



**SUPREME COURT**  
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### **Enforcement Action 21st December 2022**

The Registrar of the Supreme Court as Supervisory Authority (“SA”) for the purposes of the Proceeds of Crimes Act 2015 (“POCA”) has taken the following enforcement action pursuant to Regulation 18 of the Supervisory Bodies (Powers) Regulations 2017 (“SBPRs”).

Five fines totalling £6075 have been imposed on a law firm in respect of contraventions of provisions of POCA. These were (1) not keeping accurate records of relevant financial business transactions; (2) some deficiencies regarding the application of client due diligence; (3) not maintaining up-to-date policies, controls and procedures; (4) not monitoring their implementation and (5) not carrying out an independent audit. The firm is taking steps to remediate these contraventions which are being followed up and will be duly verified by the SA. The fine was paid in full shortly after the Decision Notice was issued.