



Simpson Thacher & Bartlett LLP
Citypoint, One Ropemaker Street, London , EC2Y 9HU
Recognised body
380782

[Prosecution Date: 23 March 2024](#)

Decision - Prosecution

Outcome: Referral to Solicitors Disciplinary Tribunal

Outcome date: 23 March 2024

Published date: 19 August 2024

Firm details

Firm or organisation at time of matters giving rise to outcome

Name: Simpson Thacher & Bartlett LLP

Address(es): Citypoint, One Ropemaker Street, London EC2Y 9HU

Firm ID: 380782

Outcome details

This outcome was reached by SRA decision.

Reasons/basis

This notification relates to a Decision to prosecute before the Solicitors Disciplinary Tribunal. This is an independent Tribunal which will reach its own decision after considering all the evidence, including any evidence put forward by the Respondent(s). The Tribunal has certified that there is a case to answer in respect of allegations which are or include that, being the 'Relevant Person' with ultimate responsibility for compliance with the prevailing anti-money laundering regulations:

1. They failed to have, in compliance with Regulation 18, of the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 ('MLRs 2017'):

1.1. Between June 2017 and 3 March 2020, a Firm Wide Risk Assessment ('FWRA'); and

1.2. Between 4 March 2020 and 1 February 2023, a fully compliant FWRA.

2. Between 26 June 2017 and 1 January 2023, they failed to have in place fully compliant policies, controls or procedures as required by Regulation 19 of the MLRs 2017.

3. Between 26 June 2017 and 1 October 2022, they failed to have in place compliant client and/or matter risk assessments in relation to four files as required by Regulation 28(12) and 28(13) of the MLRs 2017.

The allegations are subject to a Hearing before the Solicitors Disciplinary Tribunal and are as yet unproven.

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