

SOLICITORS DISCIPLINARY TRIBUNAL

IN THE MATTER OF THE SOLICITORS ACT 1974

Case No. 12781-2025

BETWEEN:

LEONARD AGULANNAH EJIOFOR

Applicant

and

SOLICITORS REGULATION AUTHORITY LTD

Respondent

Before:

Mr J Abramson (in the chair)

Ms A Kellett

Mrs S Gordon

Date of Hearing: 27 August 2025

Appearances

Mansoor Fazli, Counsel of 12 Old Square, London WC2A 3TX, for the Applicant.

Susannah Stevens, Counsel of QEB Hollis Whiteman 1-2 Laurence Pountney Hill, London EC4R 0EU, for the Respondent.

**JUDGMENT ON AN APPLICATION
TO REMOVE CONDITIONS**

Background

1. On 3 January 2018, the Tribunal found the following allegations proved against Mr Ejiofor:
 - 1.1 He provided a banking facility to his client, Ms CS, through his client account. He received payments into and made transfers into and out of his client account which were not made in respect of instructions relating to an underlying legal transaction (and the funds arising therefrom) or to a service forming part of his normal regulated activities in breach of Rule 14.5 of the SRA Accounts Rules 2011 and Principle 6 of the SRA Principles 2011.
 - 1.2 In acting for his client Ms CS, he failed to have sufficient regard for his duties under the Money Laundering Regulations 2007 and/or the SRA's warning notice on money-laundering and terrorist financing in breach of all or any of Principles 6, 7 and 8 of the SRA Principles 2011 and Outcome 7.5 of the SRA Handbook
2. The Tribunal found that the conduct found proved at allegation 1.2 was aggravated by Mr Ejiofor's recklessness.
3. The Tribunal sanctioned Mr Ejiofor with a fine in the sum of £25,000. It also imposed the following indefinite restrictions on his practice:

"The Respondent may not:

Be a Compliance Officer for Legal Practice or a Compliance Officer for Finance and Administration;

Be a sole signatory to client account or have the power to solely authorise electronic transfers from a client account; and

May not be a recognised sole practitioner, manager or owner of an authorised body."

4. The Tribunal granted liberty to either party to apply to vary those restrictions.

Application

The Applicant's Case

5. On 9 June 2025, Mr Ejiofor applied to remove the restrictions.
6. In his application, Mr Ejiofor submitted that it had been over seven years since the restrictions had been placed on his practice, during which time he had gained insight into his misconduct and failings and how he would act differently to avoid any similar misconduct.
7. Mr Ejiofor referred the Tribunal to courses he had undertaken which, he submitted, evidenced his continued learning to ensure that he was up to date with any changes in law and procedure, as well as his insight and rehabilitation. He submitted further that

the SRA's criticisms of those courses was unfair and they had adopted a subjective position to oppose the application.

8. It was submitted that since the imposition of the restrictions, Mr Ejiofor had reflected on his misconduct and failings and how he would do things differently in the future to avoid any similar misconduct.
9. In his oral evidence, Mr Ejiofor stated that he had learnt: to make initial checks in every matter; when enhanced checks were required; to investigate sources of funds; and to continue to keep matters under review. He had also learnt to undertake the necessary due diligence, to check for red flags and to refer matters to the MLRO if required.
10. Given his learning, Mr Ejiofor stated that he would now do things differently and there would be no repeat of the misconduct that led to the Tribunal imposing restrictions on his practice. He understood the prohibition on using a client account as a banking facility and thus would not make any transfers to third parties unless they were directly related to the underlying legal transaction.
11. Mr Ejiofor submitted that the restrictions were having a significant detrimental impact on his finances, causing him extreme hardship. He had been unable to obtain steady and regular work or employment as a solicitor due to the restrictions, resulting in financial difficulties. The work he currently undertook as a consultant did not generate sufficient income for Mr Ejiofor to discharge his debts and properly support his family.
12. Mr Ejiofor submitted that he had complied with the restrictions since their imposition, and he did not wish to undertake any of the roles from which he was currently restricted. Accordingly, it was unnecessary for the restrictions to remain. Given that there had been no similar misconduct since the imposition of the restrictions, it was unfair for the restrictions to remain.
13. Mr Ejiofor submitted that, in its Answer, the SRA relied on an Adjudication decision made in 2019. That decision, it was submitted, was not relevant or related to the restrictions. It related to conduct that had occurred in 2013, four years before the Tribunal's decision, and was determined a year after the Tribunal's decision. Further, the underlying conduct was different to that which the Tribunal had considered resulting in the restrictions. Mr Ejiofor submitted that to seek to rely on the Adjudication decision in opposition to his application was wrong, and if the Tribunal took it into account, would amount to double punishment.
14. Further, it would be clear to any reader of his witness statement that when he stated, "*there has never been any other incident of such misconduct*", Mr Ejiofor was referring only to the conduct that had led to the previous Tribunal proceedings, resulting in the imposition of restrictions.
15. In addition, he did not intend to hold any of the roles from which he was currently restricted. Accordingly, the references provided were appropriate; if he did not intend to undertake those roles, there was no requirement for the referees to detail systems, supervision or oversight. Mr Ejiofor submitted that the Tribunal should place significant weight on the references from other legal professionals who had worked with him over

the last years, as those referees were best placed to comment on his practice during that time.

16. Mr Ejiofor contended that the restrictions were no longer necessary for the protection of the public or the reputation of the profession. Continuing the restrictions was not only unnecessary, but also prejudicial and unfair given the extreme financial hardship caused.
17. Taking into account the time since the imposition of the restrictions, the lack of any breach of those restrictions or repeat of the misconduct, the training undertaken and the references provided, Mr Ejiofor submitted that he had evidenced his rehabilitation and that he no longer posed any risk to the public or the reputation of the profession.
18. The restrictions had been in place for over seven years, relating to conduct that had taken place 10 years ago. The SRA opposed the application without taking proper account of what had happened since the Tribunal imposed the restrictions.
19. Mr Ejiofor's case was that the documentary evidence provided demonstrated his insight and rehabilitation such that the restrictions were no longer necessary. Accordingly, his application for removal of the restrictions should be granted.

The Respondent's Case

20. Ms Stevens submitted that the factors listed at paragraph 5 of the Tribunal's "*Guidance Note on other powers of the Tribunal – 7th Edition*", published in February 2025, were relevant when considering an application to remove or vary restrictions. In particular, the following factors are relevant to this application:
 - the seriousness and circumstances of the original breach or misconduct and the steps the Tribunal regards as being relevant in supporting an application;
 - evidence to establish any training undertaken by the applicant or that they have kept their legal knowledge up to date in their area of practice;
 - evidence of any employment together with safeguards and supervision which have been put in place by the applicant's employer or alternatively a stringent oversight of the applicant's potential employment together with third party risk and personal management arrangements to be put in place by a prospective employer;
 - evidence of genuine reformation of character of the applicant including evidence of insight into the nature and effects of the misconduct and steps taken by the applicant to ensure that the wrongdoing does not reoccur;
 - The length of time since the order was imposed;
 - whether there is any continuing risk to the public;
 - whether the public would not harbour concerns about the propriety of the applicant returning to unrestricted practice;

- evidence that the conditions have been complied with;
 - evidence that the applicant has paid (or tried to pay) any financial penalties;
 - character references; and
 - the regulator’s response to the application.
21. Ms Stevens submitted that the application was opposed and that, having heard Mr Ejiofor’s evidence, the SRA’s grounds for concern had increased.
22. On 16 May 2019, an Adjudicator found proved an allegation that Mr Ejiofor had failed to act in his client’s best interests and had breached Principles 2, 4 and 6 of the SRA Principles 2011 and had failed to achieve Outcomes 1.1, 1.6 and 1.13 of the SRA Code of Conduct 2011. Mr Ejiofor received a rebuke for this matter and was also required to pay a fine in the sum of £2,000 and costs in the sum of £1,350.
23. In his witness statement, Mr Ejiofor stated:
- “I also wish to respectfully mention that I have been a solicitor for more than 19 years and there has never been any other incident of such misconduct. I contend that I pose no risk to the public and/or to the reputation of the profession if the restrictions are removed”*
24. Mr Ejiofor did not mention the Adjudicator’s decision in his application. When asked in cross-examination about this omission, Mr Ejiofor stated that he did not consider that matter to be relevant to the Tribunal’s determination of the application, as it did not form part of the Tribunal’s consideration when it imposed the restrictions.
25. With regard to the seriousness of the original matter, Ms Stevens reminded the Tribunal that Mr Ejiofor had admitted that his conduct had been reckless and that the Tribunal had found *“that this was a case where there were several blatant indicators of potential money laundering”*. Further, the Tribunal had stated:
- “The Tribunal considered that there had been recklessness of a high degree. As each indicator of money laundering presented itself the Respondent ploughed on and did nothing to guard against the risk”*
26. The Tribunal had assessed Mr Ejiofor’s culpability as high and that, having exposed his firm to the risk of his client account being abused for money laundering purposes, his conduct had the potential to cause significant damage to public confidence in the reputation of the profession.
27. With regards to the training that Mr Ejiofor had undertaken, Ms Stevens noted that he had completed nine courses over a 12 month period, with seven of those courses having been completed over three days. The concerns in relation to his training were increased given his oral evidence. There was little evidence of the sort of insight and knowledge the Tribunal would expect given its findings. The matters prayed in aid by Mr Ejiofor were so elementary that they did not reflect the type of knowledge required to demonstrate that Mr Ejiofor had learnt from his previous misconduct.

28. Ms Stevens submitted that Mr Ejiofor had failed to provide any detail of what the courses he had undertaken covered. In evidence, Mr Ejiofor stated that he had received no guidance or assistance as to what was required in support of his application. Ms Stevens noted that the Authorised Officer's decision dated 8 July 2025 for grant of a practising certificate, stated:

“It would be expected that an individual wishing to demonstrate a continuing and on ongoing commitment to updating and improving their knowledge and regulatory awareness would be undertaking courses on a regular basis over a significant period of time and would be able to provide evidence of such ... Undertaking five courses on one day also raises questions as to exactly what benefit could be gained from them without been supplied with significantly more detailed information. There has been no information provided as to what those courses covered (apart from the course title), what their structure was, course material provided, how they were undertaken and what was learnt from them.”

29. Mr Ejiofor confirmed that he had read this, but that it was *“all subjective stuff”*. Further, that this was unhelpful as it did not define terms such as *“a regular basis”* or *“a significant period”*. Those assertions, it was submitted, were indicative of Mr Ejiofor's trivialisation of important factors and demonstrated a lack of insight and remorse.
30. The references relied upon were also insufficient as they did not address how risks related to Mr Ejiofor would be managed if the restrictions were removed. Mr Ejiofor had relied on the evidence of Mr Andrew Otchie, counsel of 12 Old Square Chambers, who had worked with Mr Ejiofor on a number of complex cases and considered him to be a *“well informed, conscientious and organised Solicitor”* and *“an asset to the legal profession”*. However, Mr Otchie confirmed that he had not read any of the documents in the matter save for what appeared on the SRA's website and that he had not read the Tribunal's judgment which determined that the restrictions were necessary. Whilst he knew of the Tribunal's decision and the Adjudicator's decision, he was not aware of the details of either. Mr Otchie also confirmed that he was not present when Mr Ejiofor was undertaking initial money laundering checks with new clients.
31. Ms Stevens submitted that in the circumstances, Mr Otchie was not qualified to make a proper assessment of risk. Although the SRA previously raised concerns that Mr Ejiofor's references lacked evidence of his rehabilitation and oversight of his work, he did not address these issues and instead relied on a barrister, whom he continued to instruct, to provide evidence of his rehabilitation.
32. Ms Stevens submitted that whilst it had been some time since the restrictions were imposed, the Tribunal was required to examine how Mr Ejiofor had utilised that time. He had failed, it was submitted, to evidence that he had utilised that time in rehabilitation and had failed to demonstrate that he had learnt from his misconduct.
33. With regard to his financial detriment as a result of the restrictions, Mr Ejiofor had provided no evidence that his financial difficulties arose from the restrictions. Much of his financial hardship flowed from his obligation to pay the fines, costs and reimbursing the compensation fund for his misconduct.

34. Ms Stevens submitted that in all the circumstances, any variation or removal of the restrictions would cause harm to the public and the reputation of the profession, Accordingly, the restrictions remained necessary.

The Tribunal's Decision

35. The Tribunal noted that restricted practice will be ordered only if it is necessary to ensure the protection of the public and the reputation of the legal profession from future harm by a solicitor. Accordingly, when considering any application to remove or vary a restriction, the Tribunal will assess whether the restriction remains necessary for those purposes. Whilst the factors contained in its Guidance Note on Other Powers might assist the Tribunal in that determination, it was not necessary for an applicant to comply with those factors to demonstrate that the restriction was no longer necessary.
36. The Tribunal did not consider that the application was premature in terms of the time that had elapsed since the restrictions had been imposed. The Tribunal agreed with Mr Ejiofor that it was important to consider what had occurred since the imposition of the restrictions.
37. The Tribunal was not satisfied that Mr Ejiofor had demonstrated adequate learning from his training. The Tribunal had asked questions about what he had learnt and how he would do things differently. In his evidence, Mr Ejiofor had stated that he would look for "*red flags*". However, when asked what a red flag would be, he was only able to identify "*a delay in providing requested ID documents, a sudden change of instructions, a failure to provide ID on an ID check*". When asked what he would do, Mr Ejiofor stated that he "*might request an in person meeting if the ID checks were online or via email*". When asked whether, following his training, he had undertaken a due diligence review on any pre-existing matters, Mr Ejiofor confirmed that he had not.
38. The answers provided did not, the Tribunal found, demonstrate that Mr Ejiofor had anything other than a rudimentary knowledge of what was required of him. Further, his answers did not evidence that his knowledge of anti-money laundering requirements was sufficient to reduce the risk of repeated misconduct.
39. Additionally, Mr Ejiofor had failed to provide any detail of the content of the courses he had undertaken. In order to be satisfied that Mr Ejiofor had learnt from his training, the Tribunal felt he could have provided more substance as regards his learning, rather than simply providing certificates to demonstrate attendance on courses. Mr Ejiofor asserted that he would do things differently following his training but was unable satisfactorily to demonstrate how he would do so, or what knowledge he had acquired to enable this.
40. Mr Ejiofor asserted that he was given no guidance as to the type of evidence required. The Tribunal did not accept that assertion. The Adjudicator's decision of 8 July 2025 on granting a practising certificate was clear as to the type of evidence it would expect to see. The Tribunal did not accept that Mr Ejiofor did not understand terms such as "*a regular basis*" or "*a significant period*".
41. The Tribunal found that Mr Ejiofor had failed adequately to demonstrate that the training undertaken by him evidenced insight and rehabilitation or that he was

knowledgeable of anti-money laundering regulations, such that the restrictions on his practice were no longer necessary.

42. The Tribunal considered the references provided by Mr Ejiofor in support of his application. The reference from his current employer attested to his honesty and integrity and confirmed that he had not acted in breach of the restrictions. It stated that the firm did not believe there would be any issues if the restrictions were removed, but did not state why. Nor did it state what safeguards would be put in place were the restrictions to be removed. Whilst the reference from Eden Vale Solicitors was more detailed, it had similarly failed to address any safeguards, supervision or oversight of Mr Ejiofor's work if the restrictions were to be removed. The Tribunal also noted that neither reference referred to the Adjudication matter in 2019. Accordingly, the Tribunal was not persuaded by the written references.
43. The Tribunal did not find the oral evidence of Mr Otchie to be material to its considerations. Given his role as instructed counsel and following general conversations with Mr Ejiofor in relation to his misconduct, the Tribunal was not satisfied that Mr Otchie was in a position to assess whether Mr Ejiofor posed an ongoing risk. Mr Otchie had confirmed that he had not read the Tribunal's judgment and thus was not fully acquainted with the facts and full reasons for the Tribunal's determination.
44. Again, the decision of 8 July 2025 had identified the deficiencies in the references . Mr Ejiofor had done nothing to remedy these deficiencies before the hearing.
45. Mr Ejiofor had failed, in his documentary evidence, to inform the Tribunal of the Adjudication matter in 2019. It was his case that this was not relevant to the Tribunal's determination, as the misconduct was not related to the matters for which the restrictions were imposed. The Tribunal disagreed. In determining whether the conditions remained necessary, the Tribunal would take into account an applicant's regulatory record from the date of the imposition of the restrictions. Mr Ejiofor's assertion that as this was not a relevant matter, as it was not in the contemplation of the Tribunal when it imposed the restrictions, was of concern to the Tribunal and further evidenced Mr Ejiofor's lack of insight.
46. Mr Ejiofor asserted that he did not intend to take up any of the roles or responsibilities from which he was currently restricted. That assertion, it was found, was not enough to negate the necessity of the restrictions.
47. Mr Ejiofor had referred to the extreme financial hardship being caused by the restrictions. The Tribunal found that he had provided no evidence to support that assertion; for example, there were no letters from any prospective employers stating that but for the restrictions, they would have offered Mr Ejiofor employment. Nor was there any evidence from his current employer to that effect.
48. For the reasons detailed above, the Tribunal was not satisfied that Mr Ejiofor had evidenced that the restrictions were no longer necessary in order to protect the public and the reputation of the profession. Accordingly, the application to remove the restrictions was refused.

Costs

49. Ms Stevens applied for costs in sum of £6,048.20. The SRA was a necessary party to the application which it had successfully resisted. Costs should follow the event. Ms Stevens noted that it was Mr Ejiofor's choice to bring the application, and notwithstanding the information contained in the 8 July 2025 decision, he had chosen not to remedy the defects that were detailed in that decision.
50. Mr Fazli submitted that the costs sought were excessive. The Respondent's proposition that the application was premature was misconceived given the time that has elapsed since the original order. The application was well intentioned and had been properly brought. In illustration of the excessive costs, Mr Fazli submitted that his costs were £2,940 inclusive of VAT. Ordinarily the Applicant's costs in bringing proceedings would be higher than the Respondent's, whereas in this matter, the Respondent was claiming double the Applicant's costs.
51. With regard to Mr Ejiofor's ability to pay any costs order, he was already paying fines and costs arising out of the previous proceedings, the adjudication and the reimbursement of the compensation fund. Part of the reason for the application was to enable Mr Ejiofor to obtain paid employment or better consultancy work. His ability to pay was significantly hampered and thus the Tribunal should make no order as to costs.
52. Ms Stevens submitted that this was a surprising objection. The standard position was that costs followed the event. Mr Ejiofor had chosen to bring the application and to maintain it. As regards the level of his costs, Mr Fazli had referred to his costs, however he did not prepare the bundle, nor was he involved in any of the redactions. Mr Ejiofor had referred to documents that he wished to be added to the bundle, but had not provided any of that documentation. Instead, the SRA had to obtain and provide those documents.
53. Mr Fazli had been instructed late and had not been involved in any of the correspondence. The SRA had been working on the matter for some considerable time including undertaking work that should have been undertaken by Mr Ejiofor. The costs claimed were not unreasonable with regards to the hourly rate or the amount claimed.
54. The Tribunal examined the costs schedule with care. The Tribunal was satisfied that the costs claimed were reasonable and proportionate, both in relation to the hourly rates charged and the hours claimed. The Tribunal agreed that a comparison between the costs charged by the parties was unhelpful in circumstances where Mr Fazli had been instructed late in the proceedings and not been involved in the preparation of the proceedings. Further, the costs he claimed as counsel were not dissimilar to the costs claimed by Ms Stevens.
55. Whilst Mr Ejiofor asserted that he was in financial difficulty, he had failed to provide any evidence in support of that contention. In the absence of any clear evidence to the contrary, the Tribunal determined that the Respondent was entitled to its costs. Accordingly, the Tribunal ordered Mr Ejiofor to pay costs in full.

Statement of Full Order

56. The Tribunal ORDERED that the application of LEONARD AGULANNAH EJIJOFOR, for the removal of the conditions imposed by the Tribunal on 3 January 2018 be **REFUSED** and it further Ordered that the Applicant do pay the costs of the response of the Solicitors Regulation Authority Ltd to this application fixed in the sum of £6,048.20.

Dated this 1st day of October 2025
On behalf of the Tribunal

J. Abramson

J. Abramson
Chair