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Number 27 December 2018

Albion Chambers CRIME TEAM NEWSLETTER

Abuse of process and entrapment in online 'paedophile hunter' cases

An increasing number of cases are coming before the Courts in which defendants have been subject to the "investigation" of groups of online vigilantes who seek to expose those who contact children online for sexual purposes. A recent case, in which I was instructed, highlighted the circumstances in which the actions of such groups can amount to an abuse of process on the grounds of entrapment.

The case in question was heard before The Recorder of Bristol, His Honour Judge Blair QC. The indictment alleged a single offence of attempting to meet a child after sexual grooming.

The Crown's case was based upon evidence gathered by an online vigilante called "Danny Catcher". He set up a decoy profile posing as a teenage girl and was contacted by the defendant 'D', a young man of good character aged 20 years at the time of the alleged offence, and 21 at trial. The decoy told D that she was 14. Contact ensued in which D initiated and maintained an apparently innocuous conversation.

It was the vigilante who then steered the conversation to matters sexual. When D was willing to discuss such matters the vigilante then went on to suggest that they meet. D then engaged in a detailed and explicit discussion of the acts in which they might engage together. He told the decoy profile that her innocence was "hot".

When a meeting was proposed, D agreed readily and engaged fully in arranging a mutually convenient time and location for the following day.

As arranged, D attended the meeting point at the agreed time. He was alone and carrying a bag containing condoms, sweets and biscuits. He was arrested and interviewed, during which he said that he didn't believe the girl was underage and did not intend to have sex with her. He said he had bought the condoms as he was off to meet a girl whom he named, who was from Cardiff and with whom he had a sexual relationship.

The defence at trial raised the issue of abuse of process and entrapment.

The law – abuse of process and entrapment

The issue of entrapment in cases involving online vigilante paedophile hunter activities was recently considered by the Court of Appeal in the case of *R v TL* [2018] EWCA Crim 1821. The Court was then concerned with a (successful) prosecution appeal against a Judge's decision to stay proceedings and considered the jurisprudence in detail, taking as its starting point the decision of the House of Lords in *R v Looseley* [2001] UKHL 53. That case involved police operations in which potential defendants were provided with opportunities to sell controlled drugs to undercover officers.

Lord Nicholls' speech in Looseley confirms the established law that entrapment does not provide a defence to a criminal charge, but that the court can act in appropriate circumstances to prevent the prosecutorial arm of the state from behaving in an improper way.

Lord Nicholls suggested that it would be useful for the courts to "consider whether the police did no more than present the defendant with an unexceptional opportunity to commit a crime." He concluded that "Ultimately the overall consideration is always whether the conduct of the police or other law enforcement agency was so seriously improper as to bring the administration of justice into disrepute."

Lord Hoffman went on, in considering the distinction between "causing and providing an opportunity" to commit an offence, to approve the comments of Lord Bingham CJ in *Nottingham City Council v Amin* [2000] 1 WLR 1071 that the accused should not be "incited, instigated, persuaded, pressurised or wheedled" into committing an offence.

Lord Hutton sought to further clarify the key issues by citing the comments of McHugh in the Australian High Court case of *Ridgeway v The Queen* 184 CLR 19, who had said "I do not think that it is possible to formulate a rule that will cover all cases that arise… [t]he ultimate question must always be whether the administration of justice will be brought into disrepute because the processes of the court are being used to prosecute an offence that was artificially created by the misconduct of law enforcement authorities."

27. The legal framework set out above applies to actions by state-governed law enforcement authorities. As to the circumstances in which the conduct of non-state actors could found an abuse by entrapment, the Court in R v TL cited with approval the reasoning of Goldring J in *Council for the Regulation of Health Care Professionals v The General Medical Council and Saluja* [2006] EWHC 2784 (Admin).

28. Goldring J observed that to impose a stay in cases of alleged entrapment by a non-state actor was exceptional and then continued "the position as far as misconduct by non-state agents in concerned, is wholly different [to state actors]. By definition no question arises in such a case of the state seeking to rely upon evidence which by its own misuse of power it has effectively created. The rationale of the doctrine of abuse of process is therefore absent. However, the authorities leave open the possibility of a successful application for a stay on the basis of entrapment by non-state agents. The reasoning I take to be this: given sufficiently gross misconduct by the non-state agent, it would be an abuse of the court's process (and a breach of article 6) for the state to seek to rely on the resulting evidence. In other words, so serious would the conduct of the non-state actor have to be that reliance upon it in the court's

proceedings would compromise the court's integrity."

29. The Court in TL took as an important starting point that the non-state agent in that case committed no offences in the course of his conduct. Lord Burnett CJ observed that "[the Hunter] appears to have been scrupulous to avoid encouraging his interlocutor in the proposed sexual activity and at no time did he take the lead … [a] starting point in considering whether the conduct of a private citizen should result in a stay of proceedings is to ask whether the same, or similar, conduct by a police officer would do so."

The Ruling on Abuse of Process

In his ruling the Recorder set out the law and referred to the following factual aspects of the case:

- That 150 contacts were initiated by D with various apparently female correspondents online and none of the resultant conversations turned sexual, except the one with Danny Catcher;
- An array of computer equipment was seized from D's home and analysed, but nothing untoward was found;
- D was of previous good character;
- Danny Catcher contacted the press before the police and attended the "sting" wearing clothing which was visually similar to police gear;
- The vigilante accepted carrying out around 10 stings;
- It was the vigilante who first introduced the topic of sex, first suggested that D and the teenage decoy could meet for sex and who brought the conversation back to the topic of sex on more than one occasion;
- Under cross-examination the vigilante accepted that he perhaps should not have raised the topic of sex and should have waited for D to raise it;
- The vigilante further accepted that some online paedophile hunter groups trained their members to be "passive" and wait for their targets to mention matters sexual and raise the prospect of meeting.

It was these last two features of the evidence which seemed particularly crucial to the decision reached by HHJ Blair QC. He was particularly concerned by the "proactive" manner in which the vigilante turned the conversation to sex and made suggestions that they meet.

The learned Recorder accepted that the jurisdiction is primarily present in order to prevent the state prosecuting crimes which were induced by that same state, then went on to say "But having considered all of the facts I have concluded that this is one of those rare cases where the residual jurisdiction exists where the conduct of a private citizen can amount to an abuse."

The judgment went on to describe the actions of Danny Catcher as "sufficiently gross misconduct to require me to stay these proceedings… I am of the view that this is such exceptional behaviour that it amounts to an entrapment."

The Recorder acknowledged the public interest in prosecuting those who arrange to meet children online after overtly sexualised discussion and the making of arrangements to commit child sex offences, but considered the 'misconduct' sufficient to outweigh this concern.

Discussion

At the outset, it should be acknowledged that the way in which this vigilante carried out his investigation and his "proactive" approach to the sexualised conversation would have amounted to an abuse by way of entrapment had he been a trained police officer acting in the course of his duty, applying the *Looseley* principles.

The formulation of Lord Bingham in the Nottingham case, approved in *Looseley* was that it would be improper to proceed when an accused has been "incited, instigated, persuaded, pressurised or wheedled" to commit an offence. Lord Burnett CJ in *R v TL* recast this, referring to the undesirability of a prosecution based upon an investigator "pushing another towards committing an offence which he would otherwise not commit, for example by badgering someone to engage in unlawful sexual or other activity".

Where dealing with a non-state actor, the fundamental difference is that "the rationale of the doctrine of abuse of process is therefore absent" as this jurisdiction exists primarily to prevent state-created crime. Therefore "so serious would the conduct of the non-state actor have to be that reliance upon it in the court's proceedings would compromise the court's integrity".

In judging whether that "so serious" test is satisfied, the question of whether a police officer doing the same thing would amount to abuse is a useful "starting point" but is far from definitive. If such groups are not inherently unlawful, then it would be perverse to expect from them professional standards of police work.

The actions of the vigilante did not obviously appear to amount to badgering, wheedling, persuading or pressurising. When the suggestion of sexual contact between the two is raised, D quickly and enthusiastically accepted. He sought to ensure that the arrangements they make to meet were convenient to him and he did attend as arranged.

The expressions of the relevant tests by the higher courts are couched in terms which suggest that the standard of misconduct required by a non-state actor to engage the abuse jurisdiction is extremely high. This is reinforced by the comments from both Goldring J and Burnett CJ that neither of them can locate a single reported example of this being engaged.

The practice of online paedophile hunting is relatively new, but has already caused a number of reported judgments on its legality. Are these groups and individuals to be judged by the standards of ordinary citizens, or does their purpose and organisation elevate them to the level of quasi-state agents? It would seem unlikely that there is even such a category and no authority for this proposition emerges from the jurisprudence.

Edward Hetherington

Intimidatory offences article

The Sentencing Council has issued a new guideline for Intimidatory Offences that applies to all offenders aged 18 or over sentenced after 1 October 2018.

The new guideline covers the offences of Stalking and Harassment under ss.2, 2A, 4 & 4A of the Protection from Harassment Act 1997, including their racially or religiously aggravated forms. The guideline also covers Threats to Kill, as well as the recently introduced offences of Disclosing Private Sexual Images (s.33 Criminal Justice & Courts Act 2015) and Controlling or Coercive Behaviour (s.76 Serious Crime Act 2015).

The rationale for the new guideline is set out in the Council's Consultation Document published on 30 March 2017. The number of these offences being dealt with at both the Magistrates' and Crown Court has been rising, leading to increased attention from both the media and the public. The Magistrates' Court Guidelines contained

limited guidance on sentencing for Threats to Kill and Harassment, but there was nothing in place for the other offences, and so the Council felt it appropriate to issue the new guideline.

The 2017 Consultation Document also covered the new *Overarching Principles: Domestic Abuse* guideline, which came into effect on 24 May this year. The Intimidatory Offences guideline is clearly designed to be used in conjunction with the *Domestic Abuse* guideline, as the guideline for each individual offence in the former contains a reminder to cross-reference the latter wherever an offence is "committed in a domestic context". According to data from the Crown Court Sentencing Survey conducted between 2010 and 2015, two of the offences most associated with domestic abuse are Harassment and Threats to Kill, both of which are covered by the new guideline.

Harassment & Stalking Offences

The Council has opted to issue a single guideline for s.4 Harassment (putting people in fear of violence) and s.4A Stalking (involving fear of violence), and a single guideline for the equivalent non-violent offences under s.2 and s.2A. There was some criticism of this approach in the consultation, with some respondents arguing that there should be separate guidelines to reflect the fact that Harassment and Stalking are distinct offences, the latter characterised by obsessive, fixative behaviour which requires a greater emphasis on the psychological nature of the crime. However, the Council deemed that a single guideline would lead to greater consistency in sentencing, and it appears that the range of aggravating and mitigating factors included should be sufficient to accommodate both types of offending.

More unusually, the Council has included a Very High Culpability Category A for the s.4 and s.4A offences, meaning that there are four culpability categories as opposed to the usual three. The top category has been added to reflect the doubling of the statutory maximum for these offences from 5 to 10 years, or from 7 to 14 years if racially/religiously aggravated, effected by s.175 of the Police and Crime Act 2017, which came into force as the guideline was being composed. This means that, whereas the ranges up to the old statutory maximum of 5 years have been formulated using statistical data from the Ministry of Justice court proceedings database, the range for sentences above 5 years is not based on any sentencing data. The Council has contained sentences over 5 years within a single box (A1), which has a range of 3 years 6 months to 8 years, leaving some 'headroom' for the very worst cases. In adopting this approach, the Council's aim is to give effect to Parliament's intent that the increase to the maximum should only apply to the most serious offences. However, practitioners will be aware of the tendency for sentencing practice to expand to fit the available guidelines, and there is a risk that the existence of the Very High Culpability category will have an inflationary effect.

The s.4/s.4A guideline also includes a specific injunction under Step Two to consider whether a psychological report is required to assist with sentencing. This has been added to reflect the large proportion of defendants charged with these offences who have mental health conditions that influence their offending behaviour. The Council decided it would be disproportionate to include the same advice in the s2/s.2A guideline, although one would expect that defendants facing the less serious offences under these provisions are just as likely to suffer from poor mental health. It would be a perverse outcome of the new guideline if those facing the more serious charges involving fear of violence had a greater prospect of being diverted away from the prison system on account of their mental health than those charged with the non-violent offences under s.2/s.2A.

New Offences

The inclusion of Disclosing Private Sexual Images and Controlling or Coercive Behaviour in the guideline plugs a gap in the sentencing guidance. However, due to the very small number of cases that have so far made their way through the courts, these guidelines are based solely on analysis of sentencing remarks and media transcripts. It is perhaps questionable how comfortably Disclosing Private Sexual Images fits under the *Intimidatory Offences* umbrella in any event, given the mens rea for this offence is an intention to cause distress rather than to intimidate.

The juxtaposition of the Disclosing Private Sexual Images guideline with the guideline for Harassment/Stalking without violence also underscores the discrepancy between the sentencing ranges for the respective offences. The starting point for a category A1 Harassment offence is 12 weeks, which corresponds to the starting point for a category A3 offence of Disclosing Private Sexual Images. This means an offender who widely distributes sexually explicit images of his victim, but which are only 'live' for two weeks, and which cause the victim limited distress, could find themselves facing the same sentence as an offender who conducts a sophisticated, months-long campaign of harassment which causes their victim significant psychological harm.

Resource Assessment

The professed aim of the guideline is to improve consistency in sentencing rather than to cause any change in the use of different types of disposal. The Council's Final Resource Assessment anticipates that the introduction of the guideline will have no impact on the provision of prison places, probation and youth justice services. Given the very limited data on which the guidelines for the new offences have been based, the inclusion of the Very High Culpability category in the s.4/s.4A guideline, and the relatively tough sentences proposed for Disclosing Private Sexual Images, it will be interesting to see if this is borne out in practice.

Rupert Russell

Money launderers and POCA

Cash couriers, cash custodians and bank accounts – when will POCA bite?

Many of us will have dealt with cases where the harsh reality of the Proceeds of Crime Act 2002 will have been felt by a defendant stripped of all his worldly assets. This article looks at those convicted of money laundering and considers the approach the courts have taken to the calculation of 'benefit' within the framework imposed by POCA 2002.

The first important distinction to draw is in the nature of the activity. Money laundering takes many forms and in the case of *R v Allpress* [2009] EWCA Crim 8 the Court of Appeal had the opportunity to consider whether a cash courier or cash custodian should be treated differently to the defendant who allows their bank account to be used for the purposes of

money laundering. The court looked at the wording of s.84(2) POCA 2002, which focuses on whether the defendant had obtained an interest in the property in question and decided that a cash courier or cash custodian did not obtain an interest within the meaning of s.84(2):

If D's only role in relation to property connected with his criminal conduct, whether in the form of cash or otherwise, was to act as a courier on behalf of another, such property does not amount to property obtained by him within the meaning of POCA 2002 s80(1)

The point can perhaps be applied wider than simply money laundering. If a basis of plea has been accepted detailing that the defendant's involvement in drug supply was as a courier rather than a principal, *Allpress* suggests he has never 'obtained' the drugs within the meaning of POCA 2002 and that the value of the drugs should therefore not be included in the benefit figure when considering confiscation proceedings.

But what about the defendant who agrees to use his bank account to launder money? In *Allpress* the Court of Appeal decided this aspect of the case quite differently. Paul Morris was a solicitor who allowed Raymond Wooley to transfer criminal proceeds through client accounts, facilitating the criminal enterprise but without any evidence of personal financial benefit. At first instance it was argued on his behalf that he was only a trustee of the money, rather than someone who had obtained it within the meaning of the legislation. That argument was rejected by the Crown Court; a decision which was upheld by the Court of Appeal.

The Court of Appeal's reasoning was that payment of money into the account operated by Morris gave rise to a 'thing in action' in favour of Morris, such that he could be found to have obtained an interest in it. Accordingly, the court found that the benefit figure was the entirety of the money that had passed through the accounts – some £7,928,682. The court did however leave open the possibility of an account opened in one person's name, but which was in reality operated entirely by a third party, such as a defendant who opens an account in their spouse's name not falling foul of the legislation in the same way.

That scenario was considered in *R v Roper* [2014] EWCA Crim 2476 in circumstances where the defendant had allowed his bank account to be used by a friend, providing him with a debit card as part of the arrangement. In due course the friend laundered criminal proceeds through the account, before the defendant resumed control. In appealing the confiscation order made against the defendant, it was argued that the case fell within the exception outlined in *Allpress*, as in reality the defendant did not have control of the account at the relevant time.

The Court of Appeal rejected that argument, making it clear that the court's observations in *Allpress* were obiter on this point. In reality, the defendant had as much control over the account as his friend, and the situation could be distinguished from circumstances where the account had originally been set up for another to use from the outset. The Court of Appeal found that the defendant had benefitted by obtaining an interest in the money, and accordingly upheld the confiscation order.

From the cases of *Allpress* and *Roper*, the following principles can be distilled:

- Where a defendant acts as a mere custodian or courier, the value of the goods he is delivering or safeguarding will not be included in the calculation of his benefit;
- However, where the defendant is paid a fee for the above, that fee will be included in the calculation of his benefit from particular criminal conduct;
- Where a defendant launders money through a bank account they have control over, they will be found to have 'obtained' the money within the meaning of POCA 2002, and the value of the money passing through their account will form part of the calculation of their benefit from particular criminal conduct;
- There may be exceptional circumstances where the reality is that the defendant has no practical control over a bank account in their name. However, this will not arise where a defendant simply allows a third party to use their account for a period of time.

Of course, the above analysis only relates to the calculation of the benefit figure. The final confiscation order will still be subject to considerations of proportionality as outlined in *Waya* [2012] UKSC 51.

Alexander West

Evidential pitfalls in the digital case system

I may be in the minority but I like the digital case system. There now, I've said it, I've come out. I use it by printing out a small core bundle for myself, whilst having the entirety of whatever fraud or regulatory case at my disposal either through the DCS or as separate PDFs downloaded to my laptop.

There are undoubted problems with the architecture of the system, it can be as clunky as my arthritic hips after this summer's camping holiday but, overall, it works.

The days of ruining two or three wheelie bags a year, of dragging lever arch files around the country for a ten minute mention where you couldn't select which papers to take because you hadn't been told what the mention was are now, thankfully, only a memory.

Another positive, the side bar, to scribble notes between the parties, is another great tool. It allows advocates (and judges) to sign-post new additions to the bundle, difficulties with particular documents or even a simple indication of when something should be done, or that a matter is in hand.

All in all the DCS has been better than I had expected.

But there are significant problems, not just with the system itself but the way in which evidence is handled by that digital system.

Two dimensions

Let me explain.

I'm going to have to adopt some broad generalisations, but there are two broad types of source evidence that are uploaded to the DCS.

We have original paper evidence, evidence that is scanned in and simply uploaded. There is little if any real difference between this and the old system, where paper evidence was photocopied and served.

The second type of evidence is digital evidence. Where electronic files, let's say a letter in MS Word format, downloaded from a computer, or an Excel spread sheet, or those same documents already in PDF format, are uploaded to the DCS.

What's the problem?

Well, a digital file, let's say our MS Word letter, isn't two dimensional. There are layers and layers of data built into that file, what appears to be a two-dimensional letter is in fact many inches deep.

What happens when that file is uploaded to the DCS is that those layers

are all compressed into two dimensions, the file is flattened out. At this point, using the version of the file as stored on the DCS, it is impossible to tease out the different layers. Something may appear, in those two dimensions, to be a sound, reliable document. But in reality, like a forged painting masked behind a varnished top coat, those layers of evidence, of information, of potential cross examination are lost to the recipient.

A real example

The case of *Mazzarello, Mbadhuga and Waters*, heard at the Old Bailey a couple of years ago, was an interesting case. The prosecution alleged that the three defendants were involved in a conspiracy to evade VAT via the importation of Italian wine.

Mr Waters was represented by Jason Taylor QC, now HHJ Taylor QC, and Alec Small, both from the Albion stable.

This was a pre-DCS case but embracing the modern era, the evidence was served digitally, including copies of the original digital computer files.

Part of the prosecution case was that Mr Waters had signed various incriminating documents relating to the alleged VAT fraud.

Mr Waters' defence was that he was rarely at the business premises, had been suffering from mental health problems and could not recall whether he had signed these documents or not. He was not putting forward (during the preparation stages of the case) a positive case that these signatures were not his, simply that he didn't know whether they were or not.

During leading and junior counsel's case preparation the digital versions of these letters were examined closely. On close inspection it became apparent (and I truncate considerably the process undertaken) that the signatures, which were indeed those of Mr Waters, had in fact been digital cut from another document, and spliced into these new documents, about which Mr Waters knew nothing.

Remember, Mr Waters, due to his mental illness, couldn't remember whether or not he had signed these documents – but this analysis by his legal team provided categoric proof that he had not.

Now, imagine that same case, served via the DCS. That third dimension of digital data, the digital cut and gluing marks would have been lost to the recipient.

Yes, an expert assessing the signature could have been instructed, they would have found it to be Mr Waters' signature. However, as we know, Mr Waters, during the preparation stage of the case, was not putting a positive case in this regard because he simply didn't know. But even if an expert had been instructed, that expert would have only seen a version of the digital file, uploaded to DCS and 'flattened out' by its conversion into a PDF document.

Expert evidence

Of course documents and evidence being faked is nothing new. We are well used to instructing experts to challenge the authenticity of evidence but previously the original exhibit, the source material was 'real', it was tangible, it could be examined by the defence team whilst waiting in the inevitable floating list. If there had been a literal cut and paste, one could run our fingers over the joins, one could see a different pen had been used. There were the clues to trigger an expert being instructed.

The risk with the DCS is that those clues are lost in the PDF pancaking of the source evidence.

Adobe – further risks

For the last decade or so PDF documents have often been considered to be a reliable way to 'crystallise' a document or digital file, preventing future manipulation of it. To some extent this was an accurate understanding.

As an example of how PDFs were viewed, when someone receives a simple MS Word document, it is easy to add a paragraph or two, or delete the important caveat, or whatever else the wrongdoer wanted to do. However, when that MS Word document is 'exported' to become a PDF, that Word document is, or is believed to be, crystallised and the recipient is unable to manipulate it.

The difficulty is that technology and software has moved on.

I use Adobe Pro to help me in my practice. For fraud and regulatory offences, for those document heavy DCS briefs, Adobe Pro is invaluable.

It allows me to split larger PDF documents into individual bits – really useful for preparing cross examination, as an example. It can do lots of other things, book-marking particular passages, allowing speedy navigation around voluminous cases, it's a great bit of kit and invaluable for anybody using the DCS.

But here's the problem, it also allows you to make amendments.

If you so desired, you could change numbers in the document, values, purported stock levels, whatever. It gives an individual a really useful forger's toolbox without needing the patience to learn the forger's craft. The software does it all for you.

So just because it's a PDF does not mean it hasn't been manipulated or altered.

Now, imagine that same, heavily doctored PDF, being put through the DCS – it's flattened out once more, the data dimension has been lost. It is easy, isn't it, to foresee real injustices being created by the Crown's reliance on such flattened files, or indeed the defence's failure to dig that little bit deeper.

Conclusions

Being aware of the risks allow us to think of things differently.

In appropriate cases where these issues 'may' be relevant, awareness of those risks allow us to ask for an exact copy of the original digital document, to instruct an appropriate IT expert to undertake a proper analysis. However, before we get to that stage, we need to understand how the DCS works, what is gained and what is lost. Hopefully, this short missive has gone some way towards that objective.

Richard Shepherd

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Sarah Regan
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Emma Martin
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Anna Midgley
Call 2005 Recorder

Derek Perry
Call 2006

Edward Hetherington
Call 2006

Alun Williams
Call 2009

Clare Fear
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Alexander West
Call 2011

Philip Smith
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Simon Cooper
Call 2012

Alexander Small
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