

Paul Corren
Solicitor
159179

[Agreement Date: 8 January 2025](#)

Decision - Agreement

Outcome: Regulatory settlement agreement

Outcome date: 8 January 2025

Published date: 13 January 2025

Firm details

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

Name: Gunnercooke LLP

Address(es): 1 Cornhill, London, EC3V 3ND

Firm ID: 546420

Outcome details

This outcome was reached by agreement.

Decision details

1. Agreed outcome

1.1 Mr Corren, a solicitor of Gunnercooke LLP (the Firm), agrees to the following outcome to the investigation of his conduct by the Solicitors Regulation Authority (SRA):

- a. he is fined £14,116,
- b. to the publication of this agreement, and
- c. he will pay the costs of the investigation of £1,350.

2. Summary of Facts

2.1 Mr Corren is engaged as a consultant by the Firm. In this capacity, he acted for Person A, Company B, Company C and Company D.

2.2 Between December 2020 and May 2022, Mr Corren requested and authorised the Firm to receive receipts totalling £951,945 and make



payments totalling £578,233 on behalf of Person A, Company B, Company C and Company D.

2.3 Rule 3.3 of the SRA Accounts Rules 2019 states that you must not use a client account to provide banking facilities to clients or third parties. Payments into, and transfers or withdrawals from a client account must be in respect of the delivery by you of regulated services.

2.4 There was no evidence that the regulated services provided by the Firm had any meaningful connection with the receipts received into and the payments made from the client account.

2.5 The SRA warning notice dated 25 November 2019 (first published on 18 December 2014) states that allowing client account to be used as a banking facility carries with it the additional risk that you may assist money laundering. The receipt by solicitors of payments into their client account, could provide legitimacy and a veneer of authenticity to the transactions and money movements, which is why it is inadvisable for solicitors to provide banking facilities, and yet this was permitted by Mr Corren.

2.6 The SRA's warning notice on the improper use of client account as a banking facility was first issued on 18 December 2014. The requirement not to use the client account as a banking facility was not a new concept, having been introduced in March 2004, and Mr Corren should have been aware of this long-established rule, having been an experienced solicitor who was admitted to the profession in 1993.

3. Admissions

3.1 Mr Corren makes the following admission which the SRA accepts:

Between December 2020 and May 2022, he caused and allowed the Firm's client account to be used as a banking facility in respect of Person A, Company B, Company C and Company D.

And in doing so, Mr Corren has breached:

- Principle 2 of the SRA Principles 2019 – which states that you act in a way that upholds public trust and confidence in the solicitors' profession and in legal services provided by authorised persons.
- Rule 3.3 of the SRA Accounts Rules 2019 – which states that you must not use a client account to provide banking facilities to clients or third parties. Payments into, and transfers or withdrawals from a client account must be in respect of the delivery by you of regulated services.

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

- a. It will maintain professional standards and uphold public confidence, deterring repetition.
- b. There were serious breaches of the SRA's rules and Mr Corren should have complied with the same.
- c. The use of client account as a banking facility is sufficiently serious and in contravention of the long established rule that a client account cannot be used in this way.

4.3 A financial penalty therefore meets the requirements of rule 4.1 of the Regulatory and Disciplinary Procedure Rules.

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 Mr Corren agree that the nature of the conduct was more serious because Mr Corren failed to comply with his regulatory obligations. Allowing a client account to be used as a banking facility, when there were no underlying legal transactions carries with it significant risks, such as the account being used for money laundering. The client account usage, as a banking facility, continued over a sustained period for four different clients and this therefore formed part of a pattern of misconduct. The Guidance gives this type of misconduct a score of three.

5.3 The SRA considers that the harm or risk of harm is medium. Although this is not the type of breach giving rise to real risks of direct loss to clients, the transactions were of large value and volumes and raised obvious risk factors. Mr Corren's conduct therefore had the potential to cause moderate loss or to have a moderate impact to the reputation of the profession and public confidence in the profession. The Guidance gives this level of impact a score of four.

5.4 The nature and impact scores add up to seven. This places the penalty in Band C. The Guidance indicates a broad penalty bracket of between 16% and 49% of Mr Corren's gross annual income is appropriate.

5.5 The SRA considers that the conduct shows a pattern of misconduct, with multiple payments and receipts being identified as the provision of a banking facility. However, there was no actual harm caused. Therefore,



the SRA considers a basic penalty towards the middle of the bracket to be appropriate.

5.6 Based on the evidence Mr Corren has provided of his gross annual income for the most recent tax year, this results in a basic penalty of £15,684.

5.7 The SRA considers that the basic penalty should be reduced to £14,116. This reduction is applicable as Mr Corren has cooperated with our investigation.

5.8 Mr Corren does not appear to have made any financial gain or received any other benefit above the level of the basic penalty as a result of his conduct. Therefore, no adjustment is necessary to remove this and the amount of the fine is £14,116.

6. Publication

6.1 The SRA considers it appropriate that this agreement is published in the interests of transparency in the regulatory and disciplinary process. Mr Corren agrees to the publication of this agreement.

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

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

7.2 If Mr Corren 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 Mr Corren agrees to pay the costs of the SRA's investigation in the sum of £1,350. Such costs are due within 28 days of a statement of costs due being issued by the SRA.

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