

SOLICITORS DISCIPLINARY TRIBUNAL

IN THE MATTER OF THE SOLICITORS ACT 1974

Case No. 12878-2025

BETWEEN:

ASHTAR ABBAS DHAMI

Applicant

and

SOLICITORS REGULATION AUTHORITY LTD

Respondent

Before:

Ms A Kellett (in the chair)

Ms A Banks

Ms E Keen

Date of Hearing: 17 March 2026

Appearances

The Applicant represented himself.

Charlotte Elves, Counsel of Outer Temple Chambers, The Outer Temple, 222 Strand, London, WC2R 1BA for the Respondent.

JUDGMENT ON AN APPLICATION TO REMOVE CONDITIONS

Background

1. The Applicant was admitted to the Roll of Solicitors on 15 May 2007. At the time of the conduct which gave rise to the original allegations, he was practising as a solicitor at Hanson Young & Co (“the Firm”), based in Harrow and was the sole principal of the Firm. At the material time, the Applicant held the following roles at the Firm:
 - Director from around 1 March 2010 (upon the Firm’s authorisation as a recognised body).
 - Compliance Officer for Legal Practice (“COLP”).
 - Compliance Officer for Finance and Administration (“COFA”); and
 - Sole signatory to the Firm’s client bank accounts.
2. In March 2015, the Respondent commenced an inspection into the books of account of the Firm. This was followed by a further inspection in September 2016. The subsequent Forensic Investigation Report dated 21 September 2016 identified a number of breaches of the SRA Accounts Rules 2011 which were applicable at the time and SRA Principles 2011 which were applicable at the time.
3. On 15 November 2016, an Adjudication Panel decided to intervene into the Firm based on the identified failures to comply with the Accounts Rules and the Principles and reason to suspect dishonesty. The Respondent intervened on 17 November 2016. The Applicant’s 2015/2016 practising certificate was suspended as a result of the intervention, and it expired while it was suspended.
4. The Applicant was consequently referred to the Tribunal on 4 January 2017. The allegations against the Applicant included dishonesty and a lack of integrity, particularly in relation to information provided to his firm’s insurer. It was alleged that he falsely declared that there had been no investigations by the Solicitors Regulation Authority or the Legal Ombudsman, when in fact such investigations had taken place.
5. Further allegations related to serious and repeated breaches of the SRA Accounts Rules between 2014 and 2016. These included failures to maintain proper accounting systems and records, mishandling of client money, allowing significant client account shortfalls to arise, and failing to correct those shortfalls promptly. There were also allegations of improper transfers of client funds to office accounts and the movement of funds between client and suspense ledgers in ways that breached regulatory requirements.
6. Finally, it was alleged that the Applicant had acted improperly in his dealings with a client by entering into a settlement agreement that sought to prevent the client from making complaints to the firm or the Legal Ombudsman. This raised further concerns about his compliance with professional obligations, particularly in relation to fairness, transparency, and the proper handling of complaints.
7. In October 2017, the Applicant appeared before the Tribunal, where allegations that he had breached the SRA Accounts Rules 2011, as well as Principles 2, 8 and 10 of the

SRA Principles 2011 and Outcome 10.7 of the SRA Code of Conduct 2011, were found proven. However, the allegation of dishonesty was not proved.

8. At that hearing, the Tribunal considered it reasonable and proportionate to suspend the Applicant from practice for a period of six months. It further ordered that, upon the expiry of that suspension, the Applicant would be subject to a number of ongoing restrictions on his practice. These were as follows:

The respondent may not:

- Practise as a sole practitioner or sole manager or sole owner of an authorised body.
- Be a partner or member of a Limited Liability Partnership LLP, Legal Disciplinary Practice (LDP), or Alternative Business Structure (ABS) or other authorised or recognised body.
- Be a Compliance Officer for Legal Practice or a Compliance Officer for Finance and Administration.
- Hold client money.
- Be a signatory on any client account.
- Work as a solicitor other than in employment approved by the Solicitor's Regulation Authority.

9. In an application dated 8 December 2025, the Applicant applied for the restrictions on his practice imposed by the Tribunal on 2 November 2017 to be removed.

Applicant's Submissions

10. The Applicant submitted that it had been nearly nine years since the conditions were imposed and that, during that time, he had matured both personally and professionally. He stated that he had complied fully with all conditions, undertaken continuous professional development, and practised exclusively in criminal legal aid work. He described his work as low risk, involving the preparation of criminal cases before the Crown Court, attendance at Magistrates' Courts, and advising clients at police stations. The Applicant emphasised that he had no intention of establishing his own firm or practising outside his current area.
11. The Applicant further submitted that the conditions imposed practical and financial constraints. The Applicant referred to his significant financial responsibilities relating to his family and explained that the requirement for prior approval from the Solicitors Regulation Authority restricted his ability to undertake flexible work with other firms, as is common in criminal practice, thereby limiting his earning capacity.
12. The Applicant submitted that removal of the conditions would enable him to act as a supervisor, for which he otherwise met the relevant criteria, and would allow him to provide cover for other firms and increase his income. He contended that the conditions

had served their purpose, that the risk of recurrence was low, and that their removal was now appropriate and proportionate.

13. In support of the application, Mohammed Asif, the owner, and principal of Newgate Solicitors, provided evidence confirming that the Applicant had been employed by his firm as a part-time duty solicitor since 2018 and had been subject to close supervision in accordance with regulatory requirements. He described a structured system of oversight, including day-to-day supervision, file and attendance note reviews, input from senior solicitors, formal appraisals, and external compliance checks, all of which ensured that the Applicant's work met professional standards.
14. Mr Asif also outlined the practical difficulties of employing a solicitor subject to conditions, including administrative burdens, delays in obtaining approvals, and initial concerns regarding risk and reputation. He stated that the Applicant had demonstrated remorse, professionalism, and reliability, and confirmed that, if the conditions were removed, he would offer the Applicant full-time employment with supervisory responsibilities, including potential management of a branch office. He expressed the view that the restrictions were no longer necessary.

Respondent's Submissions

15. The Respondent, represented by Ms Elves, opposed the application on the basis of the seriousness of the Applicant's original misconduct and the continued need for the restrictions. It was submitted that the Tribunal in 2017 had found multiple breaches of the applicable accounts rules, together with findings of lack of integrity, arising from conduct that was deliberate, repeated, and extended over a period of time involving multiple clients. The Applicant had held senior roles, including director, Compliance Officer for Legal Practice, Compliance Officer for Finance and Administration and bore direct responsibility for the misconduct.
16. His culpability was assessed as high, and the Tribunal had concluded that both a period of suspension and the imposition of restrictions were necessary and proportionate to protect the public and maintain confidence in the profession.
17. The Respondent submitted that the burden lay on the Applicant to demonstrate that the restrictions were no longer necessary, and that this required clear evidence of rehabilitation, insight, and reduced risk of recurrence. It was argued that the Applicant had failed to provide sufficient or cogent evidence in this regard. His application and supporting materials were described as generalised and lacking in detail, with no substantive evidence demonstrating reflection on the misconduct, steps taken to address the underlying causes, or how the risk of repetition had been mitigated.
18. In particular, the Respondent noted the absence of relevant training addressing accounts rules, client money, ethics, or regulatory compliance, and a lack of evidence linking any professional development to the misconduct found proven. The Respondent further submitted that compliance with the conditions and the mere passage of time were not, in themselves, sufficient to justify their removal.
19. It was further submitted that the restrictions continued to serve an important protective function. The Tribunal's original reasoning emphasised the need to safeguard client

interests, uphold professional standards, and maintain public confidence. The Respondent argued that, in the absence of detailed evidence as to the Applicant's current and proposed roles, and without clear demonstration that he could safely undertake responsibilities such as management or compliance functions, there remained a risk to the public if the restrictions were lifted. The Respondent maintained that the conditions, particularly those preventing unsupervised practice and roles such as Compliance Officer for Legal Practice and Compliance Officer for Finance and Administration, remained necessary and proportionate safeguards. While acknowledging that the Applicant had complied with the restrictions and that no further concerns had been reported, the Respondent submitted that the evidence did not establish sufficient rehabilitation or reduced risk, and that removal of the restrictions would therefore be premature and contrary to the public interest.

The Tribunal's Decision

20. The Tribunal read all of the documents in the case and carefully considered the oral submissions made by the parties. The absence of any reference to particular evidence should not be taken as an indication that such evidence was not considered.
21. The Tribunal noted that restricted practice will only be ordered if it is necessary to ensure the protection of the public and the reputation of the legal profession from future harm by a solicitor. Accordingly, when considering any application to remove or vary a restriction, the Tribunal will assess whether the restriction remains necessary for those purposes. Whilst the factors contained in its Guidance Note on Other Powers might assist the Tribunal in that determination, it was not necessary for an Applicant to comply with those factors to demonstrate that the restriction was no longer necessary.
22. The Tribunal observed that the conditions originally imposed on the Applicant dated back to November 2017. During that period, and following the expiry of his suspension, the Applicant had practised as a criminal solicitor, primarily undertaking legal aid work. The evidence before the Tribunal demonstrated that no issues had arisen in respect of his work during that time and that he had been subject to effective supervision throughout. The Tribunal considered that this substantial period without incident was highly relevant and should be assessed alongside any training undertaken when evaluating the application as a whole.
23. The Tribunal accepted that the Applicant's failure to refer to his bankruptcy in his initial application or witness statement was an oversight, particularly in circumstances where the Respondent was already aware of the matter.
24. The Tribunal further considered that, after such a lengthy period, the continuation of conditions should not operate in a punitive manner so as to unduly restrict the Applicant's ability to work. However, the Tribunal emphasised that its primary duty remained the protection of the public. While the Applicant had indicated that he had no intention of establishing his own firm, the Tribunal noted that, in the absence of a restriction, there would be no safeguard against that possibility, particularly given that the original findings involved a lack of integrity.
25. The Tribunal also acknowledged that, irrespective of its decision on the present application, and pursuant to Regulation 7 of the SRA Authorisation of Individuals

Regulations 2019, the Respondent retained the power to impose conditions on the Applicant's practising certificate if was determined necessary and in the public interest.

26. The Tribunal was satisfied that, in light of the evidence, the totality of restrictions previously placed on the Applicant were no longer necessary for the protection of the public or the reputation of the profession.
27. The Tribunal therefore determined that some restrictions imposed in the original order could appropriately be lifted to ensure proportionality and fairness whilst maintaining the protection of the public and the reputation of the legal profession from future harm.
28. Specifically, the conditions set out at Paragraphs 2.1.2¹, 2.1.4², 2.1.5³ and 2.1.6⁴ of the Tribunal's Order of 2 November 2017 were removed with immediate effect.

The remaining restrictions were that the Applicant may not:

2.1.1 *Practise as a sole practitioner or sole manager or sole owner of an authorised or recognised body.*

2.1.3 *Be a Compliance Officer for Legal Practice or a Compliance Officer for Finance and Administration.*

29. These conditions remained effective.
30. All other conditions, including the requirement for the Applicant's work as a solicitor to be approved by the Solicitors Regulation Authority Ltd, were removed.

Costs

31. The Respondent sought costs in the sum of £4,750.00, reduced from the amount set out in its Schedule of Costs dated 9 March 2026 to reflect the mixed outcome of the application.
32. Ms Elves submitted that considerable work had been required to identify and extract the relevant material, particularly in light of the limitations of the Applicant's original application and supporting evidence. It was further submitted that the Applicant had failed to provide evidence of his means pursuant to Rule 43(5) of the Solicitors (Disciplinary Proceedings) Rules 2019, and that any reduction in costs on that basis would therefore be without proper foundation.

¹ The [Applicant] may not:

2.1.2 - *Be a partner or member of a Limited Liability Partnership (LLP), Legal Disciplinary Practice (LDP) or Alternative Business Structure (ABS) or other authorised or recognised body.*

² 2.1.4 - *Hold client money*

³ 2.1.5 - *Be a signatory on any client account.*

⁴ 2.1.6 - *Work as a solicitor other than in employment approved by the Solicitors Regulation Authority Ltd.*

33. The Applicant opposed the level of costs sought. The Applicant cited his financial circumstances and he also submitted that, given the relatively concise nature of the evidence in support of his application, the amount claimed by the Respondent was disproportionate.
34. The Tribunal took into account the totality of the documentation in the case and the fact that the hearing concluded in less time than originally anticipated. In all the circumstances, the Tribunal determined that a reduction in the costs sought was appropriate and ordered that the Applicant pay the Respondent's costs in the sum of £4,000.00.

Statement of Full Order

35. The Tribunal ORDERS that the application of Ashtar Abbas Dhami for the removal of the conditions imposed by the Tribunal on 2 November 2017 be **GRANTED** in part and it further Orders that the Applicant do pay the costs of the response of the Solicitors Regulation Authority Ltd to this application fixed in the sum of £4,000.00. Such costs to be paid over a period of time, such period to be agreed by the parties.
- 35.1 The Tribunal varies the conditions imposed by the Tribunal on 2 November 2017. The Respondent shall now be subject to conditions imposed by the Tribunal, until further order, as follows:
- The Respondent may not:
- 35.1.1 Practise as a sole practitioner or sole manager or sole owner of an authorised or recognised body:
- 35.1.2 Be a Head of Legal Practice/Compliance Officer for Legal Practice or a Head of Finance and Administration/Compliance Officer for Finance and Administration.
36. There be liberty to either party to apply to the Tribunal to vary the conditions set out above.

Dated this 8th day of April 2026
On behalf of the Tribunal

A Kellett

A Kellett
Chair