The Tribunal's decision dated 25 August 2026 is subject to appeal to the High Court (Administrative Court) by the Respondent. The Order remains in force pending the High Court's decision on the appeal.

SOLICITORS DISCIPLINARY TRIBUNAL

IN THE MATTER OF THE SOLICITORS ACT 1974 — Case No. 12884-2026

BETWEEN:

SOLICITORS REGULATION AUTHORITY LTD — Applicant

and

ABHISHEK KUMAR — Respondent

Before:

Mr P Lewis (in the chair)
Ms H Hasan
Mr D Kearney

Date of Hearing: 29 July 2026

Appearances

Joshua Hitchens of Outer Temple Chambers, The Outer Temple, 222 Strand, London, WC2R 1BA for the Applicant.

Abhishek Kumar represented himself.

JUDGMENT

Allegations

Rule 12 Allegation

Allegation 1

1. The allegation made by the SRA against the Respondent, Abhishek Kumar, a Registered Foreign Lawyer (RFL), is that:

1.1 On 19 August 2020, The Respondent knowingly employed an adult who was disqualified from employment by reason of immigration status, resulting in his conviction for an offence contrary to Section 21(1) and (2) of the Immigration Asylum and Nationality Act 2006 on 29 January 2024 at the Central Criminal Court.

In doing so, the Respondent breached any or all of Principles 1, 2 and 5 of the SRA Principles 2019.

2. The SRA relied on the Respondent's conviction, dated 29 January 2024, for the offence outlined at allegation 1.1, above, as evidence that the Respondent was guilty of the offence and relies upon the findings of fact upon which that conviction was based as proof of those facts. The signed Certificate of Conviction is dated 7 March 2025.

3. The SRA relied on the Respondent's sentence of 12-months Community Order, unpaid work of 150 hours, dated 26 April 2024 for the offence outlined at allegation 1.1, above, as evidence that the Respondent was guilty of that offence and relies upon the admission and acceptance of the sentence as proof of the facts.

PROVED

Rule 14 Allegations

4. The Rule 14 Allegations advanced by the Applicant against the Respondent, Mr Abhishek Kumar, are as follows:

(a) Allegation 2.1

On 12 March 2026 the Respondent filed a written Answer to the Applicant's Rule 12 Statement in these proceedings which contained misleading quotations from authorities and citations in consequence of the Respondent's use of artificial generative intelligence.

(b) Allegation 2.2

On 9 April 2026, the Respondent sent an email to the SRA in which he admitted that he had used artificial generative intelligence in the preparation of his Respondent's Answer of 12 March 2026. This email contained further erroneous citations and quotations. On 13 April 2026, the Respondent accepted that his email of 9 April 2026 had also been drafted using artificial generative intelligence and accepted that the email contained inaccuracies.

5. The authorities cited by the Respondent in his 12 March 2026 Respondent's Answer and 9 April 2026 email either:

(a) Did not exist; and/or
(b) Had incorrect citations; and/or
(c) Misquoted the principles set out in the authorities; and/or
(d) Did not contain the passages quoted from them; and/or
(e) Did not support the propositions for which they were cited.

6. By this conduct, Mr Kumar breached any or all of the following:

6.1 Principle 1 of the SRA Principles 2019 which required Mr Kumar to act in a way which upholds the constitutional principle of the rule of law, and the proper administration of justice.

6.2 Principle 2 of the SRA Principles 2019 which required Mr Kumar to act in a way which upholds public trust and confidence in the solicitors' profession and in legal services provided by authorised persons.

6.3 Principle 5 of the SRA Principles 2019 which required Mr Kumar to act with integrity.

6.4 Paragraph 1.4 of the SRA Code of Conduct for Solicitors, Registered European Lawyers, Registered Foreign Lawyers and Registered Swiss Lawyers (the Code) which required Mr Kumar not to mislead or attempt to mislead the Court.

6.5 Paragraph 2.4 of the Code which required Mr Kumar to only make assertions or put forward statements, representations or submissions to the court or others which are properly arguable.

PROVED

Executive Summary

7. Original Rule 12 Proceedings

7.1 The Applicant alleged that on 19 August 2020 the Respondent knowingly employed an adult disqualified from employment by reason of immigration status, resulting in a criminal conviction under section 21(1) and (2) Immigration, Asylum and Nationality Act 2006. The SRA relied on the Respondent's conviction, dated 29 January 2024, as evidence that the Respondent was guilty of the offence and relied upon the findings of fact upon which that conviction was based as proof of those facts. The signed Certificate of Conviction was dated 7 March 2025.

7.2 The SRA also relied on the Respondent's sentence of a 12-month Community Order, with unpaid work requirement of 150 hours, dated 26 April 2024 as evidence that the Respondent was guilty of that offence and relied upon the admission and acceptance of the sentence as proof of the facts. Dishonesty was not alleged; it was sufficient that the offence was committed knowingly. Allegation 1.1 was proved and the Respondent was ordered to be struck off the register of Registered Foreign Lawyers.

8. Subsequent Rule 14 Proceedings

8.1 The Applicant alleged that while defending the Rule 12 proceedings the Respondent filed submissions and correspondence containing incorrect, fabricated, misleading or unsupported authorities, quotations and legal propositions arising from the use of generative artificial intelligence (AI). He was alleged to have done this in his Answer to the Rule 12 Allegation dated 12 March 2026 and in email correspondence with the Applicant dated 9 April 2026. The Applicant alleged breaches of Principles 1, 2 and 5 and paragraphs 1.4 and 2.4 of the Code.

8.2 The Respondent admitted the presence of inaccurate citations and legal assertions of principle and accepted that he had used AI tools and made consequent errors. He denied any intention to mislead and cited ill-health and stress in mitigation. Dishonesty was not alleged. Allegation 2.1 was proved; Allegation 2.2 was proved in respect of the citing of non-existent cases and incorrect legal propositions. Typographical errors in case citations were not sufficiently serious to amount to misconduct. The Respondent was ordered to be struck off the register of Registered Foreign Lawyers.

8.3 This was the first time that a lawyer's use of artificial intelligence or large language models in legal proceedings had been litigated before the Tribunal. The High Court, in the matter of Ayinde v Haringey LBC [2025] EWHC 1383 (Admin), had invited the legal regulatory bodies to consider, as a matter of urgency, what further steps, beyond issuing guidance, needed to be taken to address this problem. The SRA considered, and the Tribunal accepted, that this was an issue of profound public importance, relating to the proper role of lawyers and the effect that artificial intelligence and large language models could have on the administration of justice and exercise of the rule of law in this jurisdiction.

Sanction

9. The Tribunal's reason on sanction can be found [here].

10. The Tribunal ORDERED that the Respondent be STRUCK OFF the Register of Foreign Lawyers.

Professional Details

11. The Respondent, born February 1985, was a Registered Foreign Lawyer (RFL) having been registered as such on 6 December 2018, SRA ID number 655594. At the time of his arrest by the police in relation to the conviction matter, he was employed by Rivington Solicitors Limited (the Firm). The Respondent remained an RFL but was not currently employed as an RFL at the date of the hearing.

12. The Tribunal's jurisdiction over the Respondent as an RFL arose under section 47 of the Solicitors Act 1974 as applied, with modifications, by paragraph 15 of Schedule 14 to the Courts and Legal Services Act 1990.

Documents

13. The Tribunal considered all of the documents in the case which included:
Rule 12

Applicant

- Rule 12 Statement dated 8 January 2026. [here]
- Evidence Bundle.
- The Applicant's Skeleton Argument dated 27 July 2026.

Respondent

- The Respondent's Answer dated 12 March 2026. [here]

Rule 14

Applicant

- Rule 14 Statement dated 4 June 2026. [here]
- Email correspondence between the Applicant and the Respondent dated 8 April – 14 April 2026.
- The Applicant's Skeleton Argument dated 27 July 2026.

Respondent

- Answer dated 25 June 2026 [here]
- Counter-Defence and Rebuttal Statement and correspondence in support (in response to Applicant's skeleton argument) dated 28 July 2026.
- Statement of Means dated 23 July 2026.

Both Parties

- Agreed List of Issues lodged 15 July 2026.

Witnesses

14. The written and oral evidence of witnesses is quoted or summarised in the Findings of Fact and Law below. The evidence referred to will be that which was relevant to the findings of the Tribunal, and to facts or issues in dispute between the parties. For the avoidance of doubt, the Tribunal read all of the documents in the case and made notes of the oral evidence of all witnesses. The absence of any reference to particular evidence should not be taken as an indication that the Tribunal did not read, hear or consider that evidence. No witnesses gave oral evidence.

Findings of Fact and Law

15. The Applicant was required to prove the allegations beyond a 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.

Integrity

16. The matters set at paragraphs 97 to 107 of Wingate v SRA [2018] EWCA Civ 366.

Seriousness

17. The matters set out in paragraph 120 of Dentons UK and Middle East LLP V SRA Ltd [2026] EWCA Civ 508.

Factual Background

18. **Allegation 1 and 1.1**

18.1 From July 2016, the Respondent had represented an individual referred to as ‘the Client’ in respect of immigration matters whilst operating through a firm called Kim’s Law. The Client’s claim for asylum was withdrawn in September 2019, and he was classed as having been an overstayer in the UK since his entry in April 2013.

18.2 The Respondent had contact with the Home Office, acknowledged that the Client’s asylum had been withdrawn, and indicated that there was a further ‘leave to remain’ application. This application was rejected in November 2019. The Respondent was therefore aware that the Client had no right to live or work in the UK.

18.3 On 19 August 2020, Home Office investigators attended the Firm where they spoke to the Client, who confirmed that he worked at the Firm in an administrative capacity and was paid cash in hand.

18.4 The Respondent was convicted on indictment on 29 January 2024 before the Central Crown Court at Isleworth having pleaded guilty to an offence contrary to Section 21(1) and (2) of the Immigration Asylum and Nationality Act 2006. On 26 April 2024, he was sentenced to a 12-month Community Order with an unpaid work requirement of 150 hours. The Respondent confirmed that he had served his sentence.

18.5 In his sentencing remarks, his Honour Judge Edmunds KC sitting as the Recorder of the Royal Borough of Kensington and Chelsea stated, *“I regard the level of culpability as high, given the state of knowledge of both immigration rules and [the Client’s] personal circumstances. As for harm, you deliberately breached provisions which are designed to combat overstaying and thus sought to undermine the immigration laws in this country. Second, you create a situation when you employ somebody in these circumstances for cash in hand, in which is rightful exploitation, and also of course diminishing the employment prospects of others who are entitled to work in this country”.*

18.6 A certified copy of the Certificate of Conviction proved that the Respondent was guilty of the offence in question and the findings of fact upon which that conviction was based were admissible as conclusive proof of those facts, by virtue of rule 32(1) of the Solicitors (Disciplinary Proceedings) Rules 2019 (SDPR).

Allegation 1.1 The allegation made by the SRA against the Respondent, Abhishek Kumar, Registered Foreign Lawyer (RFL), was that:

On 19 August 2020, The Respondent knowingly employed an adult who was disqualified from employment by reason of immigration status, resulting in his conviction for an offence contrary to Section 21(1) and (2) of the Immigration Asylum and Nationality Act 2006 on 29 January 2024 at the Central Criminal Court. In doing so, the Respondent breached any or all of Principles 1, 2 and 5 of the SRA Principles 2019. The SRA relied on the Respondent's conviction, dated 29 January 2024, for the offence outlined at allegation 1.1, above, as evidence that the Respondent was guilty of the offence and relies upon the findings of fact upon which that conviction was based as proof of those facts. The signed Certificate of Conviction is dated 7 March 2025. The SRA relied on the Respondent's sentence of 12 months Community Order, unpaid work of 150 hours, dated 26 April 2024 for the offence outlined at allegation 1.1, above, as evidence that the Respondent was guilty of that offence and relies upon the admission and acceptance of the sentence as proof of the facts.

<u>The Applicant's Case</u>

18.7 Mr Hitchens submitted that there was no significant factual dispute between the parties. As recorded in the agreed List of Issues, the Respondent accepted the fact of his conviction and confirmed at the Case Management Hearing on 16 April 2026 that he did not seek to go behind it.

18.7 Broadly, it was Mr Hitchens' case that the Respondent had not submitted sufficient evidence of a mental health diagnosis for the Tribunal to take the Respondent's impaired mental state into account, but Mr Hitchens was anxious that the Respondent be given breaks as needed during the proceedings. The Tribunal concurred.

18.9 The conviction was conclusively proved by the Certificate of Conviction and was admitted. The facts underlying it were established by the sentencing remarks of HHJ Edmunds KC on 26 April 2024 who found that:

(a) The Respondent had an intimate knowledge of the restrictions applying to individuals by reference to their immigration status, and a very detailed knowledge of the Client's personal circumstances, having himself assisted the Client with applications for leave to remain which were finally refused on 01 November 2019;

(b) He nevertheless employed the Client, cash in hand, over a period of months, relying on him to perform responsible tasks including opening the business and dealing with money, which was proved by mobile phone records;

(c) Culpability was high, given his state of knowledge of both the immigration rules and the Client's circumstances; he deliberately breached provisions designed to combat overstaying and thereby sought to undermine the immigration laws of this country; and

(d) When the investigation commenced, he responded to questions with lies, and he continued to seek to minimise the seriousness of what he had done.

18.10 Mr Hitchens asserted that the Respondent's attempt in his Answer to re-characterise his guilty plea to the criminal offence as "*a decision made for health preservation, not an* *admission of dishonest intent"*, went nowhere. Dishonesty was not alleged before the Tribunal; the conviction and its underlying facts stood as conclusive proof under Rule 32(1) SDPR. The Respondent, in any event, had also confirmed in the Answer and in his Counter-Défense [*sic*] and Rebuttal Statement dated 28 July 2026 that he did not seek to go behind the conviction.

18.11 Mr Hitchens submitted that, on those admitted and conclusively proved facts, each of the alleged breaches was made out:

a) Principle 1 of the 2019 Principles - the duty to act in a way that upholds the constitutional principle of the rule of law, and the proper administration of justice.

18.12 The Respondent committed a criminal offence which, as the sentencing Judge found, deliberately undermined the immigration laws of this country. Conduct demonstrating a serious disregard for the principle that the law applies equally to all was a paradigm breach of Principle 1, as reflected in the SRA's Guidance on the application of Principle 1, issued on 7 February 2019: *"Any behaviour which indicates a serious disregard for the principle that the law applies equally to all, is likely to be a breach of Principle 1."* There was a clear proximity between the behaviour giving rise to the conviction and the Respondent's practice as a lawyer who was required to administer justice.

b) Principle 2 of the 2019 Principles – the duty to act in a way that upholds public trust and confidence in the solicitors' profession and in legal service provided by authorised persons.

18.13 Mr Hitchens submitted that members of the public would not expect a regulated lawyer, least of all one practising in immigration law, to knowingly employ a person disqualified from employment by reason of his immigration status, for cash in hand. The conviction of a regulated person for such an offence plainly diminished the trust and confidence the public places in the profession. The SRA's guidance on Public Trust and Confidence was clear that where a criminal offence has been committed, a solicitor is likely to have breached Principle 2, given the key role that solicitors play in the administration of justice and the high degree of trust placed in them by the public.

c) Principle 5 of the 2019 Principles – the duty to act with integrity.

18.14 The Respondent's actions amounted to a failure to act with integrity in that he failed to act with moral soundness, rectitude and without a steady adherence to the ethical code of his profession, in breach of Principle 5 of the 2019 Principles. In Wingate v SRA [2018] EWCA Civ 366 it was held:

> *The term "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...the underlying rationale is that the professions have a privileged and trusted role in our society. In return, they are required to live up to their own professional standards.*

18.15 The Respondent failed to act with integrity as he was aware of the client's immigration status and yet continued to employ him with the knowledge that he was disqualified from employment by reason of his immigration status. This demonstrated a wilful disregard for both the law and regulatory obligations. The Respondent's behaviour fell short of the standards that the public could expect from a solicitor.

The Respondent's Case

18.16 The Respondent did not dispute the fact of his conviction. In paragraph 1 of his Answer dated 12 March 2026 he stated, *"The Respondent accepts the fact of the conviction at Isleworth Crown Court in 2024."*

18.17 The Respondent asserted, however, in his Answer, that he had originally pleaded not guilty and only changed his plea because he was suffering from severe physical and mental health difficulties and felt incapable of enduring a full criminal trial. He contended that the guilty plea should not be treated as an admission of dishonest intent or moral wrongdoing beyond the criminal offence itself.

18.18 The Respondent denied concealing the Home Office investigation or criminal proceedings. He stated that he had informed the Firm about the matter and believed in good faith that it would make any necessary notification to the SRA. He further emphasised that the conduct giving rise to the conviction occurred while working for Kim's Law and not while employed by the Firm, where he said his conduct had been professional and compliant throughout. He reiterated that he had never attempted to conceal, deceive, or act dishonestly towards his employer or the regulator.

18.19 The Respondent contended that he had fully served his criminal debt to society by completing the Community Order and submitted that *"permanent regulatory exclusion"* would amount to *"an unfair double punishment"*.

The Tribunal's Findings – Allegation 1.1

18.20 The Tribunal had read the papers carefully and listened to the helpful submissions of both parties. It noted that the Respondent did not challenge the Applicant's case and that he had expressed remorse.

18.21 When first arraigned at the Central Crown Court in August 2022, the Respondent had entered a not guilty plea to an offence contrary to Section 21(1) and (2) of the Immigration Asylum and Nationality Act 2006. As his trial approached, he was re-arraigned at his request and changed his plea to guilty. He said, in his Answer dated 12 March 2026, that he did so because he was "*under extreme medical and mental distress and felt physically and mentally incapable of enduring the rigours of a full trial*". He expressly said, however, that his change of plea was not an *"admission of dishonest intent"*.

18.22 The Respondent was convicted of the offence. The employee (the Client) engaged by the Respondent had been undertaking legal work and had more than minimal responsibilities in the administration of the Respondent's business.

18.23 The Tribunal noted that dishonesty was not an element of that criminal offence and it was complete when a person acted knowingly. The Tribunal had read the sentencing remarks of HHJ Edmunds KC from which it was clear that the Respondent had accepted his guilt at the time of sentencing, which was on the basis that he had "*intimate* *knowledge of the restrictions that apply to people depending upon their immigration status"*.

18.24 Although the Respondent had accepted the facts of his conviction in his initial response, and did not challenge the Applicant's case, he continued, at the hearing, to dispute the basis of his conviction. He maintained that he was not dishonest. The Tribunal was clear that dishonesty was not alleged. The Respondent also maintained that in respect of his conviction he had, to paraphrase his words, *'served his time'*, and any further sanction would be an *"unfair double punishment"*. The Respondent did not make any reference to the SRA Principles engaged in this case or respond to his alleged breaches of them.

18.25 The Tribunal found the allegation proved in full. It was satisfied that the certificate of conviction was proof of the findings of fact upon which the conviction was based and the allegation was properly made out. The Respondent had failed to uphold the rule of law and the administration of justice, thereby jeopardising public trust and confidence in the solicitors' profession. The Tribunal applied the test set out in Wingate v SRA [2018] EWCA Civ 366 as to integrity and found that the Principle had been breached.

19. **Allegation 2**

Factual Background

19.1 In January 2026, the Applicant brought proceedings before the Tribunal against the Respondent following his 2024 conviction at the Central Criminal Court for offences under the Immigration Asylum and Nationality Act 2006.

19.2 In compliance with the Tribunal's directions, the Respondent filed and served his Answer on 12 March 2026. On 8 April 2026, counsel for the Applicant reviewed the Respondent's Answer and identified incorrect citations and citations which did not reflect the legal propositions outlined (Allegation 2.1).

19.3 The Applicant drew these matters to the Respondent's attention on 8 April 2026 and expressly directed him to the case of Ayinde v Haringey LBC [2025] EWHC 1383 (Admin), which is the leading judgment on *"the actual or suspected use by lawyers of generative artificial intelligence tools to produce written legal arguments … which are not then checked, so that false information (typically a fake citation or quotation) is put before the court."*

19.4 The Respondent's response of 9 April 2026, which purported to correct the errors, was itself drafted using generative AI and contained further false material (Allegation 2.2).

19.5 On 13 April 2026 the Respondent accepted that the 9 April email had also been produced with AI and contained inaccuracies and stated that he was unable to provide copies of the authorities on which he relied.

Allegation (2.1): On 12 March 2026 the Respondent filed a written Answer to the Applicant's Rule 12 Statement in these proceedings which contained misleading quotations from authorities and citations in consequence of the Respondent's use of artificial generative intelligence.

Allegation (2.2): On 9 April 2026, the Respondent sent an email to the SRA in which he admitted that he had used artificial generative intelligence in the preparation of his Respondent's Answer of 12 March 2026. This email contained further erroneous citations and quotations. On 13 April 2026, the Respondent accepted that his email of 09 April 2026 had also been drafted using artificial generative intelligence and accepted that the email contained inaccuracies.

The authorities cited by the Respondent in his 12 March 2026 Respondent's Answer and 9 April 2026 email either: (a) did not exist; and/or (b) had incorrect citations; and/or (c) misquoted the principles set out in the authorities; and/or (d) did not contain the passages quoted from them; and/or (e) did not support the propositions for which they were cited. By this conduct, Mr Kumar breached any or all of the following: Principle 1 of the SRA Principles 2019 which required Mr Kumar to act in a way which upholds the constitutional principle of the rule of law, and the proper administration of justice; Principle 2 of the SRA Principles 2019 which required Mr Kumar to act in a way which upholds public trust and confidence in the solicitors' profession and in legal services provided by authorised persons; Principle 5 of the SRA Principles 2019 which required Mr Kumar to act with integrity; Paragraph 1.4 of the SRA Code of Conduct for Solicitors, Registered European Lawyers, Registered Foreign Lawyers and Registered Swiss Lawyers which required Mr Kumar not to mislead or attempt to mislead the Court and Paragraph 2.4 of the SRA Code of Conduct for Solicitors, Registered European Lawyers, Registered Foreign Lawyers and Registered Swiss Lawyers which required Mr Kumar to only make assertions or put forward statements, representations or submissions to the court or others which are properly arguable.

<u>The Applicant's Case</u>

19.6 Mr Hitchens confirmed that the facts underlying Allegation 2 were admitted in the Respondent's Answer to the Rule 14 Statement, dated 25 June 2026. The Respondent only denied *"dishonest intent, lack of integrity, or deliberate attempt to deceive"*. Dishonesty was not, however, alleged before the Tribunal.

19.7 It was contended that the Answer to the Rule 12 Statement and the email sent to the Applicant on 9 April 2026 contained erroneous and misleading citations and quotations from legal authorities as follows:

(a) The Respondent cited a case called <u>SRA v Chan</u> [2020] EWHC 1502 (Admin). Whilst a case between the SRA and a Mr Chan did exist, it was from 2015, not 2020, and did not bear the citation given by the Respondent;

(b) The Respondent also cited a case called <u>SRA v James, MacGregor & Naylor</u> [2018] EWCA Civ 1420. Whilst there was a case involving those parties, the citation given was to an intellectual property case;

(c) The Respondent cited a case called <u>SRA v Day</u> [2018] EWHC 2726 (Admin) and asserted that the case supported the proposition that "*the Tribunal must consider the proportionality of the sanction in light of the practitioner's personal circumstances and risk to the public*". In fact, *Day* was an unsuccessful appeal brought by the SRA after the SDT dismissed some disciplinary charges brought against the respondents. The appeal failed. It did not relate to the proportionality of sanctions imposed by the SDT. Paragraph 60 of the judgment confirms that sanction was not an issue before the Divisional Court:

> *"So far as sanction was concerned, it was agreed before us that if the court upheld the appeal with regard to allegation 1.19 then the matter would need to be remitted for further determination. As for the other allegations, [counsel for the SRA] sensibly proposed that the parties should await this court's decision before assessing whether any particular allegation, were the appeal to be allowed, would need to be remitted for the consideration of sanction"*;

(d) The Respondent asserted that a case called Baxendale-Walker v Law Society [2007] EWCA Civ 233 was an authority in which "*it was established that the SRA must act fairly*". The Applicant obviously accepted it was under a duty to act fairly when discharging its public functions. However, in *Baxendale-Walker*, there were only two mentions of the concept of fairness:

i. At paragraph 32 where the court summarised the Appellant's submission that fairness required that where a solicitor is acquitted of misconduct, the costs of the proceedings should be borne by the profession as a whole rather than an individual solicitor; and

ii. Paragraph 2 where the court referred to an earlier Divisional Court decision that fairness would be achieved by the Appellant paying 60% of the Law Society's costs.

19.8 The Applicant then wrote to the Respondent, expressly drawing his attention to the Divisional Court's judgment in Ayinde and requested:

(a) Copies of the authorities referred to in the Respondent's answer;

(b) Confirmation of whether the Respondent used artificial intelligence in the preparation of his submissions; and

(c) To the extent that any authorities did not exist, an explanation of how they came to be cited.

By email on 09 April 2026, the Respondent:

(a) Admitted having used artificial intelligence to assist him in the drafting of his Answer and in identifying relevant case law;

(b) Stated that he had no intention to mislead the Tribunal or the Applicant;

(c) Pointed to his mental health challenges and stress, apologised and expressed his regret for what had happened;

(d) Appeared to withdraw any reliance on SRA v Day [2018] EWHC 2726;

(e) Provided what he said were the correct citations for "SRA v James, MacGreggor

& Naylor [2018] EWCA Civ 2057". In fact, the correct citation for James was [2018] EWHC 3058;

(f) Stated, when referring to James, *"I intended to rely on this case to show that 'significant mental health issues' can be considered a 'small category of cases' where the usual sanctions may be mitigated"*. Having checked the judgment, the Applicant was unable to find the passages quoted by the Respondent;

(g) Relied on SRA v Chan [2015] EWHC 2659 (Admin) for the proposition that a practitioner's health must be factored into the assessment of their conduct. Mr Hitchens submitted that Chan was not an authority for this proposition; and

(h) Relied on *Baxendale-Walker* (cited above) for the proposition that the Applicant had a duty to act as a prosecutor in the public interest. Mr Kumar placed the word 'prosecutor' in quote marks and, therefore, the SRA understood "*prosecutor*" to be a direct quote from the judgment. The Court of Appeal's judgment in *Baxendale-Walker* does not contain the word 'prosecutor'. Mr Hitchens submitted that *Baxendale-Walker* was not authority for the proposition set out by the Respondent in his email. It is true that at paragraph 40 of the judgment, the court held that the Law Society, the body at that time responsible for regulation of solicitors, advanced the public interest in bringing disciplinary proceedings. However, this was only referenced in support of the court's conclusion that the Law Society should not be exposed to the risk of adverse costs orders just because a properly brought disciplinary case is ultimately unsuccessful.

19.9 The Applicant formed the view that the 9 April email had again been drafted by generative artificial intelligence and again contained several AI generated errors. The Applicant therefore sent a further email to the Respondent on 13 April 2026 stating that the Applicant:

a) Had been unable to find the quoted text from James set out by the Respondent in his 9 April 2026 email;

b) Had requested confirmation of the passages of Chan which the Respondent relied upon for the proposition set out in his 9 April 2026 email; and

c) Had been unable to find the word "*prosecutor*" in Baxendale-Walker.

19.10 The Applicant requested copies of authorities relied upon by the Respondent and confirmation as to whether artificial generative intelligence had been used in the preparation of the 9 April 2026 email and the Respondent accepted that his email of 9 April 2026 continued to rely on inaccurate quotes and citations.

19.11 The Respondent answered that same day, accepting that he had again used artificial intelligence in the drafting of his 09 April 2026 email and that the email contained errors. He apologised for this and explained that he had no intention to mislead but simply did not have the expertise to verify the AI output. He limited his reliance on authorities to: *"SRA v James (mental health mitigation) and Baxendale-Walker (procedural fairness)"*. Whilst Mr Hitchens accepted that James did relate in large part to the question of mental health issues and appropriate sanction, he submitted that

Baxendale-Walker did not concern procedural fairness, but rather the fairness of a costs order made by the Tribunal.

19.12 Upon being questioned by the Tribunal, Mr Hitchens properly conceded that a mere citation error would not, on its own, amount to advancing an unarguable case. However, the references to *Day* and *Baxendale-Walker* were relied upon for propositions that those authorities did not support, and therefore they amounted to unarguable submissions.

19.13 The Respondent also stated that he was unable to provide *"professional PDF copies"* of the authorities concerned. The Applicant did not, however, in its 13 April email, request copies in any particular format. The obvious concern which arose from the Respondent's inability to provide copies of the authorities relied upon was that even by 13 April 2026, he may not have read the authorities before relying on them in submissions to the Applicant or the Tribunal.

19.14 Mr Hitchens submitted that the admitted conduct amounted to breaches of the 2019 Principles and the Code:

19.15 Principle 1 of the 2019 Principles - the duty to act in a way that upholds the constitutional principle of the rule of law, and the proper administration of justice.

19.16 In Ayinde v Haringey LBC [2025] EWHC 1383 (Admin), the court held that the misuse of artificial intelligence creates serious implications for the administration of justice. The court also held that those who use artificial intelligence to conduct legal research, notwithstanding well-known risks, have a duty to check the accuracy of such research.

19.17 The SRA Topic Guide to the Application of Principle 1, issued 07 February 2019, stated, "A *solicitor is likely to breach the obligation to uphold the proper administration of justice if they mislead the court, or knowingly or recklessly allow the court to be misled".*

19.18 The Respondent did not comply with his duty to act in a way which upholds the proper administration of justice by providing misleading material to the Applicant and placing it before the Tribunal.

19.19 Principle 2 of the 2019 Principles – the duty to act in a way that upholds public trust and confidence in the solicitors' profession and in legal service provided by authorised persons.

19.20 The public would not expect an authorised person to place misleading material before the Tribunal or to mislead their regulator by using false citations and quotes from authorities. The effect of the public knowing that an authorised person has behaved in such a way carries with it the very real risk of bringing the profession into disrepute.

19.21 Principle 5 of the 2019 Principles – the duty to act with integrity. The Respondent's actions amounted to a failure to act with integrity in that by doing what he did he failed to act with moral soundness, rectitude and without a steady adherence to the ethical code of his profession, in breach of Principle 5 of the 2019 Principles as set out in Wingate v SRA [2018] EWCA Civ 366.

19.22 The Respondent failed to act with integrity in that in consequence of his use of artificial intelligence he deployed false citations, propositions and quotations from authorities both in submissions to the Tribunal and in correspondence sent to the Applicant. The Respondent's conduct thereby fell short of the high standards expected from authorised persons.

19.23 Paragraph 1.4 of the Code – the duty not to mislead or attempt to mislead your clients, the court or others, either by your own acts or omissions or allowing or being complicit in the acts or omissions of others (including your client).

19.24 The Respondent misled or attempted to mislead both the Tribunal and his regulator through the provision of false citations, authorities, quotations and propositions.

18.25 Paragraph 2.4 of the Code – the duty to only make assertions or put forward statements, representations or submissions to the court or others which are properly arguable.

19.26 In filing submissions to the Tribunal and sending correspondence to his regulator which contained false citations, quotes or propositions, the Respondent advanced assertions, statements, representations and submissions which were not properly arguable and thereby breached of Paragraph 2.4 of the Code.

<u>The Respondent's Case</u>

19.27 In his Answer dated 25 June 2026, the Respondent partially admitted both allegations.

<u>Response to Allegation 2.1</u>

19.28 In relation to the Rule 12 Answer filed on 12 March 2026, the Respondent admitted, in the Answer to the Rule 14 allegations, that it contained unverified, inaccurate legal citations, quotations and legal propositions arising from his use of generative artificial intelligence. He denied, however, that the inaccuracies were deliberate, dishonest or indicative of a lack of integrity. He emphasised that he continued to suffer from significant stress and mental health challenges, citing his medical fit notes in support. He accepted responsibility for the errors but contended that they were the product of recklessness, cognitive exhaustion and serious ill-health rather than any intention to mislead the Tribunal. He expressly denied any dishonesty, lack of integrity or deliberate attempt to deceive.

<u>Response to Allegation 2.2</u>

19.29 In relation to the email of 9 April 2026, the Respondent similarly admitted that it contained further inaccurate citations generated through unverified reliance on AI. He stated that, when the inaccuracies were identified, he openly acknowledged to the SRA on 13 April 2026 that he had used AI, apologised unreservedly, and withdrew reliance on the erroneous authorities. He relied on this conduct as evidence of transparency and maintained that he had never intended to mislead anyone.

Responses to the alleged regulatory breaches

19.30 The Respondent submitted orally that he had not believed that Ayinde applied to him because he was not a solicitor, but a Registered Foreign Lawyer. Furthermore, he was not in practice at the time of the breaches outlined in the Rule 14 Statement and considered himself to be a member of the public.

19.31 Principle 1 of the 2019 Principles - the duty to act in a way that upholds the constitutional principle of the rule of law, and the proper administration of justice. The Respondent accepted the importance of his duty to uphold the administration of justice. However, he argued that no lasting harm had been caused because the Tribunal permitted him to file an amended and verified Rule 12 Answer, thereby correcting the position.

19.32 Principle 2 of the 2019 Principles – the duty to act in a way that upholds public trust and confidence in the solicitors' profession and in legal service provided by authorised persons and Principle 5 of the 2019 Principles – the duty to act with integrity.

19.33 The Respondent acknowledged in his Answer that his carelessness in using AI created a risk of damaging public confidence in the profession. Nevertheless, he argued that the conduct amounted to incompetence and poor judgment arising from severe health difficulties rather than a lack of integrity or an intentional effort to deceive. He maintained that he acted honestly throughout.

19.34 Paragraph 1.4 of the Code – the duty not to mislead or attempt to mislead your clients, the court or others, either by your own acts or omissions or allowing or being complicit in the acts or omissions of others (including your client) and Paragraph 2.4 of the Code – the duty to only make assertions or put forward statements, representations or submissions to the court or others which are properly arguable.

19.35 The Respondent denied breaching these provisions insofar as they alleged a conscious attempt to mislead the Tribunal or advance legal submissions known to be false. He contended in the Answer to the Rule 14 Statement that the Answer to the Rule 12 Statement now contained properly verified and arguable submissions. Mr Hitchens had, however, already brought the Tribunal's attention to the fact that the Rule 12 Statement was never amended, save by the admissions in the email of 9 April, which itself contained further errors.

The Tribunal's Findings – Allegations 2.1 and 2.2

Seriousness

19.36 In approaching each of 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 was an inherent requirement of seriousness in determining whether a solicitor's conduct amounted to breaches of the SRA Principles or the mandatory provisions of the Code. The question for the Tribunal was whether the conduct would be regarded by competent and reputable solicitors as sufficiently serious to be categorised as professional misconduct.

19.37 The Tribunal was satisfied that the seriousness threshold was met because the seriousness of the misconduct was self-evident. Allegation 1 flowed from the Respondent having been convicted of a criminal offence and Allegation 2 concerned a lawyer's duty not to mislead the court or a tribunal.

19.38 The Tribunal noted that the Applicant considered that this matter raised for the first time before the Tribunal the important issue of legal proceedings having been brought in reliance on misuse, or unverified use, of AI and large language models. Each case before the Tribunal would turn on its own facts and must be capable of withstanding the anxious scrutiny of the parties and if necessary, any appeal. The Tribunal did not seek to fetter the discretion of another of its divisions in relation to different factual matrices, but it noted that the issues ventilated in this matter may be of wider assistance.

19.39 The Tribunal considered the following guidance which was publicly available:

- SRA Risk Outlook report: The use of artificial intelligence in the legal market dated November 2023.

- SRA Innovation: Navigating technology and AI-challenges and opportunities dated June 2025.

- SRA Compliance tips for solicitors regarding the use of AI and technology dated February 2026.

19.40 On 12 March 2026, the Respondent filed an Answer to the allegations brought against him in the Tribunal. In so doing, he cited a number of authorities in support. The Respondent:

- relied on a case entitled SRA v Chan citing a reference from the Administrative Court in 2020. Whilst there is an authority SRA v Chan it is from 2015 and did not bear the citation provided by the Respondent;

- referred to a case called SRA v James and others. There is such a case, but the citation provided by the Respondent related to an unrelated intellectual property case;

- referred to SRA v Day [2018] EWHC 2726 (Admin). This case does exist. Here the Respondent made assertions as to propositions the case purportedly supported but which do not chime with the reasoning in the case;

- referred to Baxendale-Walker v Law Society [2007] EWCA Civ 233 as proposition for the fact that the SRA must act fairly. The SRA must, of course act fairly. The references to fairness in that decision are, however, discrete, as was explained by Mr Hitchens.

19.41 These actions caused the Applicant to amend the allegations against the Respondent pursuant to Rule 14 SDPR. It was additionally alleged that the Respondent filed an Answer in these proceedings which contained misleading quotations and sent an email to the Applicant containing misleading and erroneous citations and quotations, thereby breaching Principles 1, 2 and 5 and Paragraphs 1.4 and 2.4 of the Code.

19.42 The Respondent accepted that the answer filed in these proceedings was prepared by what is described as 'artificial intelligence*'* software, involving 'large language models'. He apologised for his actions and expressed remorse. He said that he had no intention to mislead the Tribunal or the Applicant.

19.43 It is against that background that the Tribunal determined whether the Respondent had breached the 2019 Principles and the Code as alleged.

19.44 In his further Answer to the Rule 14 allegations, filed on 26th June 2026, the Respondent admitted that his Rule 12 Answer contained inaccurate citations and distorted legal positions but denied any dishonest intent. The Tribunal stressed that dishonesty was not alleged in this case.

19.45 The Respondent accepted that his actions breached Principle 1 and that he had failed to uphold the administration of justice. Regarding Principle 2, he deeply regretted that his *"technological negligence created a risk of bringing the profession into disrepute"* but denied that his actions breached public trust and confidence in the profession. Regarding Principle 5, he denied *"a lack of subjective ethical integrity"*. The Respondent denied breaching Paragraphs 1.4 and 2.4 of the Code.

19.46 The Tribunal considered in detail the decision of the President of the King's Bench Division and Mr Justice Johnson in Ayinde v Haringey LBC [2025] EWHC 1383 (Admin). Notable passages included:

> At [7]: *"Those who use artificial intelligence to conduct legal research ... have a professional duty to check the accuracy of such research by reference to authoritative sources ... Authoritative sources include the Government's database of legislation, the National Archives database of court judgments, the official Law Reports published by the Incorporated Council of Law Reporting for England and Wales and the databases of reputable legal publishers."*
>
> At [9]:" *... There are serious implications for the administration of justice and public confidence in the justice system if artificial intelligence is misused ... Practical and effective measures ... must ensure that every individual currently providing legal services ... understands and complies with their professional and ethical obligations and their duties to the court if using artificial intelligence."*

19.47 The Tribunal clarified that it was not a court, but a Statutory Tribunal established by the Solicitors Act 1974, with its rules derived from Statutory Instrument. It determined, however, in agreement with Mr Hitchens' submission, that there was no distinction in principle as to whether the material relied upon by a lawyer was sent to a regulator, disciplinary tribunal or court. The Tribunal fulfilled an important public function.

19.48 The issue was ultimately about a lawyer's duty in litigation and to the court. Whilst AI was, in this case, the medium through which the material was produced, it was not necessary for the erroneous material to have been generated by or with AI. The same issue might arise using common search engines or if work was produced by another person for which the respondent solicitor had ultimate responsibility.

19.49 In his oral submissions, the Respondent said that he never intended to be dishonest. He described himself as an unqualified lawyer and someone who was used to being supervised. He considered the Rules as set out in Ayinde did not directly apply to him as he was an RFL and not a solicitor. He said that he was not aware of what was going on in the legal world and had no intention to deceive anyone. Whilst deceit and dishonesty were not in issue the Tribunal did not otherwise accept these submissions. The Respondent was a regulated individual who was obliged to comply with the standards of his profession.

19.50 On the basis of the Respondent's admissions, the Tribunal found the allegations proven in so far as they breached Principles 1, 2, 5 and Paragraph 1.4 of the Code. The alleged breach of Paragraph 2.4 of the Code was proved in part, with respect to the cases referred to as *Day* and *Baxendale-Walker.* Those cases were relied upon for propositions that those authorities did not support, and therefore they amounted to unarguable submissions.

Previous Disciplinary Matters

20. None

Mitigation

21. In his written and oral submissions, the Respondent relied heavily on personal mitigation. He stated in his Answer to the Rule 12 statement that, during the relevant period, he was:

- serving a Community Order;
- receiving intensive mental health treatment;
- dealing with significant health problems; and
- coping with the bereavement of his mother-in-law.

22. He argued that these circumstances substantially limited his ability to deal with regulatory and administrative obligations.

23. The Respondent cited disputed authorities which he said demonstrated that mental ill-health and personal pressures should reduce culpability and sanction. He argued that an indefinite restriction or the most serious regulatory outcome would be disproportionate given:

- his insight;
- his rehabilitation;
- his current employment circumstances; and
- the absence of any continuing risk to the public.

24. The Respondent stated that he was the principal financial provider for his family and argued that an indefinite restriction would have a disproportionate effect on his livelihood and family life. He also referred to his efforts at professional rehabilitation and his enrolment on the Legal Practice Course to become a solicitor qualified in England and Wales.

25. The Respondent further relied heavily on mitigation in his response to the Rule 14 allegations. He stated that:

- he was acting as an unrepresented litigant in person due to impecuniosity;
- he was experiencing severe financial hardship;
- he had suffered from longstanding depression and anxiety since 2020;
- his condition had been worsened by bereavement and unemployment; and
- he had been certified as not fit for work for six months from 1 June to 30 November 2026 because of mental health conditions.

26. The Respondent contended that these circumstances materially contributed to his errors and reduced his culpability. He also pointed to the fact that he had already completed the sentence imposed for his earlier criminal conviction and submitted that further severe regulatory sanctions would be disproportionate. He argued that he had a right to be forgotten.

Sanction

27. The Tribunal referred to its Guidance Note on Sanctions (11th edition February 2025) when considering sanction and the proper approach to sanctions, as set out in Fuglers and Others v SRA [2014] EWHC 179. The Tribunal's overriding objective, when considering sanction, was the need to maintain public confidence in the integrity 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.

28. <u>Submissions</u>

28.1. The Tribunal granted Mr Hitchens' application to make submissions on sanction as the hearing raised points of law of wider interest. It welcomed submissions on any points of law which sat outside its own published guidance.

28.2 Mr Hitchens submitted that Allegation 1 involved high culpability and high harm. The Respondent knowingly employed an individual who could not lawfully work when he had detailed knowledge of both the law and the individual's circumstances. The Applicant therefore proposed that the starting point was strike-off.

28.3 In relation to Allegation 2, Mr Hitchens suggested there were some mitigating features, including that the Respondent was representing himself and not acting for a client. Notwithstanding, the Respondent repeated the conduct after being warned of the errors he had made. It was submitted that the misuse of AI had serious implications for the administration of justice and public confidence in the legal system. The Divisional Court had expressly encouraged regulators and tribunals to take effective steps to address such conduct. For these reasons, the Applicant submitted that strike-off also fell within the appropriate range of sanctions for Allegation 2.

28.4 The Respondent submitted orally that strike-off would be unfair and unreasonable. He said he had a proven record with no complaints and no findings of dishonesty. He contended that he had accepted responsibility once he had understood the legal position.

28.5 The Respondent said that he had suffered greatly already, that he needed to support his family and rebuild his life and asked the Tribunal to consider his mental health, finances, and the impact of the proceedings. He proposed that a suspension would be an appropriate sanction.

The Tribunal's Determination

28.6 The Tribunal assessed the level of the seriousness of the misconduct by considering the Respondent's culpability and the harm caused, together with aggravating or mitigating factors. It considered each of the allegations separately.

28.7 The Tribunal noted that the Respondent had no previous disciplinary findings against him.

Allegation 1

28.8 The Tribunal determined the Respondent's culpability to be very high. His motivation was economic advantage. His actions in offering the Client informal employment were planned and a breach of his position of trust. He was an immigration specialist who understood that what he was doing was outside the law. He was an experienced lawyer who had direct control at all times of the circumstances giving rise to the misconduct. Notwithstanding this, there was a pattern of blame being focused elsewhere to explain his own wrongdoing. He claimed ignorance and that he had not been in legal practice for three or four years. He did not settle on one explanation for long before moving to the next and showed a lack of insight into his own behaviour. The Tribunal found that the Respondent had misled the regulator when submitting formal communications.

28.9 The Tribunal also assessed the harm caused by the Respondent as very high. As an officer of the law, the Respondent knew that what he was doing was wrong, and his act of offering illegal employment struck right at the heart of the public's confidence in the profession. He exploited the Client and took advantage of a vulnerable person by paying low, cash in hand wages. This abuse of a position of authority was an aggravating factor, as was the commission of a criminal offence, and the placing of blame on outside causes.

28.10 The Tribunal did not assess the Respondent's stated remorse as showing genuine insight or consider that the medical evidence submitted was sufficient to provide genuine mitigation.

Allegation 2

28.11 The Tribunal determined the Respondent's culpability to be very high. A lawyer is always responsible for the accuracy of his or her output.

28.12 Mistakes happen. Not every mistake will be a matter serious enough to engage the Regulator or this Tribunal. In his response to the Rule 14 Statement, the Respondent had categorised his wrongdoing as *"technological negligence"*. His insistence, in his Rebuttal Statement of 28 July and in oral submissions, that he 'mistakenly believed' that AI was a *"lawful drafting aid"* reflected a persistent lack of insight into his misconduct. He blamed having been out of legal practice and being, *"unaware of recent regulatory warnings or procedural directives regarding AI research tools"*.

The Tribunal found that the Respondent had embarked on the use of AI without giving any proper thought to the consequences of so doing. He had failed to take proper steps to ensure his work output was accurate or to satisfy himself that the electronic tools he was seeking to use were reliable.

Having done so, the Respondent's culpability was very high because it was repeated after errors had been pointed out and explained. Rather than take active steps to rectify his mistakes, the Respondent repeated them. The Tribunal gave very substantial weight to the repeated nature of the Respondent's misconduct.

28.13 The harm caused by the Respondent's misconduct was high. It is a cardinal duty of a solicitor not to mislead a Court (and by extension Tribunal).

The Respondent was acting for himself, and not a client, and this reduced the actual harm caused, but the Tribunal rejected Mr Hitchen's submission that it was a mitigating factor, as the Respondent was seeking to be the direct beneficiary of his own misconduct. The harm in this matter was the Respondent's abrogation of his responsibilities as a regulated lawyer, which had a potentially unlimited impact.

The Tribunal found that on a case-by-case basis there may be a difference between harm (and culpability) in a respondent citing cases or propositions that did not exist, as distinct from providing incorrect citations, as occurred here.

28.14 The Tribunal determined that the Respondent's fit notes and references to himself being, *"extremely unwell"* were insufficient to support his contention that his mental health issues were such that his mental capacities were impaired to the extent that he was exonerated from complying with his duties.

28.15 The Tribunal next considered the purpose for which sanctions are imposed, noting that an important purpose of a sanction is to maintain the reputation of the solicitors' profession (Bolton v The Law Society [1994] 1 WLR 512). The damage to the reputation of the profession by the Respondent's misconduct was extremely significant as the public would trust a solicitor to respect the rule of law and the administration of justice and not be convicted of a criminal offence. The Tribunal noted that in Bolton (at paragraph 15) the Master of the Rolls considered that an order of the Tribunal is not primarily punitive in intention, especially where a criminal penalty has been imposed and satisfied, as it was in this case. That penalty did not, however, apply to Allegation 2 and the learned Judge also set down wise counsel on the deterrent function of the Tribunal: *"a penalty may be visited on a solicitor who has fallen below the standards required of his profession in order to punish him for what he has done and to deter any other solicitor tempted to act in the same way."*

28.16. The repeated disregard for verifying submissions to the regulator and to the Tribunal had serious implications for the administration of justice and public confidence in the legal system. It was paramount that the reputation of the profession be protected. The Tribunal was clear that the sanction it reached was the same sanction it would have imposed if either allegation had appeared before the Tribunal without the other.

28.17 Having considered the available sanctions from the bottom up, the Tribunal determined that the Respondent's conduct was so serious that it required an order, absent exceptional circumstances, striking the Respondent from the Register of Foreign Lawyers.

28.18 Having considered the authorities, in particular SRA v Sharma [2010] EWHC 2022 (Admin) and SRA v James [2018] EWHC 2058 (Admin), the Tribunal did not find any exceptional circumstances justifying any lesser sanction than striking off, which was an appropriate and proportionate sanction.

Costs

29. The Applicant accepted that the Respondent was impecunious and did not seek an order for costs.

Statement of Full Order

30. The Tribunal ORDERED that the Respondent, ABHISHEK KUMAR Registered Foreign Lawyer, be STRUCK OFF the Register of Foreign Lawyers and it further ORDERED that there be no order as to costs.

Dated this 25th day of August 2026
On behalf of the Tribunal

P. Lewis

P. Lewis
Chair