

SOLICITORS DISCIPLINARY TRIBUNAL

IN THE MATTER OF THE SOLICITORS ACT 1974

Case No. 12934-2026

BETWEEN:

ZULFIQAR ALI

Applicant

and

SOLICITORS REGULATION AUTHORITY LTD

Respondent

Before:

Mr E Nally (in the chair)
Mrs F Kyriacou
Dr P Iyer

Date of Hearing: 10 August 2026

Appearances

The Applicant represented himself.

Ravi Jackson, counsel of 3 Verulam Buildings, Gray's Inn, London WC1R 5NT, instructed by the Solicitors Regulation Authority Ltd for the Respondent.

**JUDGMENT
FOR RESTORATION TO THE ROLL**

Background

1. Mr Ali was a former solicitor having been admitted to the Roll in November 2010. Mr Ali appeared before the Tribunal on 6 – 8 July 2020. The allegations were that:
 - “1.1 Whilst acting in relation to a property development scheme at Property P he caused and/or permitted client money, which included purchaser's deposit money, to be paid into his office account and thereby breached Rule 13.1 and/or 14.1 of the SRA Accounts Rules 2011 (“the SARs”).*
 - 1.2 Mr Ali made payments out and facilitated transactions which were dubious and/or bore the hallmarks of fraud when acting on behalf of his client IC in relation to a property development scheme at Property P. Mr Ali transferred a minimum of £828,796 of purchaser's deposit monies to IC notwithstanding that he was aware that IC did not own Property P and that purchaser's deposit monies were being placed at risk. The Respondent thereby breached any or all of Principles 2 and 6 of the SRA Principles 2011 (“the Principles”) and failed to achieve Outcome 7.4 of the SRA Code of Conduct 2011 (“the Code”).*
 - 1.3 On 30 January 2015 and/or on or around 1 April 2015 Mr Ali advised Person A (an undercover reporter posing as an immigration client) regarding methods for circumventing the UK immigration system, namely by entering into a sham marriage. He thereby breached Principles 1, 2 and 6 of the Principles.*
 - 1.4 On 30 January 2015 and/or on or around 1 April 2015 during a surreptitiously recorded conversation with Person A, Mr Ali stated that he could prepare and/or submit paperwork in support of Person A and/or others' marriage and U.K. residency, notwithstanding that he was aware that the marriage would be bogus and arranged for the purpose of circumventing the UK immigration system. Mr Ali thereby breached Principles 1, 2 and 6 of the Principles.*
2. *Dishonesty was alleged as an aggravating factor with respect to allegations 1.3 and 1.4”.*
3. The Tribunal found all the allegations proved beyond reasonable doubt, including that Mr Ali’s conduct had been dishonest as alleged. In its Judgment dated 10 September 2020, the Tribunal ordered that Mr Ali be struck off the Roll and it further ordered that he pay costs in the sum of £26,500.
4. On 24 September 2020, Mr Ali filed an appeal with the High Court against the Tribunal’s findings. That appeal was dismissed on the grounds that the Tribunal’s Order was *“neither wrong on the facts nor unjust because of any procedural or other irregularity”*. Mr Ali sought permission to appeal to the Court of Appeal. That application was dismissed on 8 March 2022.
5. On 23 April 2026, Mr Ali filed an application for restoration to the Roll.

Documents

6. The Tribunal considered all of the documents contained in the electronic hearing bundle including:
 - The Applicant's application and Exhibits
 - The Respondent's Answer and Exhibits
 - The Applicant's Reply to the Respondent's Answer
 - The Respondent's Schedule of Costs

The Applicant's Submissions

7. Mr Ali offered an unqualified apology for his misconduct. He fully and unreservedly accepted the Tribunal's findings, which he did not seek to minimise or challenge. Mr Ali considered that his misconduct was not a minor lapse but was a serious departure from the standards expected of a solicitor. He now understood that a solicitor must exercise independent judgment and refuse to act where instructions would breach the law or professional standards. He relied on his experience since strike-off as having taught him to say "*no*" to unreasonable or unlawful demands.
8. Mr Ali submitted that he had not practised as a solicitor since the original proceedings in 2019, where he was struck off by the Tribunal. Following an appeal (which had been due to a procedural error in the period prior to the hearing) the Respondent agreed that the Tribunal's decision should be set aside and the matter was remitted to the Tribunal for re-consideration. It was the reconsideration that culminated in the Tribunal's decision of 8 July 2020 as referred to in paragraph 3 above. Accordingly, taking the 2019 date as the starting point, Mr Ali had not practised as a solicitor for over seven years. Even taking the 2020 date, it had been over six years since Mr Ali had practised as a solicitor.
9. Further, and in any event, the time that had elapsed was less relevant than his demonstration that he was now a fit and proper person to be restored to the Roll. Mr Ali considered that the quality, consistency, and duration of his rehabilitation satisfactorily evidenced his suitability for restoration. Mr Ali stated that since being struck off, he had not been convicted of any criminal offence, had not been the subject of any regulatory proceedings and had not been subject to any disciplinary findings. This demonstrated that this evidenced that his misconduct which led to his being struck off the Roll was an aberration and that he now conducted himself with honesty and integrity.
10. Given the Tribunal's findings and his unsuccessful appeals, Mr Ali sought employment outside of the profession. The findings of dishonesty made it difficult for Mr Ali to obtain work commensurate with his education and experience. He worked part-time as a salesperson with Shami Furniture Ltd for approximately four years, then later obtained an SIA licence and began working with G4S as a security officer in February 2025 and then joined HMPPS as a Prison Officer at HMP Pentonville in October 2025. He relies particularly on his current prison officer role as one involving public trust, discipline, accountability, integrity, and responsibility.

11. Mr Ali placed particular emphasis on his role with HMPPS which required enhanced vetting and involved daily responsibility for security keys, confidential information, prisoner welfare, professional boundaries, and decision-making under pressure. He argued that this was practical evidence of rehabilitation and trustworthiness in a demanding public service environment.
12. Mr Ali submitted that he was not confined to work within the profession to demonstrate evidence of rehabilitation. The Tribunal was referred to the observations of Lord Donaldson MR in *Re a Solicitor No.5 of 1983*, where it was considered that a formerly sanctioned solicitor may demonstrate rehabilitation and renewed trustworthiness by maintaining a sustained period of honest performance in alternative roles of trust.
13. Mr Ali also relied upon legal assistance provided by him post-strike-off. He had assisted in an injunction application involving landlord and lease issues, assisted a friend with clearance applications for his wife and children, attended a Care Quality Tribunal telephone case management hearing as a McKenzie Friend, and assisted another person with family court proceedings due to language difficulties. He stated that this assistance was unpaid, did not involve holding himself out as a practising solicitor, and demonstrated his continuing commitment to helping others using his legal knowledge.
14. With regard to keeping legally updated and informed, Mr Ali explained that he regularly visited legal and government websites, including immigration, nationality and GOV.UK resources, to keep himself updated. This, it was submitted, evidenced Mr Ali's interest and knowledge of legal developments whilst not in practice.
15. As to his future intentions and employment prospects if restored, although he had no current offers to that effect Mr Ali identified his intention to seek prospective roles within the public sector, emphasising that such roles would be within public authorities, subject to oversight and governance, and focused on the public interest and rule of law. Mr Ali had approached some local law firms who had indicated willingness to take him on if restored, although they were not willing to provide written offers at that stage, awaiting the result of this application and consideration of any conditions imposed on his practice.
16. Mr Ali accepted that costs remained outstanding in relation to the appeal, for which he remained responsible. Proposals had been made to resolve the issue, and Mr Ali continued to be willing to agree a reasonable repayment arrangement following enforcement correspondence. He relied on this as demonstrating willingness to meet the obligation within his means rather than avoidance of it.
17. Mr Ali submitted that public confidence was maintained not only by sanctioning serious misconduct but also by recognising genuine rehabilitation where compelling evidence existed. He contended that a person who had accepted the Tribunal's findings, lived without further misconduct, served in a trusted public role, and sought to continue in regulated public service did not pose a risk to the profession's reputation.
18. Mr Ali submitted that he had accepted responsibility for his mistakes which he could not undo and did not seek to minimise. He had devoted the years since being struck off to rebuilding his character, restoring his integrity, and demonstrating that his mistakes

were not the characteristics of the person he now was. His admission to the Roll was one of the proudest moments of his life; he regarded it as an honour and privilege to belong to the profession. His deepest wish was to return to the profession. By doing so he would demonstrate that he had accepted responsibility for his conduct, had changed and in doing so, had earned the right to be re-admitted to the Roll.

The Respondent Submissions

19. The Respondent opposed the Application. Mr Jackson submitted that the findings which led to Mr Ali's strike-off were of the utmost seriousness, involved contested dishonesty, and required exceptional reasons before restoration could properly be granted. The Respondent's position was that the Application did not disclose such exceptional reasons. The evidence relied upon by Mr Ali was limited, unsupported in material respects, and insufficient to demonstrate rehabilitation, insight, satisfactory future arrangements, or that restoration would be consistent with public confidence in the profession.
20. Mr Jackson submitted that the starting point was the gravity of the original findings. The Tribunal had found that Mr Ali was not a compelling or credible witness in relation to his conversations with Person A; that a solicitor could not simply turn a blind eye where a client proposed unlawful action; that what was discussed in both meetings was a non-genuine or sham marriage; and that Mr Ali was aware of this and gave advice on that basis. Mr Jackson submitted that the dishonesty was especially serious because it involved a solicitor dishonestly assisting a client to circumvent the law. It was difficult to imagine conduct more damaging to public trust than a solicitor knowingly advising on a sham marriage. In those circumstances, the protection of the public and the maintenance of public confidence required a high threshold before restoration could be contemplated.
21. The Tribunal was referred to the principles in *Bolton v The Law Society* [1994] 1 WLR 512, in which Sir Thomas Bingham MR stated that solicitors must discharge their professional duties with "*integrity, probity and complete trustworthiness*"; that the most serious lapses involve proven dishonesty; and that, "*Only infrequently, particularly in recent years, has [the Tribunal] been willing to order the restoration to the Roll of a solicitor against whom serious dishonesty had been established, even after a passage of years, and even where the solicitor had made every effort to re-establish himself and redeem his reputation.*" Further, "*the most fundamental*" purpose of sanction was "*to maintain the reputation of the solicitors' profession as one in which every member, of whatever standing, may be trusted to the ends of the earth*", and that to maintain that reputation and sustain public confidence it was often necessary that those guilty of serious lapses were "*not only expelled but denied re-admission*". Mr Jackson submitted that those principles applied with particular force where the original misconduct involved dishonesty, breaches of integrity, and advice directed to the circumvention of the law.
22. In *Thobani v SRA* [2011] EWHC 3783 (Admin), Burnett J stated that the Tribunal was concerned with "*the past conduct of an applicant, an evaluation of risk for the future should someone be restored to the Roll, and importantly, public confidence in the solicitors' profession*", and that public confidence in the integrity of the solicitors' profession was of "*cardinal importance*". Mr Jackson submitted that, on any proper

evaluation of risk and public confidence, Mr Ali had not discharged the burden upon him.

23. In *SRA v Simon Kaberry* [2012] EWHC 3883 (Admin), Elias LJ stated that the question was whether the public would have confidence in the solicitors' profession if it admitted a person with Mr Ali's disciplinary and personal history, having regard to culpability and losses. A finding of dishonesty, it was submitted, could constitute an almost insurmountable obstacle to restoration. In Mr Ali's case, that obstacle had not been overcome.
24. As to timing, Mr Jackson submitted that Mr Ali was wrong to treat the 2019 order as the relevant starting point. The 2019 order had been quashed on procedural grounds and remitted to the Tribunal; the operative strike-off order was made on 8 July 2020. Further, even if there were debate as to the date from which time should run, in a case involving dishonesty the passage of six years was not, of itself, sufficient. Mr Ali had pursued appeals to the High Court and Court of Appeal, challenging the central findings against him. Those proceedings were not finally disposed of until March 2022. Mr Jackson submitted that the Tribunal was entitled to take the pursuit and timing of those appeals into account when assessing whether the Application was premature, and whether there had been sufficient reflective time since the findings were finally upheld.
25. As to Mr Ali's apology and acceptance, Mr Jackson submitted that the original application had lacked a full apology and that the later apology had to be considered in the context of Mr Ali's earlier denials, his contested dishonesty, and his appeals challenging the substantive findings. The fact that Mr Ali was entitled to appeal did not prevent the Tribunal from considering whether, and when, he had truly accepted responsibility and begun the process of reflection.
26. Mr Ali had provided no cogent evidence of rehabilitation sufficient to meet the high threshold required. There was no evidence of formal employment within the legal profession since strike-off. The ad hoc assistance relied upon by Mr Ali, including assistance to friends, former clients and acquaintances, was of limited weight. It had not been undertaken under the supervision of a solicitor; it was not capable of independent assessment as competent or satisfactory legal work; and it did not enable the Tribunal to draw any meaningful conclusion as to what Mr Ali had learned or how he would avoid repetition of the misconduct.
27. It was Mr Ali's case that his role with HMPPS was a significant position of trust. Mr Jackson submitted that only limited weight could be attached to that role. Mr Ali had commenced that employment in October 2025 and, at the date of the hearing, had occupied the role for less than a year. The documentary evidence indicated that his probationary period was 12 months, and thus Mr Ali was still in his probationary period. It was noted that there was no letter or reference from HMPPS evidencing his performance, reliability, integrity or conduct in that role. Mr Jackson submitted that the Tribunal could not properly treat a short, probationary period of employment, unsupported by evidence from the employer, as demonstrating sustained rehabilitation.
28. Similar limitations applied to Mr Ali's reliance on his G4S role and his earlier employment as a salesperson. The G4S role began only in February 2025 and there was no evidence from G4S as to Mr Ali's performance. The sales assistant role was not, it

was submitted, an unusual or distinctive position of trust and responsibility capable of carrying significant weight in a restoration application involving proven dishonesty.

29. As to Mr Ali's clean record, there was no suggestion of further misconduct. However, the absence of further complaint or conviction was not sufficient. The question was whether Mr Ali had positively demonstrated rehabilitation, insight, and renewed trustworthiness, such that the public could have confidence in his restoration. A clean record, without cogent supporting evidence of rehabilitation and without satisfactory future safeguards, did not meet that threshold.
30. Mr Ali's evidence in relation to keeping legally informed was of limited assistance. He had provided scant detail of the websites visited, the legal developments reviewed, or what he had learned from them. He had not undertaken structured courses, including any ethics or professional standards training directed to the misconduct found proved. Mr Jackson submitted that there was a qualitative difference between unstructured internet research and structured, assessed training capable of evidencing insight, reflection, and professional development.
31. Mr Ali's evidence regarding future employment was wholly inadequate. Mr Ali referred to prospective public sector roles with HMPPS, the Ministry of Justice or the Government Legal Department, but he had not approached any relevant legal department, identified any vacancy, identified the nature of any proposed role, or produced evidence that any such employer would employ him if restored. His evidence that he had spoken to local firms was likewise unsupported. He did not identify the firms, the individuals spoken to, the proposed role, or the proposed supervision. There was no documentary evidence of any offer, conditional or otherwise. In the circumstances, the alleged prospects of future employment were speculative at best.
32. Further, the absence of any identified future role meant that the Tribunal could not assess what supervision or safeguards would be in place if Mr Ali were restored. In a case involving dishonesty and conduct undermining the rule of law, the Tribunal would need cogent evidence of the nature of any proposed employment, the identity and knowledge of any prospective supervisor, and the safeguards intended to mitigate risk. No such evidence had been provided.
33. As to the outstanding costs order, Mr Jackson submitted that Mr Ali remained liable for the appeal costs order of £12,500 plus VAT, totalling £15,000. Although Mr Ali had made proposals, they did not demonstrate a sufficient or sustained effort to meet the liability. Accordingly, Mr Ali had not made good the losses arising from the proceedings and that the outstanding costs remained a relevant factor, although not necessarily determinative.
34. In conclusion, taking all matters together, Mr Ali had not demonstrated exceptional reasons for restoration. The seriousness of the original misconduct, the proven dishonesty, the challenge to the central findings through the appellate process, the limited and unsupported evidence of rehabilitation, the absence of satisfactory legal employment or structured training, the speculative nature of future employment, and the outstanding costs order meant that the Application should be refused. Restoration would damage the reputation of the profession and undermine public confidence in the provision of legal services.

The Tribunal's Decision

35. The Tribunal considered the Application, the written material, and the oral submissions with care. The Tribunal's function on an application for restoration was to determine whether Mr Ali had established, on the evidence before it, that he was now a fit and proper person to have his name restored to the Roll.
36. The Tribunal had regard to the authorities cited by the parties, and to its Guidance Note on Other Powers of the Tribunal (7th Edition - February 2025). The Guidance Note required the Tribunal to consider, amongst other matters, the period which had elapsed since strike-off, the evidence of rehabilitation, Mr Ali's employment and training history, his future employment intentions, and any offers of employment within the legal profession, and the extent to which losses, fines or costs orders had been repaid.
37. The Tribunal reminded itself of the observations in *Bolton* that the most fundamental purpose of sanction was to maintain the reputation of the solicitors' profession as one in which every member may be trusted, and that in cases of serious dishonesty it would only infrequently be appropriate to restore a solicitor to the Roll, even after a passage of years and even where efforts had been made to re-establish reputation. The Tribunal also had regard to the observations in *Thobani* that the exercise required consideration of past conduct, future risk, and public confidence, and to *Kaberry*, which emphasised that the question was whether the public would have confidence in the profession if a person with Mr Ali's disciplinary and personal history were restored.
38. The findings which led to Mr Ali's strike-off were grave, including that Mr Ali had advised and offered assistance in relation to a sham marriage intended to circumvent the UK immigration system. The Tribunal also had regard to the handling and transfer of substantial purchaser deposit monies in circumstances which bore the hallmarks of fraud and placed client monies at risk. The original Tribunal had found breaches of integrity and conduct undermining public trust. Those findings formed the core of the decision to strike Mr Ali off the Roll and had withstood Mr Ali's appeal against them.
39. The Tribunal accepted that Mr Ali had now expressed remorse and had offered his unreserved apology. It also accepted that he was entitled to pursue appeals against the Tribunal's decision. However, the fact that he appealed to the High Court and then sought permission to appeal to the Court of Appeal, challenging central findings made against him, was relevant to the Tribunal's assessment of insight and the period over which reflective rehabilitation could properly be assessed. The High Court dismissed the appeal on 11 October 2021, and the Court of Appeal refused permission on 8 March 2022.
40. As to timing, the Tribunal was not persuaded in any event that the Application should be refused simply because of the date from which time was calculated. The Tribunal's considerations must go much wider. The Guidance Note stated that, save in exceptional circumstances, an application made within six years of strike-off was likely to be regarded as premature. By the date of the hearing, more than six years had elapsed from the 8 July 2020 order. The precise start date was therefore not determinative. However, the Tribunal considered that the period during which Mr Ali continued to challenge the Tribunal's findings was relevant to the weight that could be given to his asserted insight and rehabilitation.

41. The Tribunal accepted Mr Ali's submission that the passage of time alone was not the central issue. The more important question was whether the evidence demonstrated that he had been rehabilitated and that public confidence would not be harmed by his restoration. The burden lay upon Mr Ali to satisfy the Tribunal that he was now a fit and proper person to be restored to the Roll.
42. The Tribunal considered Mr Ali's reliance on his clean record since strike-off. It accepted that there was no evidence of criminal conviction, regulatory finding, or employment disciplinary matter. That was to Mr Ali's credit. However, the absence of further misconduct did not, of itself, amount to positive evidence of rehabilitation sufficient to overcome findings of dishonesty and a lack of integrity. The Tribunal required cogent evidence of reformation, insight, trustworthiness, and future safeguards.
43. The Tribunal considered the evidence of rehabilitation through employment. Mr Ali relied on work as a salesperson, his G4S role, and his employment with HMPPS as a Prison Officer at HMP Pentonville. The Tribunal accepted that those roles required honesty and responsibility. It also accepted that the HMPPS role involved public service and carried duties requiring discipline and adherence to rules. However, the evidence was insufficient to demonstrate sustained rehabilitation of the kind required in this application. Mr Ali had been employed by HMPPS only since October 2025 and remained within a probationary period. There was no reference, report, or other evidence from HMPPS addressing his performance, reliability, judgment, integrity, or trustworthiness in that role. There was similarly no evidence from G4S, and the sales role did not provide evidence of trust and responsibility of such weight as to meet the high threshold in a dishonesty restoration case.
44. The Tribunal also considered the voluntary legal assistance relied upon by Mr Ali. It accepted that he had provided the assistance detailed. However, the Tribunal attached limited weight to that evidence. The assistance was ad hoc, largely provided to friends, former clients, or acquaintances, and was not undertaken under solicitor supervision. The Tribunal had no independent evidence from a solicitor or other professional able to assess the quality, competence, or propriety of that work. It therefore did not provide strong evidence of rehabilitation or of readiness to return to the Roll.
45. The Tribunal considered Mr Ali's evidence that he had kept himself informed of legal developments by reviewing legal and government websites, including immigration and GOV.UK materials. The Tribunal accepted that he had maintained some interest in legal matters. However, the evidence was wholly insufficient. Mr Ali had not produced a record of courses, training, seminars, structured learning, ethics training, professional standards training, or assessed continuing development. He was unable to identify in any detail what he had learned, how he had kept pace with legal and regulatory developments, or how any learning addressed the specific misconduct that led to his strike-off. The Tribunal considered that unstructured online reading was not an adequate substitute for cogent evidence of continuing professional development in an application of this seriousness.
46. The Tribunal next considered Mr Ali's future employment intentions. This was a factor expressly identified in the Guidance Note. Mr Ali said that he hoped to pursue roles within HMPPS, the Ministry of Justice, the Government Legal Department, or local

firms. However, the evidence was inadequate. He had not approached the legal departments of any public authority. He had identified no vacancy, role, proposed line manager, or intended contractual position. Although he said he had spoken to some local firms, he did not identify the firms, the persons spoken to, the proposed role, or any proposed supervisory arrangements. There was no letter, reference, conditional offer, or other documentary evidence from any prospective employer.

47. The Tribunal regarded this as a significant deficiency. Without evidence of a real employment opportunity, the Tribunal could not assess whether Mr Ali would be gainfully employed in the legal profession, whether any role would be appropriate, what supervision would exist, or whether safeguards could be put in place to address the risks arising from the original findings. The Tribunal found that Mr Ali's potential employment prospects in both the public and private sectors were speculative at best.
48. The Tribunal considered the outstanding costs order. Mr Ali accepted that the appeal costs order of £15,000 remained outstanding and that he was responsible for it. The Tribunal noted his evidence that he had made proposals and remained willing to agree an instalment arrangement. The Tribunal did not regard the outstanding costs as determinative of the Application. However, it remained a relevant factor under the Guidance Note, and the fact remained that the order had not been satisfied.
49. The Tribunal considered all matters in the round. It gave credit for Mr Ali's apology, his evidence of reflection, his clean record, and his employment outside the legal profession. It accepted that he had taken some steps to rebuild his life. However, the Application did not remotely reach the level of evidence and reassurance required before restoration could be ordered in a case involving dishonesty, lack of integrity, and conduct which had undermined the rule of law and public trust.
50. The Tribunal was not satisfied that Mr Ali had evidenced rehabilitation to the required standard. There was no strong evidence of rehabilitation either in his employment pattern or in the examples of assistance upon which he sought to rely. There was insufficient evidence that he had kept up to date with legal and regulatory developments. There was inadequate evidence of future employment prospects and no evidence of the nature of any likely role or supervision. The Tribunal could not be satisfied that public confidence in the reputation of the profession would not be harmed if Mr Ali were restored to the Roll.
51. Accordingly, the Tribunal determined that Mr Ali had not established that he was now a fit and proper person to have his name restored to the Roll. The Application for restoration was refused.

Costs

52. Mr Jackson applied for the costs of and incidental to the response to the Application in the sum of £6,425. Mr Ali submitted that the costs claimed were excessive.
53. The Tribunal considered the application for costs, the length and nature of the hearing, the work required of the Respondent, and Mr Ali's submissions. The Tribunal was satisfied that the Respondent was a necessary party to the Application and that it was appropriate to make an order for costs. However, the Tribunal considered that the

amount claimed should be reduced, the fees claimed for counsel being excessive. The Tribunal accordingly ordered Mr Ali to pay the Respondent's costs fixed in the reduced sum of £3,000.

Statement of Full Order

54. The Tribunal ORDERED that the application of ZULFIQAR ALI for restoration to the Roll of Solicitors be **REFUSED** and it further Ordered that the Applicant do pay the costs of and incidental to the response to this application fixed in the sum of £3,000.00.

Dated this 18th day of August 2026

On behalf of the Tribunal

E Nally

E Nally
Chair