to him) to be taking these developments as seriously as he would have wanted. Given these developments and because he was being contacted by Mr. Kilimnik and Mr. Gates (who worked for Manafort), he felt that he needed to keep a record so that it was clear that he was acting appropriately. This led him to record the conversations referred to at paragraph 11 above.

8. At the end of August 2016, there were media articles suggesting that Mr Manafort had left the Trump campaign due to his Russian contacts and his employment of an alleged former Russian military intelligence officer.

9. The Respondent, consistent with Skadden's approach of cooperating with the OSC, agreed to the OSC's request that he attend an interview. The Respondent attended the interview without any preconditions and made arrangements (despite his heavy workload, health issues and personal commitments) to travel to the US to be interviewed.

10. The Respondent voluntarily participated in the interview on 3 November with the OSC and FBI in Washington D.C. that lasted more than eight hours with a half an hour break for lunch. The interview was in a high security building in an empty secure room into which nothing could be taken. It was not recorded although the interviewers and counsel took notes. There were 4 lawyers from Skadden present, 2 prosecutors and 2 FBI agents who sat with their guns and their handcuffs visible. The Respondent was presented with 2 lever arch files with tabs and taken through the documents one at a time. It was an intense process concerning events some of which had taken place some years previously.

11. The Respondent was represented at the interview by the Office of the General Counsel at Skadden and he was keenly aware that he was being represented by his employer.

When, near the end of the 8 hour interview, he was asked about his communication with Mr Gates and Mr Kilimnik, he found himself in a difficult and stressful situation. He had no concerns about revealing these communications to the OSC but he panicked at the thought of revealing to Skadden that he had recorded his conversation with Mr Craig of Skadden. Therefore, the Respondent, exhausted after many hours of intense interview and cognisant of the fact that his counsel was also his employer, made the catastrophic decision not to disclose the September 2016 calls with Mr Gates and Mr Kilimnik because in his panicked thinking he thought that it would then emerge in Skadden's presence that he had made a recording of his conversation with Mr Craig.

12. The Respondent's aim was not to obstruct the OSC's investigation. Rather, in a panic caused by his concern that his answers might affect his employment with Skadden, he made a misguided decision.

13. As well as the general stress caused by the 3 November 2017 interview itself, at the time of the 3 November 2017 interview the Respondent was under a great deal of other strain both personally and professionally. He had married in June 2017 and in addition to the normal adjustments a married couple have to make when they begin living together, the Respondent's wife was finding it hard to cope with his continuous and prolonged absences from home due to the demands being placed upon him by his work. The Respondent also had multiple painful skin lesions on his foot which were causing serious discomfort. In addition, a member of the Respondent's family suffers from a rare and debilitating medical condition. The Respondent's wife was concerned that he should find out whether he had the same condition. He therefore arranged an appointment with a specialist which was due to take place shortly after his first OSC interview. This meant that at the time of the OSC interview on 3 November 2017 he was in constant pain whenever he walked and anxious about the outcome of his forthcoming appointment with the specialist. The Respondent was particularly concerned that he would be diagnosed with the same condition which affected his family member and which was causing that person increasing difficulties with daily living.

14. At work, the Respondent also had day-to-day conduct of four significant matters.

15. Additionally, hoping to progress within the firm, the Respondent was actively engaged in marketing activities. For example, he published a client briefing paper in mid-2017 and he was also working on drafting an outline for another paper.

16. The Respondent accepts full responsibility, admits that he is solely responsible for his conduct, and is remorseful and has demonstrated a high degree of insight.

Agreed Outcome

30. The Respondent accepts that the seriousness of his admitted misconduct is such that neither a reprimand, a fine or being suspended from practice would be a sufficient sanction.

31. The Respondent accepts that the protection of the public and the protection of the reputation of the profession justifies him being struck off the Roll of Solicitors.

32. The SRA and the Respondent submit to the Tribunal that the following are appropriate outcomes and are consistent with the seriousness of the matters admitted and with the Tribunal's Guidance Note on Sanctions:

32.1 An Order that the Respondent be struck from the Roll of Solicitors; and

32.2 A further Order that the Respondent do pay the SRA's costs of £3,095.00.

Explanation as to why such an order would be in accordance with the Tribunal's sanction guidance⁶.

33. The Respondent had been an associate in Skadden since September 2009 and a trainee at the firm since 2007. He held a position of trust. He knew, that in dealing with his firm and in providing answers raised in a formal interview with the OSC in an extraordinarily high profile investigation, that he should be honest and truthful at all times. He failed to be. He deliberately chose not to provide all the emails required to Skadden before the interview and failed to give correct answers when being interviewed by the OSC. The Respondent's motivation for doing this was to preserve his position at Skadden. His actions were done knowingly and intentionally. By acting this way, the Respondent agrees that he acted in breach of a position of trust. The Respondent had by this time nearly 9 years' experience as a solicitor. The Respondent has caused harm to the trust the public

⁶ Guidance note on sanctions 6th edition – December 2018
<https://www.solicitortribunal.org.uk/news/publication-guidance-notes-sanctions-other-powers-and-appeals>

34. places in him and the provision of legal services. The harm caused was foreseeable. His level of culpability was correspondingly high.

35. The Respondent's conduct was a significant departure from the "complete integrity, probity and trustworthiness" to be expected of a solicitor.⁷ The harm caused by his actions was significant. A law enforcement agency should be able to assume that a solicitor will not make deliberately false statements when interviewed. His conduct, and the scale of the dishonesty, was viewed as sufficiently serious to justify a custodial sentence notwithstanding his actions in rectifying the position. The conduct of the Respondent attracted a high level of international publicity.

36. The following factors aggravate the seriousness of the Respondent's misconduct:

36.1 the misconduct involves dishonesty;

36.2 the misconduct in relation to the breaches was deliberate.

36.3 the misconduct was to protect his position at Skadden.

36.5 the misconduct was undertaken in a high-level formal interview when total honesty would be expected and required.

36.6 the dishonesty led to criminal proceedings and criminal penalties.

37. The public expects solicitors to uphold the rule of law and the proper administration of justice, act with integrity and behave in a way that maintains the trust the public places in them. The most serious misconduct involves dishonesty. A finding that an allegation of dishonesty has been proved will almost invariably lead to striking off.

⁷ Sir Thomas Bingham in *Bolton v Law Society* [1994] 1 WLR 512.

38. Having regard to all the facts giving rise to the allegations, the admissions made by the Respondent and his willingness to submit to such an Order, the SRA invites the Tribunal to make an Order that the Respondent be struck off the Roll of Solicitors.

Dated this 10 day of June 2019

Signed

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Suzanne Jackson
on behalf of the Solicitors Regulation Authority

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Alex van der Zwaan