

CGM Hampshire Limited (CGM Hampshire Solicitors, Christopher Green McCarrahers, CGM, Blatch & Co, CGM Solicitors, CGM Hampshire)

**Enterprise House, Ocean Way, Ocean Village,
Southampton , SO14 3XB**

**Licenced body
622676**

[Agreement Date: 15 August 2025](#)

Decision - Agreement

Outcome: Regulatory settlement agreement

Outcome date: 15 August 2025

Published date: 2 September 2025

Firm details

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

Name: CGM Hampshire Limited

Address(es): Enterprise House, Ocean Way, Ocean Village, Southampton, SO14 3XB

Firm ID: 622676

Outcome details

This outcome was reached by agreement.

Decision details

1. Agreed outcome

1.1 CGM Hampshire Limited, (the Firm), a licensed body, authorised and regulated by the Solicitors Regulation Authority (SRA) agrees to the following outcome to the investigation:

- a. CGM Hampshire Limited will pay a financial penalty in the sum of £31,045,
- b. to the publication of this agreement, and



- c. CGM Hampshire Limited 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 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) Regulations 2017 (MLRs 2017), the SRA Principles 2011, the SRA Code of Conduct 2011, the SRA Principles [2019] and the SRA Code of Conduct for Firms [2019].

Firm-wide risk assessment (FWRA)

2.3 Between 26 June 2017 and 16 December 2024, the firm failed to have in place an appropriate 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.

2.4 The firm has since confirmed it has put in place measures to ensure continuing and future compliance, including updating and amending its FWRA and employed the services of an external compliance consultant.

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:

To the extent that the conduct took place on or before 24 November 2019 (when the SRA Handbook 2011 was in force):

- 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.

In so far as the conduct took place from 25 November 2019 onwards (when the SRA Standards and Regulations came into force):



- d. Principle 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 2.2 of the SRA Code of Conduct for Firms [2019] – which states you keep and maintain records to demonstrate compliance with your obligations under the SRA's regulatory arrangements.
- g. 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 taken into account the admissions made by the firm and the following mitigation:

- a. The firm took steps to rectify its failings, reviewed and amended its FWRA and is compliant with the MLRs 2017.
- b. The firm has cooperated with the SRA's AML Proactive Supervision and AML Investigation teams.
- c. The firm has admitted the breaches listed above at the earliest opportunity and is remorseful of its actions.

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 potential to cause harm by failing to have compliant AML control documentation 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, 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 We have assessed the nature of conduct in this matter as more serious (score of three). This is because the firm failed to ensure that it was fully compliant with its statutory obligations until December 2024, a period of over seven years since the MLRs 2017 came into effect. The breach has arisen because of recklessness and a failure to pay sufficient regard to money laundering regulations, published guidance and the SRA warning notice first published on 7 May 2019.

5.3 The impact of the harm or risk of harm is assessed as being low (score of two). The nature of conveyancing is considered high-risk, owing to the risk of abuse of the system by criminals. As noted above, almost half of the firm's work is in the field of conveyancing, plus the firm performs other in-scope work too. However, we note 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 such proper AML documentation in place.

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

5.5 We and the firm agree a financial penalty at the highest end of the bracket. This is because a failure to have a FWRA for over seven years is a serious AML control failing that could have led to money laundering and/or terrorist financing. However, the firm has confirmed it has put in place measures to ensure continuing and future compliance, updated and amended its FWRA, employed the services of an external compliance consultant, and is remorseful of its actions.

5.6 Based on the evidence the firm has provided of its annual domestic turnover; this results in a basic penalty of £34,495.

5.7 The SRA considers that the basic penalty should be reduced to £31,045. This reduction reflects the mitigation set out at paragraph 4.2 above.



5.8 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 £31,045.

6. Publication

6.1 Section 87(1) of the Legal Services Act 2007 (LSA 2007) and the Registers of licensed bodies: Section 87(4) rules, require the SRA, as a licensing authority, to maintain and publish a register of licensed bodies, which includes information on enforcement action or sanctions imposed on a licensed body, owner or employee of a licensed body.

6.2 This agreement confirms a decision has been made under Section 95 of the LSA 2007 to fine CGM Hampshire Limited, which is a licensed body, which will be published. We do not have any discretion not to publish the decision.

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 1, 2 and 5 of the SRA Principles and paragraph 3.2 of the Code of Conduct for Firm.

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 a statement of costs due being issued by the SRA.

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