

**Amphlett Lissimore Bagshaws LLP**  
**Greystoke House, 80-86 Westow Street, London ,**  
**SE19 3AF**  
**Licenced body**  
**554555**

**[Fined Date: 7 April 2025](#)**

## **Decision - Fined**

Outcome: Fine

Outcome date: 7 April 2025

Published date: 28 July 2025

## **Firm details**

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

Name: Amphlett Lissimore Bagshaws LLP

Address(es): Greystoke House, 80-86 Westow Street, London, SE19 3AF

Firm ID: 554555

## **Outcome details**

This outcome was reached by SRA decision.

### **Decision details**

Amphlett Lissimore Bagshaws LLP (the firm), is a licensed body with an office at Greystoke Houe, 80-86 Westow Street, London SE19 3AF.

### **Summary of decision**

The firm was fined for failing to maintain fully compliant policies controls and procedures (PCPs) and failing to conduct client and matter risk assessments (CMRAs) as required by the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (MLR 2017).

### **Facts of the misconduct**



The SRA's AML proactive supervision team carried out an AML desk-based review at the firm to assess its compliance with MLR 2017.

On 4 December 2023, an SRA AML team manager notified the firm that various concerns were identified as regards its compliance with requirements for PCPs and CMRAs for work it carried out within the scope of MLR 2017.

The AML officer provided guidance to help the firm meet its obligations and the firm entered into a compliance plan to bring it into compliance with MLR 2017. The matter was also referred to the SRA's AML investigation team for formal investigation.

The firm revised its AML documentation including its PCPs so that they were compliant with MLR 2017 by March 2024. The firm accepted it did not have a CMRA form or process in place across the firm to record its client and matter risk assessments. It has now put this in place and carries out documented CMRA on all files in-scope of MLR 2017.

## **Findings**

It was found that the firm:

### **Allegation 1 a)**

Between 2 December 2019 and 19 March 2024, failed to maintain fully compliant policies, controls, and procedures (PCPs) which met the requirements of Regulation 19 of the MLR 2017.

### **Allegation 1 b)**

Between 2 December 2019 and 31 January 2024, failed to conduct client and matter risk assessments as required by Regulation 28(12) and 28(13) of the MLR 2017.

In doing so, the firm breached:

- i. Principle 2 of the SRA Principles 2019
- ii. Paragraphs 2.1(a) and 3.1 of the SRA Code of Conduct for Firms 2019.

**Decision on sanction** The firm was directed to pay a financial penalty of £114,006 and ordered to pay costs of £1,350.

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 MLR 2017, which protect the public from the serious consequences of money laundering and



- terrorist financing.
2. Its conduct was a breach of its regulatory obligations which persisted for longer than was reasonable and formed a pattern of misconduct.
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 bracket of 1.6 per cent to 3.2 per cent of annual domestic turnover. The firm's conduct was placed in the lower range of this band at C2 (2 per cent of annual domestic turnover).

In placing the conduct at the lower range of the band, the following mitigating factors were considered:

1. The firm co-operated fully with the SRA's investigation.
2. It took remedial action and now has fully compliant AML documentation and procedures in place at the firm.

### **SRA Standards and Regulations breached**

#### **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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