



**Stefanie Anne O'Bryen**  
**Solicitor**  
**121114**

**[Prosecution Date: 20 February 2024](#)**

**Decision - Prosecution**

Outcome: Referral to Solicitors Disciplinary Tribunal

Outcome date: 20 February 2024

Published date: 12 June 2024

**Firm details**

**Firm or organisation at time of matters giving rise to outcome**

Name: Stefanie O'Bryen (trading as Watlingtons),

Address(es): 20 Shirburn Street, Watlington, Oxfordshire OX49 5BT

Firm ID: 405842

**Firm or organisation at date of publication**

Name: Nuzhat Dunn Solicitors

Address(es): 20 Shirburn Street, Watlington, Oxfordshire OX49 5BT

Firm ID: 8004037

**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 Solicitor. The Tribunal has certified that there is a case to answer in respect of allegations which are or include that Miss O'Bryen :-

1. Between around 26 January 2020 and 27 July 2022, failed to keep and maintain accurate accounting records for the Firm.



2. From around January 2020 to 25 July 2022, caused or allowed a client account shortage on the Firm's client account.

3. From 26 June 2017 to around 10 October 2022, failed to have in place:

3.1 A Firm Wide Risk Assessment ('FWRA') as required by Regulation 18 of the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 ('MLRs 2017');

3.2 Anti-money Laundering Policies, Controls and Procedures ('AML Policies') as required by Regulation 19 of the MLRs 2017.

4. On or around 12 December 2019, made a declaration to the SRA which was false and misleading in that it confirmed that the Firm had in place a fully compliant FWRA as required by regulation 18 of the MLRs 2017 when, in fact, there was no such FWRA in place.

5. Between 1 January 2022 and 31 March 2022, and in relation to the purchase of a property by Client A, caused or allowed the Firm to fail to comply with the MLRs 2017 in that the Firm:

5.1. Failed to conduct adequate client due diligence ('CDD') measures as required by Regulation 28 of the MLRs 2017;

5.2. Failed to apply enhanced due diligence ('EDD') as required by Regulation 33 of the MLRs 2017;

6. Between 18 December 2023 and 26 February 2024, caused or allowed a cash shortage to occur on the Firm's client bank account and also failed to comply adequately or remedy breaches of the SRA Accounts Rules 2019 in relation to any or all of:

- a. Giving clients a bill of costs or other written notification of costs before transferring client money from a client account and any such payment must have been for a specified sum covered by the amount held for the particular client.
- b. Only withdrawing client money from a client account for the purpose for it is being held.
- c. Only withdrawing client money from a client account if sufficient funds are held on behalf of the particular client.
- d. Correcting any breaches of the Solicitors Accounts Rules promptly upon discovery and any money improperly withheld or withdrawn from a client account was to be immediately paid into the account or replaced, as appropriate.

7. Between around March 2022 and November 2023, as the principal of the Firm failed to have in place adequate/effective systems and controls to manage risks in compliance with rules made by the SRA and failed to exercise any or an adequate/appropriate degree of supervision and

control over her firm and/or its employees and in particular an individual using the name of 'Asad Sahi', who held himself out as a Registered Foreign Lawyer ('RFL').

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

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