



# The Bar Tribunals & Adjudication Service

The Council of the Inns of Court

## Report of Finding and Sanction

**Case reference: PC 2021/5516, 2022/2761 & 2021/6759**

Martha Knowlden

The Director-General of the Bar Standards Board

The Chair of the Bar Standards Board

The Treasurer of the Honourable Society of: Inner Temple

### Disciplinary Tribunal

#### Martha Knowlden

1. In accordance with an appointment made by the President of the Council of the Inns of Court in a Convening Order dated the 7<sup>th</sup> November 2023 we sat as a Disciplinary Tribunal on the 20<sup>th</sup> November 2023 to hear and determine 11 charges of professional misconduct contrary to the BSB Handbook against Martha Knowlden, barrister of the Honourable Society of the Inner Temple [2000].

#### Panel Members

2. The panel members were:  
Tom Cosgrove KC [Panel Chair]  
Siobhan Heron [Barrister Member]  
Ken Cameron [Lay Member]

#### Charges

**[2021/5516]**

##### Charge 1

##### Statement of Offence

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Professional misconduct, contrary to Core Duty 7 and rC125 of the Code of Conduct (Part 2 of the Bar Standards Board's Handbook version 4.0).

#### **Particulars of Offence**

Ms Knowlden, a barrister and BSB authorised individual, failed to provide a competent standard of work and service, in that following acceptance of instructions in April 2019, Ms Knowlden failed to issue Messrs AE and JE, direct access clients, a client care letter containing the relevant information in accordance with rC125.

#### **Charge 2**

##### **Statement of Offence**

Professional misconduct, contrary to Core Duty 7 and rC99 of the Code of Conduct (Part 2 of the Bar Standards Board's Handbook version 4.0).

##### **Particulars of Offence**

Ms Knowlden, a barrister and BSB authorised individual, failed to provide a competent standard of work and service, in that following acceptance of instructions in April 2019, Ms Knowlden failed to issue Messrs AE and JE, direct access clients, with information about their right to make a complaint.

#### **Charge 3**

##### **Statement of Offence**

Professional misconduct, contrary to Core Duty 7 and rC125.4 of the Code of Conduct (Part 2 of the Bar Standards Board's Handbook version 4.0).

##### **Particulars of Offence**

Ms Knowlden, a barrister and BSB authorised individual, failed to provide a competent standard of work and service in that, following acceptance of instructions in April 2019, she failed to inform Messrs AE and JE, direct access clients, that she was a self-employed barrister and would not be in a position to undertake the management, administration or general conduct of the clients' affairs.

#### **Charge 4**

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### **Statement of Offence**

Professional misconduct, contrary to Core Duty 7 and rC104 of the Code of Conduct (Part 2 of the Bar Standards Board's Handbook version 4.1).

### **Particulars of Offence**

Ms Knowlden, a barrister and BSB authorised individual, failed to provide a competent standard of work and service in that she failed or delayed unreasonably in acknowledging a formal complaint from Messrs AE and JE, direct access clients, made on 23 August 2019.

### **Charge 5**

#### **Statement of Offence**

Professional misconduct, contrary to Core Duty 10 and rC128 of the Code of Conduct (Part 2 of the Bar Standards Board's Handbook 4.0 (the same in version 4.1)).

#### **Particulars of Offence**

Ms Knowlden, a barrister and BSB authorised individual, failed to take reasonable steps to manage her practice and comply with the regulatory requirements set out in the Bar Standards Board's Handbook in that she accepted direct access instructions but failed to keep proper records of those instructions as required under rC128.

### **Charge 6**

#### **Statement of Offence**

Professional misconduct, contrary to Core Duty 10 and rC131.2 of the Code of Conduct (Part 2 of the Bar Standards Board's Handbook 4.0 (the same in version 4.1)).

#### **Particulars of Offence**

Ms Knowlden, a barrister and BSB authorised individual, failed to take reasonable steps to manage her practice and comply with the regulatory requirements set out in the Bar Standards Board's Handbook in that she failed to provide her clients with a response to their complaint, specifically their request for a copy of papers relating to their case, as required under rC131.2.

**[2022/2761]**

### **Charge 1**

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## **Statement of Offence**

Professional misconduct, contrary to Core Duty 7 (Part 2 of the Bar Standards Board Handbook, version 4.1).

## **Particulars of Offence**

Martha Knowlden, a practising barrister in self-employed practice, while acting for two public access clients who were defendants to an application for an interim injunction listed for hearing on 21 August 2019 in the County Court at Medway in claim number F00ME569, failed to provide a competent standard of work and service to her clients, in that, having accepted their instructions to perfect draft witness statements which they gave to her and file the statements at court as their evidence in opposition to the application, between around late July 2019 and 21 August 2019, she failed to perfect the witness statements or file them at court, or take reasonable steps to do so, with the result that her clients had no such evidence to rely on at the hearing on 21 August 2019.

## **Charge 2**

### **Statement of Offence**

Professional misconduct, contrary to Core Duty 9 and/or rC64 of the Conduct Rules (Part 2 of the Bar Standards Board Handbook, version 4.6).

### **Particulars of Offence**

Martha Knowlden, a practising barrister, failed to be open and cooperative with the Bar Standards Board and failed to respond promptly or at all to its requests for comments and/or information in respect of a complaint raised against her, in that she failed to respond substantively or at all to emails and letters sent to her by it as follows:

- (a) an email and attached letter dated 10 February 2023 containing allegations of misconduct against her and requesting her written comments by 6 March 2023;
- (b) an email dated 27 February 2023 reminding her that her response to the allegations should be provided by 6 March 2023; and
- (c) an email dated 13 March 2023 requesting her response to the allegations by 17 March 2023.

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[2021/6759]

## Charge 1

### Statement of Offence

Professional misconduct, contrary to Core Duty 5 and Core Duty 10 of the Conduct Rules (Part 2 of the Bar Standards Board's Handbook versions 4.3-4.6).

### Particulars of Offence

Ms Knowlden, a barrister, behaved in a way which is likely to diminish the trust and confidence which the public places in her or in the profession and failed to take reasonable steps to manage her practice, or carry out her role within her practice, competently and in such a way as to achieve compliance with her legal and regulatory obligations in that she failed to either remove or update her website (<https://advocaselegal-services.business.site/>) so that it is compliant with rC103.1, rC103.2.a, rC103.2.b, rC103.2.c, rC159, and rC160 in accordance with the Bar Standards Board's Transparency Rules 2019 from January 2020 to date, despite her receiving detailed feedback on 3 July 2020 on how to become compliant.

## Charge 2

### Statement of Offence

Professional misconduct, contrary to Core Duty 5 and Core Duty 10 of the Conduct Rules (Part 2 of the Bar Standards Board's Handbook versions 4.3-4.6).

### Particulars of Offence

Ms Knowlden, a barrister, behaved in a way which is likely to diminish the trust and confidence which the public places in her or in the profession and failed to take reasonable steps to manage her practice, or carry out her role within her practice, competently and in such a way as to achieve compliance with her legal and regulatory obligations in that she failed to take steps to ensure that her readily available information ('factsheet') was compliant with the Transparency Rules 2019 from January 2020 to date, despite her receiving detailed feedback on 19 April 2021 on how to become compliant.

## Charge 3

### Statement of Offence

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Professional misconduct, contrary to Core Duty 9 and/or rC89 of the Conduct Rules (Part 2 of the Bar Standards Board's Handbook versions 4.4-46).

### **Particulars of Offence**

Ms Knowlden, a barrister, failed to co-operate with her regulators and/or failed to ensure that her chambers was administered competently and efficiently in that she did not comply with the reasonable requests of the Supervision Team at the Bar Standards Board to comply with the Transparency Rules 2019 made on one or more of the occasions set out in Schedule 1, between July 2020 and April 2021.

### **Parties Present and Representation**

3. Ms Knowlden appeared in person. The Bars Standards Board ('BSB') was represented by Mr Scott-Joynt.

### **Findings**

4. There were three sets of charges for the panel to consider. All three cases (with a total of 11 charges) were joined and heard at the same hearing. We received bundles of relevant documents and evidence from the BSB in relation to each case as well as a bundle from the Respondent, further written submissions from her and a skeleton argument from counsel for the BSB. We heard evidence from the Respondent and received submissions from counsel for the BSB for which we are grateful.
5. We have carefully considered all the extensive evidence we have received.

### **Nature of the Charges**

6. The first two sets of charges (cases 5516 and 2761) arise from the services Ms Knowlden provided to the Clients. The third set (case 6759) arises from a review of Ms Knowlden's website and client materials. All are alleged by the BSB to amount to professional misconduct.
7. The burden of proving these charges lies upon the BSB throughout. The Respondent does not have to prove her innocence or any particular fact. We cannot convict the Respondent

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on any charge unless we are satisfied that the BSB has established that their case is more probable than not.

8. We set out below a summary of some of the relevant background which underpins the charges as explained by the BSB and which we find proved on the evidence before us (and which the Respondent indicated to us was almost entirely accepted by her).

## **Background**

9. Ms Knowlden is a member of the Inner Temple, having been called to the Bar in 1993. She practises (and has done for some years) as a sole practitioner. She now lives in Spain; during the period relevant to the charges, she lived in Spain but maintained an office in Kent, which she attended from time to time and where for some of the time at least she employed a paralegal. Up until October 2023, she was licensed both to undertake public access work and to conduct litigation. She worked under the name “Advocase Legal Services” (Advocase).
10. In early April 2019, Ms Knowlden was approached by two brothers, JE and AE (the Clients), who needed help with a property access dispute in which they were threatened with litigation. She agreed to assist.
11. There is no record of Ms Knowlden sending the Clients any client care letter or of providing them otherwise with any details of what she could or could not do as a self-employed barrister or of how they could make a complaint if need be. She accepted £500 as an initial payment for her services but does not appear to have provided any clear estimate of what her services would cost in total.
12. Ms Knowlden proceeded to write several pieces of correspondence for the Clients and correspond with and meet with the Clients over the succeeding days and weeks.
13. In July 2019, a hearing was listed for 21 August 2019 to address an application made against the Clients for an injunction. Ms Knowlden, or rather Advocase, went on the record on 29 July 2019, and wrote to the Court to ask for an adjournment because one of the two Clients was on vacation on the listed date.

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14. In or around the first half of August 2019, Ms Knowlden received draft statements from the Clients, and from two of their relatives. On 16 August 2019, the Court wrote to the Clients care of Advocase, refusing an adjournment unless both sides consented.
15. The same day, the Clients emailed Ms Knowlden to ask when she had acknowledged service of the proceedings, adding: "I am rather concerned the length of time this is taking."
16. On 19 August 2019, Ms Knowlden replied, saying she had "actioned" the AoS while on her "working break" and saying she would provide papers when she and the Clients met later that day. On the same day Ms Knowlden emailed separately to ask follow-up questions about one of the statements and emailed the solicitor for the claimant in the litigation asking for an adjournment, saying that the papers "did make their way to my firm... but unfortunately, they came in when I was on annual leave". Ms Knowlden met the clients at her Kent office on 19 August 2019. The contents of that meeting were a significant element in the Clients' later Complaint.
17. On 20 August 2019, the day before the hearing, Ms Knowlden texted the Clients at 17:32 to say she had missed calls from them and asking for a transfer of funds to meet her invoice.
18. On the morning of 21 August 2019, the day of the hearing, Ms Knowlden sent a further text to the Clients, voicing concern that she had had no further instructions and saying that "in accordance with my terms and conditions" she was not obliged to appear for them if payment had not been made.
19. She said she would attend court, but if – as it appeared – the Clients no longer had faith in her, she would ask to be released from the record. The contents of the text were also sent as an email.
20. Ms Knowlden's attendance note for the hearing says that she arrived at court to meet the Clients, only to be told in person that they would represent themselves.

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21. On the 23<sup>rd</sup> August 2019 the Clients sent a formal letter of complaint raising a number of issues. A further letter chasing a response was sent to Ms Knowlden on 10 September 2019 warning that if no response was forthcoming they would have to resort to the Legal Ombudsman (LeO). Following further correspondence, the clients complained to LeO in early 2021. In a response to LeO relating to the complaint Ms Knowlden acknowledged that no written terms of business appeared to have been sent to the Clients. She accepted she had not filed a formal AoS, although she had written to both court and claimant by letter on 29 July 2019 “which achieves the same thing”. She said there were no emails from the Clients asking her to file a defence, and no written instructions to settle statements – although she accepted that she had so been instructed. She said she had orally told the Clients in their first meeting that if the matter went to court costs would “escalate significantly into several thousand pounds” but said: “I appear not to have written this down.” She said she had done her best to keep the Clients orally informed of progress, since “as they worked locally and lived locally they would often pop in casually for an update. Sadly as these were informal visits, I did not make attendance notes.” She said she was “embarrassed that my service is not as I would wish to provide”.
22. On 21 February 2021, LeO sent its decision to the BSB. It found:
- a. Ms Knowlden had failed to provide written terms of business or reasonable costs information. When a bill was presented “at very short notice before a hearing” and was not paid quickly, she declined to act. This caused “significant concern” and was unreasonable.
  - b. She had failed to file an acknowledgement of service (AoS), and to settle and file statements, despite being instructed to do so.
  - c. Further, Ms Knowlden’s business set-up “could be considered unusual and potentially misleading”, since Advocase appeared to be an unregulated company which was accepting instructions without clients being “reasonably aware of this”.
  - d. Her response to the Complaint was unreasonable, since it was sent on 23 August 2019 but appeared never to have received a substantive response (procedural correspondence still being under way by 11 November 2019).

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e. All outstanding fees should be waived, and compensation totalling £600 should be paid to the Clients

23. On 9 June 2021, the BSB wrote to Ms Knowlden to inform her that it would investigate the concerns raised by the LeO Complaint [under case number 2021/5516], setting out the scope of the investigation and asking her to comment in writing by 1 July on likely allegations. It warned her that a failure promptly to provide the BSB with information it required could itself potentially be a breach of the BSB Handbook.
24. Extensive correspondence between the BSB and Ms Knowlden followed during 2021 and 2022. In this period on 18 February 2022, Ms Knowlden informed the BSB that she had been diagnosed with ADHD. Subsequently medical evidence has been provided to confirm this.
25. In October 2022, having reviewed LeO's papers, the BSB concluded that further charges may be appropriate in relation to Ms Knowlden's engagement with the Clients in 2019. On 6 February 2023 it was decided that a further investigation should proceed – which subsequently led to charges in 2022/2761.
26. In relation to issues of transparency in June 2020, the BSB undertook a routine inspection of Ms Knowlden's website(s) to assess its compliance with the Transparency Rules. The inspection identified two websites ('1' and '2') – both of which were found to be non-compliant. Following extensive correspondence in 2020 in March 2021 the BSB emailed a letter to Ms Knowlden which said her website was still not in compliance. It gave her 5 working days to explain and provide a revised date for compliance and warned that a failure promptly to provide the BSB with information could itself lead to disciplinary action. By April 2021 it appeared to the BSB that while Website 1 was no longer reachable, Website 2 remained live and unamended. Ms Knowlden said she had no knowledge of Website 2 and would speak to her IT consultant that day.
27. On 19 April 2021, the BSB emailed a letter to Ms Knowlden, listing the occasions on which it had asked her to become compliant with the transparency rules and giving her until 26

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April to remove Website 2. The letter provided details of what transparency issues remained and how they could be corrected. There was no response to the letter.

28. On 7 January 2022, the BSB wrote to Ms Knowlden to say an investigation [Case 2021/6759] was being opened into the transparency issues she and the BSB had corresponded about between July 2020 and April 2021.
29. Following further correspondence on 4 April 2022, with an IDB Panel pending the following day, Ms Knowlden emailed the BSB to explain the way her ADHD affected her professional life.
30. She said her IT consultant had discovered that Website 2 had been “generated by algorithms through Google”. She acknowledged that her anxiety and sense of being overwhelmed had led her to dread contact with the BSB, and to avoid answering calls. She said that had this transpired after her diagnosis and prescription of medication, she would have been able to deal with the issues more promptly.
31. A medical report confirming a diagnosis of ADHD with effects on organisation, time management and inability to sustain attention, and identifying what medication was being prescribed – was sent to the BSB on 23 June 2022.

### **Response to the Charges**

32. The Respondent formally admitted all the charges at this hearing and had also done so in writing prior to the hearing.
33. In light of the largely agreed factual background and having considered the evidence before us we were of the unanimous view that the conduct in each charge constituted a clear breach of the various Core Duties and other provisions of the conduct rules referred to in the charges and was sufficiently serious to constitute professional misconduct in relation to each of the 11 charges. Accordingly, pursuant to rE193 we announced the charges proved.

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## Sanction and Reasons

34. Following the Respondent's formal admission of the charges we received further submissions from the BSB and considered evidence material to sanction as well as hearing evidence and submissions from the Respondent in relation to sanction.
35. The material revealed that the Respondent had previously (in 2018/19) been found guilty of 5 charges dating from conduct in or around 2014/5 in case 2016/0109/D3 which had resulted in a period of suspension and a reprimand. The conduct in issue related to public access work she had undertaken and in particular financial irregularities concerning the way her practice had been run.
36. More recently in October 2023 in case PC 2020/1798/D5 a further 2 charges were found proved against her which also related to the ability to manage her practice albeit the subject matter was of a different nature. The Respondent was reprimanded, and the panel imposed a restriction on her ability to access clients directly pending the completion of a course authorized by the Bar Council to enable her to undertake public access work. There was a limited financial sanction imposed relating to costs. We understand that the requisite course has not yet been undertaken and so the Respondent remains barred from accessing clients directly.
37. We considered sanction in light of the BTAS Sanction Guidance version 6 (January 2022) ('the Guidance'). We had fully in mind the purpose of sanctions and the principles of sanctioning as set out in the Guidance at section 2. We noted that the fundamental principle of sanctioning is that any sanctions imposed should be proportionate, weighing the interests of the public with those of the practitioner and that the sanctions imposed should be no more than is necessary to achieve the purposes explained in the guidance namely (in summary):
- a. To protect the public and consumers of legal services.
  - b. To maintain public confidence in the profession.
  - c. To maintain and promote standards in the profession.

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d. To deter both the barrister concerned and the wider profession from engaging in the misconduct in question.

38. We followed the six-step approach outlined in the Guidance.

39. We considered that the appropriate misconduct groups for the proved misconduct were Groups K (in relation to Charges 5516.1, 2, 3, 4 & 6; 2761.1) and L (in relation to 5516.5; 2761.2; 6759.1, 2 & 3). There was some overlap between misconduct groups for some of the charges.

40. In relation to each charge we have considered the seriousness of the misconduct by reference to culpability and harm factors. We note in this regard that it is not suggested by the BSB that the conduct in issue was either intentional or reckless.

41. We are satisfied however that the conduct in cases 5516 and 2761 constituted a number of failures and cannot be considered as a one off incident. Moreover the conduct in case 6759 was sustained over a considerable period. We find that the harm (or in any event potential harm caused) by the conduct across all cases was reasonably foreseeable. In relation to the group K and L conduct we consider that inadequate administration systems contributed to the misconduct and there would clearly have been levels of distress and worry caused to clients in relation to the Group K conduct. Their position was harmed in the sense that they were left without legal representation.

42. In relation to the group L conduct we consider that Ms Knowlden's lack of substantive engagement with the BSB extended over a long period, in relation to charges 2761.2 and 6759.3.

43. Similarly, there were lengthy delays in providing information in relation to charges 2761.2 and the charges in case 6759. The extent of practice management failures was significant, in relation to the charges in cases 5516 and 6759. Such conduct across all charges has the potential for significant impact on public confidence and risked harm to the public if repeated.

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44. In light of such matters we considered that the conduct fell within the middle range of indicative sanction levels for both Groups K and L. For Group K the indicative sanction would be a medium level fine or a suspension of less than 12 months. We note that the Guidance for Group K notes that *'panels should consider whether it is appropriate to impose restrictions/conditions on practice in order to protect the public either in combination with other sanctions or as a stand-alone sanction.'* For Group L a medium to high level fine is indicated.

45. We considered aggravating and mitigating factors.

46. In this regard we paid careful attention to the previous findings made against the Respondent several of which are recent and have some relevance to these charges in that they concern the failures in managing public access work. These were important aggravating factors.

47. There were also repeated failures to take remedial action despite promptings from the BSB and a lack of substantive responses (especially in relation to case 6759 and charge 2761.2)

48. In terms of mitigation factors we considered that the Respondent demonstrated genuine remorse for what had taken place.

49. We also consider it important to appreciate and understand the health issues faced by the Respondent at material times. Ms Knowlden's medical evidence suggests she has ADHD and has had this condition for a long time. She explains (as does her medical evidence to some extent) that it would have impacted her ability to manage her practice, engage with the BSB, and in some circumstances serve her clients – potentially including the Clients in the charges. We accept that this is likely to have been the case. We understand that she is on medication and that her condition is improved and now more manageable. We have taken into account her character references but place limited weight on them in the circumstances.

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50. In relation to charges 6759.1 and 6759.3, we also accept that the evidence indicates that Website 2 was generated automatically by Google without her knowledge and this may mean the proven misconduct arose as a result of technology issues outside her control. This provides some mitigation in that regard.
51. In light of relevant aggravating and mitigating factors we have considered that imposing sanctions which broadly fall within the indicative sanction range for Group K but which to some extent fall outside of the indicative range for Group L. We set out the sanctions for each charge below. We have felt it appropriate in view of the particular circumstances of this case to restrict the nature of the work that the Respondent can undertake. Given the very dire financial situation the Respondent finds herself in – with in essence no substantive material assets and very limited finances evident either now or in the near future – we do not consider that she would be able to pay a fine as indicated in relevant parts of the sanctions guidance so that the impact of imposing a fine at that level would be disproportionate and inappropriate.
52. We have considered each charge in question in considering sanction but also had in mind the totality principle. Sanctions must be proportionate to the overall conduct and so we have also considered the totality of the sanctions to ensure the outcome is proportionate.
53. We have considered very carefully the impact of any sanction upon the Respondent's future practice and the impact that any sanction may have on her existing clients. We acknowledge that in essence all of her work is public access work and we acknowledge that any period of suspension has the potential to cause difficulties for her practice.
54. We set out below the relevant sanction applicable to each charge. In so far as we have considered it appropriate in relation to some charges to prohibit the respondent from accepting or carrying out any public access instructions (which includes litigation work for public access cases) we have indicated that some periods are to run concurrently and some consecutively so that the overall period of prohibition will last 6 months.

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55. We are satisfied that this restriction on the Respondents practice allied with the Reprimands we have determined to be appropriate is a proportionate response that will balance the interests of the public with those of the practitioner. We consider that such sanctions are no more than is necessary to achieve the purposes of applying sanctions.

56. We also note that the Respondent is currently restricted in the work she can do pending the sanctions imposed in case 202/1798/D5. We make it clear that our sanctions in no way alter or change those previous sanctions. If the Respondent does not undertake suitable training she will remain restricted under the terms of those sanctions until she has undertaken it. Equally even if she has undertaken it in the near future she will remain prohibited for six months pursuant to sanctions we have imposed.

57. Accordingly the sanctions imposed are as follows and are effective (in relation to the prohibitions on accepting or carrying out any public access work the sanctions will be effective from the 21<sup>st</sup> November 2023).

#### **Case 2021/5516**

##### **Charge 1**

The respondent is prohibited for a period of 1 month from accepting or carrying out any public access instructions. This sanction will run concurrently with other sanctions we have imposed.

##### **Charge 2**

The respondent is prohibited for a period of 1 month from accepting or carrying out any public access instructions. This sanction will run concurrently with other sanctions we have imposed.

##### **Charge 3**

The respondent is prohibited for a period of 2 months from accepting or carrying out any public access instructions. This sanction will run consecutively with other sanctions we have imposed.

##### **Charge 4**

The respondent is prohibited for a period of 1 month from accepting or carrying out any public access instructions. This sanction will run concurrently with other sanctions we have imposed.

#### **The Bar Tribunals & Adjudication Service**

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Company Number: 8804708  
Charity Number: 1155640  
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9 Gray's Inn Square, London WC1R 5JD



#### Charge 5

The respondent is prohibited for a period of 1 month from accepting or carrying out any public access instructions. This sanction will run concurrently with other sanctions we have imposed.

#### Charge 6

The respondent is prohibited for a period of 1 month from accepting or carrying out any public access instructions. This sanction will run consecutively with other sanctions we have imposed.

### **Case 2022/2761**

#### Charge 1

The respondent is prohibited for a period of 2 months from accepting or carrying out any public access instructions. This sanction will run consecutively with other sanctions we have imposed.

#### Charge 2

The respondent is prohibited for a period of 1 month from accepting or carrying out any public access instructions. This sanction will run consecutively with other sanctions we have imposed.

### Case 2021/6759

#### Charge 1

Reprimand

#### Charge 2

The respondent is prohibited for a period of 1 month from accepting or carrying out any public access instructions. This sanction will run concurrently with other sanctions we have imposed.

#### Charge 3

Reprimand

In relation to the Reprimands above as made clear to the Respondent at the hearing the proven misconduct in relation to those charges is unacceptable and must not be repeated again.

### **Costs**

We consider it proportionate to require a payment from the Respondent of £100 towards the BSB costs by way of a limited financial sanction. Such sum is to be paid within 28 days.

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**Dated: 27 November 2023**

**Tom Cosgrove KC**  
**Chairman of the Tribunal**

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