

SOLICITORS DISCIPLINARY TRIBUNAL

IN THE MATTER OF THE SOLICITORS ACT 1974

Case No. 12726-2025

BETWEEN:

SOLICITORS REGULATION AUTHORITY LTD.

Applicant

and

MICHAEL PETER GOODWIN

Respondent

Before:

Mr M. N Millin (in the chair)

Mrs A Sprawson

Ms K Wright

Date of Hearing: 19 June 2025

Appearances

Jonathan White, Solicitor, Blake Morgan LLP, 6 New Street Square London EC4A 3DJ,
Instructed by the Solicitors Regulation Authority.

The Respondent attended and was not represented.

JUDGMENT ON AN AGREED OUTCOME

Allegations

1. The allegations against the Respondent, Michael Peter Goodwin, made by the SRA are that, while in practice as a Solicitor at Talbots Law Ltd (“the Firm”):
 - 1.1 On 18 July 2023, he provided misleading information in an email to Client A by inserting Client A’s correct email address in substitution for the incorrect email address in the email he had originally sent to Client A on 17 July 2023 and in doing so breached any or all of:

Principles 2, 4 and 5 of the SRA Principles 2019 (“the Principles”) and Paragraph 1.4 of the SRA Code of Conduct for Solicitors, RELs and RFLs (“the Code for Solicitors”).

Documents

2. The Tribunal had before it the following documents:-
 - The Applicant’s Rule 12 Statement dated 16 January 2025;
 - The Respondent’s Answer to the Rule 12 Statement dated 22 April 2025;
 - The Statement of Agreed Facts and Agreed Outcome dated 18 June 2025.

Preliminary Application

Application for the Hearing to be Held in Private

3. The Respondent confirmed that he had no additional submissions beyond his written application, dated 12 June 2025. However, in anticipation of a subsequent application concerning anonymity, he requested that the hearing continue in private session based on the medical evidence provided to the Tribunal.
4. Mr White confirmed that the Applicant did not oppose any of the applications being made by the Respondent.

Decision of the Tribunal

5. The Tribunal carefully considered the submissions in the Respondent’s application to hold the hearing in private, noting that the Applicant did not object to the remainder of the hearing being conducted in private.
6. Based on the medical evidence provided, the Tribunal determined that the criteria under Rule 35(2) of the SDPR were satisfied. Sensitive material was to be referenced and discussed, thereby necessitating a direction that the public be excluded from the remainder of the hearing.

The Respondent's Application for Anonymity

7. The Respondent's written application was that under Rules 34 and 35 of the SDPR, the Tribunal make a direction that he be anonymised in all of the Tribunal's public-facing documents concerning the proceedings.

Decision of the Tribunal

8. The Tribunal first considered a query from the Applicant regarding its authority to publish the proceedings' outcome on the Solicitors Register for public protection. The Applicant was concerned that updating the Register with details on the practice status, and any disciplinary actions or restrictions placed on the Respondent, might conflict with a potential direction.
9. While recognizing the Applicant's need for transparency to foster trust in the legal profession, the Tribunal focused solely on whether to issue the requested direction. If the direction was to be issued, the Applicant retains the discretion to decide whether to withhold information on its register.
10. In deciding on the Respondent's anonymity application, the Tribunal carefully weighed the Respondent's brief oral submissions alongside the Applicant's written submissions and considered the authorities in Solicitors Regulation Authority v Spector [2016] EWHC 37 (Admin) and Linda Lu v Solicitors Regulation Authority [2022] EWHC 1729 (Admin).
11. The application for anonymity was not granted by a majority, with the Lay Member dissenting.

The Majority Decision.

12. The Majority Tribunal gave careful consideration to the Respondent's submissions and the supporting medical evidence, particularly the report of Dr. Wilkins on 17 April 2025 and the letter from Dr. Turner dated 27 May 2025. The medical evidence clearly indicated a likelihood of some prejudice or hardship if the judgment of the Tribunal was published without a direction being issued for anonymisation. However, the Tribunal concluded that this did not amount to exceptional hardship or exceptional prejudice to warrant departing from the fundamental principle of open justice, which mandates that the Tribunal's judgments and orders be published identifying the Respondent.
13. The Tribunal had regards to the comments of Nichol J in SRA v Spector [2016] EWHC 37 (Admin):

“the starting point is full openness and it is only if an exception (even a limited exception, such as allowing a witness to be anonymous) is required in the interests of the administration of justice that some limitation is justified. In some contexts, at least, curtailment of open justice may also be necessary to avoid a violation of a person's rights under the European Convention on Human Rights - see Re S (A Child) (Identification Restrictions on Publication) [2005] 1 AC 593. Either way, I agree with Simler J who in BBC v Roden [2015] ICR 985

said at [34] that what was required was a judgment between these competing demands, not the exercise of a discretion.”

The Tribunal also considered the remarks of Kerr J in Linda Lu v Solicitors Regulation Authority [2022] EWHC 1729 (Admin), who observed:

“The justice system thrives on fearless naming of people, whether bit part players or a protagonist... Yet, the inexorable trend seems to be towards less open justice and more anonymity. I doubt that this is a good direction of travel for the law.”

14. Despite the recognisable risks, the balance between the competing demands of open justice and the Respondent's interests led the majority Tribunal to uphold open justice and ensure publication, reaffirming its fundamental duty to protect the public and the reputation of the solicitors' profession. It was noted that the Respondent indicated he did not intend to continue in practice and currently did not hold a practising certificate; however, this factor did not alter the Tribunal's overriding commitment to transparency.
15. The Majority Tribunal concluded that any sensitive personal information of concern to the Respondent could be effectively managed by redacting relevant details from the published documentation. This measure would mitigate any legitimate, identifiable risks while maintaining transparency without unduly compromising the Respondent's privacy. Although the Cause List had been anonymised up to the present hearing, the publication of the judgment would otherwise disclose the Respondent's identity. This approach, consistent with earlier measures, including holding the entire hearing in a private session, would serve as an essential safeguard to protect sensitive personal details about the Respondent.
16. Accordingly, the Tribunal refused the unopposed application for a direction that the judgment be anonymised.

The Dissenting Decision

17. The dissenting member held that the application should be granted, finding that the available medical evidence justified issuing the direction under Rule 35(9) of the SDPR in the interests of justice.
18. The evaluation of the likely impact on the Respondent extended beyond concerns over the release of sensitive personal information into the public domain. It included his fears in respect of the very fact of publicity, the threat of publicity and its potential negative impact on his wellbeing.
19. Given that the risk of such impact was deemed substantial, real, and ongoing, the Respondent's interests were considered to outweigh the default presumption of open justice and transparency. In the present circumstances, transparency would be maintained by the public having full access to the case details and outcome without the Respondent's identity being disclosed.

Background

20. The Respondent was admitted to the Roll on 1 August 2021.

21. The Respondent does not currently hold a Practising Certificate.
22. At the material time the Respondent was practising as a solicitor at the Firm's Residential Property team.
23. Further details about facts and matters comprising the allegation and the breaches are set out in the Statement of Agreed Facts and Outcome.

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

24. 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

25. 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 their private and family life under Articles 6 and 8 of the European Convention for the Protection of Human Rights and Fundamental Freedoms.
26. The Tribunal reviewed all the material before it and was satisfied on the balance of probabilities that the Respondent's admissions were properly made.

Sanction

27. The Tribunal considered the Guidance Note on Sanction (11th Edition, February 2025) and the proper approach to sanction as set out in *Fuglers and Others v SRA* [2014] EWHC 179. In doing so the Tribunal assessed the culpability and harm identified together with the aggravating and mitigating factors that existed.
28. The Respondent had admitted that his conduct had shown him to lack integrity and been dishonest.
29. The Tribunal having accepted his admission of dishonesty absent exceptional circumstances would be required to order him to be struck off the roll. In this regard, the Tribunal considered the comments of Coulson J., in *Solicitors Regulation Authority v Sharma* [2010] EWHC 2022 (Admin):

"It seems to me, therefore, that looking at the authorities in the round, that the following impartial points of principle can be identified:

- (a) *Save in exceptional circumstances, a finding of dishonesty will lead to the solicitor being struck off the roll ... That is the normal and necessary penalty in cases of dishonesty ...*
- (b) *There will be a small residual category where striking off will be a disproportionate sentence in all the circumstances.*

(c) *In deciding whether or not a particular case falls into that category, relevant factors will include the nature, scope and extent of the dishonesty itself; whether it was momentary ... or over a lengthy period of time ... ; whether it was a benefit to the solicitor ... and whether it had an adverse effect on others.”*

30. In addition, the Tribunal also noted the decision in SRA -v James [2018] EWHC 2058 (Admin), in particular at para 101:

“...it is clear from the decisions in Sharma, Imran and Shaw, that the most significant factor carrying most weight and which must therefore be the primary focus in the evaluation is the nature and extent of the dishonesty, in other words the exceptional circumstances must relate in some way to the dishonesty.”

31. The Respondent’s dishonesty was confined solely to one element of a single email, the alteration of the email address. Critically, the message sent to the client was not misleading. This amendment took only a few seconds, making it a brief, isolated incident rather than a prolonged or sustained act.
32. The conduct would have resulted in minimum benefit to the Respondent, possibly the avoidance of embarrassment as a result of the initial error and/or the consequences of what might have been a data breach.
33. Ultimately, the client suffered no detriment, and the transaction remained unaffected. No client funds were involved, and the dishonesty did not relate to the substance of the client’s matter. No harm was caused to any party, and no actual harm resulted from the Respondent’s conduct.
34. According to the medical evidence considered by the Tribunal, Respondent’s health problems, dating back to 2007, may have contributed to impulsive decision-making when confronted with difficult circumstances. While this factor was taken into account during the balancing exercise in assessing exceptional circumstances, it remained secondary to evaluating the nature, scope, and extent of the dishonesty, as outlined in Sharma.
35. After conducting a holistic assessment of the facts, the Tribunal concluded that exceptional circumstances did exist in this case, given the nature and scope of the misconduct and the broader contextual factors surrounding the case.
36. Nevertheless, the Tribunal recognized the necessity to safeguard both the public and the reputation of the legal profession by curtailing the Respondent’s right to practice, thereby mitigating the risk of future harm. However, it concluded that neither of these objectives justified striking him off the Roll.
37. Accordingly, bearing in mind the seriousness of the misconduct, the Tribunal determined that the appropriate sanction would be a suspension from practice for a period of 12 months.

Costs

38. The parties agreed that the Respondent should pay costs in the sum of £12,500.00.
39. 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

40. The Tribunal Ordered that the Respondent, MICHAEL PETER GOODWIN, solicitor, be suspended from practice as a solicitor for the period of 12 months to commence on the 19th day of June 2025 and it further Ordered that he do pay the costs of and incidental to this application and enquiry fixed in the sum of £12,500.00.

Dated this 14th day of July 2025
On behalf of the Tribunal

M.N. Millin

M. N. Millin
Chair

BEFORE THE SOLICITORS DISCIPLINARY TRIBUNAL

Case No:

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

AND IN THE MATTER OF:

SOLICITORS REGULATION AUTHORITY LIMITED

Applicant

and

MICHAEL PETER GOODWIN

Respondent

STATEMENT OF AGREED FACTS AND PROPOSED OUTCOME

By its application dated 16 January 2025 and the statement made pursuant to Rule 12(2) of the Solicitors (Disciplinary Proceedings) Rules 2019 (“the Rule 12 Statement”) which accompanied that application, the Solicitors Regulation Authority Limited (“the SRA”) brought proceedings before the Solicitors Disciplinary Tribunal, making one allegation of misconduct against the Respondent, Michael Peter Goodwin.

The allegations

1. The allegations against the Respondent, made by the SRA are that, while in practice as a Solicitor at Talbots Law Ltd (“the Firm”):

- 1.1 On 18 July 2023, he provided misleading information in an email to Client A by inserting Client A’s correct email address in substitution for the incorrect email address in the email he had originally sent to Client A on 17 July 2023 and in doing so breached any or all of Principles 2, 4 and 5 of the SRA Principles 2019 (“the Principles”) and Paragraph 1.4 of the SRA Code of Conduct for Solicitors, RELs and RFLs (“the Code for Solicitors”).

Agreed Facts

2. On 22 April 2025, the Respondent filed and served an Answer in which he admitted the Allegations in full.

Professional Details

3. The Respondent, who was born on 24 April 1985, is a solicitor, having been admitted to the Roll on 1 August 2021. At the material time he was practising as a solicitor at the Firm's Residential Property team. The Respondent does not currently hold a Practising Certificate.

The facts and matters relied upon in support of the allegation

Background

4. The conduct in this matter came to the attention of the SRA when the Firm self-reported the matter to the SRA on 10 October 2023 and when the Respondent self-reported the matter to the SRA on 18 October 2023.

Allegation 1.1

5. The Respondent had been instructed by Client A in connection with a residential property purchase.
6. When the file had been opened on the Firm's case management system, an incorrect email address for Client A had been entered ("Email address 1").
7. On 17 July 2023 at 09.45, the Respondent attempted to email Client A, attaching documents relating to her transaction. This email was sent to Email address 1.
8. On 18 July 2023 at 14.52, the Respondent forwarded the email of 17 July 2023 to Client A, this time to her correct email address ("Email address 2"). The Respondent wrote:

"I understand you've not received the attached."

9. The text of the email of 17 July 2023 that was forwarded on 18 July 2023 showed the outgoing email as having been sent to Email address 2, when in fact it had been sent to Email address 1.

10. Following a file review on 2 October 2023, the Respondent was asked to attend an internal meeting at the Firm on 3 October 2023. The Respondent was asked about Client A's file, and he stated that he recalled an issue with an email address. The Respondent explained that he and his team had kept emailing the wrong email address. The Respondent went on to state that he had:

"forwarded an email to the correct email address and then edited the email address in the forwarded message to appear that it had in fact been sent to the correct email address previously."

11. The Respondent stated that he knew it was wrong and should not have done it.
12. The Respondent was placed on paid leave from 3 October 2023 and on 17 October 2023 he agreed to resign from the Firm with immediate effect as part of a settlement agreement.

Respondent's position

13. In his self-report of 18 October 2023, the Respondent stated:

"5. On 17th July an assistant on my team sent an email to the client with a completion statement. This email was not received due to the error and the email bounced back.

6. On 18th July I realised the error and reformatted the email to the correct address.

7. On the email thread in a moment of panic I altered the email address in the thread so that the client was not aware that the email had gone to the wrong place previously. I included something along the lines of "not sure if you have received the below/attached". I'm unsure of the exact wording as I have not been provided with a copy of the email."

14. He went on to state that he accepted that his *"behaviour can be seen as dishonest"*, before setting out a number of factors relating to his health and personal circumstances that he was dealing with at the time.
15. The Respondent provided a [REDACTED] report dated 3 April 2024, which sets out his [REDACTED] health issues in detail.
16. In his representations following the Notice recommending referral of his conduct to the Tribunal, the Respondent made full admissions to the Allegations.

Breaches of Principles and the Code of Conduct

Principle 4 (dishonesty)

17. The Applicant relies upon the test for dishonesty stated by the Supreme Court in *Ivey v Genting Casinos [2017] UKSC 67*, which applies to all forms of legal proceedings, namely that the person has acted dishonestly by the ordinary standards of reasonable and honest people:

“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.”

18. At the time that the Respondent amended the email address, he knew or believed the following matters:

- 18.1 The email of 17 July 2023 had been sent to an incorrect email address.
- 18.2 The email of 18 July 2023 forwarded the email that the Respondent had attempted to send the previous day.
- 18.3 That the purpose of amending the email address written in the email of 17 July 2023 in the way that he did, was to give the impression to the reader that the email of 17 July 2023 had been sent to Client A’s correct email address, when in fact it had been sent to an incorrect address.
- 18.4 That he was therefore providing misleading information to Client A in respect of which email address the email of 17 July 2023 had been sent to.
- 18.5 Falsification of documents is, in itself, a dishonest act.

19. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED].

20. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].

21. [REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] The Respondent did not subsequently correct the misleading impression and did not tell his employers what he had done until the meeting on 3 October 2023. It is accepted that the Respondent was off work for a considerable period of time between 18 July 2023 and 3 October 2023, however, there would have been opportunities for him to correct matters sooner. In those circumstances, while ordinary, decent people may have sympathy with the Respondent's circumstances, his conduct would nevertheless be considered dishonest by the standards of such people. The Respondent therefore breached Principle 4.

Principle 5 SRA Principles (integrity)

22. The Respondent's actions amounted to a failure to act with integrity (i.e. with moral soundness, rectitude and steady adherence to an ethical code) in breach of Principle 5 of the SRA Principles. 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. The Respondent failed to act with integrity in that he sought to conceal an error from a client and in doing so, provided that client with misleading information. A solicitor acting with integrity would not have sought to conceal the fact that the previous email had been sent to the wrong email address, Email address 1. The Respondent therefore breached Principle 5.

Principle 2 SRA Principles (maintaining trust)

23. The conduct alleged also amounted to a breach by the Respondent of the requirement to behave in a way which maintains the trust and confidence placed by the public in the solicitors' profession and in legal services provided by authorised persons. The Respondent's conduct in falsifying an email is a dishonest act which falls short of the higher standards expected of a member of

the solicitor's profession. The public would not expect a solicitor to alter the text of an email in order to create a misleading impression to a client. The Respondent therefore breached Principle 2.

Paragraph 1.4 of the Code of Conduct

24. Paragraphs 5 to 16 above are relied on as evidence that the Respondent breached Paragraph 1.4 of the Code of Conduct by attempting to mislead Client A that an email to her had been sent to her correct email address, when this was not the case.

Non-Agreed Mitigation

The following points are advanced by way of mitigation by the Respondent, but their inclusion in this document does not amount to adoption or endorsement of such points by the SRA.

25. [REDACTED], the Respondent was undergoing a period of considerable emotional strain due to the terminal illness of his partner's mother.

[REDACTED]
[REDACTED]. I
[REDACTED], the Respondent was undergoing a period of considerable emotional strain due to the terminal illness of his partner's mother.
[REDACTED]
[REDACTED].

26. The Respondent fully accepts the seriousness of his actions [REDACTED]
[REDACTED].
He remains committed to maintaining the standards of the profession going forward.

27. When the misconduct was brought to light, the Respondent ascertained that the high-pressure environment of the sector was not conducive to his [REDACTED]
[REDACTED] wellbeing and sought alternative employment in a different field. He believes that this demonstrates that he has developed insight [REDACTED]
[REDACTED].

Proposed Sanction

28. The proposed sanction is that the Respondent is suspended from the Roll of solicitors for a period of 12 months.

Explanation why such an order would be in accordance with the Tribunal's Guidance Note on Sanction (11th edition)

29. The following culpability factors are relevant:

- 29.1 The Respondent acted deliberately but in panic and haste in the context of poor mental health with the aim of concealing his error in sending the email to the wrong address.
- 29.2 The conduct was not planned but a spontaneous reaction to an error he had made in drafting the email.
- 29.3 The Respondent had direct control and responsibility for the circumstances giving rise to the misconduct.
- 29.4 The Respondent had been qualified for almost two years at the time of the misconduct.

30. The following harm factors are relevant:

- 30.1 There was no harm caused to the client.
- 30.2 There is always harm caused to the reputation of the profession in circumstances where a solicitor provides misleading information to a client by editing a document.

31. The following aggravating factors are present in this matter:

- 31.1 The Respondent knew that his conduct was in material breach of his obligations to protect the reputation of the legal profession.

32. The following mitigating factors are present in this matter:

- 32.1 There was no loss to the client.
- 32.2 The Respondent self-reported the matter to the SRA.
- 32.3 The misconduct was a single episode of very brief duration in a previously unblemished career.
- 32.4 The Respondent has demonstrated insight and remorse in relation to this matter.
- 32.5 The Respondent made open and frank admissions to his employer and to the SRA throughout the investigation.
- 32.6 The Respondent has fully co-operated with the SRA throughout the investigation.

Exceptional circumstances

33. The parties consider and submit that this is a matter in which a fair and proportionate resolution of the matter is that the Respondent is suspended for a period of 12 months and not struck-off the Roll, notwithstanding the admission to dishonesty.

34. Paragraph 29 of the Guidance Note on Sanction states that:

“In considering what amounts to exceptional circumstances: relevant factors will include the nature, scope and extent of the dishonesty itself; whether it was momentary, or over a lengthy period of time; whether it was a benefit to the solicitor, and whether it had an adverse effect on others.” (Sharma above). The exceptional circumstances must relate in some way to the dishonesty (James above).”

35. The following paragraphs in *SRA v James and others* [2018] EWHC 3058 (Admin) are relevant to this assessment:

Paragraph 101

“First, although it is well-established that what may amount to exceptional circumstances is in no sense prescribed and depends upon the various factors and circumstances of each individual case, it is clear from the decisions in Sharma, Imran and Shaw, that the most significant factor carrying most weight and which must therefore be the primary focus in the evaluation is the nature and extent of the dishonesty, in other words the exceptional circumstances must relate in some way to the dishonesty.”

Paragraph 103

“Inevitably, an assessment of the nature and extent of the dishonesty and the degree of culpability will involve an examination of what Ms Morris QC termed the “mind set” of the respondent, including whether the respondent is suffering from mental health issues and the workplace environment, as part of the overall balancing exercise. However, where the SDT has concluded that, notwithstanding any mental health issues or work or workplace related pressures, the respondent’s misconduct was dishonest, the weight to be attached to those mental health and working environment issues in assessing the appropriate sanction will inevitably be less than is to be attached to other aspects of the dishonesty found, such as the length of time for which it was perpetrated, whether it was repeated and the harm which it caused, all of which must be of more significance. Certainly, it is difficult to see how in a case of dishonesty, as opposed to some lesser professional misconduct, the fact that the respondent suffered from stress and depression (whether alone or in combination with extreme pressure from the working

environment) could without more amount to exceptional circumstances, a matter to which I return below."

Paragraph 104

"Therefore, whilst the mental health and workplace environment issues in any given case will not be a "trump card" in assessing whether there are exceptional circumstances, they can and should be considered as part of the balancing exercise required in the assessment or evaluation."

36. In addition, paragraph 13 in *SRA v Sharma [2010] EWHC 2022 (Admin)* is relevant to this assessment:

Paragraph 13

"It seems to me, therefore, that looking at the authorities in the round, that the following impartial points of principle can be identified: (a) Save in exceptional circumstances, a finding of dishonesty will lead to the solicitor being struck off the roll, see Bolton and Salisbury. That is the normal and necessary penalty in cases of dishonesty, see Bultitude. (b) There will be a small residual category where striking off will be a disproportionate sentence in all the circumstances, see Salisbury. (c) In deciding whether or not a particular case falls into that category, relevant factors will include the nature, scope and extent of the dishonesty itself; whether it was momentary, such as Burrowes, or over a lengthy period of time, such as Bultitude; whether it was a benefit to the solicitor (Burrowes), and whether it had an adverse effect on others."

37. The nature, scope and extent of the dishonesty was limited to one part of one email, namely the amendment of the email address. The message written to the client was not misleading.
38. The amendment was of one email address and could not have taken more than a few seconds. It was therefore momentary rather than over a lengthy period of time.
39. The only potential benefit to the Respondent appears to be that he might have avoided embarrassment and/or the consequences of what may potentially have been a data breach.
40. The client suffered no detriment, and the transaction was not affected. There was no involvement of client monies, and the dishonesty did not relate to the substance of the client's matter. There was no harm or detriment caused to anybody else (for example, the other side in the transaction). The only potential harm was that the

Firm would have been unable to report a data breach, though in the end the Firm concluded that there had not been one.

41. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] In line with paragraph 104 in *James*, these factors are relevant to the balancing exercise that should be carried out in assessing exceptional circumstances, but are secondary factors to the nature, scope and extent of the dishonesty itself.

42. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].”

43. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].”

44. The parties submit that applying the principles set out in *James*, namely that it is the criteria in *Sharma* that should be examined when considering exceptional circumstances, this is a case which falls into the small residual category of cases where striking-off for dishonesty is neither necessary for the protection of the reputation of the profession or the protection of the public and would not be proportionate in the particular circumstances of this case.

45. The parties further submit that the appropriate sanction is a suspension for a period of 12 months. This is a significant sanction which marks the seriousness of the misconduct and the exceptional nature of the circumstances in which it took place, those circumstances relating directly to the dishonest conduct. The Respondent has genuine insight into the factors that led to his panicked decision-making and has taken steps to address them by engagement with mental health services. There has been no misconduct since these events almost two years ago.

Costs

46. The parties agree that the Respondent make a contribution to the Applicant's costs in this matter in the sum of £12,500. This figure has been arrived at taking into account the Respondent's financial means.

.....
John Quentin
Head of Legal and Enforcement
Solicitors Regulation Authority Limited

Dated: 18 June 2025

.....
Michael Peter Goodwin
Respondent in the proceedings.

Dated: 18 June 2025
[dated by Blake Morgan on
Mr Goodwin's authority]

Sensitivity: General