

SOLICITORS DISCIPLINARY TRIBUNAL

IN THE MATTER OF THE SOLICITORS ACT 1974

Case No. 12748-2025

BETWEEN:

SOLICITORS REGULATION AUTHORITY LTD

Applicant

and

MATTHEW THOMAS PARISH

Respondent

Before:

Ms A E Banks (in the chair)

Mrs A Sprawson

Mr G Gracey

Date of Hearing: 2 - 5 February 2026

Appearances

Benjamin Tankel, counsel of 39 Essex Chambers, 81 Chancery Lane, WC2A 1DD, instructed by Capsticks LLP, 68 Wimbledon Hill Road, London SW19 7PA for the Applicant.

Dr Parish represented himself.

JUDGMENT

Allegations

1. The allegation made against Dr Parish by the Solicitors Regulation Authority Limited (“SRA”) were that:
 - 1.1 Between 4 May 2018 and 6 May 2018, he offered to retract complaints he had made to the UK, US and EU security and intelligence organisations about his client’s conduct, in pursuit of payment of outstanding invoices from his client. In doing so he breached any or all of:
 - 1.1.1 Overseas Principle 1 of Rule 1.3 of the SRA Overseas Rules 2013 (“the Overseas Rules”).
 - 1.1.2 Overseas Principle 2 of Rule 1.4 of the Overseas Rules; and
 - 1.1.3 Overseas Principle 6 of Rule 1.8 of the Overseas Rules.
 - 1.2 Between 10 July 2017 and 28 April 2018, he published/allowed to be published on Gentium Law Group SARL’s website, press releases relating to his former client accusing them of fraud, in breach of a court order. In doing so he breached any or all of:
 - 1.2.1 Overseas Principle 2 of Rule 1.4 of the Overseas Rules.
 - 1.2.2 Overseas Principle 6 of Rule 1.8 of the Overseas Rules.
 - 1.3 Between 27 October 2021 and 4 November 2021, he published decisions of the First-tier Tribunal (“FTT”) and Upper Tribunal (“UT”) dated 27 October 2021 and 4 November 2021 respectively, on his website, in a way which breached the anonymity granted by the FTT and UT. In doing so he breached any or all of:
 - 1.3.1 Principle 1 of the SRA Principles 2019 (“the Principles”).
 - 1.3.2 Principle 2 of the Principles.
 - 1.3.3 Principle 5 of the Principles.
 - 1.4 On 20 November 2021, threatened legal action against Charles Douglas Solicitors for making a report to the SRA. In doing so he breached any or all of:
 - 1.4.1 Paragraph 7.9 of the SRA Code of Conduct for Solicitors, RELs and RFLs (“Code of Conduct”).
 - 1.4.2 Principle 2 of the Principles.
 - 1.4.3 Principle 5 of the Principles.

Executive Summary

2. The Tribunal found allegations 1.1, 1.2 and 1.3 proved. It did not find allegation 1.4 proved and accordingly that allegation was dismissed. The Tribunal's reasoning can be accessed here:
 - [Allegation 1.1](#)
 - [Allegation 1.2](#)
 - [Allegation 1.3](#)
 - [Allegation 1.4](#)

Sanction

3. The Tribunal considered that the seriousness of the misconduct merited a sanction of a suspension from practise for 2 years. The Tribunal's reasoning on sanction can be accessed [\[here\]](#).

Documents

4. The Tribunal reviewed all the documents submitted by the parties, which included (but was not limited to):
 - Rule 12 Statement and Exhibit LJF1 dated 27 March 2025 [\[here\]](#).
 - The Respondent's Answer and Exhibits dated 6 April 2025 [\[here\]](#).
 - Applicant's Reply to the Respondent's Answer dated 13 November 2025 [\[here\]](#).
 - Applicant's schedule of costs.

Preliminary Matters

5. [Application for Anonymity](#)
 - 5.1 Mr Tankel applied for anonymity in relation to Persons A, B and C and also Company B. Person A was the individual about whom an asylum decision was made. It was the publication of that decision that formed the basis of allegation 1.3. The Applicant had sought the permission of the UT to rely upon the documents in the proceedings before the Tribunal. Permission was granted on the basis that an application for anonymity would be made.
 - 5.2 Company B was Dr Parish's client. Person B was the controlling mind of Company B, whilst Person C was strongly associated with Company B. Dr Parish had sent invoices relating to work undertaken for Company B to both Persons B and C. It was the usual position that clients were anonymised in proceedings before the Tribunal. Naming Persons B and C would lead to jigsaw identification of Company B, thereby breaching privilege.
 - 5.3 Dr Parish did not oppose the application.
 - 5.4 The Tribunal granted the application. Person A was and remained the beneficiary of an anonymity order granted in immigration proceedings. The Tribunal determined that given that order, it would be improper for Person A to be named in these proceedings.

5.5 The Tribunal referred to *SRA v Williams [2023] EWHC 2151 (Admin)*, in which Knowles J found that legal professional privilege was absolute unless waived by the client. The Tribunal determined that Company B, as the client should thus be anonymised. The Tribunal accepted the submission that the naming of Persons B and/or C would lead to the identification of Company B. Accordingly, the Tribunal granted the application for anonymisation of Persons B, C and Company B.

6. The Respondent's access to the papers

6.1 Dr Parish was unable to access the CaseLines bundle for the hearing. Dr Parish confirmed that he had access to a PDF version of a Case Management Hearing. That bundle contained the pleadings and various other documents. It did not contain the witness statement or exhibits of Matthew Williams, an Investigation Manager in the employ of the Applicant. Dr Parish confirmed that he had access to this document. There was correspondence from Dr Parish to the Applicant in relation to that document. Dr Parish confirmed that he was content that he had access to all of the evidence in the case. Mr Tankel also confirmed that the Applicant was satisfied that Dr Parish had all of the documents in the case. Whilst Dr Parish did not have access to the substantive hearing bundle on CaseLines, he did have access to all of the documents in the case, and in particular was able to access all of the evidence on which the Applicant relied. Given those assurances, the Tribunal was satisfied that it was fair to proceed with the substantive hearing. Given these assurances, the Tribunal was satisfied that it was fair to proceed with the substantive hearing.

7. Further application for anonymity

7.1 At the commencement of the hearing, Mr Tankel advised the Tribunal that an application for anonymity would be made in relation to one of the intelligence agencies contacted by Dr Parish. The application was made at the conclusion of Dr Parish's evidence by the Applicant. In a letter to the Applicant, the intelligence agency stated that it did not consent to the release of information as it was of the opinion that publication could potentially infringe upon rights and interests, and that it was not in the public interest to make the information public. Mr Tankel noted that the agency did not specify the public interest engaged, however, it was submitted, the Applicant deferred to the intelligence agency on those matters.

7.2 Dr Parish made no observations save to confirm that he did not intend to name the intelligence agency.

7.3 The Tribunal refused the application, save that the intelligence agency should be referred to in generic terms. The evidence had already been heard in the case; the application being made at the close of Dr Parish's evidence. Further, insufficient reasons had been provided for the basis of the application. The Tribunal further noted that the file had already been destroyed by the intelligence agency. Accordingly, that agency could not have made any proper assessment of public interest considerations.

Professional Details

8. Dr Parish was born in 1975 and was admitted to the Roll in September 2000. He had not held a practising certificate since 2018. He was the manager and owner of Gentium

Law Group SARL (“Gentium”), a foreign law practice not regulated by the SRA. Gentium closed in 2018.

9. Dr Parish was the managing partner of the Paladins Organisation (“the Paladins”) and also delivered humanitarian aid.

Witnesses

10. The following witness provided witness statements and gave oral evidence:
 - Dr Parish
11. For the avoidance of doubt, the Tribunal read all of the documents in the case and made notes of the oral evidence. The absence of any reference to particular evidence should not be taken as an indication that the Tribunal did not read, hear or consider that evidence.

Findings of Fact and Law

12. The Applicant was required to prove the allegations on the balance of probabilities. The Tribunal had due regard to its statutory duty, under section 6 of the Human Rights Act 1998, to act in a manner which was compatible with Dr Parish’s rights to a fair trial and to respect for his private and family life under Articles 6 and 8 of the European Convention for the Protection of Human Rights and Fundamental Freedoms.

Integrity

13. The test for integrity was that set out in Wingate and Evans v SRA and SRA v Malins [2018] EWCA Civ 366, as per Jackson LJ:

“Integrity is a useful shorthand to express the higher standards which society expects from professional persons and which the professions expect from their own members ... [Professionals] are required to live up to their own professional standards ... Integrity connotes adherence to the ethical standards of one’s own profession”.

Note: The allegations were considered in chronological order and therefore appear below out of sequence.

14. **Allegation 1.2 - Between 10 July 2017 and 28 April 2018, he published/allowed to be published on Gentium Law Group SARL’s website, press releases relating to his former client accusing them of fraud, in breach of a court order. In doing so he breached any or all of: Overseas Principle 2 of Rule 1.4; and Overseas Principle 6 of Rule 1.8 of the Overseas Rules.**

Factual Background

- 14.1 On 27 February 2020, Dr Parish was convicted by a Criminal Court in Switzerland of defamation, calumny, attempted unlawful coercion and failure to conform to an authority’s decision by a competent authority. Dr Parish was sentenced to one year’s

imprisonment, a monetary penalty of 90 days of CHF 30 per day, placed on probation for three years and ordered to undertake psychotherapy treatment. He also received a separate fine of CHF 5,000.

- 14.2 On 3 July 2020, Dr Parish was convicted by a Criminal Court in Switzerland of attempted unlawful coercion. He was sentenced to a monetary penalty of 120 days of CHF 30 per day, placed on probation for three years and ordered to undertake psychotherapy treatment.
- 14.3 Both convictions related to Dr Parish's conduct when an advocate of Gentium and within the framework of a dispute relating to fees between Gentium and Company B, a Swiss company registered and based in Geneva and whose director was Person B. Dr Parish's appeals in relation to both convictions were rejected.
- 14.4 In 2014, Company B, a long-term client of Dr Parish, instructed him in relation to various matters.
- 14.5 On 9 May 2017, Gentium sent draft invoices to Company B, raising fees of CHF 720,026.24 for work undertaken in March and April 2017. On 26 June 2017, Gentium sent the final version of invoices to Company B on behalf of Carey Olsen, an offshore law firm, for the months of May and June 2017 totalling fees of CHF 898,841.22. On the same day, Company B asked for further explanation and a breakdown of fees, noting that there had been "*a substantial increase of billing*" by both Gentium and Carey Olsen. Company B considered that it had been "*aggressively overbilled*", noting that Gentium had billed it for 26 hours of work each day of the working period of 51 days. Company B considered that the invoices did not represent "*reasonable and fair billing*" and required a significant reduction as had previously been discussed with Dr Parish. Further, Gentium's refusal to continue to work on Company B's matters was "*unjustified*" stating: "*We are at a loss to understand why the attitude of Gentium has been significantly changed recently and why we have faced such unfair attitude*". In response, Dr Parish stated: "*The content of this email is unacceptable. But even more unacceptable is the tone. You cannot treat us with this level of disrespect*".
- 14.6 On the same day (26 June 2017), Dr Parish informed the solicitors for the other side that Gentium was no longer representing Company B and that an application to remove Gentium from the court record would follow.
- 14.7 On 6 July 2017, Dr Parish emailed Company B stating that its failure to pay the invoices was "*tantamount to fraud*" and that he had initiated court proceedings for the outstanding fees "*on a fraudulent conspiracy basis*" that would be served on the company as well as Persons B and C in due course. Dr Parish added that he intended to "*take further actions*" in the interim period and that in resisting approaches for settlement, "*all you are doing is buying yourselves time, but regrettably at the cost of immense prospective damage to your own reputations as habitual defaulters upon debt*".
- 14.8 On 10 July 2017, a press release entitled "*Concerns about possible fraudulent nonpayment of the firm's invoices*" was published on Gentium's website in French, English and Russian, outlining that Gentium had been defrauded of its fee income by Company B and stating that the behaviour of Person B and Person C was "*deceptive*".

and deceitful”, and that there had been, *“evidence of intent not to pay for work that they asked this firm and its fee-earners to undertake”*.

- 14.9 On 31 July 2017, Dr Parish and Gentium were ordered by the Court of First Instance to withdraw the press release from Gentium’s website ‘in its English, French and Russian versions, or any extract thereof’. Both Dr Parish and the Firm were forbidden from *“publishing, communicating or disseminating in the future, in any printed or electronic publications, personal or professional, any information and/or data directly relating to [Company B], Person B or Person C, and any other information that might identify them”*.
- 14.10 The injunction was made under threat of criminal sanction and was effective until further order.
- 14.11 On 4 August 2017, Gentium published on its website a further press release together with a copy of the court order of 31 July 2017. Whilst the names of Company B, Person B and Person C were partially redacted, sufficient information remained in the press release (including biographical detail and personal information in relation to Person B and Person C) to identify the parties, and the publication made explicit reference to the previous press release.
- 14.12 The press release was critical of the Court of First Instance’s Order and made allegations of fraud against Person B and Person C. It also stated that *“Murky Eastern European and central Asian businesspeople should not be allowed to pervert European human rights principles in order to hide allegations of their own wrongdoings behind the shroud of a draconian judicial privacy injunction”*.
- 14.13 The legal representative for Company B, Person B and Person C wrote to Dr Parish on 7 August 2017 stating: *“unless you definitively remove all communications concerning this matter by Tuesday 8 August 2017 at 12.00 hours, I will notify the facts to the Public Prosecutor”*.
- 14.14 Dr Parish replied via email on 11 August 2017, seeking clarification on why it was considered a criminal offence had been committed and requesting full details, by reference to the court order, of which paragraphs of the press release were said to violate the Court’s order. The legal representative replied stating that he: *“will not continue any exchange of correspondence with you [Dr Parish] and the enforcement of the decision of 31 July 2017 will be made by the Public Prosecutor, to whom I will refer the matter on Monday.”*
- 14.15 Following this, the press release of 10 July 2017, was put back online on Gentium’s website.
- 14.16 On 5 December 2017, the Court of First Instance made a further order, upholding the decision of 31 July 2017, in ordering Dr Parish to remove the press release of 10 July 2017 from Gentium’s website and additionally ordering Dr Parish and Gentium to pay a fine of CHF 500 per day for failure to comply from the day the order was issued. Dr Parish and Gentium were also ordered to pay costs.

The Applicant's Case

14.17 Mr Tankel submitted that on 5 December 2017, the Court found (amongst other things) that:

" ... it is undeniable that these allegations are likely to discredit the applicants and harm them, at least financially

That they demonstrably represent an attack on their honour and call their probity into question.

That their extent is moreover potentially vast, as the litigious texts are translated into several languages, in particular those used by the applicants' business partners.

That the summoned parties, who have failed to submit written statements to these proceedings, have therefore failed to prove the accuracy of the acts infringing the honour of the applicants.

... no justifying grounds have been submitted by the summoned parties¹

.... disregarding the Order on super provisional measures of 31 July 2017, the summoned parties continued their attack on the applicants' personality."

14.18 Whilst Dr Parish admitted the factual background detailed above, he denied that he breached the court order, contending that the proceedings in Geneva were unfair and could not be relied upon. Mr Tankel submitted that that contention was not accepted. Switzerland was a member of the Council of Europe and a signatory to the European Convention on Human Rights; its hearings were presumptively fair. Mr Tankel noted that Dr Parish had an opportunity to participate in the proceedings but did not. He had failed to identify the unfairness in the proceedings. Further, Dr Parish had not successfully appealed the outcome.

14.19 Mr Tankel submitted that Dr Parish had elided his criticism of the criminal proceedings with the Applicant's reliance on the civil proceedings. Even if it was now Dr Parish's position that the civil proceedings were also unfair, the proceedings produced an order by which he was bound and which had not been set aside. Dr Parish was required to comply with the terms of that order notwithstanding that the order was from or foreign court or that Dr Parish considered that the proceedings were unfair.

14.20 A solicitor acting with integrity would engage with his clients/former clients when there was a dispute as to fees. Company B queried the fees it was charged. Rather than discuss the dispute, Dr Parish published a press release with allegations of fraud and criminality. This caused his former clients to take legal action to have the press release removed. After his former clients secured such a court order, Dr Parish went on to publish and/or cause to be published a copy of a further press release criticising the court decision in a form which although redacted, it was still possible to identify his former clients. This

¹ The summoned parties were Dr Parish and Gentium

further publication, it was submitted, evidenced a planned and thought-out breach that lasted for many months.

- 14.21 Further, a solicitor acting with integrity would respect the decision of the court and challenge any decision using the correct procedures and channels, as opposed to simply complaining about the decision by a further press release and repeating the behaviour the court had sought to prevent. In conducting himself as he had, Dr Parish had breached Overseas Principle 2.
- 14.22 Members of the public would expect a solicitor to ensure that he always acted fairly and in the interests of his client/former client. It is the Applicant's case that the press releases were published as a form of leverage to secure payment of what he considered to be outstanding fees and were latterly in breach of an order of the court. In doing so Dr Parish risked bringing the legal profession of England and Wales into disrepute. He therefore breached Overseas Principle 6.

The Respondent's Case

- 14.23 Dr Parish did not dispute the factual background. He denied that this conduct was in breach of the Overseas Rules as alleged, as he complied with the terms of the court order. Dr Parish submitted that no fine or costs were paid, nor was there any attempt at enforcement. The order had been made by the Court without the participation of Dr Parish or Gentium. The Court, it was submitted, had acted in fundamental breach of the principles of natural justice. Dr Parish submitted that "*the Geneva legal system served as a mockery of justice*" and his actions "*in struggling with a corrupt foreign court system that failed to apply elementary principles of due process*" should not cause the Tribunal to make a finding of professional misconduct.
- 14.24 Dr Parish did not accept that he had come off the record, or that the press releases were in response to the dispute over fees. He had been becoming increasingly uncomfortable with the conduct of his former clients. They had asked him to bill shell companies with the balance owed by those shell companies increasing, whilst the balance owed by the company with assets was decreasing. Dr Parish submitted that this was a deliberate tactic to put him into a weak position. Dr Parish had told Person B that usually clients would pay monies on account. However, Person B stated that they had been working together for a number of years and had built up a relationship of trust. Dr Parish explained that there was a relationship of trust, but that it was granulated with suspicion and growing concern as he witnessed the tactics with the shell companies being billed while Company B paid down its debts, Company B being the company with assets.
- 14.25 Dr Parish asserted that Person B wanted to absorb Gentium into Person B's business structure. Person B was using members of Dr Parish's staff to forge documents and create fraudulent shipping transactions. Person B had also seconded a member of Dr Parish's staff to a sanctioned Russian bank. Person B, it was submitted, was trying to place Dr Parish in an economically impossible position, whereby, in order to survive, Dr Parish would lose his independence as a solicitor to someone running an extraordinary criminal scheme.
- 14.26 As to why Dr Parish, in his response to the email from Company B querying the level of fees, did not say that he was withdrawing due to his concerns regarding criminality,

Dr Parish explained that this would be a “*nuclear option*”, and that it was less nuclear to have a fee dispute than it was to whistle blow on shadow vessel operations. Further, Dr Parish had been advised not to do so. Instead, he was advised to continue working for Person B and Company B in order to gather more information.

14.27 Dr Parish denied that his conduct lacked integrity. The Applicant, it was submitted, had ignored the evidence that:

- (i) Dr Parish was being blackmailed by his clients into participating in a criminal regime with them, which entailed his using his law firm to perpetuate acts of fraud that would enable sanctions evasion through the use of a shadow shipping fleet.
- (ii) Dr Parish had not sought to embarrass his clients *"in order to extract fees"*, he did it as part of terminating a retainer that it would have been criminal for him to continue.
- (iii) there was no allegation that Dr Parish did not believe in the truth of the reports made to the intelligence agencies; and
- (iv) one of the methods of blackmail that the clients had used was to require that Dr Parish bill their offshore shell companies and then refuse to pay their bills.

14.28 Dr Parish did not accept that he had a legitimate legal means of enforcement of his debts in circumstances where *“the Geneva legal system had left [Dr Parish] hung out to dry and had refused to take any steps to enforce [his] legitimate claims against his former clients' shell companies or [Persons B and C] standing behind them”*.

14.29 Dr Parish submitted that *“the public would be proud of a solicitor working in so toxic environment, under such stressful conditions of blackmail, who fought back against Russian state-backed criminals”*. Dr Parish submitted that he had held his head up high and that he was *“proud of his integrity, having suffered the most dreadful losses to expose the most dismal and extraordinary criminals and their crimes”*.

14.30 Such conduct, it was submitted, was not professional misconduct and did not lack integrity. Rather it was quite the opposite. Further, Dr Parish had never heard a word of criticism against him, from the public at large or from anyone else, *“as a result of his standing up to such demonic bunch of villains”*.

The Tribunal’s Findings – Allegation 1.2

14.31 The Tribunal found Dr Parish’s evidence in relation to allegation 1.2 to be evasive and contradictory. Dr Parish seemingly recalled very little and was unable to answer questions as to who had written the press releases. In his Answer Dr Parish positively asserted that he had published the press releases: *“Paragraph 1.2 is admitted to the extent that the Respondent published the press releases in question*. However, in his oral evidence, when asked if the press releases could have been published without his approval, Dr Parish stated: *“I hope not, I don’t know”*. When asked about the publication of the redacted version of the press release and whether that could have been published without his approval or coming to his attention, Dr Parish replied: *“I would hope not but can’t recall due to the lapse of time”*. The Tribunal did not accept

that Dr Parish's memory had been affected in relation to the publication of the press releases due to the lapse of time. His Answer, in which he accepted publication, was dated 6 April 2025. The Tribunal rejected the submission that Dr Parish had, within the last 10 months, now forgotten that he published the press releases. Accordingly, the Tribunal rejected any suggestion that Dr Parish had not published the press releases, and found that he had done so, as had already been admitted by Dr Parish in his Answer.

- 14.32 The Tribunal further rejected the assertions that (i) the proceedings in Geneva were unfair; (ii) *"the Geneva legal system served as a mockery of justice"*; (iii) that the court had *"acted in fundamental breach of the principles of natural justice"*; and (iv) that Dr Parish was *"struggling with a corrupt foreign court system that failed to apply elementary principles of due process"*. Dr Parish had referred to witness evidence served by observers of the contempt proceedings. Those witnesses were not relevant to civil proceedings culminating in the Order of which he was said to be in breach. Accordingly, the Tribunal was not satisfied that Dr Parish had provided any reliable evidence that the civil proceedings were conducted in any improper way. Whilst the initial prohibition on publication was made without notice, Dr Parish and the Firm were informed of the return date. Neither Dr Parish nor any representative attended the return date. Nor did he provide any documentation to the Court in his or the Firm's defence. The Tribunal was thus satisfied that the civil proceedings had been conducted entirely properly. Further, and in any event, the result of those proceedings was an order that was binding on Dr Parish.
- 14.33 Having determined that the order was properly made, and that Dr Parish had published the press releases, the Tribunal then considered whether such publication was in breach of the order. The terms of the order were clear; Dr Parish and Gentium were prohibited from:
- "publishing, communicating or disseminating in the future, in any printed or electronic publications, personal or professional, any information and/or data directly relating to [Company B], Person B or Person C, and any other information that might identify them"*.
- 14.34 In his oral evidence, Dr Parish explained that the shipping and trading community was small, that everyone in that community knew his clients, and that it was possible for some people to identify Persons B, C and Company B from the press releases.
- 14.35 The Tribunal found that the information contained in the press releases directly and indirectly related to Company B, Person B and Person C. The nature of the information meant that they were easily identifiable. The press releases included information relating to countries of origin, countries of residence, lines of business, and the fact that they were clients of Gentium. The press releases also referred to matters which, according to Dr Parish, were common knowledge. Accordingly, referring to Company B or Persons B and C by initials, was insufficient to comply with the terms of the Order. The Tribunal was satisfied that the press releases plainly breached the Order.
- 14.36 As to the letter sent to Company B's bankers, the Tribunal was not satisfied that this amounted to a publication. Accordingly, the Tribunal did not find that the sending of that letter amounted to a breach of the Order.

- 14.37 The Tribunal found that members of the public would expect a solicitor to comply with the terms of a court order, even where he did not agree with the order made. In breaching the Order, Dr Parish's conduct brought himself into disrepute as a regulated person and, by association, the legal profession in and of England and Wales in breach of Overseas Principle 6 of the Overseas Rules.
- 14.38 A solicitor acting with integrity would not publish press releases that were plainly in contravention of a court order preventing such publication. Such conduct, the Tribunal found, fell far below the higher standards which society expected from professional persons and which the legal profession expected from its own members. The Tribunal found that in publishing the press released in breach of the Order, Dr Parish's conduct lacked integrity in breach of Overseas Principle 2 of the Overseas Rules.
15. **Allegation 1.1 - Between 4 May 2018 and 6 May 2018, he offered to retract complaints he had made to the UK, US and EU security and intelligence organisations about his client's conduct, in pursuit of payment of outstanding invoices from his client. In doing so he breached any or all of: Overseas Principle 1 of Rule 1.3; Overseas Principle 2 of Rule 1.4; and Overseas Principle 6 of Rule 1.8 of the Overseas Rules.**

Factual Background

- 15.1 On 26 March 2018, Dr Parish sent a letter to the Director General of the UK Security Service. The letter, sent on the Firm's letterhead, had the title "*[Company B]: Fraudulent trading by Russian citizens based in Geneva in breach of sanctions and contrary to the security interests of Her Majesty's Government: Use of sanctioned Russian government assets*". The letter accused Company B, Person B, and Person C of involvement in a large-scale criminal scheme, alleging that:
- There were dozens or hundreds of shell companies involved in one of the most extensive abuses of such structures in recent corporate history.
 - Person B was said to operate a complex network of fraudulent offshore companies to:
 - evade UK, US, and UN sanctions.
 - hide dealings with sanctioned Russian and Iranian entities.
 - conceal links with the Russian government.
 - launder Russian government money.
 - finance transactions using sanctioned Russian banks.
 - evade taxes worldwide.
 - support the Russian state-owned oil and gas sector in ways contrary to UK interests; and
 - otherwise engage in unlawful activity harmful to UK national security.
- 15.2 Others associated with Person B were described as collaborating in this criminal scheme. The companies' alleged activities included:
- sanctions breaching oil trading.
 - disguising the origins of sanctioned oil.

- using illegal or unregulated waterways (including in occupied Crimea).
- raising false vessel flags.
- using sanctioned Russian assets to transport illicit cargo.
- unlawful hydrocarbon transactions with suspected Taliban or ISIS parties.
- large scale document forgery for bank financing; and
- complex transaction structures designed to mislead third parties.

15.3 It also alleged the creation of a fake law firm to support these activities.

15.4 Dr Parish stated in the letter that he was “*an English solicitor and a British citizen*” and that he was “*recommending that the Security Service investigate these matters.*” He stated:

“I have carefully considered my professional and regulatory obligations in light of the statutory framework and other guiding policy documents of the Security Service, and I have concluded that I am legally and professionally entitled, or even obliged, to provide this information to you.”

15.5 On 1 May 2018, Dr Parish sent a letter to the US Office of Terrorism and Financial Intelligence and the Office of Foreign Assets Control repeating the allegations in the letter of 26 March 2018 and further stating:

“I am a licensed attorney and counsellor-at-law in the State of New York, resident in Geneva, Switzerland. I make this report within the scope of my professional obligations and liberties pursuant to NYCRR Title 22 Subtitle B Chapter IV Subchapter E Rules 1.6(a)(3), 1.6(b)(2), 1.6(b)(5)(i) and/or such other rules and/or regulations of the State of New York and/or of federal criminal and/or civil law and/or such other rules of professional conduct as may be appropriate.”

15.6 On 2 May 2018, Dr Parish emailed the letter to several people at Company B, including Person B. It was also sent to the Principle Prosecutor of the Republic and Canton of Geneva.

15.7 On 3 May 2018, Dr Parish sent a letter to the Supplementary Information Request at the National Entries (“SIRENE”) in EU Countries, which contained the same allegations as in the previous letters sent to the UK and US authorities. He enclosed the letters sent to the UK and US intelligence agencies further stating:

“I am an English solicitor, resident in Geneva, Switzerland. I make this report within the scope of my due professional liberties and obligations under the law of the jurisdiction in which I am licensed to practise law.”

15.8 On 4 May 2018, Dr Parish again emailed the letter to several people at Company B, including Person B and to the Principle Prosecutor of the Republic and Canton of Geneva. On the same day, Dr Parish emailed Company B’s legal representative, copying his own Swiss lawyer, Marc Henzelin, proposing ‘some settlement terms’ for his client’s consideration, including:

“Your client arranges for payment of all my outstanding invoices in full, immediately and without deduction. There will be no negotiations. These invoices were sent in draft; no objections were raised; then they were finalised; there have been no objections of substance in near on a year. So, they must be paid in full. This happens before anything else, and before any settlement agreement is signed or even negotiated. At the current juncture, I will not seek interest from your client on those invoices - provided that this matter settles immediately.”

“I will withdraw all my various complaints to different authorities, and I will use my reasonable endeavours to ensure that those complaints are not thereafter pursued by any such authorities. I am happy to explain in writing what I will do.”

“I will not make any equivalent or similar such complaints in the future.”

The email concluded: *“There is no need for any further communications until the invoice remittances have hit my account. I mean you no discourtesy, dear colleague, but this is how it will have to be or it will not be at all.”*

15.9 Less than 10 minutes later, Mr Henzelin replied to this email stating that he *“was not consulted nor informed before this email was sent”*.

15.10 On 6 May 2018, Dr Parish emailed Person B directly with a *“last gasp attempt at settlement”*, stating:

“You surely realise that I cannot now reverse the inevitable consequences of your actions. I could have done a few days ago, but now I cannot. You are in a calamity of your own devising, and you showed no sympathy, respect of personal regard for me In [sic] the circumstances of our separation so I am not overwhelmingly inclined to reciprocate the courtesy.

To resolve this now in the way that might – might – cause you the least further misfortune, I suggest the following.

1. *You must recognise that you are in a diabolically bad situation, and there is little to nothing that either you or I can now do to one-another to reverse that.*
2. *Nevertheless, your situation might – just might – be capable of getting worse.*
3. *The gravity of your situation is revealed by the fact that when I wrote to M15, you did not immediately offer to settle. That would obviously have been the rational thing to do. You would send any amount of money, even a small sum, immediately. But you did not, and that is because you could not. This tells me everything about the problems that you have.*
4. *I respectfully suggest you should not focus upon fighting me – it will be useless – but instead upon damage limitation for your own sake.*

5. *If you want to discuss this with me, then I have a telephone number, and you can call it. But I will not take the 'phone call unless I have first seen at least CHF500,000 hit my bank account on account of my unpaid invoices. Expressions of good will must now start at your end.*

It's really up to you now. Good luck with your decision."

- 15.11 This email was forwarded to various parties including Company B on 6 May 2018, stating: *"FYI below, I have already sent this to David Bitton, Marc Henzelin and to the confidential mediator that [Person B] and I have been using over the last few days (something which, I regret to inform you, generated escalation and threats on his part rather than any sort of reconciliation). I wish you guys good luck in persuading him. Time is of the essence. I would imagine that everything will be resolved within a week or so of now"*.

The Applicant's Case

- 15.12 Dr Parish raised serious allegations of criminal activity by his former clients to the UK Security Service. He then offered to withdraw those complaints and use his endeavours to ensure those complaints were not pursued, in return for payment of his fees. To do so was to put his own financial interest and the financial interests of Gentium above the rule of law and administration of justice. Dr Parish therefore breached Overseas Principle 1.
- 15.13 Mr Tankel submitted that a solicitor who had genuine concerns about the conduct of his former clients, to the extent that he felt the need to report them to the UK, US and EU security and intelligence agencies, who then offered to retract those reports in return for payment of his outstanding fees, demonstrated a lack of integrity. He should have acknowledged the fact that payment of outstanding fees by his client and concerns over the legality of their behaviour as outlined in the reports to the UK, US and EU security and intelligence agencies were entirely separate issues. Instead, Dr Parish conflated the two issues and sought to use his position, and the status which came with it, to secure payment of fees he considered to be outstanding with an offer to withdraw those complaints. Such conduct lacked integrity.
- 15.14 It was evident from the Swiss Criminal Proceedings, that Dr Parish's position was that he held a genuine belief that his former clients were involved in unlawful activity. This explained the reports to the respective authorities. Mr Tankel submitted that in those circumstances, a solicitor who offered (a) to withdraw genuinely held complaints of unlawful activity; and (b) use his reasonable endeavours to ensure that those complaints were not thereafter pursued, on the proviso that his former clients pay what he considered to be owed, showed a lack of integrity. Mr Tankel submitted that such conduct was analogous with blackmail. The fact that he may have genuinely believed the reports made to be true did not assist.
- 15.15 Further, Mr Tankel noted that in his Answer, Dr Parish stated that he was never intending to withdraw the allegations; Persons B, C and Company B wanted a letter of exoneration that could be provided to members of the community. Mr Tankel submitted that even if this was the case, Dr Parish's conduct would still be in breach of the Overseas Rules alleged. Writing a letter of exoneration in the circumstances would be

misleading and would stake the reputation of the profession on those who he considered to be rogues of the worst kind. Furthermore, saying that he would withdraw the report when he had no intention of doing so would also be misleading.

- 15.16 Mr Tankel submitted that the requirement to behave in a way that did not bring the profession into disrepute was engaged by (a) offering to withdrawing complaints to third party authorities; and (b) using their endeavours to ensure that those complaints were not thereafter pursued by the authorities, for receipt of payment believed to be owed to them. The harm that could be caused to the reputation of the profession and the trust which the public had in solicitors was well illustrated by the fact that the offending was reported in the press with one news outlet focussing on the fact that Dr Parish was a British lawyer.

The Respondent's Case

- 15.17 Dr Parish denied allegation 1.1. He explained that the offers to withdraw were made within the context of a mediation with his former clients' representative at their instigation. Dr Parish considered this to be "*a legitimate negotiation*" that did not amount to professional misconduct.
- 15.18 Dr Parish asserted that it gradually occurred to him that Persons B and C "*were engaged in a massive international criminal fraud of monumental proportions*", operating through over 300 different shell companies in a variety of offshore jurisdictions, producing strings of international contracts for the sale and transport of hydrocarbons between their own companies. Many of these contracts and other accompanying documents were forged or fraudulent and were designed to hide the fact that they were creating artificial chains of contractual relationships with themselves to hide what they were really doing.
- 15.19 As Dr Parish started to understand this scheme with ever greater clarity, he became distinctly uneasy with it. Persons B and C, it was submitted, apparently understanding Dr Parish's realisation of their real business activities, tried to extort him into continuing to work for them and participating actively in their illegal project. They started asking him to issue invoices to various companies that turned out to be shell companies and then never paid their bills. When these bills reached a certain level that caused Dr Parish critical financial discomfort, they demanded that he wrap his law firm up into a law firm owned and controlled by them. Dr Parish refused to go along with this plan, as it would make him an active party to international criminal behaviour on a massive scale.
- 15.20 Dr Parish "*reluctantly*" made the decision in early 2018 to terminate all retainers with all companies controlled by Persons B and C, or he would place himself in criminal jeopardy and he would indeed then breach the ethical principle of integrity that was so important for any solicitor.
- 15.21 The report to the intelligence agencies was not motivated by a desire for leverage over Company B, Person B or Person C. It was not reported to Swiss intelligence agencies as Dr Parish had been informed that the Swiss authorities would do nothing about it, even if it was reported to them, so as to avoid any scandal associated with the Geneva financial system. In the circumstances, he considered it more appropriate to make a report to British intelligence agencies.

- 15.22 Dr Parish explained that he was left with a significant amount of unpaid invoices. He was contacted by an associate of Persons B and C in early 2018 to try to resolve the dispute over fees. The associate suggested that if the fees owed were paid, then Dr Parish could issue a letter of retraction of his allegations. Dr Parish explained that he agreed in principle, not because he doubted any of the allegations made, but because he was being offered payment of his invoices. Dr Parish asserted that he was “*effectively coerced into offering to withdraw the accusations that he had made*”. The associate suggested that Dr Parish produce a written communication to Persons B and C; Dr Parish did so. The fees owed were never recovered by Dr Parish.
- 15.23 Dr Parish submitted that he considered “*this was a wholly reasonable and proportionate thing to do in the circumstances*”. He asserted that he had “*acted with the highest levels of integrity expected of a member of the solicitors’ profession*”, placing “*the values of the solicitors’ profession above [his] own personal self-interest*”.

The Tribunal’s Findings – Allegation 1.1

- 15.24 The Tribunal noted that Dr Parish accepted that he had offered to “*withdraw all my various complaints to different authorities*” and to “*use my reasonable endeavours to ensure that those complaints are not thereafter pursued by any such authorities*”.
- 15.25 The Tribunal did not accept that the reports to the various security agencies were motivated by Dr Parish’s growing concern about the activities of his clients. Dr Parish had not pointed to any specific action that he had been asked to perform that was the tipping point or light-bulb moment that led to his realisation. The Tribunal was satisfied that the motivation for the reports were his unpaid fees. On his own evidence, Dr Parish was owed a significant amount and without the payment of those fees, Gentium was in severe financial difficulty. The Tribunal determined that once it became clear to Dr Parish that his fees were unlikely to be paid, he decided to make the report to the intelligence agencies. Further, Dr Parish had copied in Person B (amongst others) against whom he had alleged criminal activity. The Tribunal did not accept that believing the content of the reports to be true, Dr Parish copied that email to a number of people (including Person B) because it was a “*good idea that some who are not aware that they are part of the network become aware of it*”. Given the nature and seriousness of the allegations made by Dr Parish, the Tribunal considered his explanation for copying the email to numerous people to be incredible. Rather, the Tribunal determined, it was to ensure that many people in Company B would be aware of the reports.
- 15.26 Furthermore, the Tribunal did not accept that Dr Parish had reported the matter to UK, American and EU agencies due to his concern regarding Swiss corruption; his report to the Americans, made a few days after the initial report, was copied to the Principal Prosecutor of Geneva.
- 15.27 The Tribunal determined that the staged sending of the reports to the intelligence agencies was a device deployed by Dr Parish to exert pressure onto Persons B, C and Company B. Notwithstanding his oral evidence that by this time he had given up on receiving payment, shortly after the final report, Dr Parish had sent the email stating that he would withdraw his complaints in the event of payment of the outstanding invoices in full.

- 15.28 Additionally, on 6 May 2018 (2 days later), Dr Parish emailed Person B directly stating (amongst other things): “... when I wrote to MI5, you did not immediately offer to settle. That would obviously have been the rational thing to do. You would send any amount of money, even a small sum, immediately. But you did not ... If you want to discuss this with me, then I have telephone number you can call it. But I will not take the phone call unless I have first seen at least CHF5000,000 hit my bank account on account of my unpaid invoices.”
- 15.29 The 6 May 2018 email, the Tribunal determined, further evidenced that the purpose of sending the reports was to obtain payment of the outstanding fees.
- 15.30 The Tribunal was satisfied that in offering to withdraw reports of serious criminal activity in return for payment of his fees, Dr Parish had placed his own interests and that of his Firm above the rule of law and administration of justice in breach of Overseas Principle 1 as alleged.
- 15.31 Members of the public would not expect a solicitor, having reported serious criminal activity, to offer to retract those reports on the basis that his outstanding invoices were paid. In doing so, Dr Parish had brought himself into disrepute as a regulated person and, by association, the legal profession in and of England and Wales in breach of Overseas Principle 6 of the Overseas Rules.
- 15.32 The Tribunal found that in offering to withdraw the reports made for payment of his fees, Dr Parish’s conduct lacked integrity. A solicitor acting with integrity would not offer to withdraw complaints of that nature to secure payment of his fees. This was the case even when the suggestion to do so was not instigated by the solicitor. As detailed above, the correspondence evidenced that the real motivation for the reports was the non-payment of fees, irrespective of whether or not Dr Parish believed the reports to be true. Accordingly, the Tribunal found allegation 1.1 proved in its entirety.
- 15.33 As to the suggestion that the conduct was analogous to blackmail, Mr Tankel accepted that this had not been clearly pleaded or particularised in the Rule 12 Statement. In the circumstances, the Tribunal found that it would be unfair to Dr Parish to make any findings on this basis.
- 15.34 During the opening, Mr Tankel noted that in his Answer, Dr Parish had stated that he was never intending to withdraw the reports and that such a position was misleading and in breach of the Overseas Rules as alleged. The Tribunal noted that following Dr Parish’s Answer, the Applicant provided a Reply. It did not engage with this element of the Answer in its Reply. The Tribunal considered that raising this as an alternative formulation of a lack of integrity at this stage of the proceedings was inappropriate. This was a matter that should have been raised and particularised in the Reply. Accordingly, the Tribunal determined that it would be unfair to Dr Parish for the Tribunal to make any findings on this formulation of a breach of Overseas Principle 2.
16. **Allegation 1.3 - Between 27 October 2021 and 4 November 2021, he published decisions of the FTT and UT dated 27 October 2021 and 4 November 2021 respectively, on his website, in a way which breached the anonymity granted by the FTT and UT. In doing so he breached any or all of: Principles 1, 2 and 5 of the Principles.**

Factual Background

16.1 Person A applied for asylum in the UK. On 5 October 2018, the FTT handed down its decision, which provided, amongst other things, the following details of Person A:

- His citizenship
- His date of birth
- The date Person A last arrived in the UK and the date he claimed asylum
- The name of his wife, together with the date on which they married and the number of children they had
- Person A's professional background, including the name of a company he established and precise details of his roles in relation to that company.
- Precise, identifying, details of Person A's activities in his country of origin.

The FTT directed as follows:

“Direction regarding anonymity – Rule 13 of the Procedure (First-tier Tribunal) (Immigration and Asylum Chamber) Rules 2014 and Section 11 of the Contempt of Court Act 1981

*In order to secure the anonymity of the appellant throughout these proceedings I DIRECT that no report or other publication of these proceedings or of any part or parts of them shall name or directly or indirectly identify him. Reference to the appellant may be by use of his initials but not by name. **Failure by a person, body or institution whether corporate or unincorporated (for the avoidance of doubt to include a party to this appeal) to comply with this direction may lead to proceedings for contempt of court.** This direction shall continue in force until this Tribunal, the Upper Tribunal (IAC) or an appropriate Court shall lift or vary it.”*

16.2 On appeal by the Home Office, the UT concluded that the decision was properly made and upheld the FTT's decision. The UT decision, handed down on 9 April 2019, stated: *“I continue the anonymity order made by the First-tier Tribunal.”*

16.3 On 21 October 2021 Dr Parish wrote to Charles Douglas Solicitors attaching an unredacted copy of the asylum decision, which he said he had been given by Person A. He noted that the decision read *“I extend the anonymity order made at the earlier directions hearing on 14 May 2018”* and asked for a copy of that order. Dr Parish stated: *“I am considering whether it is lawful to circulate this document to other interested parties, given that your client gave me an unredacted copy himself.”* He asked a series of 10 questions regarding whether and the extent to which the terms of the anonymity order were binding upon him. He concluded:

“I will wait 24 hours for your replies, before deciding whether I can lawfully publish this document to interested third parties. If I decide, with or without your replies, that I can lawfully publish it (and my reasons for doing so are compelling; it is a fraud and your client is a dangerous fraudster who ought to be dealt with by the Police), then I will give you a further 24 hours' notice to allow you to apply for injunctive relief restraining me from doing so.”

- 16.4 On 23 October 2021 he also wrote to counsel who had represented Person A saying that he was “*currently undertaking an investigation*” into Person A’s asylum matter. Referring to the anticipated application for an injunction, Dr Parish stated that he would “*comply with any Order of the English High Court in relation hereto*”.
- 16.5 On 26 October 2021, Charles Douglas Solicitors wrote to Dr Parish bringing his attention to the terms of the anonymity order, Rule 13 of the Procedure (First-Tier Tribunal) (Immigration and Asylum Chamber) Rules 2014, and section 11 of the Contempt of Court Act 1981.
- 16.6 On or around 27 October 2021, Dr Parish published a link to the judgment on his Paladins website. Other than using Person A’s initials, no other redactions were made to the decision. A person clicking on the link would, in fact, have seen Person A’s surname appear on the screen because that was the file name of the associated PDF. Mr Tankel noted that when this was brought to Dr Parish’s attention, he edited the document to remove that reference.
- 16.7 On 4 November 2021, Dr Parish published a further article, also with a link to the decision.
- 16.8 On 29 June 2022, the UT wrote to Dr Parish referring to the link he had posted and asking Dr Parish to explain in writing why contempt of court proceedings should not be brought. Dr Parish responded explaining that he had complied with the anonymity direction with reference to Person A by initials. He further explained that he had been given the unredacted decision by Person A “*for such purposes as might be useful*”.
- 16.9 On the same day, Dr Parish forwarded the correspondence to the SRA, saying he was doing so “*as a courtesy*”, that he was under no obligation to “*self-report*”, and that it was “*so obviously an open-and-shut*” matter.
- 16.10 On 30 June 2022, the UT responded asking Dr Parish to address the issue of jigsaw identification. Dr Parish explained that (a) based on his own internet research, it was not possible to identify Person A from the personal details contained in the judgment; and (b) on his interpretation of the anonymity order, there was a “*caveat*” which permitted him to publish the information using Person A’s initials.
- 16.11 On 5 July 2022, Dr Parish made further submissions to the effect that the UT had no jurisdiction to make any further directions with respect to anonymity in the Person A case, including regarding contempt of court.
- 16.12 On 16 August 2022, the President of the UT sent Dr Parish a letter directing him to remove the decision from the Paladins website within 28 days. The UT was not minded during the 28-day period to pursue contempt proceedings but considered that that might need to be revisited depending upon Dr Parish’s response to the President’s request. Dr Parish immediately complied with that request, whilst expressing reservations about the UT’s power to make this direction.

The Applicant's Case

- 16.13 Mr Tankel submitted that in early October 2021, Dr Parish perceived that Person A (or someone acting on Person A's behalf) had made veiled threats about Dr Parish's parents. This, it was submitted, seemed to be the trigger for Dr Parish then publishing the FTT decision, there being no other discernible reason.
- 16.14 Mr Tankel submitted that the Tribunal should start its analysis by interpreting the anonymity direction. The order provided unambiguously that no person should name Person A whether directly or indirectly. It then stated that reference to Person A may be by his initials only. Dr Parish interpreted that to be a "*caveat*". Mr Tankel submitted that this was an untenable interpretation of the anonymity direction. The direction did not use the word "*but*" or "*however*" or any similar conjunction. Further, Dr Parish's interpretation undermined the whole purpose of the anonymity direction. Unarguably, the anonymity direction meant that Person A may not be identified directly or indirectly (e.g. by way of jigsaw identification) and that, if any (otherwise non-identifying) reference was to be made to Person A, then it must only be by way of his initials.
- 16.15 It was not sufficient for Dr Parish to make enquiries of Person A's former solicitors in circumstances where (i) Dr Parish bore his own professional obligations which could not be delegated to others; (ii) Person A's former solicitors no longer represented Person A; and (iii) Person A's former solicitors were not giving or purporting to give Dr Parish legal advice as to his professional obligations.
- 16.16 In any event, Person A's former solicitors directed Dr Parish to the anonymity direction. Dr Parish purported to interpret that as an invitation to rely upon the "*caveat*". However, it was submitted, any fair reading of the email exchange indicated that Person A's former representatives were informing Dr Parish that he could not proceed in the way that he chose to, because of the terms of the anonymity direction.
- 16.17 Mr Tankel submitted that Dr Parish contended that, because no contempt proceedings were brought, he was not in breach of the anonymity direction. Further, that the fact that the UT issued a further direction meant that the first direction did not prohibit his conduct. Mr Tankel submitted that no such inference could be drawn. The UT found a pragmatic means of resolving the issue without the need to pursue contempt proceedings. The UT kept the possibility of contempt proceedings open at all times but in the event did not need to pursue them because of Dr Parish's belated decision to comply.
- 16.18 Alternatively, even if the order was ambiguous, Dr Parish misconducted himself by proceeding in the way that he did. The order was, at worst, ambiguous. It did not clearly create, as Dr Parish contended, a "*caveat*". Dr Parish must have recognised this, because he purported to make enquiries of Person A's former representatives and of the judge that made the order. Anonymity directions in asylum proceedings were made by a competent tribunal in order to protect the applicant, and possibly their friends/relatives in their country of origin, from the risk of persecution. A solicitor acting as he ought, faced with such ambiguity and in the context of such a risk assessment, would not have proceeded to publish the entirety of an (at least) potentially anonymous decision, to all the world, when that decision plainly contained much personal information from which

Person A could be identified, without taking the slightest effort to remove any of that material (apart from Person A's full name).

- 16.19 Further, the correspondence from the UT, threatening contempt of court proceedings, at the very least put Dr Parish on notice that he was possibly in breach of an order. A solicitor properly conducting themselves, about whom the court was raising the suggestion that they were in contempt of court, would take prompt steps to purge that potential contempt, even if only as an interim measure whilst the underlying question was resolved. Instead, Dr Parish took it upon himself to perpetuate the (potential) contempt, and to continue to pose a risk of harm to Person A, for his own ends.
- 16.20 As a solicitor, Dr Parish was an officer of the court and was expected to act in accordance with directions of the court. Notwithstanding his asserted attempts to comply with the anonymity order, Dr Parish (a) failed to remove the name of Person A on eight separate occasions; and (b) left sufficient contextual information within the published document to enable the reader to identify Person A. In addition, when the decision was accessed from the Respondent's website, the document had been saved using Person A's surname. Even if this was done unintentionally, it still constituted a breach of the anonymity order.
- 16.21 By publishing the FTT and UT decisions containing sufficient information to enable anyone who knew Person A, including his political adversaries to indirectly identify him, Dr Parish failed to uphold the terms of the anonymity order and had failed to act in a way that upheld the constitutional principle of the rule of law and the proper administration of justice in breach of Principle 1.
- 16.22 The public expect solicitors, who are officers of the court, to comply with directions of the court. The anonymity order was in place to protect Person A's identity and as such the public would expect Dr Parish, as a solicitor, to comply with that direction. Dr Parish failed to do so by publishing both tribunal decisions on his website containing sufficient information to enable Person A to be identified as the appellant in those proceedings, a decision which placed Person A and his family at significant risk. By doing so, Dr Parish acted in a way which would undermine public confidence and trust in the legal profession in breach of Principle 2.
- 16.23 Dr Parish was aware of the anonymity direction attached to the FTT decision dated 5 October 2018 and that it applied to the proceedings as a whole which would include any subsequent appeals. He was also aware that the anonymity direction was made to protect Person A's identity, and by extension, to protect Person A and his family from significant risk. Charles Douglas also informed Dr Parish that publication of the decision might lead to proceedings for contempt of court. Despite this, he proceeded to publish copies of the FTT decision and the UT decision on his website containing sufficient information to enable Person A to be identified as the appellant in these proceedings. A solicitor with integrity, knowing the history between the parties involved, the sensitive nature of these proceedings and the fact an anonymity direction had been made, would not have published these decisions without seeking the approval of the Tribunal, whether they be partially redacted or otherwise. In publishing the decisions in the way that he did, Dr Parish failed to act with integrity in breach of Principle 5.

The Respondent's Case

16.24 Dr Parish denied allegation 1.3. He submitted that there was no breach of the anonymity order in publishing the decision as it had been suitably redacted to Person A's initials, which was what the anonymity order required.

16.25 The decision had been given to Dr Parish by Person A. It was published precisely in accordance with the terms of the anonymity order. The matter had been investigated by the then President of the UT, who had written to Dr Parish asking him to show cause why he should not find Dr Parish in contempt of court. Following Dr Parish's detailed reply, the President made no such finding. Dr Parish submitted that this was because he was not in contempt, having complied with the terms of the order. The President made an order for Dr Parish to remove the anonymised version from his website, which he promptly complied with.

16.26 Dr Parish submitted that as far as he was concerned, that was the end of the matter. The Immigration Tribunal system had resolved and issue and it should not be relitigated in these proceedings. No contempt finding had been made following due process.

16.27 Dr Parish referred the Tribunal to paragraph 14.05 of Paterson & Ritchie in relation to breaching court orders which stated:

"... mere mistake or error of judgment is generally not sufficient ... A gross neglect or inaccuracy in a matter which it is in the solicitor's duty to ascertain with accuracy may suffice"

16.28 Dr Parish submitted that in causing or suffering the publication of the FTT decision, there was no breach of the order. Alternatively, if there was, it was, at most, a mere mistake. It was noted that Paterson & Ritche did not refer to a distinct duty of professional conduct not to breach court orders. It was assumed that this was to be dealt with by way of contempt proceedings. That had occurred in this case, with contempt proceedings being entertained by not pursued.

16.29 Further, it was submitted that the doctrine of res judicata applied such that the Tribunal was precluded from determining whether Dr Parish was in contempt of court by publishing the FTT decision in circumstances where the President had already declined to make such a determination. Dr Parish referred the Tribunal to the comments of Lord Diplock in *Thoday v Thoday* [1964] P 181 (CA):

"Issue estoppel is a different species of estoppel per rem judicatam. It arises where a particular issue forming a necessary ingredient in a cause of action had been litigated and decided and in subsequent proceedings between the same parties involving a different cause of action to which the same issue is relevant one of the parties seeks to reopen that issue."

16.30 Dr Parish submitted that in this case the parties were the same (whether represented in form of the UT or the Applicant) and himself. That was because in all complaints of contempt of court, the aggrieved party was the state.

The Tribunal's Findings – Allegation 1.3

- 16.31 The Tribunal first considered whether it was estopped from determining this matter. The Tribunal did not accept that the SRA was an organ of the state. It did not derive its funding from government; its funding being mainly derived from Practising Certificate fees. Similarly, the Tribunal was not funded by monies from the government. Accordingly, the Tribunal did not accept the assertion that the SRA or the Tribunals were organs of the state. Thus, the parties in this matter were not the same as the parties in any contempt proceedings.
- 16.32 Further, there were no contempt proceedings. The President asked Dr Parish to show cause as to why contempt proceedings should not be brought. Having directed Dr Parish to remove the decisions, and Dr Parish having complied, contempt proceedings were not brought although the decision as to whether they would be, was expressly reserved. Correspondence about potential proceedings, the Tribunal found, did not amount to quasi-proceedings. Further, the fact that no proceedings were brought did not mean that Dr Parish was not in contempt of court.
- 16.33 In any event, the Tribunal was not considering whether Dr Parish's conduct was in contempt of court, it was considering whether his conduct breached his professional obligations as alleged. Accordingly, the Tribunal was satisfied that it had jurisdiction to consider the matter.
- 16.34 Given Dr Parish's defence, the Tribunal was required to construe the terms of the anonymity order and in particular, whether the wording of the order allowed for the decision to be published using Person A's initials.
- 16.35 The Tribunal found that the terms of the anonymity order were clear., namely: "*... that no report or other publication of these proceedings or of any part or parts of them shall name or directly or indirectly identify him.*"
- 16.36 The Tribunal found that the anonymity order created the following obligations:
- (i) Person A's name could not appear in any report, article, website post or other publication relating to the proceedings.
 - (ii) no information could be published that explicitly identified Person A.
 - (iii) no information could be published that would allow someone to work out who he was when combined with other information (e.g., job history, family details).
 - (iv) the prohibition applied to any publication and covered the whole of the proceedings and any part of them.
- 16.37 In simple terms, the anonymity order meant that no one was allowed to publish anything that could reveal Person A's identity, even indirectly, as the Immigration Tribunal had ordered that his identity be protected.

- 16.38 The Tribunal found that it was clear, given the terms of the order that referring to Person A by initials was permissible only where nothing else in the publication could lead to the identification of Person A.
- 16.39 Dr Parish published the full decision which contained the following:
- citizenship
 - date of birth
 - family details
 - employment history
 - company names
 - precise activities in his country of origin
- 16.40 All of those, when combined, easily lead to indirect identification of Person A. Further, and in any event, Dr Parish had failed to initialise Person A's name on at least eight separate occasions.
- 16.41 Dr Parish submitted that the next sentence: "*Reference to the appellant may be by use of his initials but not by name*", created a caveat that allowed for the decision to be published in full as long as Person A's name was initialised. Such a contention was, the Tribunal found, untenable, unreasonable and self-serving. His interpretation of the anonymity order was not credible and could not be considered to be an error of professional judgment given the very clear terms of the order. It was clear that no caveat had been created. If the decision could be published in full, merely swapping Person A's name for initials, the rest of the order would have been meaningless and otiose. The Tribunal was satisfied that Dr Parish, in publishing the decision in the way that he did, was in breach of the anonymity order. Having determined that Dr Parish breached the anonymity order, the Tribunal then considered whether his conduct amounted to professional misconduct as alleged.
- 16.42 He was expected, as a solicitor, to understand that anonymity means protecting identity in substance, not just removing the name. The anonymity order was not, as Dr Parish had asserted, unusual, long or complicated. The meaning of the order was plain on its wording.
- 16.43 As detailed, the Tribunal was satisfied that in publishing the decisions in the way that he did, Dr Parish had breached the anonymity order. This was not, as Dr Parish submitted, a mere mistake. Dr Parish had placed an untenable interpretation onto the anonymity order so as to justify publication in full. He had asked a number of questions of Person A's counsel and instructed solicitors as well as the court regarding potential publication. Given that the order was made by the court, it was expected that, at the very least, in circumstances where Dr Parish had questions regarding publication, he would have awaited a response from the court. Instead, Dr Parish published the decisions as described.
- 16.44 Further, at no point did Dr Parish, in the knowledge of his anticipated publication, ask the court (or anyone else written to) whether it would be permissible to publish the decisions in full initialising the names. The Tribunal considered that this was a deliberate and conscious choice, it being clear to Dr Parish that such a course would be impermissible.

- 16.45 Deliberately breaching court orders, the Tribunal found, breached the Principles as alleged. Dr Parish had failed to uphold the constitutional principle of the rule of law and the proper administration of justice in breach of Principle 1. Members of the public would not expect solicitors to deliberately breach court orders for their own purposes. In doing so, Dr Parish had acted in a way which would undermine public confidence and trust in the legal profession in breach of Principle 2.
- 16.46 That such conduct lacked integrity in breach of Principle 5 was plain. A solicitor acting with integrity would not place an untenable construction on the wording of an order simply to satisfy his own purposes, particularly given the circumstances in which the anonymity order was made. Even if, which the Tribunal did not accept, the wording of the order was ambiguous, a solicitor with integrity, having asked for clarification from the court, would not publish in the absence of that clarification, without (i) chasing the court (which Dr Parish did not do); or (ii) on the assumption that he *“did not know whether the court would ever reply. The court could be exceedingly slow.”*
- 16.47 Accordingly, the Tribunal found allegation 1.3 proved in its entirety.
17. **Allegation 1.4 - On 20 November 2021, threatened legal action against Charles Douglas Solicitors for making a report to the SRA. In doing so he breached any or all of: Paragraph 7.9 of the Code of Conduct; and Principles 2 and 5 of the Principles.**

Factual Background

- 17.1 On 26 October 2021, Charles Douglas Solicitors made a report of Dr Parish’s conduct to the Applicant, bringing to its attention his proposal to publicise the Person A decision and his Geneva convictions. Charles Douglas Solicitors initially referred the matter to the Applicant because it thought the Applicant would be able to prevent Dr Parish from publishing the Person A decision.
- 17.2 On 15 November 2021, the Applicant informed Dr Parish of the Charles Douglas Solicitors referral stating:
- “We have received a report from Charles Douglas Solicitors LLP which raises concerns that you have published a decision of the First-tier Tribunal (Immigration & Asylum Chamber) dated 5 October 2018 which was subject to an anonymity order. The firm has provided us with this link [link provided].*
- We are in the early stages of assessing this report and would welcome any observations which you wish to make.”*
- 17.3 On 20 November 2021, Dr Parish wrote to Charles Douglas Solicitors (copying in the Applicant) alleging that Charles Douglas Solicitors *“must have known that the complaint ... about my breach of the anonymity order was false or misleading”* and that in making the report, the firm was *“liable in the tort of malicious falsehood, as well as that of defamation, including for aggravated and other non-compensatory damages; [and] guilty of professional misconduct, for filing a palpably groundless and indeed malicious complaint of professional misconduct against a professional solicitor”*.

17.4 Dr Parish noted that:

- (i) he had contacted Charles Douglas Solicitors regarding the publication of the decision; Charles Douglas Solicitors had directed him to the terms of the anonymity order.
- (ii) he had initialised all the appearances of Person A's name.
- (iii) Charles Douglas Solicitors had not taken up the proposal to apply for an injunction; and
- (iv) all of this meant that he had acted "*in coordination with*" Charles Douglas Solicitors.

17.5 On 9 December 2021, Charles Douglas Solicitors explained to the Applicant that it now understood that the Applicant was already aware of the Geneva convictions, and that the Applicant did not have the power to restrain Dr Parish from publishing the Person A asylum determination. It said: "*On this basis and in light of Dr Parish' conduct following our report, we would like to withdraw it*". (**Applicant's emphasis**)

The Applicant's Case

17.6 Mr Tankel submitted that the email to Charles Douglas Solicitors, threatening legal action following its report to the Applicant involved an oppressive or abusive tactic. This type of conduct had been condemned by the Applicant in its March 2022 Guidance in relation to Conduct in Disputes. That document expressly condoned 'oppressive behaviour and tactics' which was defined as including:

- Threatening litigation where there is no proper legal basis for a claim; and
- Sending letters in abusive, intimidating or aggressive tone or language.

17.7 The Guidance simply set out long established principles in relation to the expected level of conduct on the part of solicitors when acting in disputes; it did not create or impose brand new obligations on the profession. Rule 3.9 of the Code of Conduct for Firms provided that:

"You report promptly to the SRA, or another approved regulator, as appropriate, any facts or matters that you reasonably believe are capable of amounting to a serious breach of their regulatory arrangements by any person regulated by them (including you) of which you are aware."

17.8 The trigger was thus that the firm was aware of matters that it "*reasonably believes are capable of*" serious misconduct". Charles Douglas Solicitors made a referral which was objective and factual. In publishing a decision in breach, or at least arguable breach, of an anonymity direction, Dr Parish's conduct could amount to professional misconduct. Indeed, it was a matter which the Applicant investigated, referred, and which the SDT had certified. Further, Dr Parish had been subject to criminal convictions in Geneva. Both the conduct leading to the convictions, and the convictions themselves, could amount to serious professional misconduct. Accordingly, there was no basis for

considering that the referral by Charles Douglas Solicitors was made in anything other than good faith.

- 17.9 By making allegations against the firm and threatening defamation proceedings for making a report to the SRA, Dr Parish acted in breach of paragraph 7.9 of the Code of Conduct. The allegations and threat of legal action raised in his correspondence with Charles Douglas Solicitors amounted to detrimental treatment of the firm because of its report to the Applicant. This was specifically true given that Dr Parish was unaware, at that stage, of the specific detail to the complaint that had been made against him.
- 17.10 Mr Tankel submitted that Dr Parish's actions also demonstrated a lack of integrity. A solicitor acting with integrity would not threaten legal proceedings where there were no proper grounds for doing so. As he was unaware of the actual complaint that had been made against him, Dr Parish had no proper grounds to make such threats of legal action against Charles Douglas Solicitors, who was under a duty to report concerns of possible misconduct under Paragraph 3.9 of the SRA Code of Conduct for Firms 2019. Making allegations of malicious falsehood, defamation and professional misconduct amounted to detrimental treatment for raising legitimate concerns, in breach of Principle 5.
- 17.11 The public was entitled to trust and expect that solicitors would act appropriately towards opposing parties in any apparent dispute and not seek to make inappropriate allegations and threats of litigation. The inappropriate request to Charles Douglas Solicitors was an attempt to prevent a firm of solicitors reporting conduct against another solicitor to the regulatory body. Acting in such a manner damaged the public's trust and confidence in the profession, in breach of Principle 2.

The Respondent's Case

- 17.12 Dr Parish denied allegation 1.4. Dr Parish submitted that there was no professional misconduct in a solicitor placing a law firm on notice of a potential libel or other media law action for filing a groundless professional misconduct complaint. It was denied that the litigation referred to had no proper basis; or that the correspondence sent was intimidating, abusive or aggressive in any degree so as to amount to professional misconduct, given the circumstances in which Person A (Charles Douglas's client) was busy suing Dr Parish for fraud (vexatiously, as it turned out; the matter was struck out). Dr Parish submitted that the correspondence complained of fell within the category of aggressive advocacy rather than professional misconduct.

The Tribunal's Findings – Allegation 1.4

- 17.13 The Tribunal found that Dr Parish was entitled to threaten proceedings, even if that threat was misconstrued. It could not be that, without more, the threat of proceedings amounted to professional misconduct. Charles Douglas Solicitors was an experienced firm and would have been able to assess whether the threat was of merit; plainly it was not and this would have been clear to Charles Douglas Solicitors at the time. Indeed, the Tribunal noted that Charles Douglas Solicitors did not respond to the letter.
- 17.14 The Applicant alleged that there had been detrimental treatment of Charles Douglas Solicitors due to its report. The Tribunal was not satisfied that any detriment had been caused. The purpose of the report was, in the main, to prevent Dr Parish from publishing

the immigration decisions. That was not something that the Applicant was able to do. That, the Tribunal found, was the main reason for Charles Douglas Solicitors seeking to withdraw the complaint. In the circumstances, the Tribunal found that there had been no breach of Paragraph 7.9 of the Code of Conduct.

- 17.15 The Applicant's case that Dr Parish, in seeking to prevent a report to the regulator, had breached Principle 2. That submission, the Tribunal found, was factually incorrect. The report had already been made by the time the letter was written. Accordingly, Dr Parish could not have been seeking to prevent the report. The Tribunal further noted that at no point did Dr Parish advise Charles Douglas Solicitors to withdraw its report. Accordingly, the Tribunal did not find that in writing as he had, Dr Parish had breached Principle 2 for the reasons particularised by the Applicant.
- 17.16 With regard to the allegation that Dr Parish's conduct lacked integrity, this was predicated on Dr Parish having treated the firm detrimentally. As detailed above, the Tribunal did not find that there had been detrimental treatment of Charles Douglas Solicitors. Accordingly, the Tribunal did not find that in writing as he had, Dr Parish had breached Principle 5 for the reasons particularised by the Applicant.
- 17.17 Accordingly, the Tribunal found allegation 1.4 not proved.

Previous Disciplinary Matters

18. None

Mitigation

19. Dr Parish made the following points in mitigation:
- He was a person of high moral character, having regard to the multiple unopposed character witnesses testifying in his favour.
 - He had no previous disciplinary record with the Applicant or before the Tribunal.
 - All the events took place a very long time ago.
 - It had taken an inordinate amount of time for the Applicant to bring these matters to the Tribunal and to a hearing. This was not the fault of Dr Parish.
 - In the interim, delays in investigation and pursuing legal proceedings, caused constant anxiety. Any perception that his evidence was vague or evasive was undoubtedly by reason of passage of time.
 - He had been under exceptional pressure. Dealing with two very different sorts of, criminal person, both of whom were threatening his livelihood and seeking to pull him into fraudulent schemes. In the cases of Persons B and C, they were seeking to drain his business revenues as a form of blackmail, to pressurise him into their fraudulent schemes involving forging documents to evade sanctions and to conduct shadow fleet practices. In the case of Person A, he had brought totally unwarranted accusations of fraud in the High Court that Dr Parish had to spend time and

resources defending before the claims were struck out as vexatious, frivolous, or an abusive process of the court.

- His actions succeeded, ultimately, in driving two villainous criminals out of Geneva.
- Even if the methods used were considered by the Tribunal to be imperfect under great pressure, the result was exceptional, and one for which Dr Parish had already paid a very high price, including unjust imprisonment, leading to mental health problems, destruction of his business, and impecuniosity when he was once a wealthy man.
- When the finances of his business model started turning sour as a result of the actions of Persons B and C, he kept employing his staff for as long as he could, using his firm's resources, allowing them to find time to pursue new opportunities, rather than firing them all immediately and keeping the firm's reserves for himself, something which would have been in his personal interests. He had acted decently.
- he suffered from mental health problems that followed from his incarceration as a result of his actions, intended to be perceived for the greater good since 2018 to the present day.
- He had, at least to a degree, seemed to have discouraged Person A from harassing members of relevant communities, even if Person A continued to trouble English solicitors by providing them with AI-created fictitious accounts of case law.
- He had suffered enough.
- He was pursuing law enforcement and seeking to urge the British government to act and actively cooperated with the British government.
- He had not been accused of dishonesty, and there had been no acts of dishonesty.
- He had self-reported his convictions, another index, of moral stature. He then participated fully, completely, and cooperatively in the entirety of the Tribunal process.
- In respect of the publication of the anonymised FTT decision regarding Person A, the UT saw no reason to impose a penalty, and therefore, neither should the Tribunal.
- He had exhibited continued high moral character by his, continued work as an international civilian volunteer, working in Ukraine to resist the Russian occupation.
- Since being a student, he had always hoped to be a lawyer with his own firm. Never had he believed that it would come to this - by doing something in good conscience supporting his country's interests.

20. Dr Parish submitted that were the Tribunal to impose a severe penalty, it would create a chilling effect for future professionals in his position in these highly exceptional circumstances.

Sanction

21. The Tribunal had regard to the Guidance Note on Sanctions (11th Edition – February 2025). The Tribunal's overriding objective, when considering sanction, was the need to maintain public confidence in the integrity of 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.
22. Dr Parish was motivated by his desire to obtain payment of his fees, and also to cause the maximum amount of aggravation to those whom he considered to have wronged him. His actions were planned. He had acted in breach of the trust placed in him by his former clients, and in breach of the trust the public placed in solicitors to comply with orders of the court. He was an extremely experienced solicitor who was solely and wholly responsible for his conduct.
23. He had caused harm to Persons B and C with the press releases in breach of the court's prohibition on publication. He had also risked significant harm to Person A in publication of the Immigration Tribunal decisions in contravention of the anonymity order. The Tribunal found that those publications, in breach of court orders were deliberate and were designed to cause the maximum possible harm. The Tribunal found that Dr Parish had no regard to orders of the court. It rejected his submission that he paid higher regard to orders of UK courts. That was demonstrably not the case, given his breach of the anonymity order imposed by the Immigration Tribunal. Dr Parish showed no insight into his misconduct.
24. His misconduct was aggravated by its deliberate calculated and repeated nature that had continued over a period of time. Dr Parish, the Tribunal found, knew that his conduct was in material breach of his obligations to protect the public and the reputation of the profession. In mitigation, Dr Parish had self-reported to his regulator.
25. The Tribunal considered that given the serious nature of the misconduct, sanctions such as no order, a reprimand or a financial penalty were insufficient. The Tribunal determined that the nature and seriousness of Dr Parish's conduct was such that there was a need to protect both the public and the reputation of the legal profession from future harm by removing his ability to practise. Dr Parish's lack of insight was such as to call into question his ability to continue practising appropriately. The Tribunal determined that a suspension from practise for 2 years reflected the seriousness of the misconduct.

Costs

26. Mr Tankel applied for costs in the sum of £128,551.20. He submitted that this was a matter where costs should be assessed summarily by the Tribunal; this was not a case where detailed assessment was appropriate or necessary.
27. Taking into account the provisions of Rule 43, it was submitted that: (a) the parties had conducted themselves reasonably; (b) directions had complied with in the main; (c) the

conduct of the parties had been reasonable and proportionate; and (d) the hourly rates charged by the Applicant of £145 + VAT was reasonable, it falling below the guideline rate of £180 per hour.

28. As to the time charged, this was also reasonable and proportionate given the amount of work it was necessary to undertake due to the complexity of the issues to be determined, and the matters raised by Dr Parish in his pleadings and correspondence.
29. Mr Tankel noted that Dr Parish was impecunious and that there was no reasonable prospect of him being able to pay costs in the near future.
30. Dr Parish submitted that he was impecunious in the extreme and that he could not afford to pay any significant costs order.
31. The Tribunal noted the statement of means, and Dr Parish's impecuniosity. It had regard to the decision in *Barnes V SRA [2022] EWHC 677 (Admin)*. The Tribunal determined that on any reasonable assessment of Dr Parish's current and future circumstances, it was unlikely that he would ever be able to satisfy any order for costs. Accordingly, whilst the Tribunal did not consider that there should be any reduction in the costs claimed, the Tribunal made no order as to costs due to Dr Parish's current and likely future means.

Statement of Full Order

32. The Tribunal ORDERED that the Respondent, MATTHEW THOMAS PARISH, solicitor, be SUSPENDED from practice as a solicitor for the period of 2 years to commence on the 5th day of February 2026 and it further Ordered that there be No Order as to costs.

Dated this 17th day of March 2026

On behalf of the Tribunal

A. Banks

A. Banks
Chair