

Stephen Murray & Co incorporating Penzer & Co

13 Medway Parade, Perivale , UB6 8HN

Recognised sole practitioner

077650

[Agreement Date: 19 August 2025](#)

Decision - Agreement

Outcome: Regulatory settlement agreement

Outcome date: 19 August 2025

Published date: 2 September 2025

Firm details

Firm or organisation at time of matters giving rise to outcome

Name: Stephen Murray & Co incorporating Penzer & Co

Address(es): 13 Medway Parade, Perivale, UB6 8HN

Firm ID: 077650

Firm or organisation at date of publication

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Outcome details

This outcome was reached by agreement.

Decision details

1. Agreed outcome

1.1 Stephen Murray & Co incorporating Penzer & Co (the Firm), a recognised sole practice, authorised and regulated by the Solicitors Regulation Authority (SRA), agrees to the following outcome to the investigation:



- a. Stephen Murray & Co incorporating Penzer & Co will pay a financial penalty in the sum of £3,071 under Rule 3.1(b) of the SRA Regulatory and Disciplinary Procedure Rules,
- b. to the publication of this agreement under Rule 9.2 of the SRA Regulatory and Disciplinary Procedures Rules, and
- c. Stephen Murray & Co incorporating Penzer & Co will pay the costs of the investigation of £600, under Rule 10.1 and Schedule 1 of the SRA Regulatory and Disciplinary Procedure Rules.

2. Summary of Facts

2.1 We carried out an investigation into the firm following an inspection and review of sampled files by our AML Proactive Supervision Team.

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

Client and matter risk assessments (CMRAs)

2.3 In eight files, the firm failed to conduct client and matter risk assessments, pursuant to Regulation 28(12)(a)(ii) and Regulation 28(13) of the MLRs 2017. Customer due diligence (CDD) measures / source of funds (SoF)

2.4 In four files, the firm failed to conduct appropriate customer due diligence measures, including the scrutiny of transactions undertaken (including, where necessary, the source of funds), pursuant to Regulation 28(11)(a) of the MLRs 2017.

Policies, controls and procedures (PCPs)

2.5 In eight files, the firm failed to follow or implement its own policies, controls and procedures, pursuant to Regulation 19(3)(e) of the MLRs 2017.

2.6 The firm has since confirmed it has put in place measures to ensure continuing and future compliance, including updating its CMRA process, reviewing all live in-scope files to ensure completed CMRAs were present, and also to set out a new procedure to ensure clients and matters were appropriately risk assessed going forward. Further, the firm will ensure source of funds and source of wealth checks are documented.

3. Admissions

3.1 The firm admits, and the SRA accepts, that by failing to comply with the MLRs 2017, it has breached or failed to achieve:



- a. Principle 2 of the SRA Principles - which states you must act in a way that upholds public trust and confidence in the solicitors' profession and in legal services provided by authorised persons.
- b. Paragraph 2.1(a) of the SRA Code of Conduct for Firms - which states you must have effective governance structures, arrangements, systems and controls in place that ensure: a. you comply with all the SRA's regulatory arrangements, as well as with other regulatory and legislative requirements, which apply to you.
- c. Paragraph 2.2 of the SRA Code of Conduct for Firms - which states you must keep and maintain records to demonstrate compliance with your obligations under the SRA's regulatory arrangements.
- d. Paragraph 3.1 of the SRA Code of Conduct for Firms - which states you must 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 taken into account the admissions made by the firm and the following mitigation:

- a. The firm took steps to rectify its failings and is compliant with the MLRs 2017.
- b. At the time of the inspection, the firm's FWRA, PCPs, CMRA were found to be compliant with the MLRs 2017, so there was lower exposure to ongoing risks.
- c. The firm has cooperated with the SRA's AML Proactive Supervision and AML Investigation teams.
- d. 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 undertake CMRAs and conduct SoF checks in conveyancing transactions, that could have led to money laundering (and/or terrorist financing). This could have been avoided had the firm ensured compliance by ensuring staff followed and implemented its own PCPs at file level.
- 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, to protect against these risks as a bare minimum.



- c. The agreed outcome is a proportionate outcome in the public interest because it creates a credible deterrent to others and the issuing of such a sanction signifies the risk to the public, and the legal sector, that arises when solicitors do not comply with anti-money laundering 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 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, the SRA and the firm agree that the nature of the misconduct was more serious (score of three). This is because the firm's failure to ensure it had proper documentation in place shows a persistent disregard of the firm's regulatory obligations. This is more serious given the lack of CMRAs and SoF at file level, which translated to a poor understanding of the risks posed by clients and matters and resulted in insufficient scrutiny being applied.

5.3 The firm only became compliant with the MLRs 2017 because of our AML inspection and guidance we have provided. The breach has arisen because of recklessness and a failure to pay sufficient regard to money laundering regulations published guidance and SRA warning notices.

5.4 The firm has failed to ensure that it was fully compliant with its statutory obligations until May 2025 a period of nearly eight years since the MLRs 2017 came into effect.

5.5 The impact of the harm or risk of harm is assessed as being medium (score of four). The nature of conveyancing is considered high-risk, owing to the risk of abuse of the system by criminals. We note the firm currently undertakes the majority of its work in scope of the money laundering regulations, via mainly conveyancing. This puts it at a risk of being used to launder money.

5.6 Conveyancing is a high-risk area for money laundering and terrorist financing, however there is no evidence of there being any direct loss to clients or actual harm caused as a result of the firm's failure to ensure it had proper documentation in place and despite PCPs not being followed with respect to CMRAs and SoF.

5.7 The SRA and the firm agree a financial penalty toward the lower end of the bracket. Despite the lack of compliance until May 2025, we are pleased to see the firm has confirmed it has put in place measures to ensure continuing and future compliance, by creating and rolling out new procedures for risk assessing clients and matters and undertaking and documenting SoF checks, reviewed all live files in-scope of the MLRs 2017 to ensure a completed CMRA and SoF checks are present on each file, and rectified any residual balances that had been identified during the AML inspection.

5.8 Based on the evidence the firm has provided of its annual domestic turnover, this results in a basic penalty of £3,618.

5.9 The SRA considers that the basic penalty should be reduced to £3,071. This reduction reflects the mitigation set out at paragraph 4.2 above.

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 £3,071.

6. Publication

6.1 Rule 9.2 of the SRA Regulatory and Disciplinary procedure Rules states that any decision made 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 interests of transparency in the regulatory and disciplinary process. The firm agrees to the publication of this agreement.

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 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 immediately following receipt of a statement costs due being issued by the SRA.

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