

A.S.K. Legal LLP

78 High Street, Winslow, Buckinghamshire , MK18 3DQ

**Recognised body
524151**

[Agreement Date: 3 June 2025](#)

Decision - Agreement

Outcome: Regulatory settlement agreement

Outcome date: 3 June 2025

Published date: 18 June 2025

Firm details

Firm or organisation at date of publication and at time of matters giving rise to outcome

Name: A.S.K. Legal LLP

Address(es): 78 High Street, Winslow, Buckinghamshire, MK18 3DQ

Firm ID: 524151

Outcome details

This outcome was reached by agreement.

Decision details

1. Agreed outcome

1.1 A.S.K. Legal LLP (the Firm), a recognised body, authorised and regulated by the Solicitors Regulation Authority (SRA) agrees to the following outcome to the investigation:

- a. it is fined £6,768
- b. to the publication of this agreement
- c. it will pay the costs of the investigation of £600.

2. Summary of Facts

2.1 We carried out an investigation into the firm following a desk-based review by our AML Proactive Supervision team.



2.2 Our review identified areas of concern in relation to the firm's compliance with the Money Laundering, Terrorist Financing (Information on the Payer) Regulations 2017 (MLRs 2017), the SRA Principles 2011, the SRA Code of Conduct 2011, the SRA Principles 2019 and the SRA Code of Conduct for Firms 2019.

2.3 During the investigation, historic breaches of the Money Laundering Regulations 2007 (MLRs 2007) were identified too.

Firm-wide risk assessment (FWRA)

2.4 Between 26 June 2017 and 30 March 2022, the firm failed to have in place a documented assessment of the risks of money laundering and terrorist financing to which its business was subject (a firm-wide risk assessment (FWRA)), pursuant to Regulations 18(1) and 18(4) of the MLRs 2017.

2.5 Between 31 March 2022 and 18 February 2025, the firm failed to have in place an appropriate FWRA that identified and assessed the risks of money laundering to which it was subject, taking into account all risk factors, pursuant to Regulation 18(2) of the MLRs 2017.

Policies and Procedures (P&Ps)

2.6 Between 6 October 2011 and 12 November 2012 the firm failed to establish, and from 13 November 2012 and 25 June 2017 failed to maintain, appropriate and risk-sensitive policies and procedures (P&Ps), pursuant to Regulation 20(1) of the MLRs 2007.

Policies, controls and procedures (PCPs)

2.7 Between 26 June 2017 and 30 March 2022, the firm failed to establish and maintain policies, controls, and procedures (PCPs) to mitigate and effectively manage the risks of money laundering and terrorist financing, identified in any risk assessment (FWRA), pursuant to Regulation 19(1)(a) of the MLRs 2017, and regularly review and update them pursuant to Regulation 19(1)(b) of the MLRs 2017.

2.8 Between 31 March 2022 and 4 April 2025, the firm failed to establish and maintain compliant policies, controls, and procedures (PCPs) to mitigate and effectively manage the risks of money laundering and terrorist financing, identified in any risk assessment (FWRA), pursuant to Regulation 19(1)(a) of the MLRs 2017, and regularly review and update them pursuant to Regulation 19(1)(b) of the MLRs 2017.

3. Admissions



3.1 The firm admits, and the SRA accepts, that by failing to comply with the MLRs 2007 and MLRs 2017 that:

From 6 October 2011 to 24 November 2019 (when the SRA Handbook 2011 was in force) the firm breached:

- a. Principle 6 of the SRA Principles 2011 – which states you must behave in a way that maintains the trust the public places in you and in the provisions of legal services.
- b. Principle 8 of the SRA Principles 2011 – which states you must run in your business or carry out your role in the business effectively and in accordance with proper governance and sound financial risk management principles.

And the firm failed to achieve:

- c. Outcome 7.5 of the SRA Code of Conduct 2011 – which states you comply with legislation applicable to your business, including anti-money laundering and data protection legislation.

And from 25 November 2019 (when the SRA Standards and Regulations came into force) until April 2025, the firm breached:

- d. Principle 2 of the SRA Principles 2019 – which states you act in a way that upholds public trust and confidence in the solicitors' profession and in legal services provided by authorised persons.
- e. Paragraph 2.1(a) of the SRA Code of Conduct for Firms 2019 – which states you have effective governance structures, arrangements, systems, and controls in place that ensure you comply with all the SRA's regulatory arrangements, as well as with other regulatory and legislative requirements, which apply to you.
- f. Paragraph 3.1 of the SRA Code of Conduct for Firms 2019 – which states that you keep up to date with and follow the law and regulation governing the way you work.

4. Why a fine is an appropriate outcome

4.1 The conduct showed a disregard for statutory and regulatory obligations and had the potential to cause harm, by facilitating dubious transactions that could have led to money laundering (and/or terrorist financing). This could have been avoided had the firm conducted appropriate risk assessments on its clients and files on in-scope matters.

4.2 It was incumbent on the firm to meet the requirements set out in the MLRs 2017. The firm failed to do so. The public would expect a firm of solicitors to comply with its legal and regulatory obligations, to protect against these risks as a bare minimum.

4.3 The SRA considers that a fine is the appropriate outcome because:



4.4 Rule 4.1 of the Regulatory and Disciplinary Procedure Rules states that a financial penalty may be appropriate to maintain professional standards and uphold public confidence in the solicitors' profession and in legal services provided by authorised persons. There is nothing within this Agreement which conflicts with Rule 4.1 of the Regulatory and Disciplinary Rules and on that basis, a financial penalty is appropriate.

5. Amount of the fine

5.1 The amount of the fine has been calculated in line with the SRA's published guidance on its approach to setting an appropriate financial penalty (the Guidance).

5.2 Having regard to the Guidance, we and the firm agree the nature of conduct in this matter as more serious (score of three). This is because the firm should have been aware of its obligation to have in place a FWRA & PCPs since June 2017. In addition, the majority of the firm's work falls within scope of the MLRs 2017 (and did also under the previous MLRs 2007, where P&Ps were required), therefore the firm should have been familiar with the obligations imposed by the regulations and should have implemented strict adherence.

5.3 Even though the firm has breached the regulations by not putting in place a FWRA until much later, it should have been prompted to do so when it submitted its declaration in January 2020. We note the risk assessment declaration was submitted by the firm's previous Compliance Officer for Legal Practice who is no longer part of the firm. However, this does not negate the firm's conduct as it has continued after it was and should have been known to be improper and formed a pattern of misconduct.

5.4 The firm has been carrying out a high percentage of high-risk conveyancing historically but until 2012 it has failed to have in place any written P&Ps under the previous MLRs 2007. The firm has stated it will continue to update its AML documents, in line with any changes to the money laundering regulations or its practice going forward.

5.5 All in-scope firms authorised and regulated by the SRA, must maintain compliance with the regulations and pay sufficient regard to published guidance and warning notices. There is no exception to this, and the firm failed to do this. The firm has failed to meet the requirements of the regulations for many years. Although, the firm now has compliant documents in place, which are in proper use, the firm was left vulnerable for a period the SRA considers amounting to a serious breach.

5.6 The impact of harm or risk of harm score is assessed as being medium (score of three). This is because although there is no evidence of any harm being caused, as a result of the firm not having a FWRA (until



March 2022), P&Ps (until November 2012) and PCPs (until March 2022), and thereafter its FWRA and PCPs were not compliant until February 2025 and April 2025, respectively. Given the nature of the high percentage of in-scope work it carries out, the firm had the potential to cause moderate loss or have moderate impact due to its AML failings.

5.7 The 'nature' of the conduct and the 'impact of harm or risk of harm' added together give a score of seven. This places the penalty in Band 'C', as directed by the Guidance, which indicates a broad penalty bracket of between 1.6% and 3.2% of the firm's annual domestic turnover.

5.8 Based on the evidence the firm has provided of its annual domestic turnover, this results in a basic penalty of £7,520.

5.9 The SRA considers that the basic penalty should be reduced to £6,768. This reflects the firm's transparency and cooperation with the AML Proactive Supervision team and AML Investigations team, along with admitting and remedying the breaches.

5.10 The firm does not appear to have made any financial gain or received any other benefit as a result of its conduct. Therefore, no adjustment is necessary, and the financial penalty is £6,768.

6. Publication

6.1 Rule 9.2 of the SRA Regulatory and Disciplinary Procedure Rules states that any decision under Rule 3.1 or 3.2, including a Financial Penalty, shall be published unless the particular circumstances outweigh the public interest in publication.

6.2 The SRA considers it appropriate that this agreement is published as there are no circumstances that outweigh the public interest in publication, and it is in the interest of transparency in the regulatory and disciplinary process.

7. Acting in a way which is inconsistent with this agreement

7.1 The firm agrees that it will not act in any way which is inconsistent with this agreement, such as by denying responsibility for the conduct referred to above. This may result in a further disciplinary sanction.

7.2 Acting in a way which is inconsistent with this agreement may also constitute a separate breach of principles 2 and 5 of the Principles and paragraph 3.2 of the Code of Conduct for Firms.

8. Costs

8.1 The firm agrees to pay the costs of the SRA's investigation in the sum of £600. Such costs are due within 28 days of a statement of costs due

being issued by the SRA.

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