

SOLICITORS DISCIPLINARY TRIBUNAL

IN THE MATTER OF THE SOLICITORS ACT 1974

Case No. 12867-2025

BETWEEN:

SOLICITORS REGULATION AUTHORITY LTD

Applicant

and

ANTHONY DAVID DAVIS

Respondent

Before:

Ms A Banks (in the chair)

Ms G Palmiero

Mr C Childs

Date of Hearing: 23 June 2026

Appearances

Tom Walker, counsel employed by Blake Morgan LLP, One Central Square, Cardiff CF10 1FS for the Applicant.

The Respondent represented himself.

JUDGMENT

Allegations

1. The allegation made against Mr Davis by the Solicitors Regulation Authority Limited ("SRA") were that on 16 August 2023, while attending Coventry Police Station, in his role as duty solicitor, he:
 - 1.1. Stated to Person A words to the effect of *'he had four wives in Russia, two of who had died, and the Police could not find them'* or *'he had four wives and two died in Russia because the police could not find them'*, which was inappropriate; and/or
 - 1.2. Stated to Person A words to the effect of *'his aim was to die in this job or at a police station'* and/or she would *'have to give him a kiss to keep him alive'*, which was inappropriate and/or unwanted; and/or
 - 1.3. Stated to Person A words to the effect of *'being stopped by the Police on 32 occasions and breath-tested'* and/or *'he was T total, and he was just a liability on the roads'*, which was inappropriate; and/or
 - 1.4. Stated to Person B words to the effect of *'a waitress spilt some potato soup on his crotch and started using a cloth to rub the soup off this area'*, which inappropriate and/or unwanted; and/or
 - 1.5. Stated to Person A and/or Person B words to the effect of *'about eating human flesh, especially women's flesh'* and/or *'eating human flesh'*, which was inappropriate; and/or
 - 1.6. Stated to Person B words to the effect of *'if your boyfriend becomes a violent alcoholic then I will snap you up'*, which was inappropriate and/or unwanted.

Thereby breaching any or all of Principles 2, 5 and 6 of the SRA Principles 2019 ("the Principles") and Paragraph 1.5 of the SRA Code of Conduct for Solicitors, RELs, RFLs and RSLs ("the Code").

Executive Summary

2. Mr Davis admitted that he said the words to the effect of those set out in the allegations. In the Statement of Agreed Facts, Mr Davis admitted that the comments made were inappropriate. At the commencement of the hearing, Mr Davis confirmed that it was not accepted that anything said had been inappropriate. Accordingly, the Tribunal firstly considered whether the comments were inappropriate and, if they were, whether they breached the Principles and Code as alleged. The Tribunal found that the comments made in allegations 1.1, 1.2 and 1.3 were not inappropriate. Accordingly, those allegations were dismissed.
3. The Tribunal found that the comments detailed at allegations 1.4, 1.5 and 1.6 were inappropriate. The Tribunal did not find that the comments amounted to professional misconduct in breach of the Principles and Code. Accordingly, the Tribunal dismissed the allegations.

Documents

4. The Tribunal reviewed all the documents submitted by the parties, which included (but was not limited to):
 - Rule 12 Statement and Exhibit AD1
 - The Respondent's Answer and Exhibits
 - Statement of Agreed Facts

Professional Details

5. Mr Davis, who was born in 1943 was a solicitor, having been admitted to the Roll in July 1980.

Preliminary Matters

6. Application to withdraw aggravating features
 - 6.1 The parties applied to amend the Rule 12 Statement, removing the contention that allegations 1.2, 1.4 and 1.6 were sexually motivated and or sexual in nature. Mr Walker submitted that there was never any suggestion of harassment. Following a review by the Applicant and discussions between the parties, it was agreed that those matters would not be pursued.
 - 6.2 The Tribunal considered that it was appropriate to allow the aggravated elements to be withdrawn. Accordingly, the application was granted.
7. Publication of the Statement of Agreed Facts in lieu of the Rule 12
 - 7.1 The Tribunal's Automatic Disclosure Policy provided for the disclosure of the Rule 12 Statement at the commencement of the substantive hearing. Following the Tribunal's granting of the application to amend the Rule 12 Statement, withdrawing the contention of aggravating features, the Rule 12 Statement was no longer an accurate reflection of the case against Mr Davis. In the circumstances, it was submitted, the Statement of Agreed Facts was the appropriate document to disclose.
 - 7.2 The Tribunal agreed that the Statement of Agreed Facts should be published in lieu of the Rule 12 Statement.
8. Anonymisation
 - 8.1 The parties applied to anonymise Persons A and B. At the time of the alleged misconduct, they were serving police officers. Both Persons A and B were no longer police officers. The parties submitted that there was no public interest in the disclosure of their names.
 - 8.2 The Tribunal was satisfied that members of the public would understand the case Mr Davis faced without knowing the identity of Persons A and B. There was no public interest in knowing the identities of Persons A & B. Accordingly, the Tribunal granted the application for the anonymity of Persons A and B.

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 Mr Davis's rights to a fair trial and to respect for his private and family life under Articles 6 and 8 of the European Convention for the Protection of Human Rights and Fundamental Freedoms.

Integrity

The test for integrity was that set out in Wingate and Evans v SRA and SRA v Malins [2018] EWCA Civ 366, as per Jackson LJ:

“Integrity is a useful shorthand to express the higher standards which society expects from professional persons and which the professions expect from their own members ... [Professionals] are required to live up to their own professional standards ... Integrity connotes adherence to the ethical standards of one's own profession.”

10. Agreed Facts

- 10.1 The Agreed Facts are contained in the Statement of Agreed Facts annexed to this Judgment. In summary it was agreed that on 31 May 2024, West Midlands Police made a report to the Applicant concerning Mr Davis's conduct on 16 August 2023 towards two female police officers, Person A and Person B. At the time, Mr Davis was acting as duty solicitor for a client in custody at Coventry Police Station.
- 10.2 Person A said that, while walking Mr Davis from reception to the interview room, she observed him breathing heavily and coughing. When she asked about his welfare, he said he felt ill and that the NHS *would be responsible for his death*, or words to that effect.
- 10.3 Person A then escorted him to undertake disclosure with him alone in the interview room. She considered that he appeared more interested in making light-hearted jokes than representing his client. She said he joked that he had four wives in Russia, two of whom had died and could not be found by the police, or words to that effect, before clarifying that it was a joke.
- 10.4 During disclosure, Person A said Mr Davis repeatedly stated that he had no *life* outside work, that his *aim was to die in the job or at a police station*, and that she would *have to give him a kiss to keep him alive*, or words to that effect.
- 10.5 After disclosure, Person A walked Mr Davis to the custody suite. She said he referred to having been *stopped* by police and breath-tested *on 32 occasions*, being teetotal, and being *a liability on the roads*, or words to that effect.
- 10.6 Person A showed Mr Davis to an interview room and left him there. She believed Person B later took him a drink.

- 10.7 Person B said that, when she delivered a drink and accidentally spilt some on the floor, Mr Davis, who was alone and facing her, commented that *a waitress* in Ireland had *spilt potato soup on his crotch and* rubbed it off with *a cloth*, or words to that effect. He made no movements or gestures, but the comment made Person B feel uncomfortable and shocked.
- 10.8 Before the client interview began, in the presence of the client, both officers said Mr Davis spoke about eating human flesh. Person A recalled a reference to women's flesh. Person B said she told him it was illegal, but he continued to make a further comment about eating human flesh, or words to that effect.
- 10.9 At the end of the interview, Person B said Mr Davis looked directly at her and said words to the effect that, if her boyfriend became a violent alcoholic, he would "snap [her] up". She said the comment, made in front of his client, surprised and shocked her. Person A recalled a comment about Person B's boyfriend.
- 10.10 Person A later told Person B about Mr Davis's earlier comment that he needed *a kiss* from Person A to stay alive, or words to that effect.
- 10.11 Both officers submitted contemporaneous internal reports to the supervising police sergeant.
- 10.12 Person A, then a student officer undertaking her first independent disclosure exercise with a solicitor, said the comments crossed *professional* boundaries and were directed at her and Person B as *female police* officers.
- 10.13 Person B said the comments made her feel uncomfortable and that, on reflection, she should *have challenged* them *and not continued with the interview* process. She also considered that the comments were directed at both officers as *female police officers who were visibly young in service and experience*.

The Applicant's Case

- 10.14 Mr Walker submitted that all the comments were inappropriate when considering that Mr Davis had attended the police station to represent a client in custody. As to each of the statements:
- There was no justification for the comments made in relation to Mr Davis's wives in the context of obtaining pre-interview disclosure. Mr Walker submitted that the comments could be considered glib, oversharing, and possibly alarming. In any event, they were inappropriate given the context.
 - Comments in relation to resuscitation were inappropriate as they made light of a potential welfare issue. Referring to the kiss of life created the image of physical contact between Mr Davis and a young female police officer. His comment created a sense of discomfort. Such comments, it was submitted, were both unwanted and inappropriate.
 - With regard to Mr Davis's comments on being stopped by the police and breathalysed, whilst this could be seen as a throwaway comment of a glib nature,

it referred to, and perhaps minimised contact with the police, creating the idea that Mr Davis was routinely stopped by police and was a liability on the road. Such a comment, it was submitted, was not likely to be treated as humorous and was more likely to be treated as one of alarm or concern.

- As to his comments in relation to potato soup, whilst this was made in the context of spilled water, it was an unnecessary parallel to draw. It was inappropriate for Mr Davis to make reference to another female rubbing his crotch.
- Mr Walker submitted that it was alarming and inappropriate for Mr Davis to refer to the eating of flesh whilst attending a police station to advise a suspect, and in the presence of his client.
- The comments in relation to Person B's *boyfriend* were an intrusion into her private life and were clearly and obviously inappropriate in the circumstances.

10.15 Mr Walker submitted that given Mr Davis's attendance to represent his client, the comments made were all inappropriate, were made without justification and were not reciprocated.

10.16 As to the suggestion that the comments were a succession of jokes, banter, or ribaldry in order to reduce tension, it was clear that the officers did not view them in this light. Whilst Mr Davis may well have viewed his comments in that light, they were lacking in empathy and emotional intelligence. Such comments, it was submitted, were not appropriate in the context of the professional environment.

10.17 Mr Walker submitted that some of the comments made were more inappropriate than others; this did not detract from the inappropriateness of all of the comments made.

10.18 Further, Mr Davis had been notified of a complaint made of his use of potentially inappropriate comments in May 2023. The complaint resulted in a letter of advice from the SRA to Mr Davis shortly before these incidents. Accordingly, it was submitted, Mr Davis was on notice that he needed to be more careful with his attempts at humour.

Paragraph 1.5 of the Code

10.19 Mr Walker submitted that Persons A and B were Mr Davis's colleagues. The SRA's guidance, *Workplace environment: risks of failing to protect and support colleagues*, stated that "*colleagues*" included not only those formally employed by the same firm or organisation, but also others with whom a solicitor worked closely. The Applicant's case was that, as the duty criminal solicitor attending the police station, which formed part of his working environment, Mr Davis was working closely with both officers. His comments were made in a professional context: during the provision of disclosure by Person A, while arrangements were being made for the police interview with Person B, and during and/or after the interview, including when his client was present.

10.20 Mr Davis, it was submitted, had failed to treat Persons A and B fairly and with respect. He had made sexualised remarks which were unwanted. His comments were unnecessary and unprofessional, making Persons A and B feel uncomfortable and/or

shocked. Mr Walker further submitted that the remark to Person B about her partner becoming “*a violent alcoholic*” was plainly disrespectful and/or offensive and had surprised and shocked her. Such conduct, it was submitted, breached Paragraph 1.5 of the Code.

Principle 5

- 10.21 Comments made were all inappropriate and demonstrable of a lack of integrity. Mr Walker submitted that the variety, scope, subject matter, and intrusion into personal space of the comments made was indicative of a lack of integrity. Whilst such comments might not indicate a lack of integrity in a different environment, Mr Davis was a solicitor and acting in that capacity at the time. As such, he was required to adhere to the higher standards of the profession. Making sexualised, (I REFER TO MY COMMENTS ABOVE) offensive, intrusive and inappropriate comments failed to adhere to that standard. A duty solicitor attending the Police Station to represent a detainee should conduct themselves appropriately at all times, having regard to the importance of their role in that situation. Making inappropriate remarks of the type referred to, demonstrated a lack of integrity. Mr Davis therefore breached Principle 5.

Principle 2

- 10.22 Mr Davis’s conduct also amounted to a breach of the requirement to act in a way that upholds public trust and confidence in the solicitors’ profession. As detailed, Mr Davis had made sexualised, (AS ABOVE) offensive, unprofessional, puerile, and intrusive comments. As a result of his conduct, the police officer formed the opinion that Mr Davis was not fully interested in representing his client.
- 10.23 Mr Walker submitted that such conduct was likely to diminish the trust and confidence the public would place in both Mr Davis and the wider profession. Person B said that his comments had made her feel uncomfortable and shocked and had taken her by surprise. Matters were made worse having been said in front of his client.
- 10.24 Members of the public would not expect a solicitor to make such comments to two female police officer colleagues, crossing professional boundaries, and/or causing them to feel uncomfortable with unwanted attention in the course of their duties in their workplace. While a police officer may anticipate difficult behaviour from a person in custody, they did not expect such conduct from the solicitor representing the individual.
- 10.25 Persons A and B were also members of the public (albeit having encountered Mr Davis in the course of their work as police officers). The impact of his comments on their view of him as a solicitor was relevant to the trust and confidence the public placed in the profession. In conducting himself as he had, Mr Davis breached Principle 2.

Principle 6

- 10.26 Mr Walker submitted that Mr Davis’s conduct was counter-inclusive and inconsistent with the requirement to encourage equality, diversity, and inclusion. Mr Davis was an experienced senior solicitor and colleague of Person A and Person B. He was in control of, and responsible for, his conduct. Person A stated she felt the comments were directed towards her and Person B as female police officers. Person B echoed the comments

being directed towards them as female Police Officers and being young in service and experience. Female colleagues should be able to come into their place of work without experiencing unwanted attention and feeling uncomfortable. By his conduct at allegations 1.2, 1.4 and/or 1.6, Mr Davis did not act in a way that encouraged equality, diversity, and inclusion. He therefore breached Principle 6.

The Respondent's Case

- 10.27 Mr Davis denied that any of the comments made were inappropriate. Mr Davis submitted that he took exception to the fact that informal discussions had with police officers at the police station were being noted and then used as evidence against him. Further, what was said had been twisted and taken out of its proper context.
- 10.28 Police officers, it was submitted, were employed to investigate criminal conduct. They were not noted for their hypersensitivity and were not shrinking violets. Nor did police officers have the prerogative of prescribing the moral high ground.
- 10.29 Mr Davis explained that he did not intend to cause any offence or insult by the comments made. His comments were the expression of his eccentric humour; that this was the case was clear in relation to the comment about human flesh which, it was submitted, was an '*off-the-cuff*' and flippant remark in response to something said to him.
- 10.30 As to the comment in relation to the kiss of life, Mr Davis submitted that he had a number of medical ailments. The comment was made in response to an enquiry as regards his health. Any suggestion that Mr Davis was actually asking for a kiss of life was misconstrued.
- 10.31 The comments in relation to his wives was incorrect. None of his wives were deceased. The comment regarding his having been stopped by the police and breathalysed on a number of occasions was in reference to when he had been stopped late at night, following a police station attendance and had been stopped due to his slow driving speed, his driving being slow and hesitant.
- 10.32 All of the comments complained of were an expression of Mr Davis's humour. Mr Davis queried how, if such comments caused alarm to the officers, they would be able to carry out their duties as police officers.
- 10.33 As to the alleged breach of paragraph 1.5, police officers were not colleagues, they were the opposition. To refer to police officers as colleagues was a complete anathema.
- 10.34 Members of the public, it was submitted, would not be bothered by the flippant and humorous comments complained of. Public trust in the profession was not likely to be undermined. Members of the public would be far more concerned about solicitors acting dishonestly or committing criminal offences. Comments of the nature complained of would be viewed by the public as trivial.
- 10.35 Mr Davis did not consider that his conduct lacked integrity. He had made asinine and flippant comments. Such comments did not fall below the higher standards expected in the circumstances. As to Principle 6, Mr Davis submitted that his comments were not

disrespectful, abusive, disparaging, or disdainful. Accordingly, Mr Davis denied that his conduct was in breach of Principle 6.

The Tribunal's Findings

- 10.36 The Tribunal firstly considered whether the comments made were inappropriate. The Tribunal noted that that Mr Walker had referred to the comments regarding Mr Davis's wives as being *oversharing*. Person A's statement, the Tribunal found, was silent as to how the conversation commenced, and was unclear as to the words used. The lack of clarity, the Tribunal found, was evidenced in the pleaded case. Indeed, Mr Walker had submitted that there should not be a focus on the words actually used, as the Applicant's case was not about the "*exact words*," rather it was "*a matter of generality*."
- 10.37 Mr Davis did not accept that he had told Person A that any of his wives were deceased.
- 10.38 The Tribunal was not satisfied that the words used, generally (or even exactly) were inappropriate simply due to Mr Davis attending the police station to represent a detained person. There was nothing inappropriate per se in referring to a spouse during the course of a police station attendance. The Tribunal did not accept that *oversharing* of this nature was inappropriate. Accordingly, the Tribunal dismissed allegation 1.1.
- 10.39 Allegation 1.2 related to comments made by Mr Davis regarding resuscitation. Mr Davis stated that he had not asked for a kiss. Any conversation in that regard would have related to his health conditions. He explained that he had collapsed before and that he was "*always pointing out the medical requirements if anything happened to me*." The Tribunal did not find that references to the kiss of life were inappropriate in those circumstances. Accordingly, the Tribunal dismissed allegation 1.2.
- 10.40 The Tribunal rejected the Applicant's submission in relation to Mr Davis's comments about the number of occasions on which he had been stopped by the police. Mr Walker had submitted that these comments were "*not likely to be treated as humorous and was more likely to be treated as one of alarm or concern*." The Tribunal was not satisfied that the submission advanced established that the comments were inappropriate. Having considered the context in which the comments were made, and the nature of the words alleged, the Tribunal did not find that they could be considered to be inappropriate. Accordingly, allegation 1.3 was dismissed.
- 10.41 The Tribunal found that Mr Davis's statements regarding a waitress using a cloth to rub spilt soup off his crotch, references to eating female human flesh and references to Person B's boyfriend and being first in line if she became single, were inappropriate. The Tribunal did not consider that these comments were "*banter*" or that they were an appropriate expression of Mr Davis's humour. Accordingly, the Tribunal considered whether these comments, either individually or taken together, amounted to professional misconduct in breach of the Code and the Principles as alleged.
- 10.42 The Tribunal determined that not all inappropriate conduct by a solicitor would be sufficiently serious such that it amounted to professional misconduct. The inappropriate comments made by Mr Davis fell into this category. Although inappropriate, the Tribunal did not find that the comments made were sufficiently serious such as to amount to professional misconduct. The Tribunal applied the test in Dentons v SRA

[2026] EWCA Civ 508, namely that the question for the Tribunal was “*whether the conduct in question would be considered sufficiently serious by competent and reputable solicitors that it be categorised as professional misconduct*”. The comments were inappropriate and ill-advised but did not (individually or cumulatively) cross the threshold of sufficient seriousness.

- 10.43 Further, the Tribunal was not satisfied that members of the profession would consider that Mr Davis’s comments were such as to amount to professional misconduct, nor did it find that public trust in the profession would be diminished by the comments made. Accordingly, the Tribunal dismissed the contention that his conduct was in breach of Principles 2 and 5.
- 10.44 The Tribunal was not satisfied that Mr Davis’s comments were counter-inclusive such that it amounted to a breach of Principle 6; this allegation had not been satisfactorily substantiated by the Applicant.
- 10.45 The Tribunal did not find that the police officers were colleagues for the purposes of paragraph 1.5. Mr Davis, as a representative for a detainee, could not be described as “*working closely*” with the police. Such a description, the Tribunal found, was to misunderstand the role of a solicitor representing a client in custody. Accordingly, a breach of paragraph 1.5 of the Code could not be substantiated.
- 10.46 The Tribunal, having found none of the Principles or Code breaches alleged proven dismissed the allegations.

Costs

- 11. Mr Davis applied for costs in the sum of £10,000. It was submitted that those costs comprised the loss of income due to the police banning him from attending the police station. It also included the cost of the instruction of agents for police station attendances. Further, Mr Davis had spent £1,000 instructing Kings Counsel for advice on the police station attendance ban.
- 12. Mr Walker opposed the costs application. He submitted that it would be wholly inappropriate for the Tribunal to award costs as a punitive award or as compensation.
- 13. The Tribunal noted that the costs claimed by Mr Davis did not relate to his defence of the allegations, rather, he was seeking compensation for lost income and for the instruction of counsel in relation to a decision taken by the police. The Tribunal determined that the application was not one for costs but was for compensation. The Tribunal had no jurisdiction to award compensation. Accordingly, the Tribunal determined that the appropriate order was to make no order as to costs.

Statement of Full Order

- 14. The Tribunal ORDERED that the allegations against ANTHONY DAVID DAVIS, solicitor, be DISMISSED and it further ordered that there be no Order as to costs.

Dated this 10th day of July 2026
On behalf of the Tribunal

A Banks

A Banks
Chair

BEFORE THE SOLICITORS DISCIPLINARY TRIBUNAL

Case No: 12867-2025

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

AND IN THE MATTER OF:

SOLICITORS REGULATION AUTHORITY LIMITED

Applicant

and

ANTHONY DAVID DAVIS

Respondent

STATEMENT OF AGREED FACTS

The amended allegations

1. The proposed amended allegations against the Respondent, Anthony Davis are that, on 16 August 2023, while attending Coventry Police Station, in his role as duty solicitor, he:
 - 1.1. Stated to Person A words to the effect of *'he had four wives in Russia, two of who had died, or [two wives in Russia] and the Police could not find them'* or *'he had four wives and two died in Russia because the police could not find them'*, which was inappropriate; and/or
 - 1.2. Stated to Person A words to the effect of *'his aim was to die in this job or at a police station'* and/or she would *'have to give him a kiss to keep him alive'*, which was inappropriate and/or unwanted; and/or
 - 1.3. Stated to Person A words to the effect of *'being stopped by the Police on 32 occasions and breath-tested'* and/or *'he was T total, and he was just a liability on the roads'*, which was inappropriate; and/or
 - 1.4. Stated to Person B words to the effect of *'a waitress spilt some potato soup on his crotch and started using a cloth to rub the soup off this area'*, which was inappropriate and/or unwanted; and/or

1.5. Stated to Person A and/or Person B words to the effect of '*about eating human flesh, especially women's flesh*' and/or '*eating human flesh*', which was inappropriate; and/or

1.6. Stated to Person B words to the effect of '*if your boyfriend becomes a violent alcoholic then I will snap you up*', which was inappropriate and/or unwanted.

Admissions

2. The Respondent admits that he said words to the effect of those set out in the allegations and accepts that the witnesses would have understood that he said words to those effect.
3. The Respondent accepts that his comments were inappropriate and have resulted in concern and complaint by the witnesses in this case. The Respondent does not accept that the allegations represent a breach of the Principles or Code. The Respondent states that his comments were at attempt at humour and that he had no intention to cause offence or distress but accepts that this was the consequence of his actions.

Matters in Issue

4. The issue to be determined is whether the admitted conduct of the Respondent breached any or all of Principles 2, 5 and 6 of the SRA Principles 2019 ("the Principles") and Paragraph 1.5 of the SRA Code of Conduct for Solicitors, RELs, RFLs and RSLs ("the Code for Solicitors"). Sanction remains a matter for the learned Tribunal.

Appendices and Documents

5. The following appendices are attached:

Appendix 1: Relevant Rules and Regulations
Appendix 2: Anonymisation Schedule

6. Attached to this statement is a bundle of documents, marked "AD1". Unless otherwise stated, the page references ("AD1, x") in this statement relate to documents contained in that bundle.

7. The bundle is divided into the following sections:

Section A:	Witness Statements
Section B:	Correspondence between the SRA and the Respondent
Section C:	Notice Recommending Referral to the Tribunal and Decision to Refer

Professional Details

8. The Respondent, who was born on June 1943, is a solicitor having been admitted to the Roll on 15 July 1980. The Respondent is employed by S & H Law Practice Limited.

The facts and matters relied upon in support of the allegations

9. This matter came to the attention of the Applicant on 31 May 2024, when it received a report from West Midlands Police raising concerns in relation to the Respondent's conduct on 16 August 2023 towards two female police officers, Person A and Person B. At the material time, the Respondent was the duty solicitor, acting for an individual who was in police custody in Coventry Police Station.
10. Person A stated that she met the Respondent in the reception at the police station and, whilst they were walking to the interview room, she observed the Respondent to be *'breathing very heavily'* and *'he was coughing a lot'*. She enquired of the Respondent if he was ok, in order to check on his personal welfare. In response, the Respondent stated to Person A that *'he was feeling ill'* and that the *'NHS would be responsible for his death'*, or words to that effect (AD1, 3).
11. Person A stated that she escorted the Respondent to the main part of the police station to undertake the disclosure exercise in relation to his client. At this point, Person A stated that they were alone in the interview room. She started to provide the Respondent with disclosure for his client, and it appeared to Person A that the Respondent was more interested in telling her *'light-hearted jokes rather than representing his client'*. Person A stated that the Respondent said that he had *'four wives in Russia, two of who had died, and the Police could not find them'*, or that *'he had four wives and two died in Russia because the police could not find them'*, or words to that effect. Person A stated the Respondent later clarified the comment was a joke, and Person A continued with the disclosure exercise (AD1, 3, 9).
12. Person A stated that, whilst providing the disclosure, the Respondent constantly said to her that he had *'no life other than work'*. Person A said the Respondent stated that *'his aim was to die in this job or at a Police station'*, and that Person A *'would have to give him a kiss to keep him alive'*, or words to that effect (AD1, 3).

13. After the disclosure exercise was finished, Person A stated that she then walked with the Respondent to the custody suite. She stated that the Respondent said to her something along the lines of *'being stopped by Police on 32 occasions and breath tested'*, and that he was *'T total, and he was just a liability on the roads'*, or words to that effect (AD1, 4).
14. Person A stated that she showed the Respondent to an interview room and left him in the room. In the interim, Person A stated that she believed her colleague, Person B, had taken the Respondent a drink (AD1, 4).
15. Person B stated that she collected a drink and delivered it to the Respondent in the interview room. At this point, Person B stated that the Respondent was alone. As Person B entered the interview room, she stated that she accidentally spilt some of the drink on the floor. Person B stated that the Respondent then said to her that, when he was on a trip to Ireland, *'a waitress spilt some potato soup on his crotch and started using a cloth to rub the soup off this area'*, or words to that effect. Person B stated the Respondent was *'facing directly towards her'* at the time he made the comment and *'did not make any movements or gestures'*. The Respondent's comment made her feel *'uncomfortable and shocked'* (AD1, 11).
16. Both Person A and Person B set up for the interview with the Respondent and his client. Prior to the interview starting, in the presence of his client, Person A stated the Respondent started to talk *'about eating human flesh, especially women's flesh'* (AD1, 4). Person B stated that the Respondent started to talk *'about eating human flesh'*, or words to that effect. Person B stated that she had pointed out to the Respondent that this was *'illegal'*, but the Respondent continued and made a further comment about *'eating human flesh'*, or words to that effect (AD1, 12).
17. At the end of the interview, Person B stated that the Respondent *'looked directly at her'* and stated that *'if your boyfriend becomes a violent alcoholic then I will snap you up'*, or words to that effect. Person B stated that the comment took her *'by surprise and shocked'* her. It was said by the Respondent in front of his client (AD1, 12). Person A stated that she recalled the Respondent making a comment with reference to Person B's boyfriend (AD1, 5).
18. Person A told Person B about the comment the Respondent had made during the disclosure exercise about *'needing a kiss'* from Person A to *'stay alive'* or words to that effect (AD1, 7).
19. Both Person A and Person B submitted contemporaneous internal reports about the Respondent's conduct to the supervising police sergeant (AD1, 9; AD1, 17).

20. Person A stated that, at the time of her dealings with the Respondent, she was a student officer, and this was her *'first independent experience of providing a solicitor with disclosure'* for a client. Person A also stated that she felt the comments *'crossed professional boundaries'* and were directed towards her and Person B *'as female police officers'* (AD1, 6-7).
21. Person B stated that the comments made by the Respondent made her *'feel uncomfortable'* and *'on reflection'*, she *'should have challenged his comments at the time and not continued with the interview process'*. Further, she felt the comments were directed towards her and Person A as *'female Police Officers who were both quite clearly young in service and experience'* (AD1, 14-15).

Breaches of Principles and the Code

22. The Applicant alleges breaches of the following principles which are not accepted by the Respondent.

Principle 5 (integrity)

23. The Respondent's actions amounted to a failure to act with integrity (i.e. with moral soundness, rectitude and steady adherence to an ethical code) in breach of Principle 5 of the SRA Principles. In *Wingate v Solicitors Regulation Authority v Malins* [2018] EWCA Civ 366, it was said that integrity connotes adherence to the ethical standards of one's own profession. The Respondent's comments at allegations 1.1 - 1.6 were all inappropriate, and the making of such comments demonstrated a lack of integrity.
24. The Respondent failed to act with integrity in relation to his puerile remarks at allegations 1.1 and/or 1.3., and his offensive remark at allegation 1.5, in the presence of his client about eating human flesh.
25. Person A and Person B were the Respondent's colleagues, in that they were working closely with him, as set out below at paragraph 33. A solicitor acting with integrity would not say to another colleague that she should give him a kiss to keep him alive (allegation 1.2), and/or refer a colleague to an intimate area of his body (allegation 1.4), and/or make a personal, offensive remark with reference to a colleague's partner (allegation 1.6).
26. A duty solicitor attending the Police Station to represent a detainee should conduct themselves appropriately at all times, having regard to the importance of their role in that situation. Making inappropriate remarks of the type referred to above, demonstrates a lack of integrity.

27. The Respondent therefore breached Principle 5.

Principle 2 (uphold public trust and confidence)

28. The conduct alleged also amounted to a breach by the Respondent of the requirement to act in a way that upholds public trust and confidence in the solicitors' profession.

29. The Respondent's comments at allegations 1.2, 1.4 and/or 1.6 to his colleagues, Person A and Person B, were also inappropriate because they had sexualised connotations. The comment at allegation 1.4 was also with reference to another female member of the public (the waitress). The comment made in the presence of his client about eating human flesh, particularly women's flesh (allegation 1.5) was offensive. The comments at allegations 1.1, and/or 1.3 were puerile.

30. Person A said she did not understand why the Respondent made the comment at allegation 1.2, which she '*found unnecessary*' and '*very unprofessional*' given he was there to represent his client (AD1, 4). As a result of the Respondent's conduct, the police officer formed the opinion that the Respondent was not fully interested in representing his client. Such conduct is likely to diminish the trust and confidence the public would place in both the Respondent and the wider profession.

31. Person B said that the Respondent's comment at allegation 1.4 made her '*feel uncomfortable and shocked*'. She had had no previous conversation with him other than to offer him a drink (AD1, 11). Person B said that the Respondent's comment at allegation 1.6, took her by '*surprise and shocked*' her and was a further example of an inappropriate comment for a solicitor to make to a police officer, and '*making it worse*' being in front of the Respondent's client (AD1, 12).

32. Both officers stated the comment at allegation 1.5 was a strange comment about illegal activity to make in front of a person in custody who was waiting to be interviewed (AD1, 5, 12).

33. Members of the public would not expect a solicitor to make such comments to two female police officer colleagues, crossing professional boundaries, and/or causing them to feel uncomfortable with unwanted attention in the course of their duties in their workplace. While a police officer may anticipate difficult behaviour from a person in custody, they do not expect such conduct from the solicitor who is supposed to be representing the individual. There is evidence that some of the comments were in the presence of the Respondent's client. Person A and Person B are also members of the public (albeit having encountered the Respondent in

the course of their work as police officers), which impacted on their view of him as a solicitor, which is relevant to the trust and confidence the public places in the profession.

34. The Respondent therefore breached Principle 2.

Principle 6 (encourage equality, diversity and inclusion)

35. The Respondent's conduct was counter-inclusive and inconsistent with the requirement to encourage equality, diversity and inclusion. The Respondent was an experienced senior solicitor and colleague of Person A and Person B. He was in control of, and responsible for, his conduct. Person A stated she felt the comments were directed towards her and Person B as female police officers. Person B echoed the comments being directed towards them as female Police Officers, and being young in service and experience. Female colleagues should be able to come into their place of work without experiencing unwanted attention and feeling uncomfortable.

36. By his conduct at allegations 1.2, 1.4 and/or 1.6, the Respondent did not act in a way that encourages equality, diversity and inclusion. The Respondent therefore breached Principle 6 of the Principles.

Paragraph 1.5

37. The Applicant considers that Person A and Person B were the Respondent's colleagues. The SRA's guidance on *'Workplace environment: risks of failing to protect and support colleagues'* provides that the term 'colleagues' "*not only refers to people who are formally employed by the firm or organisation in which a solicitor works but others with whom the solicitor works closely*". The Respondent was the duty criminal solicitor working in the police station, which is an extension of his working environment, working closely alongside both police officers, Person A and Person B. The comments made to Person A and Person B were during the professional work context, that is, during the provision of disclosure material by Person A for his client, whilst setting up for the police interview with Person B for his client, and during, and/or after, the interview with both officers including when the Respondent's client was present.

38. The Respondent did not treat Person A and Person B, his female colleagues, fairly and with respect, making inappropriate and sexualised remarks (allegations 1.2, 1.4 and/or 1.6), which were unwanted. Person A and/or Person B said that the comments were unnecessary, unprofessional and/or made them feel uncomfortable and/or shocked. The Respondent made a plainly disrespectful

and/or offensive remark to Person B with reference to her partner (if he becomes 'a violent alcoholic'), which surprised and shocked her.

39. The Respondent therefore breached Paragraph 1.5 of the Code.

The SRA's investigation

40. The SRA has taken the following steps to investigate the allegations which it makes against the Respondent.

41. The SRA wrote to the Respondent on 5 August 2024, notifying him of the report from West Midlands Police and requesting his comments by 19 August 2024. The Respondent provided an initial response on 7 August 2024, submitting that he was '*unaware that ribaldly*', flippancy, and '*humour was prohibited*', and that '*otiose comments designed to reduce tension would be taken down in evidence and twisted against*' him [AD1, 22]. This response has been redacted to remove references to matters outside this investigation.

42. On 1 November 2024, an SRA's Desk Based Investigator interviewed and obtained Person B's witness account. On 20 December 2024, Person B sent her signed statement back to the SRA [AD1, 10-17].

43. On 15 January 2025 an SRA's Desk Based Investigator obtained Person A's witness account. On 18 March 2025, Person A sent her signed statement back to the SRA [AD, 2-9].

44. On 2 June 2025, the SRA wrote to the Respondent attaching the Notice of its intention to refer his conduct to the Tribunal ('the Notice') [AD1, 34-46]. This notice has been redacted to remove references to matters outside this investigation.

45. In representations dated 11 June 2025, the Respondent provided his representations [AD1, 31-32]. In brief:

- 45.1. the Respondent did not deny making the statements to Person A and/or Person B. He stated he failed to see how his comments and behaviour constituted harassment, created a lack of confidence, questioned his integrity and/or affected equality and diversity.
- 45.2. He stated that all he was '*guilty of, though guilty is hardly the right word [for] innocent banter and eccentricity*'.
- 45.3. With regard to the comment, which he stated was about '*eating a bowel*

of human flesh', he submitted that if the officer did not realise he was being 'facetious', then the officer was 'obviously cognitively compromised'.

45.4. He was often asked by officers if he was alright because presumably he appears frail. His 'stock reply' is *"if I collapse feel free to give me the kiss of life"*.

45.5. If he is *'engaged in idle banter with women'*, his 'stock comment' is, *"if your husband/partner/boyfriend runs off with the Swedish au pair then can I have first refusal"*. He stated that *'virtually every woman this has been quoted to laughs and regards it as a compliment'*.

46. On 23 June 2025, the Respondent provided further representations [AD1, 33], submitting the SRA had forwarded on what was *'in essence two flippant remarks and a humorous anecdote which hardly justifies referral'*.

47. On 8 July 2025, an Authorised Decision Maker at the SRA decided to refer the conduct of the Respondent to the Tribunal [AD1, 47 - 52]. This decision has been redacted to remove reference to matters outside this investigation.

The Current Position

48. The Respondent has reflected on his conduct and accepts that his behaviour was inappropriate for the reasons outlined above.

49. The Respondent does not accept that his conduct breached Principles 2, 5 and 6 of the Principles and Paragraph 1.5 of the Code for Solicitors.

50. The Applicant submits that the focus of the Learned Tribunal must be the conduct which has been referred and the allegations in question. However, the Applicant also submits that the Respondent's behaviour must be seen in the context of him being on notice that his professional conduct was in issue.

51. The common thread is inappropriate comments or conduct by the Respondent in a misguided attempt at humour.

10 May 2023

52. For example, the Respondent was notified that a complaint was made about his use of potentially inappropriate remarks to a youth client on 10 May 2023. This was reported by Northamptonshire Youth Offending Service (YOS). On 28 July 2023 the Respondent was informed of the complaint from YOS by the SRA (the conduct includes referring to a young person as dangerous; and 'should I write my name as Adolf Hitler') (#99972). This confirms that the Respondent was

aware that issue was being taken with his behaviour, prior to the conduct giving rise to these allegations. This complaint resulted in a Letter with Advice from the SRA to the Respondent dated 31 May 2024 (#99972). The Respondent maintains that his comments as regards the young person being dangerous were reasonable comment but acknowledges this complaint.

Sanction

53. The disposal of this case is a matter to be determined by the Learned Tribunal.

Signed by Applicant

.....
Dated this 17th day of June 2026

Signed by Respondent

.....
Dated this 1st day of July 2026

BEFORE THE SOLICITORS DISCIPLINARY TRIBUNAL

Case No:

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

AND IN THE MATTER OF:

SOLICITORS REGULATION AUTHORITY LIMITED

Applicant

and

ANTHONY DAVID DAVIS

Respondent

**APPENDIX 1 TO STATEMENT PURSUANT TO RULE 12(2) SOLICITORS
(DISCIPLINARY PROCEEDINGS) RULES 2019**

Relevant Rules and Regulations

SRA Principles 2019

Principle 2	You act in a way that upholds public trust and confidence in the solicitors' profession and in legal services provided by authorised persons.
Principle 5	You act with integrity.
Principle 6	You act in a way that encourages equality, diversity and inclusion

Code of Conduct for Solicitors, RELs, RFLs and RSLs

Paragraph 1.5	You treat colleagues fairly and with respect. You do not bully or harass them or discriminate unfairly against them. If you are a manager, you challenge behaviour that does not meet this standard
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BEFORE THE SOLICITORS DISCIPLINARY TRIBUNAL

Case No:

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

AND IN THE MATTER OF:

SOLICITORS REGULATION AUTHORITY LIMITED

Applicant

and

ANTHONY DAVID DAVIS

Respondent

**APPENDIX 2 TO STATEMENT PURSUANT TO RULE 12(2) SOLICITORS
(DISCIPLINARY PROCEEDINGS) RULES 2019**

Anonymisation Schedule

Person A:

Person B: