

**SOLICITORS DISCIPLINARY TRIBUNAL**

IN THE MATTER OF THE SOLICITORS ACT 1974

Case No. 12684-2024

**BETWEEN:**

SOLICITORS REGULATION AUTHORITY LTD.	Applicant
and	
SATNAM SINGH TALWAR	Respondent

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Before:

Mrs L Boyce (Chair)  
Mrs C Evans  
Mr B Walsh

Date of Hearing: 25 April 2025

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**Appearances**

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

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**JUDGMENT ON  
AGREED OUTCOME**

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## **Allegations**

1. The allegations against the Respondent are that:
2. While in practice as a Solicitor at QC Law Limited / Queens Court Law (“the Firm”):
  - 2.1 Between 12 July 2022 and 6 October 2022, he acted for Client B in relation to a financial dispute against an existing client (Client A) of the firm. In acting for Client B, Mr Talwar acted in circumstances which gave rise to a conflict of interest or a significant risk of such a conflict of interest and by doing so:
    - 2.1.1. breached Principles 2 and 5 of the SRA Principles 2019 (‘the Principles’); and
    - 2.1.2. breached paragraph 6.2 of the Code of Conduct for Solicitors, RELs and RFLS 2019 (“the Code”).
  - 2.2 Between 12 July 2022 and 6 October 2022, he acted for Client B in relation to a financial dispute against Client A. In acting for Client B, Mr Talwar was reckless as to whether there was a conflict of interest or significant risk of such a conflict of interest.
  - 2.3 Between 12 July 2022 and 27 October 2022 in his capacity as Compliance Officer for Legal Practice (“COLP”) at the Firm, Mr Talwar failed to ensure the Firm’s compliance with the SRA’s regulatory arrangements. He did so by acting in circumstances which gave rise to a conflict of interest or a significant risk of such a conflict of interest and/or was reckless as to whether there was a risk of a conflict of interest. He also failed to report the conduct concern to the SRA. By doing so, he:
    - 2.3.1 breached all or any of Principles 2 and 5 of the Principles; and 2.3.2 breached paragraph 9.1 of the Code of Conduct for Firms ( the Code for Firms’).
3. On 16 October 2024, Mr Talwar filed and served an Answer stating, “*I confirm I agree with all the allegations against me*”.

## **Documents**

4. The Tribunal had, amongst other things, the following documents before it:-
  - The Form of Application dated 11 September 2025.
  - Rule 12 Statement dated 11 September 2025 and exhibits.
  - Agreed Outcome submitted 25 April 2025

## Background

5. The Respondent is a solicitor, having been admitted to the Roll on 15 August 2003. He had been a COLP since 17 June 2013. At the time of the alleged misconduct, the Respondent was the Director and Owner of the Firm, as well as the COLP, Compliance Officer for Finance and Administration (“COFA”) and Anti Money Laundering Officer (‘AMLO’) for the Firm. He held a Practising Certificate free from conditions.
6. Interim conditions were imposed on 23 February 2024, stating “*Mr Talwar may not hold COLP, COFA, manager or owner roles, save for his current role as owner of the Firm*’.
7. The Respondent was not currently working for a body regulated by the SRA.

## Application for leave

8. The parties lodged the application less than 28 days from the date of the Substantive Hearing and therefore required the leave of the Tribunal to submit the Agreed Outcome proposal.
9. The Applicant and Respondent apologised for the late submission, which was regrettable and no discourtesy to the Tribunal had been intended. The parties set out a chronology to evidence that there had been no undue delay in making the application and that each party had actively engaged with the issues at hand. The final approval and signature of the Agreed Statement was slightly delayed due to the Easter weekend of 18-21 April 2025.
10. The Tribunal noted that the application was submitted on 25 April 2025 with the Substantive Hearing listed to be heard on 15 and 16 May 2025. Given the circumstances relating to the ongoing negotiations, the proposal set out in the Agreed Outcome and the delay caused by the Easter break, the Tribunal decided it was right to grant the parties leave.

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

11. The parties invited the Tribunal to deal with the Allegations against the Respondent in accordance with the Statement of Agreed Facts 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

12. The Applicant was required to prove the allegations on the balance of probabilities. The Tribunal had due regard to its statutory duty, under Section 6 of the Human Rights Act 1998, to act in a manner which was compatible with 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.
13. The Tribunal reviewed all the material before it and was satisfied on the balance of probabilities that the Respondent’s admissions were properly made.

14. The Tribunal considered the Guidance Note on Sanction (11th edition). In doing so the Tribunal assessed the culpability and harm identified together with the aggravating and mitigating factors that existed.
15. The Respondent had admitted lack of integrity and there could be no doubt that his culpability for his conduct was high, and that his actions had had the potential to directly harm the reputation of the legal profession. His mitigation was noted but the fact remained he had been reckless in not satisfying himself that all was in order when he acted for his clients.
16. Matters were made more egregious by the fact that he was the Firm's COLP and COFA throughout and despite holding these responsible positions his error was spotted by his paralegal in July 2022 and brought to his attention. He failed to act upon this information and continued to act. His failure to self-report spoke volumes as to the Respondent's cavalier attitude to the rules of professional conduct though it was to be noted that his admissions now demonstrated an element of insight and contrition.
17. In all the circumstances the Tribunal accepted that the proposed sanction (as set out in its order) was a reasonable and proportionate sanction to mark the seriousness of the misconduct, protect the public and maintain the reputation of the profession.
18. The Tribunal considered that this case served as a stark reminder to members of the profession to take great care and caution not to place themselves in a position where they act when there is a conflict of interest or the risk of one occurring. Further, if such an event occurs then steps must be taken promptly to rectify the position and make full disclosure where required.

### **Costs**

19. The parties agreed that the Respondent should pay costs in the sum of £17,773.20. The Tribunal considered the Applicant's costs schedule and determined that the agreed amount was reasonable and appropriate. Accordingly, the Tribunal ordered that the Respondent pay costs in the agreed sum.

### **Statement of Full Order**

20. The Tribunal ORDERED that the Respondent, SATNAM SINGH TALWAR solicitor, be SUSPENDED FOR SIX MONTHS commencing from the 25<sup>th</sup> April 2025. At the expiration of the period of suspension, Mr Talwar will be subject to a RESTRICTION ORDER for 3 years wherein he must not hold COLP, COFA, manager or owner roles. It further Ordered that he do pay the costs of and incidental to this application and enquiry fixed in the sum of £17,773.20.

Dated this 15<sup>th</sup> day of May 2025

On behalf of the Tribunal

*L. Boyce*

L. Boyce  
Chair

BEFORE THE SOLICITORS DISCIPLINARY TRIBUNAL  
12684-2024

CASE NO:

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

AND IN THE MATTER OF:

SOLICITORS REGULATION AUTHORITY LIMITED

Applicant

- and -

SATNAM SINGH TALWAR

Respondent

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STATEMENT OF AGREED FACTS AND PROPOSED OUTCOME

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1. By its application dated 11 September 2024, and the statement made pursuant to Rule 12(2) of the Solicitors (Disciplinary Proceedings) Rules 2019 ("**Rule 12 Statement**") which accompanied that application, the Solicitors Regulation Authority Limited ("**the SRA**") brought proceedings before the Solicitors Disciplinary Tribunal, making three allegations of misconduct against Satnam Singh Talwar ("**Mr Talwar**").

The Allegations

2. The allegations against Mr Talwar are that:

While in practice as a Solicitor at QC Law Limited / Queens Court Law ("**the Firm**"):

- 2.1 Between 12 July 2022 and 6 October 2022, he acted for Client B in relation to a financial dispute against an existing client (Client A) of the firm. In acting for

Client B, Mr Talwar acted in circumstances which gave rise to a conflict of interest or a significant risk of such a conflict of interest and by doing so,

2.1.1. breached Principles 2 and 5 of the SRA Principles 2019 (**‘the Principles’**); and

2.1.2. breached paragraph 6.2 of the Code of Conduct for Solicitors, RELs and RFLS 2019 (**“the Code”**).

2.2 Between 12 July 2022 and 6 October 2022, he acted for Client B in relation to a financial dispute against Client A. In acting for Client B, Mr Talwar was reckless as to whether there was a conflict of interest or significant risk of such a conflict of interest.

2.3 Between 12 July 2022 and 27 October 2022 in his capacity as Compliance Officer for Legal Practice (**“COLP”**) at the Firm, Mr Talwar failed to ensure the Firm’s compliance with the SRA’s regulatory arrangements. He did so by acting in circumstances which gave rise to a conflict of interest or a significant risk of such a conflict of interest and/or was reckless as to whether there was a risk of a conflict of interest. He also failed to report the conduct concern to the SRA. By doing so, he

2.3.1 breached all or any of Principles 2 and 5 of the Principles; and

2.3.2 breached paragraph 9.1 of the Code of Conduct for Firms (**‘the Code for Firms’**).

3. On 16 October 2024, Mr Talwar filed and served an Answer stating, *‘I confirm I agree with all the allegations against me’*.

### Agreed Facts

4. The following facts and matters, which are relied upon by the SRA in support of the allegations set out within paragraph 2 of this statement, are agreed between the SRA and Mr Talwar.

5. References to certain individuals and entities have been anonymised as per the attached schedule.

### Professional Details

6. Mr Talwar, who was born on May 1974, is a solicitor, having been admitted to the Roll on 15 August 2003. He had been a COLP since 17 June 2013.
7. At the time of the alleged misconduct, Mr Talwar was the Director and Owner of the Firm, as well as the COLP, Compliance Officer for Finance and Administration (“**COFA**”) and Anti Money Laundering Officer (‘**AMLO**’) for the Firm.
8. At the time of the alleged misconduct, Mr Talwar held a Practising Certificate free from conditions.
9. Interim conditions were imposed on 23 February 2024, stating ‘*Mr Talwar may not hold COLP, COFA, manager or owner roles, save for his current role as owner of the Firm*’.
10. Mr Talwar is not currently working for a body regulated by the SRA.

### Background

11. The conduct in this matter came to the attention of the SRA on 10 March 2023 when Mr Jackson Ng of Jackson Lyon LLP, the then legal representative for Client A, submitted a referral.
12. The Firm had been instructed by Client A on 28 July 2021 to recover monies owed by Ms L. Client A successfully obtained judgment against Ms L on 8 July 2022. On 12 July 2022, Ms L instructed the Firm to set aside judgement, becoming Client B. Mr Talwar was warned of the potential for conflict on 14 July 2022. On 12 August 2022, Mr Talwar was notified that Equivo, an enforcement service, was declining instructions as it had been instructed by the Firm to a) enforce the debt on behalf of Client A, but also b) asked to take no action to enforce on behalf of Client B. The retainers with Client A and Client B were not terminated by the Firm until 12 October and 9 October 2022 respectively. Mr Talwar did not self-report to the SRA.

The facts and matters relied upon in support of all allegations

13. On 28 July 2021, Client A instructed the Firm in a monetary dispute against Ms L. The following steps were taken:
- 13.1 A client care letter was sent to Client A which stated that Mr Talwar had overall supervision of the Firm.
  - 13.2 A letter of claim was sent by the Firm on Client A's behalf to Ms L on 6 August 2021.
  - 13.3 The Firm corresponded with Ms L on 8 September 2021, 17 September 2021, 30 September 2021, 4 October 2021 and 9 October 2021.
  - 13.4 Ms L advised on 9 October 2021 that she did not accept the debt.
  - 13.5 The Firm filed a claim (claim number J19YJ247) on behalf of Client A against Ms L on or about 17 March 2022.
  - 13.6 On 8 July 2022, Client A was awarded default judgement against Ms L.
14. On 1 April 2022, Mr Talwar approved the Firm's Conflicts Policy which stated that the Firm must not act if there was a conflict of interest or a significant risk of a conflict arising. Any conflict or potential conflict was to be referred to Mr Talwar as COLP.
15. On 12 July 2022, Ms L contacted the Firm. On the same date, she signed a Letter of Authority instructing the Firm to represent her, thus becoming Client B.
16. A Litigation Paralegal in the Firm sent an internal email to Mr Talwar on 14 July 2022, drawing his attention to paragraph 6.2 of the Code and providing a link to SRA Guidance on Conflicts of Interest.
17. On 22 July 2022, Mr Talwar signed and filed an application made in claim number J19YJ247 to set aside the judgement obtained by Client A against Client B.
18. The application was accompanied by a statement from Client B, drafted by Mr Talwar which confirmed that the statement had been prepared by Mr Talwar and acknowledging that she had instructed the same law firm as the Claimant, but that there were safeguards in place to avoid any conflicts of interest.



19. On 22 July 2022, Client A instructed the Firm to enforce the default judgement of 8 July 2022 and signed a letter of authority. Client A was sent a client care letter on 26 July 2022. Again, Mr Talwar was stated to have overall supervision of the Firm.
20. The Firm instructed Equivo on 2 August 2022 to recover the debt owed to Client A.
21. The Firm emailed Equivo on 10 August 2022 asking it to cease taking action on behalf of Client A to recover monies from Client B. Mr Talwar was copied into this email.
22. On 12 August 2022, there was an exchange of correspondence between the Firm and Equivo:
- 22.1 At 11.25, Equivo emailed the Firm declining instructions on behalf of Client A on the basis that the Firm was clearly conflicted and stating that the same firm cannot act for both the Claimant and Defendant in litigation. The email contained links to SRA guidance and paragraph 6.2 of the Code. Mr Talwar was copied into this email.
- 22.2 At 12.10, Mr Talwar sent an email to Equivo stating he was the compliance officer and would consider what to do next.
- 22.3 At 12.14, Equivo emailed Mr Talwar to confirm that it was declining the instruction.
23. The Firm's retainers with Clients A and B were not terminated until October 2022. The sequence of events was as follows:
- 23.1 On 6 October 2022, a paralegal at the Firm emailed Mr Talwar stating that he had now been advised that the Firm could not proceed with acting on both the Claimant and Defendant's side with regard to Clients A and B.
- 23.2 Shortly after receiving this email, Mr Talwar instructed a colleague at the Firm to terminate Client B's retainer and advised that Client A's retainer should also be terminated.

- 23.3 The paralegal sought advice from the SRA Ethics Helpline on 12 October 2022 and informed Mr Talwar on that same date that the SRA had given advice that a single firm should not be instructed for both claimant and defendant in litigation and it was a firm wide obligation to avoid conflicts of interest. The paralegal also referred back to the email of 14 July 2022 referred to at paragraph 16 above.
- 23.4 On 12 October 2022, a letter was drafted to Client A terminating her retainer which was reviewed by Mr Talwar.
24. Mr Ng of Jackson Lyon was instructed by Client A and wrote to Mr Talwar on 25 October 2022. This letter asked why Mr Talwar did not seek Client A's consent to act for Client B and why it took 3 months to inform Client A that the Firm was already acting for Client B.
25. On 25 October 2022, Mr Talwar replied in detail to Mr Ng's letter by email. He stated that, as COLP, he had taken the decision on or about 12 August 2022 that the Firm should cease acting for both clients. He advised he accepted that there had been breaches of paragraphs 6.2, 6.4 and 6.5 of the Code and that he would make a self-report to the SRA.
26. Mr Talwar did not self-report to the SRA.

Allegations 1.1 and 1.3 - Principle 5 - Integrity

27. By the admissions made in his Answer, Mr Talwar accepts that:
- 27.1 By accepting instructions from Client B on 12 July 2022, when Client A was already a client of the Firm or had very recently been a client, he acted in circumstances which gave rise to a conflict of interest or a significant risk of a conflict.
- 27.2 He accepted instructions to act for Client B on 12 July 2022, whose interests were directly opposed to those of Client A.
- 27.3 He ignored the email of 14 July 2022 drawing his attention to paragraph 6.2 of the Code and asking him to consider the same and failed to take time to review paragraph 6.2 of the Code for himself.

- 27.4 He failed to take into account the Firm's Conflict Policy, which he had approved on 1 April 2022, and which clearly identified acting for both parties to litigation as a conflict.
  - 27.5 He failed to identify that the Firm was not able to act for Clients A and B even if these clients consented and, in any event, failed to confirm whether Client A had, in fact, given consent for the Firm to act for Client B or evidence that Client B had given informed consent to the Firm acting for both her and Client A.
  - 27.6 He permitted, or otherwise failed to identify, that the Firm accepted further instructions from Client A on 26 July 2022.
  - 27.7 He failed to immediately act on the email from Equivo dated 12 August 2022 advising that there was a conflict of interests as he did not terminate the retainers of Clients A and B until 12 and 6 October 2022 respectively.
  - 27.8 As COLP, he had an additional responsibility to maintain knowledge of, and ensure compliance with, the Code and the Firm's own Conflict Policy.
  - 27.9 He failed to self-report this matter to the SRA, despite having told another firm of solicitors that he would do so.
28. The gravity of Mr Talwar's conduct is amplified by his position as COLP.
29. For these reasons, Mr Talwar's conduct amounts to a breach of Principle 5.

Allegations 1.1 and 1.3 - Principle 2 – Public Trust

30. By the admissions made in his Answer, Mr Talwar accepts that the public would expect:
- 30.1 A solicitor to have systems in place to identify and manage potential conflicts of interests, to ensure that client interests and confidentiality are safeguarded.

30.2 A solicitor to recognise that, by allowing a conflict of interest, or a significant risk of a conflict of interest, to arise, he would place, or would risk placing, his clients in positions whereby their ability to exercise their legal rights were compromised.

30.3 A solicitor, director and COLP to be fully aware of the SRA's rules and his Firm's policy regarding conflicts of interests and be able to identify when a conflict has or may arise and to act appropriately in such circumstances.

30.4 A solicitor to comply with his duty to self-report to the SRA.

31. The gravity of Mr Talwar's conduct is amplified by his position as COLP.

32. By his conduct, Mr Talwar breached Principle 2.

Allegation 1.1 - Paragraph 6.2 of the Code – Not acting where there is a conflict of interest or a significant risk of one

33. By the admissions made in his Answer, Mr Talwar accepts that he acted where there was a conflict of interest or a significant risk of one for the reasons set out in paragraphs 13-25 and 27.

34. Mr Talwar had signed off his Firm's Conflicts Policy on 1 April 2022 and had been referred to paragraph 6.2 on 14 July and 12 August 2022. He had knowledge, or ought to have knowledge, of the SRA's rules and standards on conflicts of interest, both prior to 12 July 2022, and thereafter.

35. By his conduct, Mr Talwar breached Paragraph 6.2 of the Code.

Allegation 1.2 - Recklessness

36. By the admissions made in his Answer, Mr Talwar accepts that he acted recklessly according to the test in *Brett v SRA* [2014] EHC 2974. At paragraph 78 in that case, Wilkie J said that he adopted the working definition of recklessness from the case of *R v G* [2004] 1 AC 1034. He said that the word recklessly is satisfied: with respect to (i) a circumstance when {the solicitor} is aware of a risk that it exists or will exist and (ii) a

result when {the solicitor} is aware that a risk will occur and it is, in circumstances known to them, unreasonable for them to take the risk.

37. By the admissions made in his Answer, Mr Talwar accepts by accepting the instructions of Client B on 12 July 2022 and not terminating Client B's retainer until 6 October 2022, despite the advice available from the Policy, the email of 14 July 2022 and the email from Equivo dated 12 August 2022, he demonstrated a reckless disregard for both the SRA's principles and standards, and his duty to act in the best interests of the Firm and its clients.

#### Allegation 1.3 - Paragraph 9.1 of the Code for Firms – COLP Duties

38. By the admissions made in his Answer, Mr Talwar accepts that he did not comply with his duties as a COLP in that:

38.1 In breach of Paragraphs 9.1(b) and (c) of the Code for Firms, he failed to ensure that the Firm's managers and employees complied with the SRA regulatory arrangements and did not cause or contribute to a breach of those arrangements. The facts and matters set out at paragraphs 17-30 demonstrate that Mr Talwar failed to comply with that duty and, further, acted in breach of the SRA's regulatory arrangements himself.

38.2 In breach of Paragraph 9.1 (d) and (e) of the Code for Firms, he failed to report any facts or matters which he reasonably believed were capable of amounting to a serious breach of the SRA's regulatory arrangements and/or any matters which ought to be brought to the attention of the SRA to allow it to investigate.

39. By his conduct, Mr Talwar breached Paragraph 9.1 of the Code.

### Non-Agreed Mitigation

40. The following mitigation, which is not agreed by the SRA, is advanced by Mr Talwar:

40.1. He believed that Client A's file had been closed after default judgment had been obtained on 8 July 2022 and that she was, therefore, an ex-client when Client B sought to instruct the Firm on 12 July 2022.

- 40.2. Client B was aware that the Firm had acted for Client A but was keen to instruct the Firm.
- 40.3. He had asked a colleague at the Firm to obtain Client A's permission to act for Client B. He had understood that Client A had provided consent.
- 40.4. Client B had consented to the Firm acting for her despite knowing that it also acted for Client A.
- 40.5. He did not have any involvement with Client A's file. Chinese walls were in place and the teams acting for Clients A and B did not have access to each other's files and worked in separate rooms.
- 40.6. He did no work on Client B's file from 12 August 2022.

### Proposed Sanction

- 41. It is proposed that Mr Talwar should be suspended from the Roll of Solicitors for a period of 6 months commencing with the date of the SDT's order.
- 42. It is proposed that upon the expiration of the period of suspension, Mr Talwar should be subject to a restriction order for a period of 3 years on the following terms: *'Mr Talwar may not hold COLP, COFA, manager or owner roles'*.

### Explanation as to why such an order would be in accordance with the Tribunal's sanctions guidance

- 43. The SDT's "Guidance Note on Sanction" (10th edition), paragraph 8, states that the SDT's approach to sanction involves consideration of a) seriousness, b) the purpose for which sanctions are imposed and 3) the choosing of the sanction which most appropriately fulfils that purpose for the seriousness of the conduct in question.
- 44. In considering seriousness, factors which the SDT may take into account include:

- 44.1 Culpability.
- 44.2 Harm
- 44.3 Aggravating factors
- 44.4 Mitigating factors

45. The parties agree that the primary factors going to culpability are:

- 45.1 Mr Talwar's seniority as a partner, director, COLP and solicitor of 19 years' experience (at the time of the conduct),
- 45.2 The fact that he took the decision that the Firm should act for Client B and then represented Client B,
- 45.3 Ignoring the advice provided to him on 14 July 2022 and the Firm's Conflict Policy which he had approved, and
- 45.4 Mr Talwar's acceptance that he lacked integrity and was reckless.

46. In terms of harm, the conflict created by the Firm acting for Clients A and B resulted in the Firm not being able to act in the best interests of either client, as demonstrated by the returning of instructions by Equivo on 12 August 2022.

47. Aggravating factors are:

- 47.1 Mr Talwar's seniority and position as COLP.
- 47.2 His awareness of facts that should have led him to conclude there was a conflict or a risk of one.
- 47.3 Ignoring internal advice and the Firm's Conflict Policy.
- 47.4 Failing to self-refer to the SRA despite confirming he would do so.

48. In mitigation:

- 48.1 This was a single episode of misconduct.
- 48.2 Mr Talwar made early admissions, accepted breaches and has shown contrition.
- 48.3 Mr Talwar stepped down as COLP and accepted conditions.

49. The parties consider and submit that, in light of the admissions set out above, and taking due account of the mitigation put forward by Mr Talwar, the proposed outcome represents a fair and proportionate resolution to the matter consistent the “Guidance Note on Sanction” (10th edition), which states at paragraph 38 that suspension from the Roll will be appropriate where:

- *the seriousness of the misconduct is such that neither a Restriction Order, Reprimand nor a Fine is a sufficient sanction or in all the circumstances appropriate.*
- *there is a need to protect both the public and the reputation of the legal profession from future harm from Mr Talwar by removing their ability to practise, but neither the protection of the public nor the protection of the reputation of the legal profession justifies striking off the Roll.*
- *public confidence in the legal profession demands no lesser sanction.*
- *professional performance, including a lack of sufficient insight by the respondent (judged by the Tribunal on the basis of facts found proved and the respondent’s evidence), is such as to call into question the continued ability to practise appropriately.*

50. The parties agree that suspension from the Roll should be followed by a three-year restriction order preventing Mr Talwar from acting as a COLP, COFA, manager or owner, in order to protect the public. A restriction order on these terms is fair and proportionate given that Mr Talwar’s conduct indicates a risk that he may not understand, or may fail to comply, with his regulatory obligations. Therefore, Mr Talwar should not hold a position of responsibility until such time as he has provided reassurance that that risk no longer exists, or a reasonable period for oversight and reflection has occurred.

51. When conducting an overall balancing exercise, the Tribunal should take into account that although the harm caused by Mr Talwar’s conduct was not of the highest level of seriousness, Mr Talwar held a senior position as a Partner and COLP with responsibility



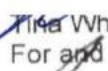
for ensuring his Firm's compliance with SRA Rules and Regulations and has accepted that his conduct was reckless.

52. In all the circumstances, a suspension followed by a restriction order is the only fair, reasonable and proportionate sanction that would have an appropriate effect on public confidence in the legal profession and adequately reflects the serious misconduct.


## Costs

53. As all allegations have been admitted, the SRA submits that the proper order for costs is for Mr Talwar to pay the SRA's costs in the sum of £17,773.20.

Dated: 24.4.25

 Tina Whitman, Legal Director, Blake Morgan LLP  
For and on behalf of the SRA

Dated: 24/4/25

 Mr Satnam Singh Talwar  
Respondent in these proceedings