

SOLICITORS DISCIPLINARY TRIBUNAL

IN THE MATTER OF THE SOLICITORS ACT 1974

Case No. 12852-2025

BETWEEN:

SOLICITORS REGULATION AUTHORITY LTD Applicant

and

HABIBUR CHOUDHURY First Respondent

and

ARCHSTONE SOLICITORS LIMITED Second Respondent

Before:
Mrs L Boyce (Chair)
Ms V Kaye
Dr S Bown

Date of Hearing: 28 May 2026

Appearances

Jermel Anderson Counsel in the employ of Blake Morgan LLP, as an Associate, of 6 New Street Square, London EC4A 3DJ, for the Applicant.

The First Respondent attended and represented both himself and the Second Respondent.

JUDGMENT

Allegations

First Respondent

1. The allegations against the First Respondent, Habibur Choudhury, made by the SRA are that, while in practice as a Solicitor at Archstone Solicitors Limited (“the Second Respondent”) he:
 - 1.1 While acting as the Second Respondent’s Compliance Officer for Legal Practice, failed to ensure the Second Respondent’s compliance with any or all of the conditions imposed on its authorisation on 19 October 2022 until at least 11 November 2024, thereby breaching any or all of Paragraphs 9.1(a) and 9.1(b) of the Code of Conduct for Firms 2019 (“the Code for Firms”) and Paragraph 7.10 of the Code of Conduct for Solicitors (“the Code for Solicitors”).
 - 1.2 Between 18 November 2022 and 11 March 2025, failed to co-operate with the SRA, and in doing so breached any or all of Paragraphs 7.3 and 7.4 of the Code for Solicitors and Principle 2 of the SRA Principles 2019 (“the Principles”).

Second Respondent

2. The allegations made against the Second Respondent, Archstone Solicitors Limited, a firm, are that:
 - 2.1 Between 20 October 2022 and at least 11 November 2024, in respect of one or both of the Second Respondent’s websites, failed to publish any or all of the following information required by the SRA Transparency Rules 2018 (“the Transparency Rules”).
 - 2.1.1 Costs information, in breach of any or all of Rules 1.1, 1.5 and 1.6 of the Transparency Rules.
 - 2.1.2 Complaints information, in breach of Rule 2.1 of the Transparency Rules.
 - 2.1.3 The Second Respondent’s SRA number, in breach of Rule 4.1 of the Transparency Rules.
 - 2.1.4 The Second Respondent’s SRA digital badge, in breach of any or all of Rule 4.1 of the Transparency Rules.

Thereby breaching any or all of Paragraphs 2.1(a) and 2.1(b) of the Code for Firms.
 - 2.2 Between 20 October 2022 and at least 11 November 2024, failed to comply with any or all of the conditions imposed on its authorisation on 19 October 2022 thereby breaching any or all of Paragraphs 3.2 and 3.4 of the Code for Firms.

Executive Summary

3. The First Respondent, a solicitor admitted in 2006, was at the material time the Compliance Officer for Legal Practice (COLP) and an owner of the Second

Respondent, Archstone Solicitors Limited, a small firm based in Stratford. Following an Adjudicator's Decision of 19 October 2022 which imposed a fine, costs and three conditions on the Firm's authorisation in relation to non-compliance with the SRA Transparency Rules 2018, the Firm was required, within 30 days, to demonstrate compliance with the rules and to take down its former website at archstone.org.uk. Over a period of approximately two years thereafter the Firm failed to bring either of its two websites into compliance, notwithstanding repeated contact from the SRA and the First Respondent's own assurances that compliance would be achieved regarding the second website though he had explained to the SRA that there was nothing he could do about the first website. The First Respondent's engagement with the regulator was sporadic throughout the period, with extended intervals of complete non-response. The Respondents admitted the allegations brought by the SRA, and the Tribunal, having satisfied itself by reference to *Dentons UK and Middle East LLP v SRA* [2026] EWCA Civ 508 that the conduct met the threshold of seriousness required to constitute professional misconduct, found all of the allegations in the Rule 12 Statement proved in full.

Sanction

4. The Tribunal assessed the Respondents' culpability as falling towards the higher end of the low to medium range and the harm as medium, the principal harm being to the reputation of the profession arising from the apparent indifference shown to the regulator. The Tribunal placed the misconduct within Level 1 of the indicative bands in its Guidance Note on Sanction (11th Edition, February 2025). It imposed a fine of £4,500 at the upper end of that band, payable by the First and Second Respondents on a joint and several basis to reflect that the misconduct found against each arose from the same underlying failures and that the First Respondent was the controlling mind of the Firm. The Tribunal's reason on Sanction can be found [[here](#)].

Documents

5. The Tribunal considered all the documents in the case which were contained in the electronic bundle.

Preliminary Matters

6. The Chair established with the First Respondent that the allegations in the Rule 12 Statement were admitted by both the First and Second Respondent. The issues which fell to be determined were whether the admissions were properly made and supported by the evidence, and if so, found by the Tribunal, the appropriate sanction, and costs.

Factual Background

7. The First Respondent

- 7.1 The First Respondent, who was born in May 1978, is a solicitor, having been admitted to the Roll on 15 December 2006. At the material time, SRA records showed that the First Respondent was an owner of the Second Respondent. The First Respondent continues to practise there. The First Respondent holds a current practising certificate with one condition, that he cannot operate as a Compliance Officer for Legal Practice

(“COLP”). This condition was imposed on 9 May 2025. The First Respondent had previously been the COLP at the Second Respondent.

The Second Respondent (the Firm)

7.2 The Second Respondent is a Limited company and an authorised body, with a registered office at 131 The Grove, Stratford, London E15 1EN. According to the Second Respondent’s Director’s Report and Unaudited Accounts dated 29 February 2024, there was one Director listed, Ms Nadia Shahzad. The Second Respondent’s turnover for the year ending 29 February 2024 was £161,417. No employees were recorded as working at the Second Respondent during the reporting year.

Witnesses

8. *There was no live evidence.*

Findings of Fact and Law

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

NOTE: While all the evidence was carefully considered the Tribunal does not refer to each and every piece of the evidence or submissions in its judgment and findings.

- [R12 Statement \[here\]](#)

10. The Applicant’s Case

10.1 The proceedings with respect to the First and Second Respondent had their origin in an Adjudicator’s decision of 19 October 2022, which found that the Firm’s website failed to display the costs information, complaints information and digital badge required by the Transparency Rules, and that the Firm had not promptly removed its former website at archstone.org.uk when asked to do so.

10.2 The Adjudicator imposed a fine of £1,600, ordered costs of £600, directed publication, and attached three conditions to the Firm’s authorisation. Each condition required the Firm, within 30 days, to produce evidence demonstrating compliance with the relevant rule. The deadline for compliance was therefore 18 November 2022. Mr Anderson submitted that there was a sustained failure to comply and to engage with the regulator over a period of two years.

10.3 The Firm operated two websites in parallel: the original archstone.org.uk and a newer site at archstonesolicitors.co.uk. The SRA conducted its first post-decision web-sweep on 26 January 2023, some two months after the deadline for compliance had passed. The new website was found wanting in respect of costs information across five

service areas: debt collection, residential conveyancing, probate, immigration, and licensing, and contained no reference to the Legal Ombudsman's limitation periods.

- 10.4 The SRA wrote on 9 February 2023 identifying the deficiencies and seeking confirmation within a fortnight that remedial action had been taken and that the old website had been removed. No response was received. A further web-sweep on 27 March 2023 disclosed precisely the same deficiencies. A letter of 3 April 2023 followed, again without response, as did requests for information on 1 June, 13 June, and 9 July 2023. A telephone message left on 7 July 2023 met with the same silence.
- 10.5 Engagement was eventually triggered, not by any initiative on the Firm's part, but by a direct call from the Investigating Officer on 11 September 2023, taken by a colleague of the First Respondent. That same day the SRA conducted web-sweeps of both websites. The original website was found to publish no costs information at all across six service areas, no complaints or Legal Ombudsman information, and no clickable digital badge. The newer website displayed persistent inadequacies in costs information across the same six areas.
- 10.6 The First Respondent then engaged briefly. On 19 September 2023 he wrote indicating that the Firm no longer undertook immigration, debt collection, or licensing work and that pricing information was already in place for residential conveyancing and probate. On 20 September he reported that the changes had been actioned and invited the SRA to confirm that the website was compliant. A web-sweep carried out the same day disclosed that it was not. On 26 September the First Respondent spoke to the Investigating Officer by telephone; when she raised the difficulties the SRA had experienced in engaging with him, he is recorded as having laughed and said that he was busy. He wrote again on 27 September, once more inviting confirmation that matters were now in order. Web-sweeps on 2 October and 1 November 2023 demonstrated that they were not.
- 10.7 After this brief flurry of activity, contact lapsed once more. A letter of 2 October 2023 inviting the First Respondent to consider the continuing breaches went unanswered. So too did a letter of 22 November 2023 informing him that a Notice recommending a fine was in preparation. A further web-sweep on 29 May 2024 disclosed continued non-compliance in four service areas, and a letter sent the same day attaching the findings received no response. The Investigating Officer's request for closed accounts on 1 July 2024 had to be chased on 10 July before the First Respondent replied, on 16 July 2024, confirming that the original website had been taken offline and indicating that he was working towards rectifying website 2 by 28 August 2024. A subsequent request for his P60 and turnover figure went unanswered. A web-sweep on 11 November 2024 disclosed that costs information remained inadequate for residential conveyancing, probate, and immigration.
- 10.8 The Notice recommending a fine, formally issued on 25 November 2024, attracted no response. Voicemails left on 16 December 2024 were not returned, and a further opportunity to respond, offered the same day, went unanswered. The First Respondent did reply to a request for information on 21 January 2025, supplying the Firm's closed accounts, but when the Investigating Officer pointed out the following day that the information was incomplete and asked, by return, for confirmation of the COLP's identity and a copy of the P60, no further response was forthcoming. The financial

information sought was not incidental: the SRA needed it in order to determine whether any financial penalty it might contemplate would fall within its statutory powers. The P60 was never provided, and turnover figures emerged only after prompting.

- 10.9 The First Respondent's status as COLP was invoked as an aggravating feature: the public, it is said, would not expect a solicitor holding a specified compliance role to behave in this way over so prolonged a period.
- 10.10 In March 2025 the Investigating Officer's original recommendation, made on 25 November 2024, had been that the Respondents be fined was revised to a referral to the Tribunal, the change being attributable to the inadequacy of the response on the First Respondent's income, which had prevented the SRA from satisfying itself that a financial penalty would fall within its statutory limits. No representations were received in response to the revised recommendation, and on 29 April 2025 an Authorised Officer formally referred the conduct of both Respondents to the Tribunal.

11. **The First and Second Respondent's Case**

- 11.1 In his Answer the First Respondent's adopted a position of qualified admission. He accepted at the outset, and in terms, that the Firm's website was not brought into compliance with the Transparency Rules promptly or within a reasonable time, and he expressed personal disappointment that he was unable to resolve matters more quickly. He said, however, that at no point was the delay deliberate, and that he was attempting throughout to co-operate with the SRA and to discharge his obligations as COLP, albeit while encountering obstacles which he asked the Tribunal to take into account.
- 11.2 The principal explanation offered by the First Respondent was that in or about mid-2022, the Firm had received a routine enquiry from the SRA as to the compliance of its website, and he had responded by way of voluntary disclosure to explain that the Firm had lost control of, and access to, its original website at archstone.org.uk. The site had been operated by a web developer with whom he could no longer make contact, and he had no log-in details with which to update or remove it. Faced with this difficulty, he took the decision to launch a new website at archstonesolicitors.co.uk and to disassociate the Firm from the old one. He said that over a period of time he implemented on the new site everything required for Transparency Rules compliance, and that it is now, and has for some time been, compliant. The old website, he explained, was eventually taken down by the hosting platform in 2024, a development which he says was communicated to the SRA and acknowledged by it in May 2024.
- 11.3 On the basis of this account, he invited the Tribunal to view the evidence in a different light. Much of the conduct relied upon by the Applicant, he submitted, related to the old website, over which he had no practical control, rather than to a lack of co-operation on his part. As regard to the delay in achieving full compliance of the new website, he attributed it to a combination of his part-time working, family commitments, his own limited expertise in web and IT matters, and his consequent reliance on third-party developers whose timetable he could not dictate. The Firm is a small two-solicitor practice with a low turnover and lacked the resources to procure

swifter action. He acknowledged that the work was not completed expeditiously, for which he apologised but he maintained that he was trying his best in the circumstances and that the new website was itself launched as an act of co-operation, with compliance being achieved step by step in accordance with SRA guidance.

- 11.4 In closing, he did not deny that the Firm's website was not brought into compliance within a reasonable time and said that he was very upset with himself for the failure. He asked the Tribunal to weigh against that, however, the facts that he remained in communication with the SRA, that improvements were made progressively over the relevant period, that no individual or body had suffered harm or detriment, and that the position has now been rectified. On that footing he invited the Tribunal, should it consider any sanction necessary, to take all these matters into account in mitigation.

12. The Tribunal's Findings

- 12.1 The Tribunal reminded itself that the burden of proof rested on the Applicant throughout, and that the standard of proof was the civil standard, namely the balance of probabilities.
- 12.2 In approaching the allegations, the Tribunal had regard to *Dentons UK and Middle East LLP v SRA* [2026] EWCA Civ 508, in which the Court of Appeal held that there is an inherent requirement of seriousness in determining whether a solicitor's conduct amounts to a breach of the SRA Principles or the mandatory provisions of the SRA Code. The question for the Tribunal in every such case is whether the conduct would be regarded by competent and reputable solicitors as sufficiently serious to be categorised as professional misconduct.
- 12.3 The Tribunal was satisfied that the threshold was met. The admitted breaches concerned core obligations under the SRA Transparency Rules 2018 and the conditions imposed on the Second Respondent's authorisation.
- 12.4 Having considered the evidence relied upon by the Applicant, the Tribunal was satisfied that the admissions made by the First and Second Respondents had been properly made and it accepted them accordingly. The Tribunal found all of the allegations set out in the Applicant's Rule 12 Statement proved in full, including the cited breaches of the Principles, the Codes of Conduct and the Transparency Rules.

Previous Disciplinary Matters

13. Neither Respondent had any previous findings against them at the Tribunal.

Mitigation

14. The First Respondent accepted that a sanction was warranted and expressed personal disappointment and embarrassment at having to appear before the Tribunal, on his own account and for the Second Respondent.
15. He explained what he characterised as genuine difficulties: as a small firm operating on a very limited budget in the post-COVID period, the firm had been unable to

access its old website to make the necessary changes, which had limited what he had realistically been able to do

16. His primary submission was that the appropriate outcome was no order or a reprimand. He advanced three supporting points: there had been no harm to any individual or organisation and no risk to anyone, the matter being a technical breach; there was no risk of repetition, the circumstances being unique, as the old website had since been taken down and the new one was fully compliant, so the issue had been resolved; and there had been no personal gain or benefit to him or the Second Respondent. However, if the panel was against him on his submission that the most appropriate sanction was no order or a reprimand, he submitted that any fine should fall within the Level 1 band for seriousness.
17. On means, he noted that the firm's turnover was circa £160,000 and that he had taken no income while working to recover the firm, a point he said he had explained to the SRA investigator before the referral to the Tribunal. He concluded that the costs and any fine would themselves be more than sufficient to address what had occurred.

Sanction

18. The Tribunal referred to its Guidance Note on Sanction (11th Edition, February 2025) when considering sanction and the proper approach to sanction, as set out in *Fuglers and Others v SRA* [2014] EWHC 179 (Admin). The Tribunal's overriding objective, when considering sanction, was the need to maintain public confidence in the integrity and reputation of the profession. In determining sanction, it was the Tribunal's role to assess the seriousness of the proven misconduct and to impose a sanction that was fair and proportionate in all the circumstances.
19. The Tribunal assessed the seriousness of the misconduct by first considering the level of the First Respondent's (and by inference the Second Respondent, the firm) culpability and the harm caused, before turning to any aggravating or mitigating factors.
20. The Tribunal found that the First Respondent's motivation for the misconduct was a form of professional inattention: he had not kept his focus on the matter and had not treated the breaches when pointed out to him with sufficient seriousness to address them within a reasonable period. The misconduct had not been planned.
21. The First Respondent had, however, direct control over and responsibility for the circumstances giving rise to the breaches and could have rectified them considerably sooner than he did. While the First Respondent was a solicitor of some fifteen years' post-qualification experience, the Tribunal did not regard his level of experience as a feature of particular weight in this case, save that a solicitor of that standing might reasonably be expected to engage with his regulator in a professional and serious manner. The Tribunal was satisfied that the First Respondent had not deliberately misled the regulator.
22. The Tribunal noted, however, that the First Respondent's engagement with the SRA had been markedly inconsistent throughout the relevant period. The chronology disclosed in the Rule 12 Statement showed that, following the imposition of

conditions on the Second Respondent's authorisation on 19 October 2022, the First Respondent failed to respond at all to five separate communications from the SRA between 9 February 2023 and 9 July 2023, including chasing emails marked “urgently”. A short period of engagement followed in September 2023, during which the First Respondent gave assurances that website 2 would be “fully compliant” within 48 hours, but the web sweeps undertaken thereafter demonstrated that those assurances were not made good. A further period of non-engagement then ensued, with four substantive communications from the SRA between October 2023 and July 2024 eliciting no response. A second short burst of engagement occurred in mid-July 2024, again unaccompanied by compliance, followed by a further period of silence including non-response to the Notice of 25 November 2024 recommending a fine, telephone calls and voicemails on 16 December 2024, and a further opportunity to respond of the same date. A third burst of engagement in January 2025 was again partial and did not produce the financial information which the SRA had repeatedly requested.

23. The Tribunal assessed the First Respondent's culpability as falling towards the higher end of the low to medium range.
24. The Tribunal found that the principal harm caused by the misconduct was to the reputation of the profession, particularly arising from the First Respondent's apparent indifference towards the regulator.
25. However, the Tribunal noted that there had been no complaints from members of the public or from the First and Second Respondent's clients, and no evidence of harm to any individual. Nonetheless, it was the First Respondent's cavalier approach to engagement, that had brought the matter before the Tribunal in circumstances where things could have been resolved very much sooner. The Tribunal noted in particular that the SRA's Investigating Officer's original recommendation, made on 25 November 2024, had been for the Respondents to be fined by the SRA itself; the recommendation was revised to one of referral to the Tribunal on 11 March 2025 only because of the First Respondent's continuing failure to provide the financial information necessary to determine whether the appropriate penalty fell within the SRA's own statutory powers.
26. Although the misconduct had not been intended, the First Respondent ought to have foreseen the consequences, and ought reasonably to have taken the matter more seriously.
27. The Tribunal assessed the harm as medium.
28. The Tribunal identified no aggravating factors. There was no dishonesty alleged or proved; no criminal offence; no element of sexual misconduct; no abuse of power or position; no concealment of wrongdoing; and no attempt to place the blame on others. The misconduct had not been deliberate or calculated.
29. The Tribunal considered the following factors to mitigate the seriousness of the misconduct. There had been no coercion or deception by any third party. The First Respondent had demonstrated some insight, which the Tribunal was prepared to accept, together with remorse, having expressed his embarrassment at being before

the Tribunal. The First Respondent had made open and frank admissions, both in his Answer and at the substantive hearing, and the Tribunal accorded weight to the admissions in mitigation, while noting that they had been made against a background of sustained non-engagement with the regulatory process. The Tribunal also noted that the breaches had ultimately been remediated, the non-compliant websites having been removed and a compliant website put in place.

30. Having reached a provisional view on the seriousness of the misconduct, the Tribunal took into account the First Respondent's personal mitigation in accordance with the Guidance Note. The Tribunal had some understanding of the circumstances raised by the First Respondent, namely that the conduct had occurred during or around the period of the COVID-19 pandemic and that the Transparency Rules were then a relatively new requirement. The Tribunal accepted that the wider circumstances of the pandemic had been outside the First Respondent's control and had caused difficulty for many in the profession. However, the novelty of the rules, while relevant, was no excuse for the failure to comply over so extended a period.
31. The Tribunal noted that the First and Second Respondent had no previous disciplinary findings against them and they were of good character.
32. Weighing the First and Second Respondent's culpability, which it had assessed towards the higher end of the low to medium range and medium harm, and taking account of the absence of any aggravating factor and the mitigation available, the Tribunal concluded that the misconduct, while serious, fell within the lower band of seriousness for the purpose of sanction.
33. The Tribunal reminded itself that an important purpose of any sanction is to maintain the reputation of the solicitors' profession (*Bolton v The Law Society* [1994] 1 WLR 512), and that the sanction imposed must be no more than is necessary and proportionate to meet that purpose.
34. The Tribunal considered the available sanctions, working upwards (in seriousness) from the least restrictive. It was satisfied that no order and a reprimand each failed to reflect the seriousness of the misconduct and in particular, the harm caused to the reputation of the profession by the Respondents' sustained problematic engagement with the regulator. Neither would maintain public confidence in the profession.
35. The Tribunal was satisfied that a financial penalty was the appropriate and proportionate sanction. Having regard to the indicative bands in the Guidance Note, the Tribunal placed the misconduct within Level 1 (less serious misconduct), reflecting the absence of any aggravating feature, the absence of harm to clients or the public, and the genuine, if belated, remediation and insight shown by the First Respondent. The Tribunal considered, however, that the sustained nature of the failure and the harm to the reputation of the profession warranted a fine at the upper end of that band, and accordingly fixed the fine at £4,500.
36. The Tribunal considered the First Respondent's submissions as to means. It noted that the First Respondent had not provided documentary evidence of his means in the manner contemplated by Rule 43.5 of the Solicitors (Disciplinary Proceedings) Rules 2019, and that the limited financial information before the Tribunal related to the

Second Respondent for a single tax year. The Tribunal was not persuaded that the First Respondent had established a lack of means such as to warrant a reduction in the level of fine otherwise appropriate to the seriousness of the misconduct.

37. The First Respondent was the compliance officer for legal practice and the controlling mind of the Second Respondent. The misconduct found against each Respondent arose from the same underlying failures to comply with the Transparency Rules and the conditions on the Second Respondent's authorisation. In those circumstances, the Tribunal was satisfied that it was just and proportionate to impose a single financial penalty, payable by the First Respondent and the Second Respondent on a joint and several basis, rather than separate penalties against each. The total fine payable across both Respondents is accordingly £4,500.
38. The Tribunal emphasised that engagement with the regulator is not merely a matter of courtesy but a professional requirement which must be taken seriously.

Costs

The Applicant's Application

39. Mr Anderson applied for costs of £52,717.50 under Rule 43 SDPR, as set out in the schedule at H3 to H6 of the CaseLines Bundle. He corrected the schedule's reference to him as "Senior Associate" (he is an Associate). He addressed each of the factors in Rule 43.4 SDPR 2019 in turn:
 - (a) Conduct: the Applicant's conduct had been reasonable, the allegations had been properly brought and proved in full. He challenged the First Respondent's characterisation in the Answer that he had admitted his failings at an early stage to bring early resolution, submitting this was not a wholly accurate reflection given the documented non-responsiveness over a lengthy investigation.
 - (b) Compliance with directions: the Applicant had complied fully.
 - (c) Proportionality of time spent: Mr Anderson submitted this was a complex matter involving two Respondents and a sustained investigation, the web sweep table at A13 to A15 reflecting the effort required.
 - (d) Hourly rates and disbursements: there had been no disbursements; the investigation could potentially have been avoided with earlier engagement. The SRA had sought information on the First Respondent's means which was not provided, which would have shortened matters.
 - (e) The paying party's means: very limited information had been provided. Mr Anderson cited Rule 43.5 SDPR 2019, which requires representations on means to be supported by a statement of assets, income, and expenditure with documentary evidence, and he submitted this had not been done. Multiple requests for P60s, tax statements and means explanations had gone unanswered. Financial information related only to the 2023–24 tax year and only to the Second Respondent; there was nothing on the First Respondent's means beyond his Answer. A solicitor asserting impecuniosity bore the onus of putting sufficient

evidence before the Tribunal in advance and Mr Anderson submitted no such evidence had been supplied.

40. Dr Bown, Lay Member of the Panel, pressed Mr Anderson, by reference to the Applicant's schedule of costs (H5) on the hourly rate, noting a combined total of 575 units and a total of £52,717.50. Mr Anderson initially calculated approximately £916 per hour, but explained the figure was not purely an hourly rate as it included a fixed fee reflecting complexity, with initial investigation and supervision costs at £75 per hour. He later corrected himself (after the First Respondent's submissions), stating Part B on H5 better reflected the firm's hours, giving a rate closer to £790 per hour.

The Respondents' Submissions

41. They argued £52,000, was disproportionate. The case had not been complex by the standards of other matters coming before the Tribunal. The facts were admitted early, so there was no dispute.
42. The First Respondent identified only three substantive elements of work carried out by the Applicant, compilation of the bundle, limited correspondence, and attendance at a case management hearing, plus the substantive hearing which had lasted less than half a day.
43. As for the bundle the First Respondent submitted it was little more than a collation of printouts rather than complex legal argument, that the implied rate in excess of £900 per hour was excessive, that there was no breakdown between elements, and that the blanket fixed fee appeared punitive rather than reflective of costs actually incurred. He accepted some cost consequence was appropriate but said repaying £52,000 would be very difficult without taking out a loan and an unfair burden.

Tribunal's Decision on Costs

44. The Tribunal considered its discretion under Rule 43 of the Solicitors (Disciplinary Proceedings) Rules 2019 and to the factors in Rule 43.4.
45. The matter had been properly brought, and the Applicant had acted reasonably in its conduct of the proceedings and had complied with all directions. The First Respondent's late and partial engagement with the regulatory process had contributed to the length of the investigation, and the Tribunal had regard to that factor in its overall assessment.
46. The Tribunal accepted the Applicant's investigation and supervision costs of £7,237.50 in full. The hourly rate of £75 and the 96.5 hours recorded were reasonable, the work was genuinely required, and the figure properly reflected the investigative effort undertaken by the SRA.
47. The Tribunal had greater difficulty with the further sum of £45,480.00 claimed in respect of the work of Blake Morgan LLP. The Tribunal noted that, although described as a fixed fee, the schedule at H4 and H5 provided a unit-based breakdown of the work undertaken, against which the proportionality of the sum claimed could be

assessed. On that breakdown, the combined total across all stages was 575 units (57.5 hours), giving an effective rate, inclusive of VAT, of approximately £790 per hour.

48. The Tribunal considered that rate to be excessive for a matter of this character. The case as ultimately presented was straightforward. The allegations had been admitted in the Answer and at hearing. The Rule 12 Statement was a short document, largely populated with chronology tables drawn from the SRA's investigation rather than the product of substantial legal analysis, yet the schedule recorded 156 units (15.6 hours) of Legal Director and Partner time on its drafting. The hearing block included an estimate of 130 units of preparation and attendance for a hearing listed for a full day but in the event concluded in approximately two hours, with admissions removing the need for any contested element. The schedule also included time recorded against "applying to proceed in absence," a step which did not in the event arise on the facts of this case.
49. The Tribunal considered that the matter could have been prepared and presented at a cost level considerably closer to that of the investigation and supervision element. The Tribunal recognised that an Applicant is entitled to incur the costs reasonably necessary to bring proceedings before the Tribunal, and that an admission at hearing does not entitle a Respondent to a default reduction in costs incurred up to that point. The Tribunal's concern was not with the fact of the costs but with the proportionality of the sum claimed for the work that the case, as presented, actually required.
50. The Tribunal also took into account the First Respondent's submissions as to means. While the Tribunal noted that no documentary evidence of means had been provided in accordance with Rule 43.5, the absence of such evidence did not displace the Tribunal's independent assessment of what was a proportionate sum to order in all the circumstances.
51. Standing back and taking these matters together, the Tribunal concluded that the proportionate and reasonable sum to be ordered by way of costs was £15,000, inclusive of VAT, to be paid by the First Respondent and the Second Respondent on a joint and several basis.

Statement of Full Order

The First Respondent

52. The Tribunal Ordered that the First Respondent, HABIBUR CHOUDHURY, solicitor, do pay a FINE of £4,500, such sum to be paid jointly and severally with the Second Respondent. This penalty is forfeit to His Majesty the King. The Tribunal further Ordered that the First Respondent do pay the costs of and incidental to this application and enquiry, fixed in the sum of £15,000, such costs to be paid jointly and severally with the Second Respondent.

The Second Respondent

53. The Tribunal ORDERED that the Second Respondent, ARCHSTONE SOLICITORS LIMITED, do pay a FINE of £4,500.00, such sum to be paid jointly and severally

with the First Respondent. This penalty is forfeit to His Majesty the King. The Tribunal further Ordered that the Second Respondent do pay the costs of and incidental to this application and enquiry fixed in the sum of £15,000.00, such costs to be paid jointly and severally with the First Respondent.

Dated this 5th day of June 2026
On behalf of the Tribunal

L. Boyce

L. Boyce
Chair