

Mansukhlal Shah

Employee

7266524

[Employee-related decision Date: 3 July 2025](#)

Decision - Employee-related decision

Outcome: Control of non-qualified staff (Section 43 / Section 99 order)

Outcome date: 3 July 2025

Published date: 9 July 2025

Firm details

Firm or organisation at time of matters giving rise to outcome

Name: Bartletts

Address(es): 38 Willoughby Road, London, N8 0JQ

Firm ID: 62315

Outcome details

This outcome was reached by SRA decision.

Decision details

1. Agreed outcome

1.1 Mr Mansukhlal Shah ('Mr Shah'), a former employee of Bartletts ('the Firm'), agrees to the following outcome to the investigation of his conduct by the Solicitors Regulation Authority ('SRA'):

- a. to the SRA making an order under section 43 of the Solicitors Act 1974 (a section 43 order) in relation to Mr Shah that, from the date of this agreement:
 - i. no solicitor shall employ or remunerate him in connection with his practice as a solicitor
 - ii. no employee of a solicitor shall employ or remunerate him in connection with the solicitor's practice
 - iii. no recognised body shall employ or remunerate him.
 - iv. no manager or employee of a recognised body shall employ or remunerate him in connection with the business of that body
 - v. no recognised body or manager or employee of such a body shall him to be a manager of the body



- vi. no recognised body or manager or employee of such body shall him to have an interest in the body

except in accordance with the SRA's prior permission

- b. to the publication of this agreement
- c. he will pay the costs of the investigation of £300.

2. Summary of facts

2.1 Mr Shah, a non-authorised person, was employed as the Firm's bookkeeper for approximately 30 years.

2.2 In the course of his employment, Mr Shah had access to all the Firm's accounts.

2.3 On 30 June 2021, Mr Shah transferred £15,000 from the client account into his wife's personal bank account. His wife was not a client of the Firm, and the £15,000 did not belong to her.

2.4 On 22 February 2022, the Firm discovered that £15,000 was missing from the client account. Mr Shah was interviewed by the Firm and admitted making the transfer to his wife.

2.5 On 23 February 2022, Mr Shah returned £15,000 into the Firm's client account and resigned with immediate effect.

3. Admissions

3.1 Mr Shah makes the following admissions which the SRA accepts:

- a. on 30 June 2021, he transferred £15,000 of client money from the Firm's client account into his wife's personal bank account
- b. that he was involved in conduct related to the provision of legal services which means that it is undesirable for him to be involved in a legal practice
- c. that his conduct set out above was dishonest.

4. Why a section 43 order is appropriate

4.1 The SRA's Enforcement Strategy and its guidance on how it regulates non-authorised persons, sets out its approach to using section 43 orders to control where a non-authorised person can work.

4.2 When considering whether a section 43 order is appropriate in this matter, the SRA has taken into account the admissions made by Mr Shah and the following mitigation which he has put forward:

- a. he has admitted the facts of the allegation to the SRA and cooperated with its investigation



- b. he returned the money to the Firm
- c. he has expressed insight and remorse into his conduct.

4.3 The SRA and Mr Shah agree that a section 43 order is appropriate because:

- a. Mr Shah is not a solicitor
- b. his employment or remuneration at the Firm (a recognised body) means that he was involved in a legal practice
- c. the dishonest action of transferring £15,000 from the client account to his wife's personal bank account makes it undesirable for him to be involved in a legal practice.

4.4 The conduct occurred while he was involved in a legal practice working as a bookkeeper. According to the SRA Enforcement Strategy, certain types of allegations, such as the misuse of client money, are considered inherently more serious. Mr Shah's actions are likely to undermine public confidence in the delivery of legal services if he were to work in an SRA-regulated firm without prior permission from the SRA.

5. Publication

5.1 The SRA considers it appropriate that this agreement is published in the interests of transparency in the regulatory process. Mr Shah agrees to the publication of this agreement.

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

6.1 Mr Shah agrees that he will not deny the admissions made in this agreement or act in any way which is inconsistent with it.

6.2 If Mr Shah 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.

6.3 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, RFLs and RSLs.

7. Costs

7.1 Mr Shah agrees to pay the costs of the SRA's investigation in the sum of £300. Such costs are due within 28 days of a statement of costs due being issued by the SRA.

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