

SOLICITORS DISCIPLINARY TRIBUNAL

IN THE MATTER OF THE SOLICITORS ACT 1974

Case No. 12597-2024

BETWEEN:

SOLICITORS REGULATION AUTHORITY LTD

Applicant

and

CARTER DEVILE
(Recognised Body)

Respondent

Before:

Ms H Hasan (in the Chair)
Mrs F Kyriacou
Ms J Rowe

Date of Hearing: 27 October 2025

Appearances

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

JUDGMENT ON AN AGREED OUTCOME

Allegations

1. The Allegations made against the Respondent, Carter Devile (“the Firm”) made by the SRA, are that they:

1.1 From approximately 26 June 2017 to 21 January 2020, it failed to ensure that it had in place a **firm -wide** risk assessment, as required by Regulation 18(1) of the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (“the 2017 MLRs”), and in doing so:

In so far as the conduct took place before 25 November 2019, breached any or all of Principles 6, 7 and 8 of the 2011 Principles and failed to achieve Outcomes 7.2 and 7.5 of the 2011 Code.

In so far as the conduct took place on or after 25 November 2019, breached either or both of Principle 2 of the SRA Principles 2019 (“the 2019 Principles”) and Rule 2.1 of the SRA Code of Conduct for Firms 2019 (“the 2019 Code”).

1.2 From approximately **6 October 2022** to on or around 26 June 2017, it failed to establish or maintain appropriate and risk-sensitive policies and procedures, as required by Regulation 20(1) of the 2007 MLRs, and

In doing so breached any or all of Principles 6, 7 and 8 of the 2011 Principles and failed to achieve Outcomes 7.2 and 7.5 of the 2011 Code

1.3 For a **period** between approximately 26 June 2017 to February 2021, it failed to establish and maintain policies, controls and procedures to mitigate properly anti-money laundering risks, and in doing so:

In so far as the conduct took place before 25 November 2019, breached or failed to achieve any of all of Principles 6 and 8 of the 2011 Principles and Outcome 7.2 of the 2011 Code of Conduct.

In so far as the conduct took place on or after 25 November 2019, breached either or both of paragraph 2.1(a) of the SRA Code of Conduct for Firms (the Code for Firms) and Principle 2 of the SRA Principles 2019.

1.4 Between 5 January 2015 and 26 June 2017, it failed to take appropriate measures so that all relevant employees were regularly given training in how to recognise and deal with transactions and other activities which may be related to money laundering or terrorist financing, as required by Regulation 21(b) of the 2007 MLRs.

In doing so breached any or all of Principles 6, 7 and 8 of the 2011 Principles and failed to achieve Outcomes 7.2 and 7.5 of the 2011 Code.

1.5 From 26 June 2017 to on or around 21 February 2021, it failed to take appropriate measures to ensure that its relevant employees were regularly given training in how to recognise and deal with transactions and other activities or situations which may be related to money laundering or terrorist financing, as required by Regulation 24(1) of the 2017 MLRs, and in doing so:

In so far as the conduct took place before 25 November 2019, breached any or all of Principles 6, 7 and 8 of the 2011 Principles and failed to achieve Outcomes 7.2 and 7.5 of the 2011 Code.

In so far as the conduct took place on or after 25 November 2019, breached any or all of Principle 2 of the 2019 Principles and Rules 2.1a and 4.3 of the 2011 Code.

Documents

2. The Tribunal had before it the following documents:-
 - Rule 12 Statement and Exhibit LJF1 dated 30 April 2024;
 - The Respondent's Answer dated 3 July 2024;
 - Statement of Agreed Facts and Proposed Outcome dated 14 October 2025

Background

3. Proceedings were brought by the Applicant against the Respondent in these proceedings.
4. The Respondent was a recognised body with the SRA from 31 March 2009 until 13 October 2023. At the time of the Allegations, the Firm was managed by two Partners: the Respondent (Senior Partner and sole equity owner) and Ms Heather Mead. Ms Mead held the roles of Compliance Officer for Legal Practice ("COLP"), Compliance Officer for Finance and Administration ("COFA"), and Money Laundering Compliance Officer ("MLCO").
5. Following the sad passing of Ms Mead on Friday 13 October 2023, the Respondent ceased operating as an SRA-authorized partnership. The continuing practice of Carter Devile now trades as the recognised sole practice of Mr John Devile, with SRA authorisation transferred from the former partnership to the sole practice, effective from 13 October 2023.
6. The proceedings are brought against the Respondent on the basis that the Tribunal retains jurisdiction to sanction a former recognised body pursuant to Schedule 2 of the Administration of Justice Act 1985.

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 (11th edition, February 2025).

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. The Tribunal considered the Guidance Note on Sanctions. Having regard to all the circumstances, including the Respondent's limited personal culpability, his lack of direct involvement in the subject matter files, and his genuine belief that the Firm was compliant at the material time, the Tribunal determined that the level of seriousness and culpability was low. It was therefore satisfied that it would be unfair and disproportionate to impose a sanction and accordingly made No Order.

Costs

11. The parties had agreed costs in the sum of £5,000. The Tribunal found the agreed sum to be reasonable and proportionate. Accordingly, the Tribunal ordered the Respondent to pay costs in the agreed sum.

Statement of Full Order

12. The Tribunal makes NO ORDER in respect of the allegations against the Recognised Body CARTER DEVILE, of 592 Green Lane, Ilford, Essex, IG3 9SG. The Tribunal further Ordered that the Respondent pay the costs of and incidental to this application and enquiry fixed in the sum of £5,000.00.

DATED AND FILED WITH THE LAW SOCIETY

Dated this 4th day of November 2025

On behalf of the Tribunal

H Hasan

H Hasan

Chair

Clerks Note

The amendments highlighted in blue were made by the Clerk on 20 November 2025 in accordance with Rule 40(5) of the Solicitors (Disciplinary Proceedings) Rules 2019.

BEFORE THE SOLICITORS DISCIPLINARY TRIBUNAL
IN THE MATTER OF THE SOLICITORS ACT 1974 (as amended)
B E T W E E N:

Case No.: 12597-2024

SOLICITORS REGULATION AUTHORITY LIMITED

Applicant

and

REHANA SAEED
(SRA ID: 7534)

First Respondent

and

CARTER DEVILE
(SRA ID: 44747)

Second Respondent

STATEMENT OF AGREED FACTS AND OUTCOME FOR THE SECOND RESPONDENT

Introduction

1. By a statement made by Lyndsey Farrell on behalf of the Solicitors Regulatory Authority Limited ("the SRA") pursuant to Rule 12 of the Solicitors (Disciplinary Proceedings) Rules 2019, dated 30 April 2024, the SRA brought proceedings before the Tribunal making Allegations against the Second Respondent. Definitions and abbreviations used herein are those set out in the Rule 12 Statement. The Tribunal made Standard Directions on 8 May 2024, which were varied on 6 June 2024. Following the Case Management Hearing on 6 February 2025, the Substantive Hearing is currently fixed for 11 – 14 November 2025.
2. The Second Respondent, through Mr John Devile, is prepared to make admissions to all the Allegations it faces, including to breaches of all of the Principles and the specified Outcomes of the Codes of Conduct set out in the Allegations.

Admissions

3. The Second Respondent admits that:

- 2.1. From approximately 26 June 2017 to 21 January 2020, it failed to ensure that it had in place a firm-wide risk assessment, as required by Regulation 18(1) of The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 ("the 2017 MLRs"), and in doing so:*
In so far as the conduct took place before 25 November 2019, breached any or all of Principles 6, 7 and 8 of the 2011 Principles and failed to achieve Outcomes 7.2 and 7.5 of the 2011 Code
In so far as the conduct took place on or after 25 November 2019, breached either or both of Principle 2 of the SRA Principles 2019 ("the 2019 Principles") and Rule 2.1 of the SRA Code of Conduct for Firms 2019 ("the 2019 Code")
- 2.2. From approximately 6 October 2011 to on or around 26 June 2017, it failed to establish or maintain appropriate and risk-sensitive policies and procedures, as required by Regulation 20(1) of the 2007 MLRs, and in doing so breached any or all of Principles 6, 7 and 8 of the 2011 Principles and failed to achieve Outcomes 7.2 and 7.5 of the 2011 Code.*
- 2.3. For a period between approximately 26 June 2017 to February 2021, it failed to establish and maintain policies, controls and procedures to mitigate properly anti-money laundering risks, and in doing so:*
In so far as the conduct took place before 25 November 2019, breached or failed to achieve any of all of Principles 6 and 8 of the 2011 Principles and Outcome 7.2 of the 2011 Code of Conduct.
In so far as the conduct took place on or after 25 November 2019, breached either or both of paragraph 2.1(a) of the SRA Code of Conduct for Firms (the Code for Firms) and Principle 2 of the SRA Principles 2019.
- 2.4. Between 5 January 2015 and 26 June 2017, it failed to take appropriate measures so that all relevant employees were regularly given training in how to recognise and deal with transactions and other activities which may be related to money laundering or terrorist financing, as required by Regulation 21(b) of the 2007 MLRs,*

and in doing so breached any or all of Principles 6, 7 and 8 of the 2011 Principles and failed to achieve Outcomes 7.2 and 7.5 of the 2011 Code.

- 2.5. *From 26 June 2017 to on or around 21 February 2021, it failed to take appropriate measures to ensure that its relevant employees were regularly given training in how to recognise and deal with transactions and other activities or situations which may be related to money laundering or terrorist financing, as required by Regulation 24(1) of the 2017 MLRs, and in doing so:*
- In so far as the conduct took place before 25 November 2019, breached any or all of Principles 6, 7 and 8 of the 2011 Principles and failed to achieve Outcomes 7.2 and 7.5 of the 2011 Code*
- In so far as the conduct took place on or after 25 November 2019, breached any or all of Principle 2 of the 2019 Principles 2019 and Rules 2.1a and 4.3 of the 2019 Code.*

Agreed Facts

Second Respondent (and First Respondent)

5. The Second Respondent (SRA ID: 44747) was a recognised body with the SRA from 31 March 2009¹ until 13 October 2023. At the time of the Allegations, the Firm was managed by two Partners; Mr John Devile (SRA ID: 110374) (Senior Partner and sole equity owner) and Ms Heather Mead (SRA ID: 362582).
6. The First Respondent is a solicitor. The Applicant's records show that she was registered as employed by the Second Respondent from 5 January 2015 onwards. At the time of joining the Second Respondent, the First Respondent's Practising Certificate was subject to conditions, that:
- i. She may act as a solicitor only as an employee;
 - ii. She may not be a sole practitioner, or a manager, or owner of any authorised body or authorised non-SRA firm;

¹ The partnership existed prior to this, but this is the date that it was passported to recognised body status, in line with the SRA Recognised Body Regulations 2009.

- iii. She does not hold, received, or have access to client money, or act as a signatory to any client or office account, or have the power to authorise electronic transfers from any client or office account; and
 - iv. She shall immediately inform any actual or prospective employer of these conditions and the reasons for their imposition.

7. From 2016 to 2018, whilst continuing to work at the Second Respondent, the First Respondent's Practising Certificate was subject to the sole condition that she must not be sole practitioner, or a manager, or owner of any authorised body or authorised non-SRA firm.

8. The First Respondent is still working for the continuing practice of Carter Devile, which is now the recognised sole practice of Mr John Devile (see paragraph 10 below), holding a Practising Certificate free from conditions since 2019.

9. At the time of the Allegations, Mr Devile was the Firm's Money Laundering Reporting Officer ("MLRO"), whereas Ms Mead was the Firm's Compliance Officer for Legal Practice ("COLP"), Compliance Officer for Finance and Administration ("COFA") and Money Laundering Compliance Officer ("MLCO").

10. Mr Devile informed the Applicant on 18 October 2023 that Ms Mead had sadly passed away on Friday 13 October 2023. The Second Respondent, operating under SRA ID 44747, ceased to be a recognised body at the SRA² under the 'SRA Authorisation of Firms Rules' on 13 October 2023, following the death of Ms Mead. The SRA brings these proceedings on the basis that the Tribunal has the power to sanction a former recognised body pursuant to paragraph 16(1) of Schedule 2 of the Administration of Justice Act 1985. The continuing practice of Carter Devile is now trading as a recognised sole practice ("RSP") of Mr Devile under SRA ID: 8006679, with SRA authorisation transferred from the partnership entity to the RSP, to be effective from 13 October 2023. It is accepted by the Applicant that had Ms Mead not passed away then she would have been a named individual within these proceedings (see paragraph 13 below).

11. Mr Devile, in his 8 January 2021 letter to the SRA and Ms Mead in her 21 February 2021 e-mail, confirmed the following:

² Pursuant to section 9 of the Administration of Justice Act

- 11.1. That Ms Mead was based at the Firm's Goodmayes office and Mr Devile was based at the Buckhurst Hill office, although he attended the Goodmayes office on a daily basis;
 - 11.2. Ms Mead was responsible for supervising staff at the Goodmayes office, whereas Mr Devile supervised staff at the Buckhurst Hill office; and
 - 11.3. In Ms Mead's absence, the First Respondent should have approached Mr Devile with any queries she had.
12. In response to a s.44B Notice sent by the SRA, the Firm provided the following fee income percentage figures for its conveyancing work:
- 12.1. 2015 – 2016 – 35%;
 - 12.2. 2016 – 2017 – 40%;
 - 12.3. 2017 – 2018 – 35%;
 - 12.4. 2018 – 2019 – 40%;
 - 12.5. 2019 – 2020 – 30%; and
 - 12.6. 2020 – 2021 – 20%.

Heather Mead

13. The referral decisions to the Tribunal, made on 17 May 2023 included a decision to refer Heather Mead. However, as noted above the Applicant understands that Ms Mead sadly passed away on 13 October 2023. As a result, the case that the Applicant now seeks to advance before the Tribunal only relates to the First and Second Respondents.

Background

14. On 12 June 2019, the First Respondent made a report to the SRA in relation to her concerns regarding the seller's solicitors for both Property A and Property B. These concerns related to the Land Registry's rejection of the ID for the sellers that had been provided by their solicitors. The Firm had acted for the buyer of both of these properties. Disciplinary proceedings against solicitors acting for the sellers have previously been concluded in 2023.

15. On 31 October 2019, Mishcon de Reya LLP, who had been instructed for litigation purposes by a lender on one of the transactions, also reported concerns to the SRA in relation to these conveyancing transactions.
16. As a result of these reports, an SRA investigation into the Second Respondent started on 26 August 2020, which culminated with the Forensic Investigation Officer ("FIO") producing a Forensic Investigation Report on 28 April 2021 ("the FIR").
17. The Allegations the Second Respondent faces arise from matters set out in the FIR by the FIO.

Allegations relating to the Second Respondent

Firm-wide risk assessment

18. During the course of the FIO's investigation, she was provided with a firm-wide risk assessment document for the purposes of Regulation 18 of the 2017 MLRs.
19. The final page of this document suggests that the initial draft of this document was approved by the MLCO (Ms Mead) on 22 January 2020, with a revised version being approved that same day. This post-dates the transactions exemplified elsewhere in relation to the Allegations faced by the First Respondent.
20. In the course of her interview with the FIO, Ms Mead indicated that there had been an earlier version of this document. This was an assertion that was repeated by Ms Mead in her response to the SRA's Notice.
21. On 23 March 2021, the FIO sent an e-mail to Ms Mead requesting a copy of all firm-wide risk assessments that had been in place from 1 January 2018 up until January 2020, along with a copy of any e-mails where that earlier risk assessment had been shared with staff at the Second Respondent.
22. The FIO never received a firm-wide risk assessment that pre-dated 22 January 2020. Nor did she receive any e-mails demonstrating that any earlier document had been shared with staff.

23. In the course of his interview with the FIO, Mr Devile confirmed that the drafting of policies and firm-wide risk assessments was left by him to Ms Mead.
24. The First Respondent, in her interview with the FIO, claimed ignorance of a firm-wide risk assessment and asserted that she had not seen one.

AML policies

25. The Firm produced the following versions of an anti-money laundering policy for the FIO:
 - 25.1. A policy dated March 2018, which was in fact a full copy of the Legal Sector Affinity Group Guidance (LSAG Guidance), which had been annotated with "CARTERS MONEY LAUNDERING POLICY". A copy of this document was sent to the FIO by Ms Mead in a 1 March 2021 e-mail, which referred to the document as, "...the original AML Policy". This document was a generic guidance document. It had not been adapted to the Firm at all. It was not truly a policy, and did not comprise a set of policies, procedures or controls.
 - 25.2. A policy document, marked "Updated October 2019"; and
 - 25.3. A January 2021 update of the October 2019 policy document.
26. The January 2021 policy document also made reference to a version of the document that had been updated in October 2020.
27. On 23 March 2021, the FIO e-mailed Ms Mead and asked her to provide copies of any e-mails, from 1 January 2018 onwards, in which the Firm's AML policy had been shared with staff. The FIO did not receive a response to this request.
28. In the course of his interview with the FIO, Mr Devile referred to the March 2018 policy as the, "...original introductory policy".

AML training

29. In an e-mail addressed to both Mr Devile and Ms Mead, dated 17 December 2020, and in a letter again addressed to the same two people, dated 8 February 2021, the FIO requested copies of the Firm's AML training records from 1 January 2018 to date.

30. On 21 February 2021, Ms Mead responded to the FIO's request, and made the following points:

"With regard to AML training, this is usually done by way of ensuring that all current Practice Directions and Guidelines issued by the Law Society are given to the relevant fee earners (John Devile, Rehana Saeed, Dawn Dansey, and Manjeet Chaggar) together with any case law which I feel may be relevant to the issues. A copy is also given to Emma Wakefield, Secretary. The following have been given out to date:

19.06.2018 – Verifying Company Clients – AML Searches

14.09.2018 – SRA Cyber Attack information

13.05.2019 – Methods criminals use to intercept funds

17.05.2019 – AML Guidelines and updates

13.01.20 – Mortgage Fraud

26.06.20 – Property and Registration Fraud

Further, if any fee earner identifies additional training that they feel they would benefit from, I will ensure they are booked onto the course. There is also a large poster up in the office showing the warning signs to watch out for in respect of moneylaundering (sic), and the staff are reminded to familiarise themselves with this on a regular basis."

31. The FIO responded to this e-mail on 24 February 2021, with Mr Devile copied in. The FIO requested: (i) copies of all documents which had been referenced in the 21 February 2021 e-mail as having been distributed; and (ii) details of any training courses requested and undertaken by staff since 1 January 2018.

32. Ms Mead replied on 1 March 2021, with Mr Devile copied in, attaching a number of Law Society documents and stated:

"There were no specific Money Laundering courses booked within the timeframe referred to".

33. When asked about AML training in her interview with the FIO, Ms Mead made the following comments:
- 33.1. There was no formalised training; there was simply ad hoc discussions on a regular basis;
 - 33.2. When asked whether staff had received any specific AML training, Ms Mead stated that she believed Mr Devile had received training, but said of the more general staff, *"...they've not had formalised training"*. Ms Mead also stated that she believed that Ms Chaggar had received some training some time ago;
 - 33.3. She denied that she had been asked by the First Respondent for any specific training;
 - 33.4. She confirmed that whilst there had been no specific training sessions given by a provider, she had sent out updates and refreshers, and there had been ad hoc discussions about money laundering and compliance;
 - 33.5. She also referred to the presence of posters within the office which identified the money laundering flags;
 - 33.6. She believed that Mrs Dansey, as part of the accounts team, had received AML training through ILEX; and
 - 33.7. That she believed that more formal training would need to be implemented as, *"...opposed to the informal way that we've done it to-date"*.
34. On 7 September 2023, a section 44B Notice was sent to the Second Respondent, which requested evidence for AML training given to staff between the period 5 January 2015 and 21 February 2021. Mr Devile responded on 29 September 2023, and made the following points:
- 34.1. *"Miss Mead attended first a Money Laundering Course conducted by the Law Society at Chancery Lane on 2016 – 2017 followed by a course conducted by the FCA some months later at the same venue. The notes,*

certainly, for the second course referred to were disseminated to relevant members of staff. The firm also invested in "reliance" webinar services which conducted online courses in Money Laundering they being attended online by Ms Mead on a monthly basis. Copies of relevant attendance Certificates in respect of those courses are enclosed running from the period commencing August 2016 through to April 2017 albeit not every month. It is considered that such Certificates may not fully represent the number of such courses attended. In addition, Ms Mead also regularly consulted the SRA website and sent out appropriate notifications to staff and Mr Devile the other partner of Carter Devile. In this latter respect and by way of indication we enclose copies of 6 emails sent by Ms Mead in this regard for the period 9th-17th May 2019 the contents of which will be self-explanatory; and

34.2. He provided the following breakdown of training that had been received by staff:

"a. Mrs Dawn Dansey. She is the firm's book keeper but she is currently absent unwell. She tended to book her own courses via the Institute of Legal Executives and no further information can currently be provided pending her further advices.

b. Mrs Manjeet Chaggar. Money Laundering courses were booked twice for her but she was not able to attend on either occasion owing to family emergencies.

...d. Mr J R Devile. Mr Devile undertook a Money Laundering course prior to the period mentioned and joined with Ms Mead in respect of many of the "reliance" online training courses referred to above. Mr Devile also separately undertook considerable online consultations as to Money Laundering and received the benefit of various online bulletins provided to him and relevant staff by Miss Mead.

e. Miss Rehana Saeed. The firm did not pay for her to attend any relevant courses because her knowledge of Money Laundering appeared equal to that of Miss Mead. It is understood that Miss Saeed undertook her own research into the issue of Money Laundering as was reasonable to expect her to do. Miss Saeed undertook a number of Money Laundering courses after the expiry of the relevant period."

Response to the Notice

35. Mr Devile responded to the Notice that was sent to the Second Respondent. In the course of the response, Mr Devile made the following points:

35.1. He rejected the First Respondent's assertion that she had received no or no adequate money laundering training from the firm. He identified the training that the First Respondent had attended in 2020 – 2022, and stated that, "...when RS requested training she received it at the expense of the firm"; and

35.2. That as far as he was concerned, the First Respondent appeared to display a knowledge of the professional requirements of money laundering

Allegations and Breaches of Principles

Second Respondent

Allegation 2.1 – Failing to ensure a firm-wide risk assessment was in place

36. The only firm-wide risk assessment located by the FIO during the SRA's investigation was the one dated 22 January 2020. No earlier such document has been provided. The absence of any such document which pre-dates the version that has been obtained therefore indicates that one was not in place from 26 June 2017 (the date at which the 2017 MLRs came into force) through to 21 January 2020.

37. An inevitable consequence of the Second Respondent failing to have in place a firm-wide risk assessment until 22 January 2020 was that even if some policies and procedures had been in place, it would have been unable to comply with the requirement under Regulation 19 of the 2017 MLRs; namely, the requirement to have in place policies to address the risks identified by the risk assessment. The absence of a firm-wide risk assessment between 26 June 2017 and 21 January 2020 is therefore aggravated by the impact this had on the ability of the Second Respondent to put in place appropriate policies, controls, and procedures to address the risks that would, or should, have been identified had the Second Respondent complied with its duty under Regulation 18(1).

38. In failing to comply with a requirement under Regulation 18(1) of the 2017 MLRs, the Second Respondent has failed to ensure that systems were in place to ensure compliance with its regulatory regime and statutory requirements.
39. In failing to have in place a firm-wide risk assessment, as required by the 2017 MLRs, the Second Respondent has failed to comply with its regulatory and statutory requirements, and also failed to run its business in accordance with proper governance and risk management principles,
40. The public would trust firms of solicitors to comply with regulatory and legal requirements. By failing to ensure a firm-wide risk assessment was in place prior to 22 January 2020, the presence of which may have assisted and instructed the First Respondent in her dealings with Person E in relation to Properties A and B, the Second Respondent has damaged the public's trust and confidence in solicitors complying with their regulatory and legal requirements.

Allegation 2.2: Failure to have in place a risk sensitive policy in relation to money laundering and Allegation 2.3: failure to establish and maintain policies, controls and procedures to mitigate anti-money laundering risks

41. The March 2018 document is the earliest version of any document claimed to be the Firm's money laundering policy that was provided to the FIO. Furthermore, this was referred to by both Mr Devile and Ms Mead as the "original" policy. Therefore there was no documentation in place for the Second Respondent prior to March 2018, but the March 2018 document in any event is generic guidance and not a substantive attempt to establish AML policies or procedures.
42. The 2017 MLRs require such policies to be in place to address the risks identified by a firm-wide risk assessment. Given that no such firm-wide risk assessment existed until 22 January 2020, the Second Respondent could not have fully and technically complied with the requirements under the 2017 MLRs until 22 January 2020 and. In this respect, the absence of a risk assessment being able to be considered in any policies or procedures for so long is also advanced as an aggravating feature of Allegation 2.1. Nevertheless, firms of solicitors would be expected and trusted in any event to have in place policies, controls and procedures which mitigate the very well-known risks of money laundering within certain sectors and types of legal work.

43. The obligations under the 2007 MLRs to have such a policy in place were not predicated on the existence of a firm-wide risk assessment. Allegation 2.2 is therefore pleaded based on a breach of the 2007 MLRs.

Allegation 2.2

44. In failing to ensure that a risk sensitive policy for money laundering was in place, the Second Respondent failed to comply with the anti-money laundering regime, and also failed to have in place effective systems and controls in place to ensure compliance.
45. As with the firm-wide risk assessment, by failing to have in place a document mandated by the MLRs, the Second Respondent has failed to comply with its regulatory and statutory requirements, and also failed to run its business in accordance with proper governance and risk management principles.
46. The public would trust and expect solicitors to comply with regulatory requirements under the MLRs (when in scope for them). A failure to have in place any documentation until March 2018 (long after the 2007 MLRs came into force) would serve to damage that trust.

Allegation 2.3

47. Following the coming into force of the 2017 MLRs, the Second Respondent had no firm-wide risk assessment at all until 22 January 2020, and therefore no opportunity to show full compliance with the requirements of those regulations. However, the issues and concerns around AML are long-standing and should be well known in any event. In this respect, in addition to a potential loss of trust in not being able to fully comply with the 2017 MLRs, the public would in any event trust and expect solicitors undertaking substantial amounts of conveyancing work, or otherwise within scope of the MLR's, to establish (and maintain) AML policies controls and procedures ("PCPs"), or at least make a substantive attempt to do so.
48. Simply writing the firm's name onto a guidance document does not equate to establishing AML PCPs, and the failure by the Second Respondent to establish any such PCPs would be likely to reduce trust in the profession and the provision of legal services.

49. The continuing failure to establish and maintain PCPs, to mitigate properly AML risks, including but not limited to the training of staff, was a continuing failure by the Second Respondent to run its business in accordance with proper governance and risk management principles.
50. Given that the Second Respondent failed to have effective systems and controls in place to comply with all the 2011 Principles in relation to this issue, there was also a failure to achieve Outcome 7.2 of the 2011 Code for periods from 26 June 2017 to 24 November 2019. Similarly, for periods on or after 25 November 2019 the lack of effective arrangements, systems and controls to ensure compliance with the SRA's regulatory arrangements comprised a breach of paragraph 2.1(a) of the Code for Firms.

Allegations 2.4 and 2.5 – Failure to provide adequate money laundering training

51. The training the Second Respondent provided to its staff in relation to money laundering rested primarily on Ms Mead circulating updates to staff and putting up posters within the office as to money laundering warning signs.
52. These steps fall short of the requirements set out within both the 2007 and 2017 MLRs to ensure that employees received regular training.
53. In failing to have in place measures to ensure that employees received this training, the Second Respondent failed to comply with the anti-money laundering regime, and also failed to have in place effective systems and controls to ensure compliance.
54. In failing to comply with the requirements relating to training, the Second Respondent has failed to comply with its regulatory and statutory requirements and also failed to run its business in accordance with proper governance and risk management principles.
55. The public trusts solicitors and solicitors' firms to comply with their regulatory requirements under the MLRs. A failure to ensure that employees received regular training, as required by the MLRs, would serve to damage that trust.
56. In so far as the breaches of the 2017 MLRs took place after 25 November 2019, the failure to provide regular training to staff represents a failure by the Second

Respondent to have in place systems and controls to ensure compliance with the regulatory regime.

57. By not providing regular training as required, the Second Respondent has failed to ensure that its employees were competent to carry out their role and keep their understanding of their regulatory obligations up to date.
58. A failure to comply with a mandatory requirement under the MLRs is conduct that would damage the trust and confidence the public places in the solicitor's profession.

Non-agreed Mitigation

59. The Second Respondent advances the following points by way of mitigation but their inclusion in this document does not amount to acceptance or endorsement of such points by the SRA:
 - 59.1. Mr Devile had no detailed knowledge of background to the matter files dealt with by the First Respondent or the facts and particulars in respect of the substantive allegations as alleged against the First Respondent within these proceedings;
 - 59.2. Mr Devile did not have day to day conduct of the subject files and was never based at the office where the work on the files was conducted. From time to time the First Respondent would discuss files and matters with him but most commonly this would be discrete points;
 - 59.3. Mr Devile on behalf of the Second Respondent accepts responsibility in representing the former partnership within these proceedings;
 - 59.4. Mr Devile genuinely believed that Ms Mead was complying with all her duties in respect of her respective regulatory offices and that the Second Respondent was in fact compliant with the respective rules and regulations that governed it at the material times; and
 - 59.5. Mr Devile represents the Second Respondent (now dissolved) as a former partner only.

Agreed Outcome

60. The Second Respondent agrees to pay a contribution to costs to the SRA in the sum of £5,000.

61. The costs set out above include a reduction for (i) the case having concluded by way of Agreed Outcome; and (ii) the unusual circumstances of the case as set out in paragraph 63.
62. The parties consider and submit that in light of the admissions set out above, and taking due account of the circumstances and the mitigation put forward by the Second Respondent, the proposed outcome represents a proportionate resolution of the matter, consistent with the Tribunal's Guidance Note on Sanction (11th Edition).
63. It is agreed that:
- 63.1. Paragraphs 18(1) and (2) of Schedule 2 of the Administration of Justice Act 1985 limit the Tribunal's powers in relation to a recognised or former recognised body (as opposed to an individual) to the following:
- 63.1.1. Revocation of the body's recognised status;
- 63.1.2. An order directing the payment of a fine; and/or
- 63.1.3. An order directing the payment of the costs, or a contribution to the costs, of the proceedings
- 63.2. As the Second Respondent is no longer a recognised body, revocation of such status would not be available to the Tribunal;
- 63.3. Whereas firms facing Allegations relating to failures to comply with the requirements under the MLRs ordinarily receive a fine, the circumstances of this case are very unusual. The Second Respondent was a two-person partnership (Mr Devile and Ms Mead) and is no longer a recognised body. Mr Devile is the only surviving partner from that partnership. However, of the two partners, his personal conduct was not referred to the SDT as an individual (unlike Ms Mead who was so referred). The Applicant acknowledges that the successor practice is now operating as a Recognised Sole Practice with a different governance structure, and the events considered in the Allegations pre-dated the passing away of Ms Mead and the dissolution of the previous recognised body partnership;
- 63.4. In these particular and unusual circumstances, it is considered that the financial impact of any fine that is imposed upon the Second Respondent is likely to be borne solely by Mr Devile. In circumstances where his conduct as an individual did not warrant a referral to the Tribunal, it would be disproportionate for him now to be required to meet a fine imposed upon the now-defunct partnership that was the Second Respondent;

- 63.5. Notwithstanding these unusual, if not unprecedented, circumstances, both parties are agreed that a £5,000 contribution to the Appellant's costs is appropriate. The matter was properly referred to the Tribunal at a point when the Second Respondent was a recognised body. The Second Respondent has admitted 5 breaches of the MLRs, and it remains appropriate for the imposition of such an order to serve as a contribution to the costs incurred by the Applicant in bringing these proceedings, and to mark the admitted breaches.
64. In respect of the level of culpability:
- 64.1. The Allegations span a number of years, and therefore represent a sustained and persistent failure to comply with the Money Laundering Regulations.
65. In respect of the level of harm:
- 65.1. The public are entitled to expect that law firms will adhere to the Money Laundering Regulations, and will be capable of instigating the necessary risk assessments, PCPs and staff training measures required to reduce to the risk of the firm becoming embroiled in transactions which may give rise to suspicions of money laundering. Failure to do so risks damaging the trust that the public places in the profession and law firms to (i) handle monies appropriately and (ii) only to act in transactions for which they are properly satisfied do not entail a risk of money laundering; and
- 65.2. The First Respondent asserts that the absence of a firm-wide risk assessment and/or adequate policies, controls, procedures and training may have contributed to her actions which are the subject matter of the Allegations she now faces, and which are factually admitted by the First Respondent.
66. In respect of mitigating features, the Second Respondent's mitigation is set out at paragraph 59 above.

67. The Parties consider that in light of the admissions set out above and taking due account of the circumstances and the mitigation put forward by the Second Respondent, the proposed outcome represents a proportionate resolution of the matter which is in the public interest.

Signed:

Date:

14/10/2025

Signed:

On behalf of Solicitors Regulation Authority Limited

Date:

14 October 2025