



Enforcement Determination Notice

24 November 2021

HB Property Legal Ltd (also trading as JP Goldman)

Alternative Business Structure

License Number: 11570

Main office: Suite 7 Stanley House, Crofts Bank Road, Urmston Manchester M41 0TZ

The CLC issued **HB Property Legal Ltd** (the **Licensed Body**) with a Warning Notice dated 9 August 2021 (the **Warning Notice**) setting out its intention and reasons for imposing a sanction. The Licensed Body's response to the Warning Notice was to accept the sanction in full.

Accordingly, this Enforcement Determination Notice is an agreed outcome between the Council for Licensed Conveyancers (**CLC**) and the Licensed Body in relation to the breaches set out in the Warning Notice as identified during the Monitoring Inspection of the practice on 8 October 2020.

Determination details:

The Licensed Body, an Alternative Business Structure (**ABS**) authorised and regulated by the CLC, agrees to the following outcomes in respect of breaches of the CLC's Anti-Money Laundering and Combatting Terrorist Financing Code and the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (as amended) as identified during the Monitoring Inspection:

- a) that a financial penalty of £1,187.50 is imposed on the Licensed Body, pursuant to Paragraph 13.8 of the ABS Framework;
- b) to the publication of this Enforcement Determination Notice.

Summary of Facts:

It was identified during reviews of transaction files at the Monitoring Inspection that the Licensed Body had failed to verify or adequately verify the source of funds on a number of matters, including matters which the CLC considers were high risk and/or should have attracted a level of further enquiry and/or enhanced due diligence.

The CLC considers that the conduct of the Licensed Body breached:

- Outcomes 2 and 3 of the Anti-Money Laundering and Combatting Terrorist Financing Code;
- Specific Requirements 6, 7, 9(e), 11(a) and 11(c) of the Anti-Money Laundering and Combatting Terrorist Financing Code; and
- Regulations 28(11)(a) and 33 of The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (as amended).

Publication:

Any enforcement determination of the CLC under the ABS Framework should be published in order to ensure that transparency in regulatory and disciplinary processes is maintained, unless the CLC considers that the reasons for non-publication of the particular circumstances of an enforcement decision outweigh the public interest.

Accordingly, the CLC considers it is appropriate in the circumstances to publish this Enforcement Determination Notice.