

## **GD Legal Solicitors Ltd (GD Legal Solicitors Ltd)**

**Lowry Mill, Lees Street, Pendlebury, Swinton, Manchester , M27 6DB**

**Recognised body  
627291**

[Fined Date: 2 July 2024](#)

### **Decision - Fined**

Outcome: Fine

Outcome date: 2 July 2024

Published date: 9 August 2024

### **Firm details**

#### **Firm or organisation at date of publication**

Name: GD Legal Solicitors Ltd

Address(es): Lowry Mill, Lees Street, Pendlebury, Swinton, Manchester, M27 6DB

Firm ID: 627291

### **Outcome details**

This outcome was reached by SRA decision.

#### **Decision details**

##### **Who does this disciplinary decision relate to?**

GD Legal Solicitors Ltd (the firm), is a recognised body, with its head office at Lowry Mill, Lees Street, Pendlebury, Swinton, Manchester M27 6DB.

#### **Summary of Decision**

The firm was fined £21,843 for failing to have in place or to maintain relevant documentation to prevent activities relating to money laundering and terrorist financing as required by the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (the MLRs 2017).

### **Facts of the misconduct**

The firm has been carrying out conveyancing work since 2019. In early 2023, the SRA undertook an inspection at the firm to assess its compliance against the MLRs 2017. This identified various areas of concern surrounding the firm's compliance with requirements for a documented and compliant firm wide risk assessment (FWRA), policies, controls and procedures (PCPs) and client/matter risk assessment (CMRA) process.

These concerns led to a referral to the SRA's AML investigation team.

It was found that:

1. From March 2019 until October 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 FWRA) pursuant to Regulation 18(1) and 18(4) of the MLRs 2017.
2. From March 2019 until December 2023 the firm failed to ensure that it had in place fully compliant PCPs, as required by Regulation 19 of the MLRs 2017.
3. From March 2019 until June 2023, the firm failed to implement a client and matter risk assessment (CMRA) process, as required by Regulation 28(12)(a)(ii) and Regulation 28(13) of the MLRs 2017.

In doing so, to the extent the conduct took place up to 25 November 2019, the firm

- i. breached Principles 6 and 8 of the SRA Principles 2011, and
- ii. failed to achieve Outcomes 7.2 and 7.5 of the SRA Code of Conduct 2011

and to the extent the conduct took place after 25 November 2019

- i. breached Principle 2 of the SRA Principles 2019, and
- ii. breached Paragraph 2.1(a) and Paragraph 3 of the SRA Code of Conduct for Firms (2019).

### **Decision on sanction**

The firm was directed to pay a financial penalty of £21,843.

This was because the firm's conduct was serious by reference to the following factors in the SRA Enforcement Strategy:

1. The findings relate to breaches of the MLRs 2017, which protect the public from the serious consequences of money laundering and terrorist financing. The associated risks were heightened given the high proportion of the firm's work that was 'in scope' of the MLRs 2017.



2. Its conduct was a breach of its regulatory obligations which persisted for longer than was reasonable.
3. The firm was responsible for its own conduct which was serious and had the potential to cause harm to the public interest and to public confidence in the legal profession.

In view of the above, the firm's conduct was placed in conduct band C which has a financial penalty of 1.6% to 3.2% of annual domestic turnover. In light of these factors, the firm's conduct was placed in the mid-range of this band at C3 (2.4% of annual domestic turnover).

The following mitigating factors were considered:

1. The firm co-operated with the SRA.
2. The firm had taken remedial action.
3. There was no evidence that actual harm had materialised.

The firm was also ordered to pay costs of £1,350.

### **SRA Principles 2011**

#### **Principle 6**

You must behave in a way that maintains the trust the public places in you and in the provision of legal services.

#### **Principle 8**

You must run your business or carry out your role in the business effectively and in accordance with proper governance and sound financial and risk management principles.

### **SRA Code of Conduct 2011**

#### **Outcome 7.2**

You have effective systems and controls in place to achieve and comply with the Principles, rules and outcomes and other requirements of the Handbook, where applicable.

#### **Outcome 7.5**

You comply with legislation applicable to your business, including anti-money laundering and data protection legislation.

### **SRA Principles 2019**

#### **Principle 2**

You act in a way that upholds public trust and confidence in the solicitors' profession and in legal services provided by authorised persons.

**SRA Code of Conduct for Firms (2019)**

**Paragraph 2.1(a)**

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.

**Paragraph 3.1**

You keep up to date with and follow the law and regulation governing the way you work.

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