

John P Martin & Co
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2BT
Recognised body
076493

[Agreement Date: 8 October 2025](#)

Decision - Agreement

Outcome: Regulatory settlement agreement

Outcome date: 8 October 2025

Published date: 24 November 2025

Firm details

No detail provided:

Outcome details

This outcome was reached by agreement.

Decision details

1. Agreed outcome

1.1 John P Martin & Co (the firm), a recognised body, agrees to the following outcome to the investigation of its conduct by the Solicitors Regulation Authority (SRA):

- a. it is fined £3,340,
- b. to the publication of this agreement, and
- 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 the SRA AML Proactive Supervision Team.

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



2.3 Between 26 June 2017 and 31 January 2025, 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.

3. Admissions

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

To the extent the conduct took place on or before 24 November 2019 (when the SRA Handbook 2011 was in force) it failed to achieve or breached:

- a. Outcome 7.5 of the SRA Code of Conduct 2011 – which states you must comply with legislation applicable to your business, including anti-money laundering and data protection legislation.
- b. 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 provision of legal services.
- c. Principle 8 of the SRA Principles 2011 – which states 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.

To the extent that the conduct took place from 25 November onwards (when the SRA Standards and Regulations came into force) it breached:

- d. Principle 2.2 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 SRA's Enforcement Strategy sets out its approach to the use of its enforcement powers where there has been a failure to meet its standards or requirements.

4.2 When considering the appropriate sanctions and controls in this matter, the SRA has considered the admissions made by the firm and the



following mitigation:

- a. the firm has taken steps to rectify its failings and reviewed and amended its FWRA and, in doing so, is now compliant with the MLRs 2017,
- b. the firm has cooperated with the AML Proactive Supervision and AML Investigation teams, and
- c. the firm has admitted the breaches listed above at the earliest opportunity.

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

- a. the conduct showed a disregard towards statutory and regulatory obligations and had the potential to cause harm by failing to have a compliant AML control environment in place, which left the firm susceptible to money laundering (and/or terrorist financing),
- b. 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, and
- c. the agreed outcome is a proportionate outcome to the public interest because it creates a credible deterrent to others. The issuing of a sanction signifies the risk to the public, and the legal sector, which arises when solicitors do not comply with AML legislation and their professional regulatory rules.

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 the legal services provided by authorised persons. There is nothing within this Agreement with conflict 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 We have assessed the nature of conduct in this matter as more serious (score of three). This is because we consider that the firm's conduct continued after it was known to be improper. There has been a requirement to have a compliant FWRA in place since the MLRs 2017 came into force on 26 June 2017. The firm has failed to pay sufficient regard to the SRA's warning notice on the same, first published 7 May 2019 (updated 25 November 2019).

5.3 The harm, or risk of harm is assessed as being medium (score of four). This is because failing to ensure it had a compliant FWRA in place left the firm vulnerable to the risks of money laundering, particularly



when providing in-scope work such as conveyancing, which forms a significant percentage of the work carried out by the firm. The firm left itself without effective arrangements in place to manage compliance with the MLRs 2017.

5.4 The 'nature' of the conduct and the 'impact of harm or risk of harm' added together gives a score of seven. This places the penalty in Band 'C,' as directed by the Guidance.

5.5 We and the firm agree a financial penalty in the lowest part of the band. This is because the failings identified formed a pattern of misconduct. The firm should have been aware of its obligation to have a compliant FWRA since 26 June 2017 but failed to have this in place.

5.6 Based on the evidence the firm has provided of its annual domestic turnover; this results in a basic penalty of £3,711.

5.7 The SRA considers that the basic penalty should be reduced to £3,340. This reduction reflects the mitigation set out in paragraph 4.2 above.

5.8 The firm does not appear to have made any financial gain, or received any other benefit, because of its conduct. Therefore, no adjustment is necessary, and the financial penalty is £3,340.

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 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 deny the admissions made in this agreement or act in any way which is inconsistent with it.

7.2 If the firm denies the admissions, or acts in a way which is inconsistent with this agreement, the conduct which is subject to this agreement may be considered further by the SRA. That may result in a disciplinary outcome or a referral to the Solicitors Disciplinary Tribunal on the original facts and allegations. 7.3 Denying the admissions made or 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 7.3 of the Code of Conduct for Solicitors, RELs and RFLs.

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.

The date of this Agreement is 8 October 2025.

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