SOLICITORS DISCIPLINARY TRIBUNAL

IN THE MATTER OF THE SOLICITORS ACT 1974 Case No: 12840-2025

BETWEEN:

SOLICITORS REGULATION AUTHORITY LTD. Applicant

and

RANJADAYALINI KULASEGARAM Respondent

Before:

Ms H Hasan (in the Chair)
Ms O Davies
Ms E Keen

Date of Hearing: 15 October 2026

Appearances

Delme Griffiths, solicitor, Blake Morgan LLP, One Central Square, Cardiff, CF10 1FS (instructed by the Applicant).

Susanna Heley, solicitor, Russell Cooke Solicitors, 8 Bedford Row, London WC1R 4BX (instructed by the Respondent).

JUDGMENT ON AN AGREED OUTCOME

Allegations

1. The allegations against the Fourth Respondent ("the Respondent") within the Amended Rule 12 Statement are that whilst a director, manager, COLP and COFA of the Firm between 16 August 2022 and 5 December 2022:

Allegation 6.4

Between 16 August 2022 and 5 December 2022, as COFA of the Firm in accordance with paragraph 9.2 of the SRA Code of Conduct for Firms, Ranjadayalini Kulasegaram failed to take all reasonable steps to ensure that the Firm, its managers and employees complied with their obligations under the SRA Accounts Rules, specifically Rules 8.1, 8.2, 8.3 and 8.4, and thereby breached any or all of:

6.4.1 Principles 2 and 5 of the SRA Principles 2019; and

6.4.2 Paragraphs 4.2 and 7.2 of the Code of Conduct.

Allegation 6.6

Between 16 August 2022 and 5 December 2022 as COLP of the Firm in accordance with paragraph 9.1 of the SRA Code of Conduct for Firms Ranjadayalini Kulasegaram failed to take all reasonable steps to ensure that the Firm, its managers and employees complied with their obligations under the SRA Code of Conduct for Firms, in particular paragraphs 4.3 and 4.4 (competence and supervision of employees), and thereby breached any or all of:

6.6.1 Principles 2 and 5 of the SRA Principles 2019; and

6.6.2 Paragraphs 3.5, 3.6 and 7.2 of the Code of Conduct.

Documents

2. The Tribunal considered all the documents in the case which were contained in the case electronic bundle including the following:

(a) the Respondent's Answer to the Rule 12 Statement dated 12 November 2025.

(b) the Amended Rule 12 Statement dated 12 September 2025 filed with the tribunal on 11 September 2026.

(c) the Statement of the Applicant pursuant to Rule 14 dated 11 September 2026.

(d) the Statement of Agreed Facts and Outcome dated 14 October 2026.

Application Pursuant to Rule 25(1) SDPR 2019

3. The Tribunal considered the parties' application for permission to consider, out of time, the Statement of the Agreed Facts and Outcome pursuant to Rule 25(1) of the Solicitors (Disciplinary Proceedings) Rules 2019, and the reasons set out in the Application.

4. The proceedings were brought by the Applicant against four Respondents, of whom Ranjadayalini Kulasegaram was the Fourth Respondent. The substantive proceedings were listed for hearing commencing on 19 October 2026.

5. Following a review of the case by the Applicant, the Rule 12 Statement was amended at a Case Management Hearing on 16 September 2026. A number of the allegations against the Fourth Respondent were withdrawn, leaving allegations 6.4 and 6.6. The effect was materially to narrow the case which she faced. Following those amendments, discussions took place between the Applicant and the Fourth Respondent which resulted in the Proposal for Agreed Outcome presently before the Tribunal.

6. Having considered the reasons advanced by the parties and having regard to the overriding objective, the Tribunal was satisfied that there was a proper basis for the Proposal having been brought at this stage of the proceedings and that it was appropriate in all the circumstances to exercise its discretion pursuant to Rule 25(1) and permit the Proposal to be considered.

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

7. 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.

Findings of Fact and Law

8. The Applicant was required to prove the allegations on the balance of probabilities. The Tribunal had due regard to its statutory duty, under section 6 of the Human Rights Act 1998.

9. The Tribunal reviewed all the material before it and was satisfied on the balance of probabilities that the Respondent's admissions were properly made.

10. Accordingly, the Tribunal found allegations 6.4 and 6.6 proved on the basis of the Respondent's admissions and the facts set out in the Statement of Agreed Facts and Outcome.

Sanction

11. The Tribunal considered the Guidance Note on Sanctions (11th Edition, February 2025) and the proper approach to sanctions as set out in *Fuglers and others v SRA* [2014] EWHC 179 (Admin). The Tribunal's principal purpose when considering sanction was the need to maintain public confidence in the integrity of the profession.

12. In determining sanction, the Tribunal's role was to assess the seriousness of the proven misconduct and to impose a sanction that was fair and proportionate in all the circumstances. In determining the seriousness of the misconduct, the Tribunal was to consider the Respondent's culpability and harm identified together with the aggravating and mitigating factors that existed.

13. In assessing culpability, the Tribunal took into account that the Respondent was an experienced solicitor and held the positions of COLP and COFA. Those roles carried significant responsibilities for the management, supervision, and regulatory compliance of the firm. The misconduct arose from failures in the discharge of those responsibilities and continued over a period of time. The Tribunal considered that the Respondent's culpability was therefore significant.

14. In assessing harm, the Tribunal considered that the Respondent's failures exposed clients and the public to the risks associated with inadequate systems of supervision and regulatory oversight. The misconduct also had the potential to damage public confidence in the profession and in the effectiveness of the regulatory arrangements intended to protect clients.

15. The Tribunal was satisfied that the sanction and restriction ultimately agreed between the parties were fair and proportionate and adequately protected the public and the reputation of the profession. The Tribunal therefore approved the Agreed Outcome.

Costs

16. The Applicant and the Respondent agreed costs in the sum of £7,500.00. Accordingly, the Tribunal was satisfied that costs in the sum of £7,500.00 were reasonable and proportionate in all the circumstances.

Statement of Full Order

17. The Tribunal ORDERED that the Respondent, RANJADAYALINI KULASEGARAM, solicitor, be suspended from practice as a solicitor for a period of six months to commence on 15 October 2026.

    The Tribunal further ORDERED that, upon the expiry of that period of suspension, the Respondent shall not, for a period of 18 months, be permitted to act as a Manager, Compliance Officer for Legal Practice ("COLP") or Compliance Officer for Finance and Administration ("COFA") of any authorised body.

    The Tribunal further ORDERED that the Respondent do pay the costs of and incidental to these proceedings, such costs being summarily assessed and fixed in the sum of £7,500**.**

Dated this 4th day of November 2026
On behalf of the Tribunal

H. Hasan

H. Hasan
Chair

BEFORE THE SOLICITORS DISCIPLINARY TRIBUNAL **Case No: 12840-2025**

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

AND IN THE MATTER OF:

SOLICITORS REGULATION AUTHORITY LIMITED

Applicant

and

JASMIN SABRINA KHAN

First Respondent

and

ADIEL CHOWDHRY

Second Respondent

and

TEHMINA HUSSAIN MALIK

Third Respondent

and

RANJADAYALINI KULASEGARAM

Fourth Respondent

STATEMENT OF AGREED FACTS AND PROPOSED OUTCOME IN RESPECT OF THE FOURTH RESPONDENT ("AOP")

By its application dated 12 September 2025, which included a statement pursuant to Rule 12(2) of the Solicitors (Disciplinary Proceedings) Rules 2019 ("the SDPR"), as amended per Rules 14 (on 11 September 2026) and 24 (on 16 September 2026) of the SDPR ("the Amended Rule 12 Statement"), the Solicitors Regulation Authority Limited ("the SRA") brought proceedings before the Solicitors Disciplinary Tribunal ("the Tribunal") against four respondents, including Ms Ranjadayalini Kulasegaram ("the Fourth Respondent"), as arising from the SRA regulated firm of Crimson Phoenix Solicitors Ltd ("the Firm")

The allegations

1. The allegations against the Fourth Respondent, made by the SRA within the Amended Rule 12 Statement, are that:

   Whilst a director, manager, COLP and COFA of the Firm between 16 August 2022 and 5 December 2022:

Allegation 6.4

6.4. Between 16 August 2022 and 5 December 2022, as COFA of the Firm, in accordance with paragraph 9.2 of the SRA Code of Conduct for Firms, Ranjadayalini Kulasegaram failed to take all reasonable steps to ensure that the Firm, its managers, and employees, complied with its obligations under the SRA Accounts Rules, specifically Rules 8.1, 8.2, 8.3 and 8.4 and thereby breached any or all of:

6.4.1. Principles 2 and 5 of the SRA Principles 2019; and

6.4.2. Paragraphs 4.2 and 7.2 of the Code of Conduct.

Allegation 6.6

6.6. Between 16 August 2022 and 5 December 2022, as COLP of the Firm, in accordance with paragraph 9.1 of the SRA Code of Conduct for Firms, Ranjadayalini Kulasegaram failed to take all reasonable steps to ensure that the Firm, its managers, and employees, complied with its obligations under the SRA Code of Conduct for Firms, in particular paragraphs 4.3 and 4.4 (competence and supervision of employees) and thereby breached any or all of:

6.6.1. Principles 2 and 5 of the SRA Principles 2019; and

6.6.2. Paragraphs 3.5, 3.6 and 7.2 of the Code of Conduct.

2. The Fourth Respondent, represented by Russell Cooke LLP, admits allegations 6.4 and 6.6, as set out at paragraph one of this AOP.

Agreed Facts

3. The following facts and matters, which are relied upon by the SRA in support of the allegations set at paragraph one of this AOP, are agreed between the SRA and the Respondent:

The Fourth Respondent

3.1. The Fourth Respondent was admitted as a solicitor on 15 October 1992. She does not have a current practising certificate. She was the sole practitioner, principal, COLP and COFA of the sole practice of Crimson Phoenix Solicitors ("the Sole Practice"). She was the person with significant control of the Firm from its incorporation on 10 June 2022 until 5 October 2022. She was a director of the Firm from 10 June 2022 to 1 November 2022. Her letter of resignation, dated 1 November 2022, was stated to take effect immediately. Companies House records indicate that she resigned on 8 December 2022. The Fourth Respondent was also the COLP and COFA of the Firm from 16 August 2022 to 5 December 2022.

Summary of case concerning Fourth Respondent

3.2. The case concerning the Fourth Respondent centres on her time as the COLP and COFA of the Firm from 16 August 2022 until 5 December 2022, and her failure by omission regarding the Firm's compliance with the SRA Accounts Rules and in respect of the lack of supervision. The Fourth Respondent's conduct lacked integrity and failed to uphold public trust and confidence in the profession.

3.3. As is clear from the Amended Rule 12 Statement, it is not alleged that the Fourth Respondent had any knowledge of, or deliberate involvement in, the case concerning the 32 improper transactions, any fraud, or the concealment from the SRA of the true ownership structure of the Firm.

Allegation 6.4 / SRA Accounts Rules based on COFA role

3.4. Noting the Firm was authorised by the SRA on 16 August 2022, the Firm had a duty to comply with the SRA Accounts Rules 2019. Rules 8.1 to 8.4 of the SRA Accounts Rules 2019 state the Firm had to:

3.4.1. Keep accurate, contemporaneous, and chronological records to track

payments and transactions in respect of the client account at the Firm;

3.4.2. Obtain bank statements for all Firm client and business accounts held by the Firm at least every five weeks;

3.4.3. Complete a reconciliation process of the client account balance against the client account ledger and investigate / resolve any differences; and

3.4.4. Keep a central record of bills / other written notification of costs.

3.5. These are fundamental standards against which firms must operate, but they are also basic requirements which may reasonably be expected of any responsible business where client money is being handled and disbursed. They provide the necessary structure against which the Firm would be able to operate with transparency and accountability. The act of implementing such a system is important as it allows the flow of client money held by a firm to be checked and monitored, and any difficulties to be quickly identified and put right.

3.6. As part of the Forensic Investigation ("FI") conducted by the Applicant, the Firm was required to provide its accounting records for inspection. The Interim FI Report of 13 March 2023, and the FI Report of 23 June 2023 both noted the absence of any relevant records being presented to the FI, and since the conclusion of the FI no such records have been presented to the Applicant. The inference from the absence of evidence is that the Firm kept *none* of the records required under Rules 8.1 to 8.4 of the SRA Accounts Rules 2019.

3.7. As stated above in terms of the duties of the manager, COLP and COFA roles:

3.7.1. As a director of the Firm, she fell within the definition of a manager of the Firm, and thus had a responsibility for compliance by the Firm with the SRA Code of Conduct for Firms, per paragraph 8.1 of the SRA Code of Conduct for Firms;

3.7.2. As COLP of the Firm, she held the duty to take all reasonable steps to ensure compliance with the SRA's regulatory arrangements, which include the SRA Code of Conduct for Firms; and

3.7.3. As COFA, per paragraph 9.2(a) of the SRA Code of Conduct for Firms, she

had a personal duty to take all reasonable steps to ensure that the Firm complied with the SRA Accounts Rules.

3.8. The Fourth Respondent stated as part of the FI that she did not believe that any work was being carried out and thought that no money was therefore passing through the Firm's accounts.

3.9. The Fourth Respondent did not keep and maintain any accounting records for the period while she was COFA, as required by Rules 8.1 of the SRA Accounts Rules, nor did she take steps to cause, direct, or verify that any other person (including the bookkeeper she says had been or was in the process of being engaged) maintained such records on the Firm's behalf. Notwithstanding that she was an initial signatory on the client account and could, on her own admission, have attended the Firm's bank in person to check the account balances and transactions, had she chosen to do so, she did not obtain bank statements for the client and office accounts or otherwise attend the bank or make any enquiry of it in breach of Rule 8.2 of the SRA Accounts Rules.

3.10. She undertook no reconciliations of the client account between 2 November 2022 and 5 December 2022 (as required by Rule 8.3 of the SRA Accounts Rules). She made no checks of banking records or accounts and had no awareness of what was happening in the Firm. This is not compliance with her duties as COLP and COFA.

3.11. On 11 October 2022, the Fourth Respondent sent a WhatsApp message to the Second Respondent stating, "I am not taking any new matters until these issues are resolved. Please do not take any new matters until the new COLP and COFA are approved," to which the First Respondent responded "noted" and the Second Respondent responded "ok". Notwithstanding this request, and notwithstanding her own recognition that there were unresolved issues at the Firm, she took no steps to verify that no new matters were in fact being taken on, or to check the state of the client account, whether by reviewing bank statements, attending the bank, or otherwise. Money was subsequently received into and paid from the client account after that date.

3.12. Nor did the Fourth Respondent keep, or take steps to ensure the Firm kept, a readily accessible central record of bills or other written notifications of costs given to clients, in breach of Rule 8.4 of the SRA Accounts Rules.

3.13. The Fourth Respondent, as COFA of the firm, until 5 December 2022, had a personal

duty per paragraph 9.2(a) of the Code of Conduct for Firms, to take all reasonable steps to ensure that the firm complied with the obligations imposed under the SRA Accounts Rules, including the obligation under Rule 8.1 to keep and maintain accurate, contemporaneous and chronological accounting records.

3.14. Despite her experience and senior positions at the Firm, the Fourth Respondent showed no inclination or commitment to actively take control of the accounts management and consequently she failed to take reasonable steps to ensure the Firm complied with Rules 8.1, 8.2, 8.3 and 8.4 of the SRA Accounts Rules.

3.15. The absence of a system of compliance to ensure the Firm met its obligations under the SRA Accounts Rules, which the Fourth Respondent had failed to take reasonable steps to ensure during her tenure as COFA, increased the level of risk posed to client money and subsequently made the Firm vulnerable to the actions of the First, Second and Third Respondents.

3.16. The failures by the Fourth Respondent posed a significant risk to genuine clients. Notwithstanding the request she made on 11 October 2022 that no new client matters be accepted, she did not verify that this request was followed, or that the issues she had identified had been resolved. This conduct demonstrates a clear failure by the Fourth Respondent to act with integrity.

3.17. By failing to fulfil her duties as COLP, COFA and (until 1 November 2022) manager of the firm, the Fourth Respondent has breached Principle 2. The public would expect a manager and compliance officer at the firm, who is tasked with important obligations and responsibilities, to fulfil them.

3.18. The public expects a solicitor in the Fourth Respondent's position of seniority to take all steps to ensure that the firm and those who worked there were complying with the SRA's Standards and Regulations, Principles and Accounts Rules. By taking no more than superficial steps to address the concerns that she had identified, she contributed to a situation which allowed the payments that were being made, without her knowledge, to go unchallenged. The public expects a solicitor in the Fourth Respondent's position and with her level of experience, to have taken a position of control. Members of the public expect solicitors to protect client money and assets and the failure to do so damages public trust and confidence in the solicitors profession.

3.19. The Fourth Respondent's omissions further amount to a breach of Paragraph 4.2 of the

Code of Conduct for Solicitors, RELs, RFLs and RSLs 2019, in that client money passing through the Firm's client account, including the sums subsequently misappropriated, was left unprotected and unmonitored throughout her tenure as COFA.

3.20. Paragraph 7.2 of the Code of Conduct requires the Fourth Respondent to be able to justify her decisions and actions as demonstrating compliance with her regulatory obligations. Notwithstanding her status as an initial signatory to the Firm's client account, the Fourth Respondent omitted to obtain online banking access or request bank statements, relying instead solely on assurances from the First and Second Respondents that no work was being undertaken. That reliance, unsupported by any independent verification, does not justify her decision not to exercise the means of oversight available to her, and accordingly she breached paragraph 7.2 of the Code of Conduct.

Allegation 6.6 / Supervision breaches based on COLP role

3.21. After being authorised by the SRA on 16 August 2022, the Firm had a duty to comply with the SRA Code of Conduct for Firms 2019. Paragraphs 4.3 and 4.4 detail the requirements to supervise and ensure managers and employees of the Firm were competent to practice and understood their legal, ethical and regulatory obligations, and that there is an effective system to supervise clients' matters.

3.22. There was no structure in place to support employees or client matters, particularly in respect of an unqualified person at the Firm who was to have a significant role in respect of the transactions concerning properties A to E inclusive. Ms S, was brought into the Firm by the First Respondent, but there is no evidence to suggest that there was a supervision system in place to effectively supervise her, as a non-solicitor, nor the client matters she worked on.

3.23. When the First Respondent introduced Ms S to the Firm, the Firm was provided with a driving licence and utility bill which purportedly confirmed her identity, although it is unclear as to who provided those documents to the Firm. It is noted that the first name and the surname for Ms S on the driving licence are the wrong way around (the surname was in the first name section and the first name was in the surname section). A curriculum vitae ("CV") provided to the Applicant relating to Ms S stated she had worked at one other regulated solicitor's firm from January 2019 to July 2021.

According to the CV, Ms S had no experience of conducting conveyancing transactions. The CV gave no assurance that she had the relevant experience to conduct conveyancing transactions with minimal or no supervision. No steps were taken to check that Ms S had knowledge and experience in conveyancing matters.

3.24. The majority of the work was purportedly undertaken by Ms S but none of the solicitors at the firm supervised her. Aside from the specific example of Ms S, there is no evidence of a supervision structure for employees or matters at the Firm.

3.25. Despite knowing that the individual known as Ms S was carrying out conveyancing work at the Firm and/or playing a role in the operation of the firm, there is no evidence that the Fourth Respondent undertook any checks in relation to her background or experience or to ascertain precisely what work she would be dealing with. She did not seek references from Ms S' previous employers and did not check discrepancies in the documents relating to Ms S.

3.26. In relation to the involvement of Ms S, the Fourth Respondent stated she had '*no idea*' when she joined and that she knew she was working for them but *'not legally'*. The Fourth Respondent said that '*I don't know this lady and I don't want her to do any work without my supervision in the company'*.

3.27. Despite this, the Fourth Respondent failed to ascertain on what basis Ms S was working at the firm, what work she was doing, her levels of competence and experience, work history or to ensure that she was properly supervised. She stated that she never met or spoke with Ms S, who had no legal qualifications or any knowledge of the work being done. Her engagement with the Firm during her tenure as COLP was, on her own account, limited to weekly visits. On 23 November 2022, she transferred conduct of the Property C transaction, a matter of around £2 million in value, which she had personally conducted, to Ms S; she accepted in interview that she should have carried out due diligence on Ms S before doing so.

3.28. The Fourth Respondent started dealing with the sale of properties in the Property C matter on or around 19 July 2022. She told the FI that, when in the office together, the First Respondent stated that her friend, Client C, wanted to sell some flats or houses and wanted them to do this work. For some reason this had gone to Ms S at another company. The First Respondent asked the Fourth Respondent to deal with it and the matter would be transferred to the Firm once it was up and running.

3.29. The Fourth Respondent therefore dealt with the file under her sole practice and started

corresponding with the Wilkes Partnership, the solicitors on the other side. No one had done any work on the matter prior to this.

3.30. On 22 November 2022, the Fourth Respondent says she was asked by the Second Respondent to transfer the file to Ms S and she received the client's letter of authority to do so. The Second Respondent told her to give a USB thumb drive containing the electronic file to the First Respondent and she would upload everything on the system.

3.31. On 23 November 2022 the Fourth Respondent sent an email to the Wilkes Partnership to advise that she was no longer acting for Client C under the sole practice and that all future correspondence was to be forwarded to Ms S at the Firm. By this time, the sole practice had ceased to be an authorised body.

3.32. The Fourth Respondent was asked to comment on the fact that she was transferring a file to Ms S, a person she had never met, knew nothing about and had done no due diligence in respect of. The Fourth Respondent agreed that she should have done her own due diligence and had failed to check things out properly before passing on the file. The Fourth Respondent had already resigned as a director of the Firm by this time and the sole practice was no longer authorised.

3.33. Paragraphs 3.5 and 3.6 of the Code of Conduct require a solicitor who supervises or manages others providing legal services to remain accountable for their work, effectively supervise it, and ensure they are competent to carry out their role. The Fourth Respondent permitted Ms S to carry out conveyancing work, specifically the Property C transaction, without any assessment of her competence and without the supervision the Fourth Respondent had herself identified as necessary between 23 November and 5 December 2022.

3.34. Paragraph 7.2 of the Code of Conduct requires the Fourth Respondent to be able to justify her decisions and actions as demonstrating compliance with her regulatory obligations. On 23 November 2022, she acquiesced to the instruction to transfer conduct of the Property C transaction to Ms S, an individual she had expressly stated should not do any work without her supervision. When asked in interview to justify that decision, she accepted she should have carried out due diligence on Ms S before doing so and had failed to check things out properly. That decision, and her inability to justify it, constitutes a breach of paragraph 7.2 of the Code of Conduct.

3.35. A solicitor acting with integrity should have ensured that proper arrangements were in place for adequate supervision of staff and that the firm had an effective system for

supervising client matters and conveyancing transactions. The Fourth Respondent allowed a situation to exist at the firm where work was being undertaken by non-authorised persons with wholly inadequate qualifications or little or no experience in conveyancing matters, with no supervision. Had the Fourth Respondent acted with integrity she would have taken her own steps to ensure that she made herself aware of exactly what work was being undertaken at the firm and by whom.

3.36. The public expects members of the legal profession to ensure staff working at law firms are appropriately supervised, that firms have adequate systems in place for supervision of client matters, that staff are competent to carry out their roles and keep their professional knowledge and skills up to date. Her failings in respect of all of these matters mean that the Fourth Respondent's conduct has breached Principle 2.

Non-Agreed Mitigation

4. The following mitigation, which is neither agreed nor endorsed by the Applicant, is put forward by the Fourth Respondent:

4.1. The Fourth Respondent was able to demonstrate compliance by the sole practice with all relevant regulatory arrangements.

4.2. The Fourth Respondent believed that the Firm was dormant and undertaking only preparatory steps towards starting trading until a date on or around 17 November 2022. From that point, the Fourth Respondent believed that she held no further roles in the Firm due to information provided by others. She accepts that she did not verify the position directly with the SRA and was mistaken in that belief.

4.3. The Fourth Respondent believed, mistakenly, that she had no option but to transfer the Client C file at the combined instruction of the purported client and the Firm because the sole practice's authorisation had expired.

4.4. The Fourth Respondent's failures were of omission rather than commission.

4.5. The Fourth Respondent was misled by individuals at the Firm into believing that no work was being undertaken and that the client account was not in use during her tenure with the Firm. She accepts that she did not independently verify that position and that she was mistaken in that belief.

4.6. The Fourth Respondent acted honestly but naively in connection with the sale of her

business and deeply regrets that her actions contributed to a situation in which a significant fraud was able to be carried out.

Sanction proposed and Costs

5. It is proposed that the Fourth Respondent should be suspended from practice for a period of three months.

6. Having considered the Fourth Respondent's financial circumstances as evidenced by her Statement of Means dated 24 September 2026, it is agreed that she should pay a contribution to the Applicant's costs of this matter in the sum of £7,500.00.

Explanation as to why such an order would be in accordance with the Tribunal's sanctions guidance(11th edition)

7. Having considered the Tribunal's Guidance Note on Sanctions (11th edition), the parties agree that, in view of the admitted lack of integrity and the consequential likelihood of a severe sanction per *Bolton v The Law Society [1994] 1 WLR 512*, the case has crossed the threshold of a suspension from practice, and three months is the appropriate tariff.

8. In terms of the extent of the Fourth Respondent's culpability for the admitted allegations, whilst it is accepted her misconduct is chiefly by way of omission and that she was not actively involved in the wider fraudulent behaviour at the Firm, it occurred during the period when she was the Firm's COLP and COFA, specific roles set up to ensure compliant practice, and designed to increase the level of protection for clients interacting with the Firm. Her leading role at the Firm placed her in a position of trust, in the context of her considerable years of experienced in the legal profession.

9. The Fourth Respondent's conduct had the impact of causing the level of risk in respect of client money to increase, given the lack of systems in place per the SRA Accounts Rules to protect the same. It allowed work at the Firm in a notably high risk and highly regulated area, conveyancing, to be completed by non-authorised persons without supervision, with the specific case of the Property C transaction and Ms S a significant and serious example.

10. It is noted the Fourth Respondent has admitted the conduct alleged, and that it occurred in the context of an otherwise long and previously unblemished legal career. In terms of

the ongoing risk, it is understood that the Fourth Respondent has retired from the legal profession, and that she does not currently have a practising certificate.

11. There is evidence to the effect the First and Second Respondents were untruthful to the Fourth Respondent, specifically in respect of the assurance provided that work was not being undertaken. But whilst it is fair to acknowledge the same, its impact as mitigation is tempered by the Fourth Respondent's omission to ensure she had a correct understanding of the position at the Firm, a duty she had to discharge whilst she was its COLP and COFA.

12. Therefore, considering the level of culpability and risk of harm, and balancing that against the mitigation, the parties agree that there is a clear need for the sake of the protection of the reputation of the legal progression, and to mitigate the level of risk posed by the Fourth Respondent, to suspend her from practise for three months. It is not stated that the threshold for an indefinite suspension or a striking off order has been passed in this matter.

13. In all the circumstances of the case, it is therefore proportionate and in the public interest that Ranjadayalini Kulasegaram should be suspended from practice for a period of three months, and ordered to pay a contribution to the Applicant's costs in the sum of £7,500.00.

..... Dated:

Stephen Parish
Senior Associate (FCILEx), Blake Morgan LLP
For and on behalf of the Applicant in these proceedings, the SRA

... Dated: 14-10-2026

Ranjadayalini Kulasegaram
Respondent in these proceedings