

SOLICITORS DISCIPLINARY TRIBUNAL

IN THE MATTER OF THE SOLICITORS ACT 1974

Case No. 12681-2024

BETWEEN:

SOLICITORS REGULATION AUTHORITY LTD

Applicant

and

IMRAN HAIDER KHAWAJA

Respondent

Before:

Ms T. Cullen (Chair)
Mr U. Sheikh
Ms L. Hawkins

Date of Hearing: 7 May 2025

Appearances

Delme Griffiths, Solicitor and Partner at Blake Morgan LLP of One Central Square, Cardiff, CF10 1FS, for the Applicant.

Jonathan Goodwin, Solicitor Advocate of Jonathan Goodwin Solicitor Advocates for the Respondent.

JUDGMENT

Allegations

1. The allegations against the Respondent, Mr Imran Haider Khawaja, made by the SRA are that:
 - 1.1 In relation to investigations undertaken by the Legal Ombudsman and/or the SRA between approximately January 2021 to February 2024, the Respondent failed to:
 - 1.1.1 Adequately cooperate with the Legal Ombudsman and/or respond promptly to its enquiries.
 - 1.1.2 Adequately cooperate with the SRA and/or respond promptly to its enquiries.
 - 1.1.3 Comply with the requirements of a Notice issued by the Legal Ombudsman pursuant to s. 147 of the Legal Services Act 2007 within the time specified or in a timely manner.

PROVED

In doing so, the Respondent breached any or all of Principle 2 and Principle 5 of the SRA Principles (“the Principles”) and Paragraph 7.3 and Paragraph 7.4 of the SRA Code of Conduct for Solicitors, RELs and RFLs (“the Code”).

- 1.2 From July 2022 to June 2023, the Respondent failed to discharge an undertaking provided by him within a reasonable time. In doing so, the Respondent breached any or all of Principles 2 and Principle 5 of the Principles and Paragraph 1.3 of the Code.

PROVED

Executive Summary

2. The primary allegations involved failures to adequately cooperate with investigations by the Legal Ombudsman (LeO) and the SRA over an extended period, specifically from early 2021 to early 2024, which included not responding promptly to enquiries and failing to comply with a statutory notice. Additionally, it was alleged that the Respondent failed to discharge a professional undertaking within a reasonable time between July 2022 and June 2023.
3. The Respondent apologised for the delays in responding to regulatory bodies and fulfilling an undertaking. However, while admitting the facts underpinning the allegations and the breaches of professional conduct, he disputed that the delays constituted a lack of integrity. His defence to lack of integrity was based predominantly upon the impact of a serious health event and its immediate and consequential impact on his cognitive abilities and capacity to manage his professional responsibilities effectively during the relevant period. He had enjoyed a long and previously unblemished career. He asked the Tribunal to take into account his genuine remorse, and the corrective measures he had taken. The Tribunal was

invited to consider medical evidence as a crucial factor in understanding his conduct and determining culpability, particularly regarding the allegation of lack of integrity.

4. In the event the Tribunal found that his conduct did not meet the higher threshold of a lack of integrity (Principle 5) and ultimately it found that the allegations of lack of integrity were not proven, attributing the admitted failings to the medical issues as an explanation rather than an excuse.

Sanction

5. [The Respondent was fined £5,000.](#)

Documents

6. The Tribunal considered all the documents in the case which were contained in the electronic bundle.

Factual Background

7. The Respondent, a solicitor, was admitted to the Roll on 4 May 1993. He was director, company secretary, and owner of Armstrong Legal Limited.

Findings of Fact and Law

8. The Applicant was required to prove the allegations on the balance of probabilities. The Tribunal had due regard to its statutory duty, under s. 6 of the Human Rights Act 1998, to act in a manner which was compatible with the Respondent's right 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.
9. The Tribunal had due regard to the following and applied the various tests in its fact-finding exercise:

Integrity

The matters set at paragraphs 97 to 107 of [Wingate v SRA \[2018\] EWCA Civ 366](#),

NOTE: While all the evidence was carefully considered the Tribunal does not refer to each and every piece of the evidence or submissions in its judgment and findings.

10. **Allegations 1.1 – 1.1.3**

Redacted Rule 12 Statement - [Click Here](#)

The Applicant's case

Chronology

10.1 Key dates and communications for the Client A, Client B, and Sheridans matters outlining the numerous attempts by LeO and the SRA to engage with the Respondent and his lack of response or delayed and inadequate responses are as follows:

Client A

- Numerous instances of failure to respond to LeO requests between December 2020 and January 2024 (approximately 10 occasions of no response or timely response, plus others with non-substantive responses).
- Numerous instances of failure to respond to SRA requests between December 2021 and January 2024 (approximately 8 occasions of no response or timely response, plus others with non-substantive responses).
- LeO's report to the SRA in November 2021 due to non-response.
- LeO's pre-notice letter dated 3 July 2023, explicitly warning of a s.147 Notice¹ and contempt proceedings.
- s.147 Notice issued on 29 August 2023, with a compliance deadline of 12 September 2023.
- Failure to comply with the s.147 Notice until 28 January 2024 (over 4 months late), after SRA intervention.

Client B

- Multiple instances of failure to respond to LeO communications between March 2021 and September 2023 (approximately 5 occasions of no response or timely response, plus others with non-substantive responses).
- Multiple instances of failure to respond to SRA communications between May 2022 and February 2024 (approximately 7 occasions of no response or timely response, plus others with non-substantive responses).
- LeO's report to the SRA in March 2022 due to non-compliance.
- Delayed payment of compensation to Client B (not made until 31 January 2024, despite LeO's decision in September 2023).

¹ A S. 147 notice, as outlined in the Legal Services Act 2007, empowers the Legal Ombudsman to demand specific documents or information from a legal professional to investigate a complaint. This notice allows the Ombudsman to request evidence, explore facts, and make a decision.

Sheridans

- The giving of an undertaking on 19 November 2021 to pay costs of £3,500 + VAT.
 - Invoice sent by Sheridans on 6 July 2022.
 - Sheridans chasing payment on 27 March 2023.
 - Report to SRA by Sheridans on 4 April 2023 due to non-payment and non-response.
 - Payment finally made on 5 June 2023, after SRA intervention.
 - Multiple instances of failure to respond to SRA enquiries regarding the undertaking and firm procedures between April 2023 and January 2024 (approximately 6 occasions of no response or timely response, plus others with non-substantive responses).
- 10.2 The dominant theme across all three matters (Client A, Client B, and Sheridans) was the Respondent's repeated failure to respond to communications and requests for information from both LeO and the SRA over a significant period. The alleged lack of cooperation led directly to the unreasonable and unnecessary prolonging of the investigations conducted by LeO and the SRA.
- 10.3 It was said that the delays caused by the Respondent's alleged conduct had a detrimental impact on Client A and Client B, delaying the resolution of their complaints. Similarly, Sheridans Solicitors were required to chase payment and ultimately report the matter to the SRA due to the non-discharge of the undertaking. Despite being an experienced solicitor and holding key compliance roles (MLRO, COLP, COFA, Designated Complaints Handler) at the Firm, the Respondent was said to have shown a flagrant unwillingness to adhere to his regulatory obligations in connection with LeO and the SRA.
- 10.4 The most serious aspect of the non-cooperation in the Client A matter was the failure to comply with a s. 147 Notice from LeO, a formal statutory requirement. The SRA notes that this should not have been necessary and was only complied with significantly late after SRA intervention. LeO's pre-notice letter explicitly warned of the potential for High Court action for contempt.
- 10.5 In the Sheridans matter, the undertaking for costs was not discharged for almost a year after it became due, and even then, payment was only made after SRA intervention.
- 10.6 The Respondent partially admitted the allegations in his response to the SRA's referral notice, citing medical issues during a specific period as having a "causative impact on his actions."
- 10.7 Pre-empting submissions the Tribunal was to hear regarding a serious health event suffered by the Respondent, Mr Griffiths argued that conduct did amount to a lack of integrity, even accounting for medical issues. He relied on the principles from

Wingate, acknowledging that not every breach of the code equates to a lack of integrity and that the duty does not require professionals to be “*paragons of virtue*.” However, there were strong factors supporting a finding of lack of integrity as follows:

- *Multiple reminders and persistent non-compliance:* the Respondent was repeatedly reminded of his obligations but did not change his behaviour.
- *Breadth of failings:* The conduct spanned three separate complaints with distinct failings (non-compliance with LeO and SRA, s. 44B and s. 147 notices required, delaying payment of award, promising responses but not delivering).
- *Length of time:* The same failings were repeated over a prolonged period (2021-2024). The Sheridan’s complaint was particularly egregious given its timing after previous reminders and failure to fulfil an undertaking within a reasonable time.
- *Impact on Regulators and Complainants:* Significant resources were expended by the LeO and SRA in chasing responses, delaying investigations and causing stress/frustration to complainants.
- *S.147 Notice:* This had been a serious, unusual step. Failure to comply until months later, without reasonable explanation, was a standalone factor indicating a lack of integrity. A solicitor acting with integrity would not have put the ombudsman in this position.
- *Impact on Complainants:* Client A waited years for an outcome (though ultimately their complaint was not upheld), and client B experienced a significant delay in receiving a financial award.
- *The Respondent’s Status and Experience:* As a highly experienced solicitor, director, owner, and complaints handler, his failure to meet standards was more serious and diluted the impact of health matters. He “*ought to have known better*.”
- *In relation to the undertaking (Allegation 1.2):* Mr Griffith argued the lack of integrity was made out due to the context and the length of time of the breach, compounded by the failure to respond to requests for discharge and the need for SRA intervention.

The Respondent’s case

Allegation 1.1

- 10.8 The Respondent admitted to a breach of Principle 2 and Paragraphs 7.3 and 7.4 of the SRA Code of Conduct, subject to explanation and mitigation. He denied a breach of Principle 5 (lack of integrity).

Allegation 1.2

- 10.9 The Respondent admitted to a breach of Principle 2 and Paragraph 1.3 of the SRA Code of Conduct. He denied a breach of Principle 5 (lack of integrity).
- 10.10 The Respondent acknowledged and apologized for the delays in responding to regulatory bodies and fulfilling an undertaking. However, he disputed that these delays constituted a lack of integrity.

The Respondent's Health

- 10.11 The central plank of the Respondent's defence was significant medical history which had played its part in this case. On 29 October 2020, the Respondent suffered a serious health event. His survival was described as "rather miraculous" by medical professionals. However, this event resulted in residual and pervasive issues affecting in the short to medium term his cognitive functioning, memory, and focus which impacted upon his work during the relevant period, though his recovery was now almost complete.
- 10.12 The health event took place within the context of the Covid 19 pandemic and the death of his father in December 2022, who lived with him. The delay had not been intentional and it was not a deliberate flouting of rules but was due to his issues following the health event. The Respondent explained that his health issues significantly preoccupied him during much of the relevant period (2021 and early 2022) when he was undergoing treatment.
- 10.13 The Respondent said that as the Director of a small firm, he lacked access to sufficient resources to delegate the regulatory matters, and he had had no option but to fight through his issues and continue as best he could.
- 10.14 The Respondent directed the Tribunal to medical evidence in support.

Context of the Regulatory Delays

Client A Complaint:

- 10.15 The complaint was received on 17 August 2020, but the LeO's initial contact was around six weeks after the Respondent's health event. There were subsequent delays in his responses, culminating in a five-month delay in complying with a s.147 Notice. The Respondent offered a sincere, and genuine, apology for this delay. Notably, the LeO ultimately did not consider that the Firm needed to take any action to resolve this complaint.

Client B Complaint:

- 10.16 This complaint was received on 15 December 2020, approximately seven weeks after the health event. Delays in responding occurred, and there was an approximately four-month delay in paying the compensation awarded by the LeO. The Respondent again offered a sincere, and genuine, apology for this delay. He said there had been

difficulty in dealing with this complaint due to the fee earner responsible for the underlying matter having left the firm.

11. Allegation 1.2

Undertaking Failure (Allegation 1.2):

- 11.1 The failure related to discharging an undertaking provided on 19 November 2021 to pay a landlord's legal costs. The SRA was notified of this failure on 4 April 2023. The Respondent admitted this delay, stating, *"I am sorry that this appears to have slipped through the net. We have monies on client account, and I have arranged for payment to go out today."* He attributed this partly to the matter not completing as expected and an unexpected request for payment mid-transaction. He had since implemented measures to prevent future delays with undertakings.

Denial of Lack of Integrity (Principle 5)

- 11.2 The Respondent denied that his actions amounted to a lack of integrity. Mr Goodwin contended that as an admitted case, the central issue is whether the conduct crossed the integrity threshold. He relied on the principles established in *Wingate*, arguing that while the delays were *"regrettable,"* they did not constitute a lack of integrity because they were:

- Not intentional or done in bad faith.
- Did not involve an attempt to conceal information.
- Were caused by circumstances outside his control, specifically his medical condition.

- 11.3 Mr Goodwin said there were two central questions:

1. What caused a solicitor with over 30 years of unblemished practice to act this way?
2. Was there an explanation that, while properly admitting the allegations, justified a finding of no lack of integrity?

- 11.4 The delays were a result of the circumstances existing after his serious health event, not a deliberate flouting of professional obligations. The effects of the serious health event had had profound and immediate repercussions on the Respondent's ability to function as he had done prior to the health event. His road to recovery had taken a number of years and encompassed the relevant period in the allegations. The delays and omissions were therefore the result of and informed by the medical position and a fair assessment shows a solicitor *"overwhelmed,"* not acting without integrity, and doing his *"best in extremely challenging circumstances."* Regarding the undertaking, whilst acknowledging the delay in payment, Mr Goodwin noted the undertaking had not specified a time period for compliance, only that payment was due whether or not completion occurred.

- 11.5 Mr Goodwin emphasised the Respondent's exemplary and unblemished regulatory and disciplinary history of over 31 years' qualification and expressed being professionally embarrassed to be facing Tribunal proceedings; especially at the tail end of his unblemished career.
- 11.6 The Respondent expressed his regret and remorse for the delays and said that he had taken steps to prevent recurrence, including setting reminders, allocating dedicated time for regulatory tasks, and improving time management. Moving forward, he said he was committed to ensuring that such delays did not occur again.

The Tribunal's Findings

- 11.7 The Tribunal reviewed all the evidence before it and considered the submissions it had heard. The Tribunal applied the civil standard of proof, as it was required to do. The burden of proof lay entirely with the Applicant.
- 11.8 The Tribunal reviewed all the material before it and was satisfied on the balance of probabilities that the Respondent's admissions were properly made.
- 11.9 The Tribunal next considered the disputed part of the allegations regarding lack of integrity. To do so, it considered the decision in *Wingate* and its application to the instant case.
- 11.10 *Wingate* had clarified that lack of integrity is a distinct standard from dishonesty. Integrity as applied to a professional requires a higher level of *ethical* (emphasis added) behaviour from solicitors. In his judgment Jackson LJ gave examples, admittedly not exhaustive, of conduct which could give rise to a finding of lack of integrity, as follows:
- Giving the appearance of a partnership while operating as a sole practice and deliberately flouting rules.
 - Recklessly, but not dishonestly, allowing a court to be misled.
 - Subordinating client interests to personal financial interests.
 - Making improper payments from client accounts.
 - Involvement in conveyancing transactions bearing the hallmarks of mortgage fraud.
 - Making false representations on behalf of a client.
- 11.11 Each of the cited examples referred to matters which fell just short of outright dishonest behaviour. While noting the distinction between dishonesty and lack of integrity the Tribunal observed that there was, necessarily, a high threshold to be crossed before any Tribunal could make a finding of lack of integrity. As a matter of law and logic this assessment had to be correct otherwise lack of integrity would naturally follow in any episode of proved misconduct.

- 11.12 In the present matter the Respondent admitted there had been delays and it had been over a number of years. He had tried to respond, but those attempts had been flawed and patchy, undermined as they had been by his serious health event and its consequential impact upon his functioning, upturning his practice and good conduct over the previous 30 years.
- 11.13 The Tribunal noted that it had been possible for the Respondent to represent clients, attend court etc., and still experience difficulties. Each represented a different form of stress, the former being more akin to a ‘muscle memory’ requiring an objective approach and ‘distance’, the latter being more subjective and requiring a closer internal scrutiny of his work which he was not capable of carrying out at that time.
- 11.14 In some circumstances, absent any credible explanation, a failure and/or protracted delay in responding to the regulator LeO and delay in fulfilling an undertaking could amount to a lack of integrity. However, in the Respondent’s case the Tribunal accepted the medical issues represented an explanation rather than excuse, particularly the ongoing nature of the issues and the impact they had had on aspects of the Respondent’s professional and personal life.
- 11.15 Therefore the Tribunal found that the high threshold for lack of integrity has not been found proved.
- 11.16 In conclusion the Tribunal found Allegations 1 and 1.2 proved in full on admission, save for the allegations of lack of integrity which were contested and not found proved.

Previous Disciplinary Matters

12. There were no previous findings.

Mitigation

13. Mr Goodwin referred to matters which he had raised earlier, the Respondent’s genuine remorse; his hitherto unblemished disciplinary and regulatory history; the serious health event; lack of harm and the remediation he had put in place to prevent repetition.
14. Mr Goodwin referred to a previous decision of the Tribunal in *Parry 12663-2024* which raised similar issues and was an example of a nuanced approach where there had also been a failure to cooperate with regulators over a prolonged period. In that case lack of integrity was not found due to underlying personal difficulties and the Respondent had been reprimanded. As an aside, Mr Goodwin said that Ms Parry had not engaged with the Tribunal proceedings whereas the Respondent in this case had fully co-operated and engaged.
15. Mr Goodwin submitted that the Tribunal should impose the lowest possible sanction and that if a reprimand was not considered to be appropriate then a fine at Level 1 of the indicative fine bands would be an alternative proportionate sanction. He urged the Tribunal against imposing a sanction that would adversely affect the Respondent’s

ability to practise. He expressed the Respondent's profound embarrassment and deep regret.

Sanction

16. The Tribunal applied the Guidance Note on Sanction (11th Edition) ("the Sanctions Guidance") and the proper approach to sanctions 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.

Stage one: seriousness of the misconduct (culpability and harm).

17. The Applicant had viewed The Respondent's alleged conduct as potentially serious, highlighting the protracted nature of the failures, the involvement of multiple complaints, and the disregard for direct reminders of obligations and the potential consequences, including the issuance of a statutory notice and the explicit warning of contempt proceedings. It noted that his position as a director, owner, and compliance officer at the Firm would have exacerbated the seriousness of the alleged breaches. Whilst these were relevant considerations the Tribunal found them to be blunted by the evidence relating to the Respondent's health event which pervaded his actions during the relevant period and served to reduce his culpability to a low to moderate level.
18. The failure to observe the undertaking within a reasonable time frame, however, raised the level of seriousness in this case. The giving of an undertaking by a solicitor was a solemn and serious step. The giving and discharge of undertakings formed the basis of trust between solicitors and without which transactions would falter and break down. Even though the Tribunal had accepted the matters relating to health, and not found lack of integrity, it would have been an easy matter for him to have written a cheque to discharge the undertaking he had given.
19. By his admissions, the Respondent accepted that his conduct would have damaged the trust and confidence placed by the public in him and the profession. The harm had, in real terms, also been low to medium.
20. The Respondent had advanced mitigation, accepted by the Tribunal, regarding an unblemished career over the preceding three decades, the steps taken to stabilise his health, reorganise professional affairs, and ensure compliance and that absence of subsequent concerns was testament to those efforts. The Tribunal accepted that the Respondent had fully cooperated with the SRA investigation and Tribunal proceedings, making early admissions. No client money had been at risk, there was no dishonesty, and no concealment.

Stage two: the purpose of sanctions

21. The Tribunal had regard to the observation of Sir Thomas Bingham MR (as he then was) in Bolton v Law Society [1994] 1 WLR 512 that the fundamental purpose of sanctions against solicitors was:

“to maintain the reputation of the solicitors’ profession as one in which every member, of whatever standing, may be trusted to the ends of the earth”.

Stage three: the most appropriate sanction

22. The Tribunal followed the ‘bottom up’ approach suggested by Mr Goodwin. In this case no order was not appropriate and neither was a reprimand. At the other end of the spectrum suspension or strike off was not proportionate.
23. Having heard the argument relating to the case of *Parry*, the Tribunal first noted that the decision in *Parry* was not binding on this constitution of the Tribunal. It then found that the present case could be distinguished from *Parry* given the issue regarding the undertaking and the delay in it being discharged by the Respondent. This took the matter into the next level of sanction. To this end the Tribunal found that a fine at Level 1 of the indicative fine band represented the most appropriate and proportionate sanction with the fine set at the top end to mark the seriousness of the matter regarding the undertaking.
24. As it had set out before the Tribunal urged people in similar circumstances to ensure that they sought appropriate help before matters spiralled out of their control.

Costs

25. Mr Griffiths submitted that as a matter of principle the Applicant was entitled to its proper costs. The Applicant had succeeded on its case in relation to both allegations save for the element of lack of integrity which, notwithstanding, had been at the very least arguable and properly made. Reference was made to the Referral Decision which concluded there was a realistic prospect of a lack of integrity finding, noting that at the time of referral, there were still unanswered questions from the Respondent.
26. Mr Griffiths said the quantum of costs set at £30,330.00 in its claim dated 29 April 2025 was reasonable and proportionate though he accepted that there should be some reduction as the case had taken one day only instead of two. The Respondent had not submitted a statement of means and there was no evidence presented to suggest his inability to pay costs.
27. Mr Goodwin submitted that the most important element of the Applicant’s case, lack of integrity, had not been found proved. He asserted that it was misconceived and without merit to claim that the case should have been referred to the Tribunal due to the lack of integrity allegation. Mr Goodwin submitted that the case could and should have been dealt with by the SRA internally using its increased fining powers (up to £25,000), even with a lack of integrity allegation. He cited the joint SRA/SDT statement on referrals (30 January 2023) to support the argument that cases should not be referred unnecessarily and that the SDT should handle the most serious cases leading to suspension or strike off. Therefore, referring this case had disproportionate effects resulting in significant and avoidable costs.
28. Mr Goodwin stated that the Respondent had co-operated fully and made sensible admissions and contested those matters which had been proved to have had no merit.

He acknowledged no statement of means had been provided and did not advance inability to pay a fine or contribute to costs. He invited the Tribunal to exercise discretion to make no order as to costs or, in the alternative, order a modest contribution.

Tribunal's Decision on Costs

29. The Tribunal noted that under Rule 43 (1) of The Solicitors (Disciplinary Proceedings) Rules 2019 it has the power to make such order as to costs as it thinks fit, including the payment by any party of costs or a contribution towards costs of such amount (if any) as the Tribunal may consider reasonable. Such costs are those arising from or ancillary to proceedings before the Tribunal.
30. By Rule 43(4), the Tribunal must first decide *whether* to make an order for costs and when deciding whether to make an order, against which party, and for what amount, the Tribunal must consider all relevant matters such as:
 - The parties' conduct.
 - Were directions/ deadlines complied with?
 - Was the time spent proportionate and reasonable?
 - Are the rates and disbursements proportionate and reasonable?
 - The paying party's means.
31. The Tribunal found the case had been properly brought by the Applicant and that the parties had complied with the directions and deadlines set. The Respondent had engaged appropriately in the adversarial process. The Tribunal also noted the following factors:
 - The substantive hearing had taken one day and not two.
 - This had not been a case of legal complexity, and the matters had been straightforward. Both advocates had presented their cases very well.
 - The Applicant had pursued its case in a reasonable and proportionate way and followed all directions.
 - The Respondent had made sensible admissions, and the Applicant had not been required to call live evidence.
 - The rates at which the Applicant claimed its costs appeared proportionate and reasonable.
 - The Respondent had not provided evidence of his means, though noted the matters raised by Mr Goodwin in relation to this.

32. As usual in dealing with costs applications the Tribunal adopted a 'broad brush' approach to the costs and looked at matters in the round. The Tribunal concluded that it should have been incumbent upon the Applicant to have carried out a further review to examine critically whether the case had crossed the high threshold required to make a finding of lack of integrity (this with a view to settling the matter) once it had received the Applicant's Answer and his medical evidence. This would have saved time and costs.
33. In the circumstances, the Tribunal found it justifiable to reduce the Applicant's costs and it was right for the Respondent to pay the costs claimed by the Applicant at a reduced amount of £20,000.

Statement of Full Order

34. The Tribunal ORDERED that the Respondent, IMRAN HAIDER KHAWAJA solicitor, do pay a FINE of £5,000.00, such penalty to be forfeit to His Majesty the King, and it further Ordered that he do pay the costs of and incidental to this application and enquiry fixed in the sum of £20,000.00.

Dated this 30th day of May 2025

On behalf of the Tribunal

T. Cullen

T. Cullen
Chair