

SOLICITORS DISCIPLINARY TRIBUNAL

IN THE MATTER OF THE SOLICITORS ACT 1974

Case No. 12742-2025

BETWEEN:

SOLICITORS REGULATION AUTHORITY LTD

Applicant

and

JACK ALEXANDER WILLIAMS

Respondent

Before:

Mr A Horrocks (in the Chair)

Mr U Sheikh

Ms J Rowe

Date of Hearing: 10 November 2025

Appearances

Thomas Walker, Counsel employed by Blake Morgan LLP, One Central Square, Cardiff CF10 1FS for the Applicant.

Steve Roberts, employed by Richard Nelson LLP, Temple Court, 13a Cathedral Road, Cardiff CF11 9HA for the Respondent.

JUDGMENT

Allegations

1. The allegations against Mr Williams, made by the Solicitors Regulation Authority Ltd (“SRA”) were that whilst in practice as a Solicitor at Blaser Mills LLP of 40 Oxford Road, High Wycombe, Buckinghamshire HP11 2EE (“the Firm”):
 - 1.1 On or around 25 September 2023, he amended the electronic copy of an internal handover note dated 19 December 2022 relating to the Estate of Client A, by deleting the prompt to carry out CGT mitigation with the intention and/or effect of misleading others into believing that no prompt had been included in the original handover note; and
 - 1.2 On 27 September 2023, he sent an email which was misleading by failing to set out fully and/or accurately the circumstances that gave rise to a CGT liability to the Estate of Client A.
2. By doing so Mr Williams breached any or all of Principles 2, 4 and 5 of the SRA Principles 2019 (“the Principles”) and Paragraph 1.4 of the Code of Conduct for Solicitors, RELs and RFLs (“the Code”).
3. The Allegations were advanced on the basis that Mr Williams’ conduct was dishonest. Dishonesty was alleged as an aggravating feature of his misconduct.

Executive Summary

4. Mr Williams admitted Allegations 1.1 and 1.2 and admitted that his conduct breached Principles 2, 4 and 5 of the Principles and that he failed to comply with Paragraph 1.4 of the Code.
5. The purpose of the hearing was for the Tribunal to determine whether the admissions had been properly made and if so, to then consider mitigation, sanction and costs. The Tribunal considered whether the appropriate and proportionate sanction was to strike Mr Williams from the Roll of Solicitors as the case against him was admitted. The Tribunal decided that there were exceptional circumstances and that the appropriate and proportionate sanction was an immediate fixed term of suspension of two years. Following the period of suspension, the current restrictions placed on his practising certificate by the SRA would remain in place for a further two years.

Documents

6. The Tribunal considered all of the documents in the case which included but were not limited to:
 - Rule 12 Statement [\[here\]](#)
 - Mr Williams’ Answer dated 6 May 2025 [\[here\]](#)
 - Mr Williams’ Reflective Statement dated 3 November 2025
 - Applicant’s Updated Schedule of Costs dated 4 November 2025
 - Mr Williams’ Statement of Means dated 7 November 2025

Preliminary Matters

Application by Mr Williams to adduce further evidence

7. Mr Roberts applied, out of time, to adduce testimonials and character references in support of Mr Williams' case. He confirmed that the new evidence included a supplementary witness statement (the reflective statement referred to above) from Mr Williams, client testimonials and witness statements in support of Mr Williams from the Firm's former Head of Risk and Compliance and the Firm's Compliance Officer. He confirmed to the Tribunal that he would not be applying to call any live witnesses.
8. Mr Roberts further submitted that the new evidence supported Mr Williams' position on mitigation only and did not address the admitted conduct.
9. The Tribunal invited Mr Walker to make submissions on the application. Mr Walker submitted that the Applicant's position was that the new evidence should not have been served late but that as the new material addressed mitigation only and witnesses were not going to be called the Applicant would not be disadvantaged by the new material being admitted into evidence. He did not oppose the application.
10. The Tribunal considered that the hearing would be assisted by the new material. Accordingly, the application was granted.

Application by the Applicant to make submissions on Sanction

11. Mr Walker applied to address the Tribunal on sanction. He submitted that as the case was admitted the Tribunal might be assisted by hearing from the Applicant on sanction.
12. The Tribunal invited Mr Roberts to make submissions on the application.
13. Mr Roberts opposed the application on the grounds that the Tribunal was an expert Tribunal and well versed in dealing with such cases. It did not require the Applicant's assistance and it would be contrary to its established practice to grant the application.
14. The Tribunal accepted Mr Roberts's submissions and refused the application. However, the Tribunal decided that it would hear Mr Walker in reply on any points of law after Mr Roberts had presented Mr Williams's case on sanction. In the event, Mr Walker made no submissions to the Tribunal in reply on any points of law.

Factual Background

15. Mr Williams was admitted to the Roll of Solicitors in September 2020. He was an employed solicitor at the Firm which he had joined on 25 November 2022. At the time of the misconduct, he was employed in the wills and probate team of the Firm at its offices in Amersham, Buckinghamshire.
16. At the time of the misconduct, he held a Practising Certificate. His Practising Certificate for 2023/2024 and 2024/2025 was subject to the following conditions imposed by the SRA:

- He could not act as a manager or owner of any authorised body.
- He could only act as an employed solicitor and only where the employment had been first approved by the SRA.
- He could not act as a compliance officer for legal practice (COLP) or a compliance officer for finance and administration (COFA) for any authorised body.
- He could not practise on his own account under regulation 10.2(a) or (b) of the SRA Authorisation of Individuals Regulations.

Witnesses

17. The allegations were admitted by Mr Williams and no oral evidence was heard at the hearing.
18. The written evidence of witnesses is quoted or summarised in the Findings of Fact and Law below. The evidence referred to will be that which was most relevant to the findings of the Tribunal, and to facts or issues in dispute between the parties. For the avoidance of doubt, the Tribunal read all of the documents in the case. The absence of any reference to particular evidence should not be taken as an indication that the Tribunal did not read or consider that evidence.

Findings of Fact and Law

19. 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.
20. The Tribunal had due regard to the following and applied the various tests in its fact-finding exercise:

Dishonesty

The test set out at paragraph 74 of [Ivey v Genting Casinos \(UK\) Ltd t/a Crockfords \[2017\] UKSC 67](#).

Integrity

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

21. The Applicant's Case
 - 21.1 On 19 December 2022 Ms Heenal Chhipa-Gadday, a solicitor with the Firm, prepared a handover note ("the Handover Note") on the file relating to the Estate of Client A before going on maternity leave. She confirmed in a statement dated 13 June 2024 that she wrote the Handover Note as a Word document and uploaded it onto the Firm's document management system on 19 December 2022. She also printed a copy of the Handover Note and placed it at the front of the paper file before handing a physical copy to Mr Williams, who was taking over the file. Ms Chhipa-Gadday stated that the

Handover Note was detailed as Mr Williams “*was coming in new....so I made sure the handover notes I made were thorough.*”

- 21.2 The Handover Note made the point that that it would be necessary to keep in contact with the person dealing with the sale of the property constituting part of the Estate of Client A so that steps to mitigate CGT for the estate could be considered. Mr Williams then assumed conduct of the file.
- 21.3 In the event there were significant delays, not of Mr Williams’s making, in the sale of the property which was not sold until 8 September 2023.
- 21.4 On 14 September 2023 Mr Williams emailed the beneficiaries of the Estate of Client A and stated that there were some costs to sort out including CGT liability. On or around 14 September 2023 Mr Williams discussed the file with his supervisor, Mr Minest Thakrar, a Partner in the Firm’s Wills, Trusts and Probate team. The appropriation of property prior to sale to reduce CGT was discussed. During this conversation it was identified that the property had not been appropriated as it should have been. Mr Thakrar asked Mr Williams to put something down in writing about what happened and to work out the CGT.
- 21.5 On 20 September 2023, Mr Williams emailed an accountant Mr Alan Poole to ask for assistance with the CGT calculation. In this email he stated that “*I note that Heenal did not appropriate the property before it was sold and therefore it was sold by the Estate.*”
- 21.6 On 21 September 2023, Mr Thakrar spoke to Ms Kempson, the former Head of Risk and Compliance, about the failure to appropriate the property which led to an increased CGT liability for the estate. This discussion prompted Mr Thakrar to email Mr Williams asking him to prepare a note on what had led to the issue and details regarding the additional cost to the Estate.
- 21.7 On 25 September 2023 at approximately 14.10pm Mr Williams accessed the electronic copy of the Handover Note and deleted the paragraph about keeping in contact with the seller of the property in order to avoid CGT liability.
- 21.8 On 27 September 2023, Mr Williams sent an email to Mr Thakrar copied to Ms Kempson in response to Mr Thakrar’s request for a note on 21 September 2023. The email from Mr Williams advised Mr Thakrar of the following:
 - The Firm was the Executors of the Estate.
 - “*Heenal provided a handover note dated 19 December 2023. It was my understanding that a Deed of Appropriation had already been signed in preparation of the sale.*”
 - The property sale which had been agreed when Ms Chhipa-Gadday handed over the File subsequently “*fell through*” and the Property was not sold until “*recently.*”
 - “*It was only at the point of sale and updating the estate accounts that I realised that Heenal had not signed a Deed of Appropriation and that a Declaration of*

Trust was drafted instead and not signed. There had been a long gap between the sales and this was an oversight.”

- 21.9 Mr Williams further stated that due to the property not being appropriated before sale there was a modest loss to the Estate which would have to be picked up by the Firm.
- 21.10 After hearing a conversation between Mr Williams and Mr Thakrar about CGT liability to the Estate Ms Birchenough checked the paper file for the Estate on 29 September 2023. She identified that the paper copy of the Handover Note referred to CGT. On checking the electronic file, Ms Birchenough noticed that a new version of the Handover Note had been created on the system on 25 September 2023 by Mr Williams. Ms Birchenough identified that references to CGT had been removed from the new Handover Note and reported the position to Mr Thakrar. On 4 October 2023 Mr Thakrar spoke to Mr Williams about the different versions of the Handover Note. Mr Thakrar told Mr Williams that his actions were unacceptable. and that his actions wrongly suggested that Heenal did not hand over to him properly. As Mr Thakrar’s email report to the partners at the Firm says, Mr Williams *“immediately confessed to changing the documentshe didn’t know how to deal with the matter and panicked.”*
- 21.11 The Firm’s Managing Partner, Mr Jonathan Lilley, met with Mr Williams on 25 October 2023 to give him the chance to explain his actions. Mr Williams explained that he felt foolish as he had not read the Handover Note carefully when it was presented to him. When asked why he did not explain his failing on the file to Mr Thakrar he accepted that his not accepting it to his supervisor and his amendment of the Handover Note were stupid things to have done.
- 21.12 Following an internal investigation at the Firm Mr Lilley prepared an internal report on 15 November 2023. He noted a wish to show Mr Williams *“mercy”* for the following reasons:
- Mr Williams had confessed immediately and showed remorse and
 - There was no harm done to clients and there were no wider repercussions.
 - There was no other evidence of misconduct or a *“propensity to behave dishonestly.”*
 - *“It was a moment of madness at which his ego got the better of him, causing him to take a seriously wrong turn which means he should never repeat such action in the future.”*
- 21.13 Mr Williams was not dismissed by the Firm; he was instead issued with a final written warning on 16 November 2023.
- 21.14 Mr Lilley referred the matter to the SRA on 22 November 2023. The SRA notified Mr Williams of its investigation on 9 February 2024. On 15 October 2024, the SRA issued a notice recommending referral of the matter to the Tribunal.

21.15 Mr Williams promptly admitted Allegation 1.1 and Allegation 1.2 during the Firm's investigation and during the investigation by the SRA. He co-operated fully with the investigation.

22. The SRA's case on the alleged breaches

22.1 Mr Walker submitted that when Mr Williams realised that he did not follow the clear instructions left by his colleague in the original Handover Note with regards to appropriation and CGT liability he dishonestly created a substitute Handover Note. This substitute note removed Ms Chhipa-Gadday's clear reference to appropriation of the property. When Mr Williams sent the email about the matter to his supervisor Mr Thakrar, he asserted that the Deed of Appropriation was the responsibility of Ms Chhipa-Gadday, attempting to deflect responsibility for his own mistake and blaming a colleague.

22.2 Mr Walker submitted that the misconduct of Mr Williams was not an isolated episode. His misconduct and therefore his dishonesty consisted of a series of actions over a number of days. When Mr Williams was asked to explain his misconduct to the Firm's Managing Partner, Mr Lilley, he did confess to his misconduct immediately but there was no voluntary self-report and it was not possible to discern if disclosure of his misconduct would ever have voluntarily been made by him.

Principle 4 (Dishonesty)

22.3 Mr Walker submitted that Mr Williams' conduct was dishonest by the ordinary standards of reasonable and honest people.

Principle 5 (Integrity)

22.4 Mr Walker submitted that Mr Williams failed to act with integrity i.e. with moral soundness, rectitude and steady adherence to an ethical code. A solicitor acting with integrity would ensure that he did not amend existing documents or create any documents containing misleading information. In creating the Handover Note and the email to Mr Thakrar Mr Williams breached Principle 5 of the Principles.

Principle 2 (Public trust)

22.5 Mr Walker submitted that the conduct admitted amounted to a breach by Mr Williams to behave in a way which maintained the trust placed in him by the public in the provision of legal services. Public confidence in Mr Williams, in solicitors and in the provision of legal services was undermined by the creation of the Handover Note and the email to Mr Thakrar. In those circumstances, Mr Williams breached Principle 2 of the Principles.

Paragraph 1.4 of the Code

22.6 Mr Walker said Mr Williams planned to mislead the Firm and the beneficiaries of the Estate as to responsibility for the mistake through his admitted misconduct. Given this state of knowledge, Mr Williams' conduct breached Paragraph 1.4 of the Code.

23. The Respondent's Case on the alleged breaches

- 23.1 Mr Williams admitted Allegations 1.1 and 1.2 in full, thereby admitting that he had engaged in dishonest conduct, he had lacked integrity and his conduct had breached the trust and confidence placed in him by the public and he had breached Paragraph 1.4 of the Code.

The Tribunal's Findings on the Alleged Breaches

24. The Tribunal found that Mr Williams' admissions were unequivocal, supported by the evidence and properly made. The Tribunal therefore found Allegations 1.1 and 1.2 proved in full to the requisite standard, namely on the balance of probabilities.

Previous Disciplinary Matters

25. Mr Williams had no previous disciplinary findings recorded against him.

Mitigation

26. Mr Roberts accepted on Mr Williams's behalf that, absent exceptional circumstances, striking a solicitor from the Roll of Solicitors was the appropriate sanction in cases where dishonesty had been found or admitted.
27. The principal relevant case law was set out in *Solicitors Regulation Authority v Sharma [2010] EWHC 2022 (Admin)* and *SRA v James [2018] EWHC 3058 (Admin)*. He also referred the Tribunal to *SRA v Imran [2015] EWHC 2572 (Admin)*. Mr Roberts submitted that Mr Williams' case fell within that "*small residual category*" of cases for which striking off the roll was not appropriate and was deserving of a lesser sanction.
28. Mr Roberts submitted that the timeline during which the misconduct took place was relevant. On 14 September 2023, there was a discussion between Mr Williams and his supervisor Mr Thakrar, about CGT liability on the Estate of Client A. This took place 10 months after the Handover Note had been written. On 20 September 2023, Mr Williams emailed the accountant Mr Poole about failure of his colleague to prepare a Deed of Appropriation. On 21 September 2023, Mr Williams was asked to prepare a detailed note of the circumstances. On 25 September 2023, Mr Williams amended the Handover Note. On 27 September 2023, Mr Williams emailed Mr Thakrar providing misleading information. Although there were relevant dates in the factual matrix before 25 and 27 September 2023, Mr Williams' misconduct only took place on 25 and 27 September 2023 and therefore within a short space of time.
29. When Mr Williams amended the Handover Note it was the deletion of the original text which represented the misconduct. These actions were very crude; he deleted the paragraph about appropriation in panic. He did not delete the Handover Note itself.
30. Mr Roberts further submitted that no harm was caused to anyone through this misconduct. There was a CGT liability which was borne by the Firm, but this was not as a result of the amendment to the Handover Note. When Mr Williams was questioned about his deletion to the Handover Note he immediately confessed.

31. The Firm stood by him after his misconduct and the documents and statements in support of Mr Williams' case as to personal mitigation were relevant. The Firm decided not to dismiss Mr Williams. The report to partners from a colleague described his actions as a "*moment of madness*." Mr Roberts directed the Tribunal to the witness statement of Ms Chippa-Gadday. She held no bad feelings towards Mr Williams. Whilst there could have been potential consequences of his misconduct towards her there had in fact been no such consequences.
32. Mr Williams was immediately remorseful for his misconduct. He and the Firm believed that he could learn from his mistakes. He had demonstrated insight and was determined to make amends. He had strong personal mitigation; there was no previous misconduct and there has been no reoccurrence. It was significant that the Firm had stood by him, not least in these proceedings.
33. Mr Roberts submitted that Mr Williams undertook two very brief moments of misconduct which caused no harm and that in these circumstances a period of suspension was the appropriate sanction by the Tribunal.

Sanction

34. The Tribunal referred to the Guidance Note on Sanctions (11th edition – February 2025) The Tribunal's main concern when considering sanction, was the protection of the public and the need to maintain public confidence in the profession. In determining sanction, it was the Tribunal's role to assess the seriousness of the proven misconduct and to impose a sanction that was fair and proportionate in all the circumstances.
35. The Tribunal considered that Mr Williams's motivation for amending the Handover Note was to cover up his error in not reading it thoroughly and, following the realisation that he had not followed up the reference to the Deed of Appropriation within it; to avoid or mitigate responsibility for that failure to follow up. He was not motivated by personal gain in any financial or other material sense.
36. As to Mr Williams' motivation for sending the email to Mr Thakrar on 27 September 2022 the Tribunal noted that there were two days between the amendment of the Handover Note and the date of the email during which Mr Williams' did not report his mistake. The Tribunal found that Mr Williams' motivation for sending the misleading email was to continue to conceal his mistake. It determined that he misled Mr Thakrar but he did so as part of two actions which followed one from the other. There was no repeated pattern of conduct nor of dishonesty.
37. The Tribunal found that Mr Williams did have control of the circumstances leading to the misconduct but that his actions had largely been spontaneous. The Tribunal considered Mr Williams's inexperience as a qualified solicitor was an important part of the context. He had only recently joined the Firm and had inherited a heavy caseload. He was three years qualified at the time of the misconduct and while conscientious had panicked at the realisation of having made a mistake and made a poor decision. The Tribunal noted that he co-operated fully not only with the Firm but also with the regulator as soon as the Firm reported his dishonest conduct.

38. The Tribunal determined that Mr Williams's misconduct departed from the integrity, probity and trustworthiness expected of a solicitor and was serious. However, no direct harm was caused to anyone by it. The estate to which the file related had suffered a small financial loss but that was because of the mistake in relation to appropriation, which had already happened by the time of Mr Williams's relevant conduct. The small loss to the estate was not caused by his conduct. The Tribunal recognised that while harm could have been caused to his colleague's reputation, in the event, no actual harm was caused to her in this respect. She continued to work with Mr Williams and indeed had put in a witness statement in which she said there were now no hard feelings.
39. The Tribunal found that the seriousness of Mr Williams's misconduct was aggravated by his admitted dishonesty.
40. It was accepted on Mr Williams's behalf that absent exceptional circumstances, striking a solicitor from the Roll of Solicitors was the appropriate sanction in cases where dishonesty had been found or admitted. The Tribunal agreed but given the above submissions as to exceptional circumstances went on to consider whether the circumstances of this case were such that it could or should impose a lesser sanction.
41. The deletion of the Handover Note paragraph and the subsequent misleading email were deliberate attempts by a solicitor to conceal an oversight on his part. These acts were deliberate, significant, and clearly contrary to the principles of honesty and integrity expected of a solicitor.
42. At the same time, the Tribunal considered the misconduct in context. The dishonest acts were confined to a single client matter and comprised two related acts over a short period. They did not form part of a pattern. The solicitor had gained no personal financial or other material advantage. No actual harm was caused to any colleague or client by the dishonest acts themselves, as the small extra CGT liability was not caused by the dishonest conduct. The misconduct related for the most part to the internal workings of the Firm.
43. Mr Williams had been a junior solicitor with limited experience. He had admitted his misconduct fully and immediately upon confrontation and thereafter co-operated fully with both the Firm's and the SRA's investigations. He demonstrated genuine remorse, insight into his failings, and had undertaken ethics training on his own initiative.
44. Evidence from colleagues and supervisors confirmed that the misconduct had been committed in a moment of panic and that no harm resulted from it. The partner who investigated the misconduct for the Firm described it at the time as a "*moment of madness*." His conclusion was that Mr Williams had no propensity to do something like this again. The Tribunal took account of the continued support of the Respondent's employer, who considered that he could learn from the incident and could continue in practice under appropriate supervision. The Firm had continued to employ him and had provided witness statements to the Tribunal which were not contested by the SRA and which were highly supportive of him.
45. The Tribunal also took account of the Reflective Statement of Mr Williams the contents of which were not challenged by the SRA and which in the Tribunal's view demonstrated Mr Williams's genuine insight into, and remorse for, his actions.

46. The Tribunal considered the relevant authorities, including *Sharma* and *James* which emphasise that a finding of dishonesty will ordinarily result in striking off, save in exceptional circumstances. The Tribunal first examined the dishonesty itself, considering its nature, scope, and extent and the degree of culpability before weighing mitigation directly linked to the misconduct. The Tribunal concluded that, although the misconduct was serious and deliberate the case did in all the circumstances, while the decision was a finely balanced one, fall within the very narrow residual category recognised in the authorities. The dishonesty was brief, confined to a single matter, unaccompanied by gain to the solicitor or actual harm to the client or anyone else, and there was highly credible evidence of immediate confession, remorse and genuine insight. It was a notable and unusual feature of this case that there was powerful such evidence not only from the solicitor himself but also from his Firm and individual colleagues, who continued to support him and have trust in him. There were also testimonials from clients in evidence although the Tribunal did not accord them substantial weight.
47. The Tribunal carefully considered in reaching its decision not only the nature of the dishonesty, as set out above, but also its impact on the reputation of the solicitors' profession. The Tribunal accepted that the misconduct had damaged the reputation of the profession and that a substantial sanction was necessary given the need to maintain public confidence. Nevertheless, the exceptional circumstances identified justified a sanction less than striking off. The Tribunal was satisfied taking into account the totality of the factors in this case, which like the *Imran* case involved a young solicitor making a foolish decision of short duration, that a lesser sanction was consistent with the maintenance of the reputation of the profession.
48. On balance, the Tribunal determined all in all that a suspension from practice for two years, to take effect immediately, followed by a further two-year period of strict practising conditions, was fair and proportionate.
49. The practising conditions included a prohibition on acting as a manager or owner of an authorised body, restriction to employment as a solicitor only in posts approved by the SRA, and exclusion from acting as a compliance officer for legal practice or for finance and administration. The Tribunal's view was that these restrictions (the same as those the SRA had already imposed) would ensure that Mr Williams would continue to be supervised for a period after his suspension before being able to return to unrestricted practice and would serve to assist in the maintenance of the reputation of the profession.
50. In making these determinations, the Tribunal carefully balanced the seriousness of the dishonesty against the personal mitigation, the absence of harm, the lack of gain, and the low risk of repetition, in accordance with the principles set out in the Guidance Note on Sanctions and the decisions in *Sharma* and *James*. The Tribunal noted that the Respondent's conduct remained a serious breach of professional standards and that the sanction imposed reflected the need to protect the public and uphold the integrity of the profession while also providing the opportunity for continued rehabilitation. The Tribunal in making its decision recognised and emphasises that the exceptional circumstances were narrowly confined to the facts of the case and should not be read as creating a wider precedent for leniency.

Costs

51. Mr Walker made an application for costs as set out in the SRA's schedule of costs dated 4 November 2025. The total costs claimed amounted to £31,059.00, comprising £1,779.00 for the SRA's investigation and administration, £24,400.00 for solicitor agent work, and VAT, bringing the total costs to £29,280.00. Mr Walker noted a minor error in the schedule regarding a case management hearing, which meant that the total time incurred was 47 hours rather than 48, but he submitted that this did not affect the overall figure. He argued that the costs were inevitable given the dishonesty involved and represented the true economic cost to the regulator. He explained that the solicitor agents worked on a fixed fee basis and that the case was categorised at the lowest tariff, without additional complexity, multiple witnesses, or co-respondents. On this basis, he submitted that the effective hourly rate of under £500 was not disproportionate.
52. Mr Walker acknowledged that the Tribunal might make some adjustments to the final order, taking account of the Respondent's admissions.
53. Mr Roberts accepted that costs were payable but contended that the amount claimed was neither reasonable nor proportionate, particularly given the early admissions. He emphasised that the case was straightforward, involving only two core documents and one email, and that the admissions were known well before the solicitor agents were instructed or the matter was reported to the SRA. He accepted the reasonableness of Part A costs but challenged the Part B costs of £24,400.00 plus VAT, arguing that most of the work was undertaken prior to the referral to the Tribunal and that there was no justification for 50 hours of solicitor time after the referral in a case with early admissions. He also questioned the hourly rate and the use of external agents when the SRA had in-house advocates.
54. Mr Roberts urged the Tribunal to consider the impact of the two-year suspension on Mr Williams's ability to earn money and therefore pay costs, noting that any significant costs order would accrue interest rapidly before he could work as a solicitor again.
55. In reply, Mr Walker noted that the drafting of the Rule 12 statement had required 11 hours of work, which he considered reasonable.

The Tribunal's Decision on Costs

56. The Tribunal noted that under Rule 43(1) of the Solicitors (Disciplinary Proceedings) Rules 2019 it has discretion 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 considers reasonable. Under Rule 43(4), when deciding whether to make an order for costs, against whom and in what amount, the Tribunal must take into account all relevant factors, including the parties' conduct, compliance with directions, the reasonableness and proportionality of time spent and rates claimed, and the means of the paying party.
57. The Tribunal was satisfied that the proceedings had been properly brought by the SRA and that, in principle, it was reasonable for the SRA to claim costs. The preparation undertaken by the SRA and its solicitors was appropriate given the nature of the case and the need to present the matter before the Tribunal. The Tribunal accepted that the

SRA had incurred genuine economic costs and that a proportion of those costs were properly recoverable.

58. In considering the amount to be ordered against Mr Williams, the Tribunal had regard to the early admissions made by him, which simplified the case considerably, as well as the relatively limited volume of documentation or multiple witnesses. While Mr Williams was not impecunious, the Tribunal took into account his relatively modest means, including the impact of the two-year suspension on his ability to generate income in the near term, and the need for any costs order to be reasonable and proportionate in the circumstances.
59. The Tribunal reminded itself of the principles established in *R v Northallerton Magistrates' Court, ex parte Dove* [1999] 163 JP 894, that an order for costs is compensatory, not punitive, and must not exceed costs reasonably incurred. It also had regard to relevant authorities confirming that costs should be moderated where circumstances, including admissions and ability to pay, make full recovery disproportionate.
60. Applying those principles, the Tribunal concluded that while the SRA was entitled to recover its costs in principle, a reduction was appropriate to reflect the early admissions and the overall proportionality of the claim. Accordingly, the Tribunal allowed the Part A costs in full and 50 per cent of the Part B costs, fixing the final costs order at £16,419.00.

Statement of Full Order

61. The Tribunal ORDERED that the Respondent, JACK ALEXANDER WILLIAMS, be SUSPENDED from practice as a solicitor for the period of 2 years, to commence on the 10th day of November 2025 and it further Ordered that he do pay the costs of and incidental to this application and enquiry fixed in the sum of £16,419.00.
- 61.1 Upon the expiry of the fixed term of suspension referred to above, the Respondent shall for a further two years be subject to conditions imposed by the Tribunal as follows:
 - 61.1.1 He may not act as a manager or owner of any authorised body.
 - 61.1.1.1 He may act as a solicitor only as an employee and only where the employment has first been approved by the SRA.
 - 61.1.1.2 He is not to act as a Compliance Officer for Legal Practice (COLP) or a Compliance Officer for Finance and Administration (COFA) for any authorised body.
 - 61.1.1.3 He may not practise on his own account under regulation 10.2 (a) or (b) of the SRA Authorisation of Individuals Regulations.

Dated this 5th day of December 2025
On behalf of the Tribunal

A. Horrocks

A. Horrocks
Chair