

# **SOLICITORS DISCIPLINARY TRIBUNAL**

IN THE MATTER OF THE SOLICITORS ACT 1974

Case No. 12759-2025

## **BETWEEN:**

SOLICITORS REGULATION AUTHORITY LTD

Applicant

and

ALISON HALEY GRIFFITHS

Respondent

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Before:

Mr R Nicholas (in the chair)  
Mrs F Kyriacou  
Mrs C Valentine

Date of Consideration: 1 August 2025

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## **Appearances**

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

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**JUDGMENT ON AGREED OUTCOME**

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## **Allegations**

The allegations against the Respondent, Alison Haley Griffiths, made by the Applicant are that, while in practice as a Solicitor at Regulatory Law Limited (“the Firm”):

- 1.1. Between 1 December 2018 and 20 February 2021, while acting under a Lasting Power of Attorney for Client A, abused her position by misappropriating £49,482.52 from Client A’s bank account, contrary to section 4 of the Fraud Act 2006. In doing so she breached any or all of: For the period up to 25 November 2019

- 1.1.1 Principle 2 of the SRA Principles 2011,
- 1.1.2 Principle 6 of the SRA Principles 2001; and
- 1.1.3 Outcome 11.1 of the SRA Code of Conduct 2011

For the period from 25 November 2019

- 1.1.4 Principle 1 of the SRA Principles 2019;
- 1.1.5 Principle, 2 of the SRA Principles 2019;
- 1.1.6 Principle 4 of the SRA Principles 2019;
- 1.1.7 Principle 5 of the SRA Principles 2019; and
- 1.1.8 Paragraph 1.2 of the SRA Code of Conduct for Solicitors, RELS and RFLS 2019.

- 1.2 Between 1 March 2021 and 1 October 2021, while acting under a Lasting Power of Attorney for Person B, she abused her position by misappropriating £35,790 from Person B’s bank account contrary to section of the Fraud Act 2006. In doing so she breached any or all of;

- 1.2.1 Principle 1 of the SRA Principles 2019;
- 1.2.2 Principle 2 of the SRA Principles 2019;
- 1.2.3 Principle 4 of the SRA Principles 2019;
- 1.2.4 Principle 5 of the SRA Principles 2019; and
- 1.2.5 Paragraph 1.2 of the SRA Code of Conduct for Solicitors, RLS and RFLS 2019.

- 1.3 In addition, allegation 1.1 is advanced on the basis that the Respondent’s conduct was dishonest. Dishonesty is alleged as an aggravating feature of the Respondent’s misconduct in respect of the period up to 25 November 2019 in respect of allegation 1.1, but it is not an essential ingredient in proving the allegation.

2. The Applicant relies upon the Respondent’s convictions for the offence of Fraud by abuse of position contrary to section 4 of the Fraud Act 2006 on 4 August 2023 and 6 December 2023, as evidence that the Respondent was guilty of those offences and relies upon the findings of fact upon which those convictions were based as proof of those facts.

## **Admissions**

3. The Respondent admitted all the allegations.

## Documents

4. The Tribunal had, amongst other things, the following documents before it:-
  - The Form of Application dated 28 April 2025.
  - Rule 12 Statement dated 28 April 2025 and exhibits.
  - Agreed Outcome dated 25 July 2025

## Background

5. The Respondent is a solicitor having been admitted to the Roll on 1 August 2003.
6. The Respondent had commenced her employment with the Firm in February 2018 and was designated as an authorised signatory in October 2018. She worked in the firm's Wills and Probate division. According to SRA records, which rely upon solicitors providing accurate information and keeping their employment records up to date, she also served as a Director for the Firm from August 2019. These records also indicate that she was employed at the Firm on the date of the offence relating to the first allegation and for one month during the period of the offence relating to the second allegation.
7. The Respondent ceased working at the Firm in April 2021 and according to the SRA records, she is not currently employed in legal practice.
8. The Respondent does not hold a practising certificate for the current practicing year. Her last practising certificate was for the year 2019/2020
9. The conduct in this matter came to the attention of the Applicant when it received a report on 9 April 2021 (the Report) from the Firm's director and Head of Legal, Iain Mason ("Mr Mason"). Mr Mason notified the Applicant through the report, that on 8 April 2021, the Respondent had admitted to fraudulent behaviour in respect of her role as attorney for a Client (Client A), in that she had taken approximately £20,000 from her. Mr Mason reported the Respondent's conduct to Wiltshire Police.
10. In summary, following Wiltshire Police's investigation, it was identified that between 1 March 2021 and 1 October 2021, the Respondent had misappropriated £49,482.52 of Client A's funds through ATM withdrawals and direct bank transfers to her own account. The money was used to purchase goods and even finance a holiday.
11. The Respondent was interviewed by Wiltshire Police on 24 June 2021. During the interview, she confirmed she was not under duress to spend the money and acted independently.
12. In or around September 2021, additional issues were brought to attention, when Person B's family were contacted as care payments for Person B could not be made due to insufficient funds. A report was made to the police and following further investigation, it was discovered that the Respondent had misappropriated funds from Person B, whilst also acting as a Lasting Power of Attorney. This took place between 1 March 2021 and 1 October 2021 and a total of £35,790 had been misappropriated.

13. Upon conclusion of the Police investigations, the Respondent was charged with fraud by abuse of position contrary to section 4 of the Fraud Act 2006. The Respondent entered guilty pleas in relation to the offence against Person B on 4 August 2023 and on 6 December 2023 regarding the offence against Client A. This is evidenced in the Certificate of Conviction dated 4 August 2023 and 6 December 2023.
14. The Respondent subsequently appeared before Salisbury Crown Court on 2 February 2024, where she was sentenced to 24 months imprisonment on each account to run concurrently.

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

15. The parties invited the Tribunal to deal with the Allegations against the Respondent in accordance with the Statement of Agreed Facts and Outcome annexed to this Judgment. The parties submitted that the outcome proposed was consistent with the Tribunal's Guidance Note on Sanctions (11<sup>th</sup> Edition / February 2025).

### **Findings of Fact and Law**

16. The Applicant was required to prove the allegations on the balance of probabilities. The Tribunal had due regard to its statutory duty, under section 6 of the Human Rights Act 1998, to act in a manner which was compatible with the Respondent's rights to a fair trial and to respect for his private and family life under Articles 6 and 8 of the European Convention for the Protection of Human Rights and Fundamental Freedoms.
17. The Tribunal reviewed all the material before it and was satisfied on the balance of probabilities that the Respondent's admissions were properly made. The Tribunal considered the Guidance Note on Sanction (11<sup>th</sup> Edition / February 2025). In doing so, the Tribunal assessed the culpability and harm identified together with the aggravating and mitigating factors that existed.
18. The Respondent was convicted of fraud by abuse of position contrary to section 4 of the Fraud Act 2006 having entered guilty pleas to all counts detailed on the Certificate of Conviction and was sentenced to 24 months imprisonment on 2 February 2024 at Salisbury Crown Court.
19. Within the sphere of regulatory and disciplinary conduct there could be no mitigation to minimise the harm. The Respondent's misconduct could only be viewed as extremely serious and no sanction less than a strike off would be sufficient to protect the public and the reputation of the profession.

### **Costs**

20. There was no application for costs by the Applicant.

### **Statement of Full Order**

21. The Tribunal ORDERED that the Respondent, ALISON HALEY GRIFFITHS, solicitor, be STRUCK OFF the Roll of Solicitors and it further Ordered that there be no order as to costs

DATED AND FILED WITH THE LAW SOCIETY  
This 18<sup>th</sup> day of August 2025

On behalf of the Tribunal

*R. Nicholas*

R Nicholas  
Chair

Sensitivity:  
General

**BEFORE THE SOLICITORS DISCIPLINARY TRIBUNAL**

Case  
No: 12759-2025

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

**AND IN THE MATTER OF:**

**SOLICITORS REGULATION AUTHORITY LIMITED**

Applicant

and

**ALISON HALEY GRIFFITHS**

Respondent

**STATEMENT OF AGREED FACTS AND PROPOSED OUTCOME**

By its application dated 28 April 2025, and the statement made pursuant to Rule 12 (2) of the Solicitors (Disciplinary Proceedings) Rules 2019 ("the Rule 12 Statement") which accompanied that application, the Solicitors Regulation Authority Limited ("the SRA") brought proceedings before the Solicitors Disciplinary Tribunal making two allegations of misconduct against the Respondent.

**The allegations**

1. The allegations against the Respondent, made by the SRA within that statement were that: -

- 1.1 Between 1 December 2018 and 20 February 2021, while acting under a Lasting Power of Attorney for Client A, abused her position by misappropriating £49,482.52 from Client A's bank account. In doing so she breached any or all of:

For the period up to 25 November 2019

- 1.2 Principle 2 of the SRA Principles 2011;
- 1.3 Principle 6 of the SRA Principles 2011; and
- 1.4 Outcome 11.1 of the SRA Code of Conduct 2011

For the period from 25 November 2019

- 1.5 Principle 1 of the SRA Principles 2019;
- 1.6 Principle 2 of the SRA Principles 2019;
- 1.7 Principle 4 of the SRA Principles 2019;
- 1.8 Principle 5 of the SRA Principles 2019 and;
- 1.9 Paragraph 1.2 of the SRA Code of Conduct for Solicitors, RELS and RFLS 2019.

2. Between 1 March 2021 and 1 October 2021, while acting under a Lasting Power of Attorney for Person B, she abused her position by misappropriating £35,790 from Person B's bank account. In doing so she breached any or all of;

- 2.1. Principle 1 of the SRA Principles 2019;
- 2.2. Principle 2 of the SRA Principles 2019;
- 2.3. Principle 4 of the SRA Principles 2019;
- 2.4. Principle 5 of the SRA Principles 2019; and
- 2.5. Paragraph 1.2 of the SRA Code of Conduct for Solicitors, RLS and RFLS

3. In addition, allegation 1.1 was advanced on the basis that the Respondent's



conduct was dishonest. Dishonesty was alleged as an aggravating feature of the Respondent's misconduct in respect of the period up to 25 November 2019 in respect of allegation 1.1, but it is not an essential ingredient in proving the allegation.

4. The SRA relies upon the Respondent's convictions for the offence of Fraud by abuse of position contrary to section 4 of the Fraud Act 2006 on 4 August 2023 and 6 December 2023, as evidence that the Respondent was guilty of those offences and relies upon the findings of fact upon which those convictions were based as proof of those facts.

### **Agreed Facts**

5. On 16 June 2025, the Respondent filed and served an Answer in which she admitted the Allegations in full.

### **Professional Details**

6. The Respondent, who was born on September 1968, is a solicitor having been admitted to the Roll on 1 August 2003.

7. The Respondent had commenced her employment with Regulatory Law Limited ("the Firm") in February 2018 and was designated as an authorised signatory in October 2018. She worked in the firm's Wills and Probate division. According to SRA records, which rely upon solicitors providing accurate information and keeping their employment records up to date, she also served as a Director for the Firm from August 2019. These records also indicate that she was employed at the Firm on the date of the offence relating to the first allegation and for one month during the period of the offence relating to the second allegation.

8. The Respondent ceased working at the Firm in April 2021 and according to the SRA records, she is not currently employed in legal practice.
9. The Respondent does not hold a practising certificate for the current practicing year. She remains on the Roll. Her last practising certificate was for the year 2019/2020.

### **Background**

10. The conduct in this matter came to the attention of the Applicant when it received a report dated 9 April 2021 ("the Report") from the Respondent's Firm's director and Head of Legal, Iain Mason ("Mr Mason"). Mr Mason notified the Applicant through the report, that on 8 April 2021, the Respondent had admitted to fraudulent behaviour in respect of her role as attorney for Client A, in that she had taken approximately £20,000 from Client A. Mr Mason mentioned that he had reported the Respondent's conduct to Wiltshire Police.

11. In summary;

- 11.1. Following Wiltshire Police's investigation, it was identified that between 1 March 2021 and 1 October 2021, the Respondent had misappropriated £49,482.52 of Client A's funds through ATM withdrawals and direct bank transfers to her own account. The money was used to purchase goods and even finance a holiday.

- 11.2. The Respondent was interviewed by Wiltshire Police on 24 June 2021. During the interview, she confirmed she was not under duress to spend the money and acted independently.

- 11.3. In or around September 2021, additional issues were brought to attention, when Person B's family were contacted as care payments for Person B could not be made due to insufficient funds. A report was made to the police and following further investigation, it was discovered that the Respondent had misappropriated funds from Person B, whilst also acting as a Lasting Power of Attorney. This took place between 1 March 2021 and 1 October 2021 and a total of £35,790 had been misappropriated.

- 11.4. Upon conclusion of the Police investigations, the Respondent was charged with fraud by abuse of position contrary to section 4 of the Fraud Act 2006.



11.5. The Respondent pleaded guilty to the offence in relation to Person B on 4 August 2023 and pleaded guilty to the offence in relation to Client A on 6 December 2023 and

11.6. She subsequently appeared before Salisbury Crown Court on 2 February 2024, where she was sentenced to 24 months imprisonment on each account to run concurrently.

### **Breaches of Principles and the Code of Conduct as accepted by the Respondent**

#### - Allegation 1.1

#### - Principle 1 SRA Principles 2019 (uphold rule of law and administration of justice)

12. Those that are regulated by the Applicant, are expected to act in a manner which upholds the constitutional principle of the rule of law, and proper administration of justice. On 2 February 2024, the Respondent was convicted of fraud by abuse of position. She was found guilty of a criminal offence and received a custodial sentence. By its nature, commission of a criminal offence, especially fraud by abuse of her position, is a failure to abide by the rule of law and is not conduct expected of a solicitor.

13. The offence which the Respondent was convicted of under section 4 of the Fraud Act 2006, undermines the rule of law because it involves fraud by abuse of position. The Respondent had been appointed as an attorney for an individual who was vulnerable and would have placed her trust in her to perform her duties as her attorney. The Respondent therefore breached Principle 1 of the SRA Principles 2019 for the period from 25 November 2019.

#### Principle 2 SRA Principles 2011/Principle 5 SRA Principles (you must act with integrity)

14. The Respondent's actions as described above, for which she was found guilty on her own admission, amount to a failure to act with integrity, i.e. with moral soundness, rectitude and steady adherence to an ethical code. In *Wingate v Solicitors Regulation Authority v Malins [2018] EWCA Civ 366*, it was said that integrity connotes adherence to the ethical standards of one's own profession

15. The Court of Appeal's definition of 'integrity' was endorsed by the High Court in *Beckwith*. The High Court said:

16. *"This approach to the meaning of the requirement to act with integrity facilitates a principled approach to the important point raised by the circumstances of this appeal: the extent to which it is legitimate for professional regulation to reach into personal lives of those who are regulated"*

17. *"There can be no hard and fast rule either that regulation under the Handbook may never be directed to the regulated person's private life, or that any/every aspect of her private life is liable to scrutiny. But Principle 2 or Principle 6 may reach into private life only when conduct that is part of a person's private life realistically touches on her practise of the profession (Principle 2) or the standing of the profession (Principle 6). Any such conduct must be qualitatively relevant. It must, in a way that is demonstrably relevant, engage one or other of the standards of behaviour which are set out in or necessarily implicit from the Handbook. In this way, the required fair balance is properly struck between the right to respect to private life and the public interest in the regulation of the solicitor's profession"*.

18. A solicitor acting with integrity, in accordance with the high ethical standards of the profession would not have knowingly committed fraud by abuse of their position. The Respondent demonstrated a wilful or reckless disregard of ethics, and the professional standards expected of her. She improperly withdrew money from Client A's personal bank account over an extended period and was subsequently convicted of fraud by abuse of position. Her actions amount to a failure to act with integrity.

19. In his sentencing remarks, the Judge stated Client A was a vulnerable victim because she had dementia and no family. The Respondent's actions caused financial loss to Client A and the amount that the Respondent dissipated from



Client A's account was £49,482.52. Both the Judge's remarks and the amount in question clearly indicate the seriousness of the offence committed by the Respondent where only imprisonment was the only appropriate sentence. The expectation would have been that the Respondent acted with honesty and integrity which she did not. Given Client A's vulnerabilities above, she was unable to monitor her own finances, and there was nobody to operate as a check and balance upon the Respondent's actions.

20. A solicitor who acted as described within the paragraphs 10-11 above and who has been found guilty of committing such a criminal offence may properly be said to have conducted herself in a manner lacking in moral soundness, rectitude and steady adherence to an ethical code, or the ethical standards of the profession so as to lack integrity. It is the Applicant's case that adherence to the ethical standards of the profession must and does include adherence to the wider law of the land, especially the criminal law, not least because solicitors are officers of the court. The Respondent therefore breached Principle 2 of the SRA Principles 2011 for the period up to 25 November 2019 and Principle 5 of the SRA Principles thereafter.

Principle 6 SRA Principles 2011/Principle 2 SRA Principles (you must behave in a way that maintains the trust the public places in you and in the provision of legal services)

21. Solicitors are expected to abide by the law. The conduct alleged is a breach by the Respondent of the requirement to behave in a way which maintains the trust placed by the public in them and in the provision of legal services. The public would not expect a solicitor, who is an officer of the court, to act in the manner as described at paragraphs 10-11, above and to thereafter be convicted of a criminal offence particularly where the offence is so serious that it relates in an immediate custodial sentence. Public confidence in the Respondent, in solicitors and in the provision of legal services is likely to be undermined a solicitor misusing her position in such a manner that resulted in a criminal conviction given the high degree of trust which is placed in solicitors by the public. The conviction stands as conclusive proof of the Respondent's guilt and the underlying facts.
22. The nature and seriousness of the Respondent's conduct and conviction would have a clear impact on the Respondent's practice as a solicitor. Her fraud by abuse of her position caused a financial loss to Client A. The Respondent carried out the misconduct over a sustained period whilst she was a practising as a solicitor. She had been instructed to act as an attorney for Client A under an LPA. During that time, she dissipated £49,482.52 from Client A's personal bank account for her own benefit. The public would expect a solicitor, in particular someone in a senior position within a law firm, to be trustworthy and act with integrity when dealing with their clients.
23. Solicitors must conduct themselves in a manner that maintains the public trust in them and in the provision of legal services. Members of the public would not expect a solicitor to commit fraud by abusing their position to misappropriate their client's funds for their own financial gain. Her actions in doing so would not inspire confidence in a solicitor and would undermine the trust the public holds in the profession. The Respondent therefore breached Principle 6 of the SRA Principles 2011 for the period up to 25 November 2019 and Principle 2 of the SRA Principles 2019 for the period thereafter.

**Paragraph 1.2 of SRA Code of Conduct for Solicitors, RELs, RFLs and RSLs (you do not abuse your position by taking unfair advantage of clients or others) and Outcome 11.1 of the SRA Code of Conduct 2011 (you do not take unfair advantage of third parties in either your professional or personal capacity)**

24. The Respondent's conduct would also amount to an abuse of her position by taking unfair advantage of Client A. Client A was a vulnerable individual who would have entrusted the Respondent to carry out her duties as an attorney and would not have expected her to misappropriate funds from her bank account for her own personal use. The Respondent would have known at the time of the misconduct that she was misappropriating funds which did not belong to her. As per the sentencing remarks, the judge has stated that Client A was suffering from dementia and had no family. There would therefore not have been anyone to ensure that the money in the client's account was being used for the correct purpose other than the Respondent. The Respondent has therefore breached Outcome 11.1 of the SRA Code of Conduct 2011 for the period up to 25 November 2019 and paragraph 1.2 of the Code of Conduct for solicitors 2019 thereafter by abusing her position and taking unfair advantage of the client.



**Dishonesty - In respect of allegation 1.1, dishonesty is alleged against the Respondent as an aggravating feature of her misconduct for the period up to 25 November 2019, and as a breach of Principle 4 of the SRA Principles 2019 for the period thereafter.**

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

25.1. *"When dishonesty is in question the fact-finding tribunal must first ascertain (subjectively) the actual state of the individual's knowledge or belief as to the facts. The reasonableness or otherwise of his belief is a matter of evidence (often in practice determinative) going to whether he held the belief, but it is not an additional requirement that his belief must be reasonable; the question is whether it is genuinely held. When once his actual state of mind as to knowledge or belief as to facts is established, the question whether his conduct was honest or dishonest is to be determined by the fact-finder by applying the (objective) standards of ordinary decent people. There is no requirement that the defendant must appreciate that what he has done is, by those standards, dishonest."*

26. When the Respondent abused her position to misappropriate the sum of £49,482.52 from Client A between 1 December 2018 and 20 February 2021 she knew and / or believed that:

26.1. She occupied a position of trust in which she was expected to safeguard the interests of Client A, as their solicitor.

26.2. That Client A was vulnerable due to her age and mental capacity.

26.3. That she was taking money belonging to Client A for purposes other than those that were in her client's best interests.

26.4. That she was taking money belonging to her client and misusing it for her own personal benefit.

26.5. That she, the Respondent, was not entitled to, and had not authority to, access Client A's funds for her own benefit.

26.6. That her conduct spanned a significant period of time, over two years.

26.7. That her actions constituted a criminal offence.

27. In these circumstances, the Respondent's actions in misappropriating the sum of £49,482.52 from Client A when she knew that she was not entitled to do so were dishonest by the objective standards of ordinary people. Dishonesty was therefore an aggravating feature of her actions for the period up to 25 November 2019 and for the period thereafter she acted in breach of Principle 4 of the SRA Principles 2019.

28. It is noted that dishonesty was a necessary ingredient of the offence of which the Respondent was convicted on her own admission in criminal proceedings.

#### Allegation 2

29. The Applicant relies upon paragraphs 10 to 11 above. Additionally, the Applicant relies upon the following facts and matters:

#### Breach of Principles:

##### Principle 1 SRA Principles 2019 (uphold rule of law and administration of justice)

30. The Applicant further relies on the contents of paragraphs 13 to 14 in that they are also applicable to allegation 1.2. For those same reasons, the Respondent again breached Principle 1 of the SRA Principles 2019.

##### Principle 2 SRA Principles 2019 (uphold public trust and confidence)



31. The Applicant relies on the contents of paragraphs 22 to 24 insofar that they also apply to allegation 1.2 save that the individual whose funds were dissipated by the Respondent was not her client.

32. The nature and seriousness of the Respondent's conduct and her subsequent conviction on her own admission would have a clear impact on the Respondent's practice as a solicitor. Her actions constituted a serious criminal offence, as evidenced by the custodial sentence imposed. The Respondent's actions also undermined public trust and confidence in the profession as the public would not expect a solicitor to conduct themselves in the way that the Respondent did.

33. The Respondent carried out the misconduct over a sustained period, some of which occurred whilst she was practising as a solicitor at the Firm, and she has been on the Roll of Solicitors throughout the entire period of her misconduct. She had been appointed as an attorney for Person B under an LPA. During that time, she dissipated £35,790 from Person B's personal bank account for her own benefit. Even though Person B was not the Respondent's client, she would still have been well aware of the duties required to be fulfilled by her as a power of attorney and the public would expect a solicitor, in particular someone with the Respondent's experience, to be trustworthy and act with integrity when dealing with legal matters. The Respondent therefore breached Principle 2 of the SRA Principles 2019

Principle 5 (you must act with integrity)

34. The Applicant relies on paragraphs 14-20 insofar that they also apply to allegation 1.2. The Respondent's actions caused significant financial loss to Person B. In the police interview at Exeter Custody Unit on 7 October 2021, the Respondent stated that she assumed she became POA because she was at that time a solicitor. Person B would have therefore entrusted the Respondent to carry out her duties as the attorney on the LPA and act with honesty and integrity without the need for any checks or balances, which she did not.

35. A solicitor who has acted as described at paragraphs 10-11 above for which she was subsequently found guilty of committing a criminal offence may properly be said to have conducted herself in a manner lacking in moral soundness, rectitude and steady adherence to an ethical code, or the ethical standards of the profession so as to lack integrity. It is the Applicant's case that adherence to the ethical standards of the profession must and does include adherence to the wider law of the land, especially the criminal law, not least because solicitors are officers of the court. The Respondent therefore breached Principle 5 of the SRA Principles 2019.

#### **Paragraph 1.2 of the Code of Conduct for Solicitors, RELs, RFLs and RSLs 2019 (taking unfair advantage of clients and others)**

36. The Applicant relies on paragraph 24 insofar that it also applies to allegation 1.2. Although Person B was not the Respondent's client, Person B still would have expected and entrusted the Respondent to act in his interests and not take unfair advantage of him. The Respondent has therefore breached paragraph 1.2 of the Code of Conduct for Solicitors 2019.

#### **Principle 4 of the Principles (act with honesty)**

37. The SRA relies upon the test for dishonesty stated by the Supreme Court in *Ivey v Genting Casinos* as per paragraph 25 above.

38. When the Respondent abused her position to misappropriate the sum of £35,790 from Person B between 1 March 2021 and 1 October 2021 she knew and / or believed that:

38.1. She occupied a position of trust in which she was expected to safeguard the interests of Person B, as their attorney.

38.2. That Person B was vulnerable due to his age and health issues.

38.3. That she was taking money belonging to Person B for purposes other than those that were in Person B's best interests.

38.4. That she was taking money belonging to Person B and misusing it for her



own personal benefit.

38.5. That she, the Respondent, was not entitled to, and had not authority to access Person B's funds for her own benefit.

38.6. That her conduct spanned over a sustained period of time.

38.7. That her actions constituted a criminal offence.

39. In these circumstances, the Respondent's actions in misappropriating the sum of £35,790 from Person B when she knew that she was not entitled to do so were dishonest by the objective standards of ordinary people. The Respondent therefore acted in breach of Principle 4 of the SRA Principles 2019.

40. It is noted that dishonesty was a necessary ingredient of the offence of which the Respondent was convicted on her own admission.

#### **Non-Agreed Mitigation**

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

42. *I have nothing further to add. A.H. Griffiths*

#### **Proposed Sanction**

43. The proposed sanction is that the Respondent be struck off the Roll of Solicitors.

#### **Explanation why such an order would be in accordance with the Tribunal's Guidance Note on Sanction (11<sup>th</sup> edition)**

44. Ms Griffiths has admitted dishonesty. The Solicitors Disciplinary Tribunal's "Guidance Note on Sanction" (11<sup>th</sup> edition), at paragraph 28, states that: *"The most serious misconduct involves dishonesty, whether or not leading to criminal proceedings and criminal penalties. A finding that an allegation of dishonesty has been proved will almost invariably lead to striking off, save in exceptional circumstances (see Solicitors Regulation Authority v Sharma [2010] EWHC 2022 (Admin))."*

#### **Exceptional circumstances**

45. The parties agree and the Respondent accepts that there are no exceptional circumstances to the conduct.

#### **46. The following culpability factors are relevant:**

46.1. The Respondent acted deliberately while acting under Lasting Power of Attorneys and abused her position by misappropriating funds from Client A and Person B's bank account.

46.2. The misconduct directly benefitted the Respondent.

46.3. The Respondent had direct control and responsibility for the circumstances giving rise to the misconduct.

46.4. The Respondent was an experienced solicitor having been qualified for 15 years at the time of the misconduct in relation to the first allegation and 18 years at the time of the misconduct relating to the second allegation.

#### **47. The following harm factors are relevant:**

47.1. The Respondent misappropriated significant amounts of £49,482.52 from Client A's account and £35,790 from Person B's account.

47.2. There was therefore significant financial detriment caused to Client A and



Person B which resulted in their care fees being unpaid.

47.3. In his sentencing remarks, His Honour Judge Mousley states that Client A was a particularly vulnerable victim due to age and mental capacity, experiencing dementia and lacking any family support.

47.4. The Respondent abused the confidence placed in her as a solicitor.

47.5. There is always harm caused to the reputation of the profession in circumstances where a solicitor is convicted of a criminal offence.

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

48.1. The misconduct involves acts of dishonesty and lack of integrity which benefitted Ms Griffiths to the detriment of Client A and Person B.

48.2. The Tribunal's Sanctions guidance notes that the commission of a criminal offence is a serious aggravating feature to the conduct as is misconduct continuing over a period of time. Ms Griffiths' dishonest conduct was sustained over a period of time and very serious.

48.3. Ms Griffiths had been sentenced to a term of imprisonment. As Sir Brian Leveson, then President of the Queen's Bench Division, noted in *SRA v Farrimond* [2018] EWHC 321 (Admin) at [34]: "... it is beyond argument that a solicitor sentenced to any substantial term of imprisonment should not be permitted to remain on the Roll even if suspended indefinitely ..."

48.4. The Respondent's misconduct involved a repeated pattern of behaviour and an abuse of position of trust which involved vulnerable individuals.

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

49.1. The Respondent demonstrated insight and remorse in relation to the matter.

49.2. The Respondent made open and frank admissions to her employer, the police and to the SRA throughout the investigation.

49.3. The Respondent has fully co-operated with the SRA throughout the investigation.

50. The parties consider that that in light of the admissions set out above and taking due account of the mitigation put forward by the Respondent, the appropriate sanction is the Respondent be struck off from the Roll of Solicitors. The proposed sanction represents a proportionate resolution of the matter, which marks the seriousness of the misconduct which is also in the public interest.

### Costs

51. The parties agree that based upon the Statement of Means provided by Ms Griffiths, the SRA will not seek their costs.

Dated: 25 July 2025

John Quentin  
Head of Legal and Enforcement  
Solicitors Regulation Authority Limited

Dated: 24/7/2025

Alison Haley Griffiths  
Respondent in the Proceedings.