



“2018: A year in review” Anti-money laundering

Tackling illicit finance

January 2019

Introduction

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2018 was a busy year for anti-money laundering activity with a number of legislative changes, reports and headline speeches by law enforcement agencies focusing on the issue of illicit finance and what is to be done about it. The National Crime Agency (NCA) [suggests](#) that, whilst there is no reliable estimate of the total value of laundered funds that impacts on the UK, given the volume of financial transactions transiting the UK, there is a realistic possibility that the scale of money laundering impacting the UK annually is in the hundreds of billions of pounds. This is a strategic threat to the UK's economy and reputation and therefore a top law enforcement and government priority.

In December 2018, the Financial Action Task Force (FATF) published its report on the UK regime to counter money laundering (ML) and terrorist financing (TF). The report praises the strength of the UK regime, noting that the UK has a 'robust' understanding of ML/TF risk. The UK has used this report as somewhat of an endorsement about its tough regime relating to anti-money laundering and dramatically increased activity since 2014. The public/private partnership and information sharing between law enforcement agencies themselves and the private sector is held up as a notable achievement. However, there are also some weaknesses identified in relation to Suspicious Activity Reports (SARS), correspondent banking, and the limited role of the UK's Financial Intelligence Unit (FIU).

For more on this report see our related blog: [Routinely and aggressively pursuing money-laundering investigations: the verdict on the UK's AML regime](#)

This review examines activity in this field during 2018 and casts an eye forward to see what we can expect in 2019.

Contents

Legislation.....	4
Fifth Money Laundering Directive (5MLD)	4
Sixth Money Laundering Directive (6MLD)	4
Criminal Finances Act 2017 (CFA 2017)	5
Additional European Union initiatives.....	8
UK withdrawal from the European Union	8
Regulatory landscape	9
Office for Professional Body Anti-Money Laundering Supervision.....	9
Solicitors Regulation Authority	9
Financial Conduct Authority AML report 2017-18	10
Key developments.....	10
Law Commission review of Anti-Money Laundering: the SARS regime	10
Law Commission review of Confiscation.....	10
The National Economic Crime Centre	11
Law enforcement objectives	11
Anti-Corruption Strategy 2017-20	11
Serious and Organised Crime Strategy 2018	12
National Strategic Assessment of Serious and Organised Crime 2018.....	12
Parliamentary scrutiny.....	13
Cases of note.....	13
Forward look.....	14
Preparations for Brexit.....	15
Our team	16

Legislation

A number of pieces of reform were introduced in 2018, building on the changes introduced under the Fourth Money Laundering Directive implemented in the UK via the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) [Regulations](#) 2017 (MLR 2017).

Fifth Money Laundering Directive (5MLD)

The [Fifth Money Laundering Directive](#) was formally adopted on 19 June 2018. A number of new provisions were introduced to address the ever-changing economic crime landscape and allow law enforcement authorities to keep pace. The revised directive addresses five key issues:

- ensuring a high level of safeguards for financial flows from high-risk third countries;
- enhancing the powers of EU Financial Intelligence Units and facilitating their cooperation;
- ensuring centralised national bank and payment account registers or central data retrieval systems in all Member States;
- tackling terrorist financing risks linked to virtual currencies; and
- tackling risks linked to anonymous pre-paid instruments (e.g. pre-paid cards).

See our related blogs:

- [Anti-Money Laundering: will new EU regime impact the UK?](#)
- [Beyond #Brexit: new anti-money laundering regime agreed](#)

The deadline by which EU Member States have to transpose the provisions into national law is 10 January 2020.

Notwithstanding the UK's withdrawal from the EU, or any transition period, the government has [stated](#) that the UK intends to implement the provisions of the 5MLD. It will issue a consultation on its transposition into national law within the first few months of 2019.

Sixth Money Laundering Directive (6MLD)

The next piece of reform in relation to anti-money laundering was the Directive on combating money laundering by criminal law – the [Sixth Money Laundering Directive](#) (6MLD). It is worth noting that the UK government did not choose to opt-in to this Directive and (regardless of Brexit) will not be bound by its provisions. Nevertheless, had the UK chosen to be bound by these provisions it would have met many of the requirements in any event.

The deadline by which EU Member States have to transpose the provisions into national law is 3 December 2020.

This Directive focuses on introducing a unified list of 22 specific predicate offences for money laundering activity which all EU Member States must criminalise in national legislation (if they have not already done so). As to the key provisions of the Directive:

- there is a focus on virtual currencies - Member States should ensure 'those risks are addressed appropriately' (interestingly, virtual currencies fell within the scope of the 5MLD so this is clearly an area of priority);
- money laundering offences are defined, including punishments for individuals convicted of money laundering offences - for example, there should be a maximum term of imprisonment of at least four years with more severe penalties for public office holders;
- greater co-operation between Member States and third countries in terms of information sharing to improve investigation and prosecution;
- extension of criminal liability to organisations, such as companies or partnerships, to ensure that such legal entities are held liable where the lack of supervision or control has made possible the commission of any of the money laundering offences.

See our related article:

- [Tougher EU rules and enforcement for money laundering](#)

Criminal Finances Act 2017 (CFA 2017)

Unexplained Wealth Orders

Certain provisions of the [Criminal Finances Act 2017](#) came into force in 2018. One of the key provisions was the introduction of the Unexplained Wealth Order (UWO).

UWOs have been in force since February 2018. They are intended to bolster the Proceeds of Crime Act 2002 (POCA) regime, by making it easier for law enforcement agencies to seize assets suspected of representing criminal property. Several authorities are empowered to apply to the court for such orders, including HMRC, the National Crime Agency (NCA), the Serious Fraud Office (SFO) and the Financial Conduct Authority (FCA). To date 3 have been issued with the NCA confirming to the media early in 2018 that they were considering "100s more."

Provisions relating to interim freezing orders for property identified under a UWO and on forfeiture of money held in bank and building society accounts were also introduced.

To read more about the issues see our blogs on this topic:

- [Tackling Corruption: Unexplained Wealth Orders now in force](#)

- [What you need to know about Unexplained Wealth Orders](#)
- [Unexplained Wealth Orders – can you prove the legitimate provenance of all of your significant assets?](#)
- [Media focus on first 'McMafia law' challenge](#)

Related topic

It is worth noting that s 45 and 46 CFA 2017 introduction provisions introducing criminal liability for corporates for failure to prevent tax evasion offences – in the UK and overseas. These came into force in September 2017. At the timing of writing no prosecutions had been brought.

Suspicious Activity Reports

The CFA 2017 also introduced provisions to extend the “moratorium period” of Suspicious Activity Reports (SARS) and power to obtain further information. The NCA [SARS report 2018](#) confirmed that its investigators made use of the new extension provisions leading to a successful outcome in relation to an international fraud.

Overseas Investigations

The CFA 2017 made a number of amendments and introduced new powers under POCA relating to overseas investigations. These powers are available in domestic cases. They can, by way of Orders in Council, be made available to provide assistance in overseas cases where evidence, or a person or property is in the United Kingdom. This Statutory Instrument Proceeds of Crime 2002 (External Investigations and External Orders and Requests (Amendment) Order 2018/1078 [here](#) sets out the provisions to do this.

Magnitsky Provisions

The CFA 2017 also sets down measures relating to unlawful conduct: gross human rights abuses or violations – the so-called Magnitsky provision.

Read more on this issue in our blogs here:

- [Business and Human Rights: Magnitsky clause now in force](#)
- [The Magnitsky Clause Part 1: Profiting from the suppression of whistleblowers – what does it mean for business?](#)
- [The Magnitsky Clause Part 2: Profiting from the suppression of those who seek to assert their human rights?](#)

Beneficial ownership information

The CFA 2017 introduced provisions relating to co-operation and sharing of beneficial ownership information between the UK and “relevant territories” i.e. British Crown Dependencies and Overseas Territories (e.g. the BVI and Cayman Islands).

A review of existing arrangements for sharing Overseas Territories’ company beneficial ownership information with UK law enforcement authorities was published in May 2018 and found that the systems were working effectively.

In addition, the [Sanctions and Anti-Money Laundering Act 2018](#) (referred to below) also contains provisions in relation to publicly accessible registers of company beneficial ownership in the UK Overseas Territories. Reasonable assistance must be provided to enable each of those governments to establish a publicly accessible register of the beneficial ownership of companies registered in each government’s jurisdiction. The Secretary of State must, no later than 31 December 2020, prepare a draft Order in Council requiring the government of any British Overseas Territory that has not introduced a publicly accessible register of the beneficial ownership of companies within its jurisdiction to do so.

Registration of Overseas Entities Bill

The Government is also taking steps to address the widespread concern expressed about the lack of transparency around who ultimately owns land in the UK, where the land is registered to an overseas company or other entity. In March 2018 it published its response to the previous consultation on a register of beneficial owners of overseas companies and other legal entities (from 2017). The aim of the register is to show who owns and controls overseas companies and other legal entities that own UK property or participate in UK government procurement.

The [Draft Registration of Overseas Entities Bill](#) was published in draft in July 2018. This sets out provisions to establish a new beneficial ownership register of overseas entities that own UK property. It seeks to meet the widespread concern about the lack of transparency around who ultimately owns land in the UK, where the land is registered to an overseas company or other entity. It is therefore not clear who really owns and controls the entity and, by extension, the land itself. The Government intends that the register will be operational in 2021.

In contrast, since June 2016, most UK-registered entities have been required to provide information about their ultimate owners and controllers to Companies House, and these are held on the public People with Significant Control (PSC) register.

See our related blog:

[Emerging from the shadows: the new regime of corporate transparency in the UK](#)

Additional European Union initiatives

In December 2018 an [Action Plan](#) for Money laundering was adopted at the Economic and Financial Affairs Council of the European Union. The conclusions set out a number of short-term non-legislative actions to address key objectives relating to identifying the factors that contributed to the recent money laundering cases in EU banks, identify the risks and best prudential supervisory practices to address them; improve supervision and exchange of information share best practice.

In addition agreement was reached on reinforcing the [role](#) of the European Banking Authority (EBA) as regards risks posed to the financial sector by money laundering activities.

UK withdrawal from the European Union

With a view to UK AML powers post-Brexit the Sanctions and Anti-Money Laundering Act 2018 (Sanctions Act 2018) deals with the making of regulations enabling or facilitating the detection or investigation of money laundering, or preventing money laundering; enabling or facilitating the detection or investigation of terrorist financing, or preventing terrorist financing; and, the implementation of Standards published by the Financial Action Task Force from time to time relating to combating threats to the integrity of the international financial system.

Money Laundering and Transfer of Funds (Information) (Amendment) (EU Exit) Regulations 2018

In the event of a “No-Deal” Brexit the government has introduced the draft [Money Laundering and Transfer of Funds \(Information\) \(Amendment\) \(EU Exit\) Regulations 2018](#) which “addresses deficiencies” in each of the existing regulations that arise from the UK leaving the EU to ensure that this legislation continues to operate effectively. There are no substantive policy changes introduced to the wider AML regime – the only changes that it makes are to ensure that the UK’s AML regime continues to operate effectively once the UK ceases to be a member of the EU.

Indeed, it is not expected that the UK will diverge from the EU’s anti-money laundering regime following Brexit. Not least that it has played a global leadership role in this area – often going beyond the provisions of EU legislation, and seeks to continue to do so to protect the UK’s position as a global financial centre and [world-leading place to do business](#).

Regulatory landscape

Office for Professional Body Anti-Money Laundering Supervision

The Office for Professional Body Anti-Money Laundering Supervision ([OPBAS](#)) was launched in January 2018 and is widely termed the “AML Watchdog” or “supervisor of supervisors”. Housed in the FCA this was set up by the government to strengthen the UK’s anti-money laundering (AML) supervisory regime and ensure the professional body AML supervisors provide consistently high standards of AML supervision. The [OPBAS Regulations](#) set out duties and powers to ensure AML supervisors meet the standards required by the [MLR 2017](#). Its purpose is also to facilitate collaboration and information sharing –exchanging intelligence and sharing best practice - between AML supervisors, statutory supervisors, and law enforcement agencies.

See our related blogs on this topic:

- [OPBAS: A supervisor of supervisors?](#)
- [OPBAS – FCA consults on the “supervisor of supervisors”](#)

Solicitors Regulation Authority

In March 2018 the anti-money laundering guidance produced by the Legal Sector Affinity Group, *Anti-Money Laundering Guidance for the Legal Sector* ([the Guidance](#)), was approved by HM Treasury. The Legal Sector Affinity Group is comprised of the AML supervisors for the legal sector and the guidance replaces previous Law Society guidance and good practice information on complying with anti-money laundering legislation.

The SRA also produced a [Risk Assessment](#) relating to anti-money laundering and terrorist financing and published a [thematic review](#) on Preventing Money Laundering and Financing of Terrorism. In both of these the SRA [underlined](#) how the legal profession plays a vital role in tackling money laundering which is considered to be one of the greatest risks both society and the profession faces.

Indeed, the role of the legal profession and other regulated professionals is often referred to by the Government either as “gate-keepers” or in more derogatory terms - “enablers”. This is both in relation to suspicious activity reports (NCA [SARS report 2018](#)) and in terms of enabling money laundering by offering a “[veil of legitimacy](#)”.

For more on the debate in this area see our related blogs:

- [Tackling Illicit Finance – Lawyers under the spotlight](#)
- [AML: targeting the professional enablers – action not just talk](#)

Financial Conduct Authority AML report 2017-18

The [FCA: Anti-money laundering Annual Report 2017/18](#) sets out that the size and global nature of the UK financial industry means that both money laundering, and the criminality that creates the need to launder money, present significant risks to the UK. So financial crime and anti-money laundering (AML) remain one of the FCA's key priorities. The FCA sets out in the report that its safeguards to prevent financial crime are designed to make the UK and the financial services sector a hostile place for criminals, a safe place for consumers, and ensure that it meets the latest international standards

See our related blogs on this topic:

- [The FCA Annual Report 2017-18: Anti-Money Laundering takes centre stage](#)
- [FCA: Criminal prosecutions for AML systems and controls failings – a step too far?](#)

Key developments

Law Commission review of Anti-Money Laundering: the SARS regime

The Law Commission agreed with the Home Office in 2017 to [review](#) and make proposals for reform of limited aspects of the anti-money laundering regime in Part 7 of POCA and of the counter-terrorism financing regime in Part 3 of the Terrorism Act 2000. The review will essentially focus on the current reporting of suspicious activity regime and specifically when it is used to seek a defence against money laundering or terrorist financing offences. The primary purpose of the review is to improve the prevention, detection and prosecution of money laundering and terrorism financing in the United Kingdom. The Home Office recently stated it is offering £3.5 million to support work to reform the suspicious activity reports regime (SARS).

See our related blog:

- [AML: reforming the suspicious activity reporting regime – have your say](#)

Law Commission review of Confiscation

The Law Commission is also undertaking a related proceeds of crime [project](#) to consider reforms to the confiscation regime “[to ensure they're effectively depriving convicted offenders of their ill-gotten gains](#)”. Noting that the confiscation regime is a potentially valuable tool by which offenders can be deprived of any benefits they have gained through criminal conduct, the Commission acknowledged that the law in this area is unduly complex and can hamper the effective recovery of the proceeds of crime

See our related blog:

- [Ensuring crime doesn't pay: confiscation regime under review](#)

The National Economic Crime Centre

[The National Economic Crime Centre](#) (NECC) started operating on 31 October 2018. The NECC is an overarching body whose function is to coordinate the UK's national response to economic crime by tasking and co-ordinating the UK's different prosecuting bodies, supported by "enhanced analytic capabilities and intelligence". Its aim is to improve the UK's ability to fight economic crime, with a particular focus on money laundering and corruption offences, by enhancing cooperation between different law enforcement agencies, but also with the Government and the private sector.

The NECC is based at the Head Quarters of the NCA and operates with a staff, recruited mainly from the NCA, SFO, HMRC, the City of London Police and the FCA. Its first annual budget is in the region of £6million.

See our related blog:

- [The UK's new National Economic Crime Centre](#)

Law enforcement objectives

As stated in the introduction this area is a key priority for Government and law enforcement. A number of action plans/strategy documents have been published which set out priorities and next steps.

Anti-Corruption Strategy 2017-20

The [Anti-Corruption Strategy 2017-20](#) establishes an ambitious and long-term framework for tackling corruption. The strategy built on the UK's [2014 Anti-Corruption Plan](#).

Key priorities set out are:

1. Reduce the insider threat in high risk domestic sectors
2. Strengthen the integrity of the UK as an international financial centre
3. Promote integrity across the public and private sectors
4. Reduce corruption in public procurement and grants
5. Improve the business environment globally
6. Work with other countries to combat corruption

More specifically in relation to tackling illicit finance, the paper sets out that the UK will ensure that: "the UK as a financial centre is hostile to illicit finance and has a world-leading reputation based on its integrity". The Government sets out its commitment to further strengthen the UK's anti-money laundering systems and ensure that professionals working with the financial sector uphold higher standards. It states

that it will strengthen the ability of UK authorities to investigate and prosecute grand corruption and return assets, working with international partners. Success will mean that the UK is more hostile to illicit finance, and citizens have more confidence in UK institutions and that the UK attracts high quality foreign investment, safeguarding our long-term prosperity.

Goals set out to strengthen the integrity of the UK as an international financial centre include:

- Greater transparency over who owns and controls companies and other legal entities
- Stronger law enforcement, prosecutorial and criminal justice action
- Further enhanced anti-money laundering and counterterrorist financing capability
- Stronger public-private partnership, to share information and improve targeting of those who pose greatest risk

A "[1 Year Update](#)" was published in December 2018. See our related blog:

- [Tackling economic crime 2018-19](#)

Serious and Organised Crime Strategy 2018

The [Serious and Organised Crime Strategy 2018](#) was published in November 2018 and reiterates that the vast majority of financial transactions through and within the UK are entirely legitimate, but its role as a global financial centre and the world's largest centre for cross-border banking makes the UK vulnerable to money laundering.

The report presents this as a significant reputational risk to the integrity of the UK's financial sector, which is essential for global trade and our long-term prosperity. Professionals such as lawyers and accountants are an important part of the response to serious and organised crime. However, whether "complicit, negligent or unwitting", the paper states that professional enablers are also key facilitators in the money laundering process and often crucial in integrating illicit funds into the UK and global banking systems.

The NCA also published its Annual Report and [Accounts](#) which includes highlights/key successes in July 2018.

National Strategic Assessment of Serious and Organised Crime 2018

Reiterating the central theme of the UK's "large, open financial sector is a global centre for legitimate business" the [strategic assessment](#) confirmed that this is also attractive to money launderers because of the "plethora of professional services and the complex and varied ways available to launder money". Although the majority of financial services and professional providers are not criminally complicit or negligent with regards to money laundering, these are areas of high risk and remain crucial enablers for disguising the origins of funds. The risk to regulated sectors from money laundering is heightened when interacting with the unregulated sector, where similar money laundering risks exist from a lack of due diligence and awareness.

“Professional enablers” and criminal exploitation of accounting and legal professionals, particularly those involved with trust and company service provision, continue to pose a significant threat, states the report. It also identifies that: money laundering through capital markets is an evolving threat; trade based money laundering (TBML) is a complex global issue and a key method of money laundering impacting on the UK; and a small but growing number of criminals are laundering money using crypto currencies.

The report also identifies the overseas jurisdictions that have the most enduring impact on the UK across the majority of the different money laundering threats which are: Russia, China, Hong Kong, Pakistan, and the United Arab Emirates (UAE). Some of these jurisdictions have large financial sectors which also make them attractive as destinations or transit points.

Parliamentary scrutiny

This area has been the focus of a number of debate and parliamentary inquiries in 2018. Including the Treasury Committee’s [Economic Crime](#) inquiry and related issues discussed in the House of Lords [Bribery Act](#) inquiry. See our related blogs on the issue:

- [Corporates in the spotlight: NCA and SFO confirm tackling money laundering a strategic priority](#)
- [Bribery Act 2010: Under Scrutiny](#)
- [Reform of corporate liability – renewed calls for change](#)

Cases of note

It is not possible to profile the sheer number of money laundering cases. Indeed the FATF [review](#) of the UK states that the UK “achieves around 7 900 investigations, 2 000 prosecutions and 1 400 convictions annually for stand-alone ML or where ML is the principal offence.”

The NCA [Annual Report and Accounts](#) reports on major high value money laundering cases. The SFO refers to a number of on-going cases where money laundering offences are cited as part of the investigation: [Afren Plc](#); [Chemring](#); [Petrofac](#) and [Unaoil](#).

The FCA sanctioned a number of entities for AML systems and controls failings: [Canara Bank](#) and [Sonali Bank](#) in 2018. The FCA’s second largest ever criminal prosecution - [Operation Tidworth](#) related to a “boiler room scam” where money laundering was charged alongside offences of conspiracy to defraud, fraud, and perverting the course of justice.

A related case of interest is the Lonsdale vs Natwest case relating to suspicious transactions where it was held that suspicions about money laundering submitted to the NCA may well amount to “personal data” for the purposes of the DPA 1998 and are therefore *prima facie* disclosable.

See our related:

- [Disclosure of Suspicious Activity Reports may not amount to Tipping-off, says High Court](#)

Forward look

2019 shows no signs of any slowdown in this area, quite the opposite when on the 14 January the Government launched its [Economic Crime Strategic Board](#) (so-called “Economic Crime Task Force”. This builds on previous public/private partnerships - exemplified through models such as the [Joint Money Laundering Intelligence Taskforce](#). The Board will meet twice a year, and will set priorities, direct resources and scrutinise performance against the economic crime threat. The board includes CEOs and chief executives from the banking institutions Barclays, Lloyds and Santander as well as senior representatives from UK Finance, the National Crime Agency (NCA) and the Solicitors Regulation Authority, Accountants Affinity Group and National Association of Estate Agents.

See our related blog:

- [Working in Partnership: a new public/private approach to tackle economic crime](#)

We expect to see the next steps in relation to the extension of the failure to prevent offence (under s7 Bribery Act) beyond the current reach of bribery and corruption and tax evasion more broadly into areas of fraud and money laundering. The Ministry of Justice is due to publish its response to the consultation process. They have been renewed calls for this from the SFO’s Director (appointed in August 2018) Lisa Osofsy.

- See our related blog: [Reform of corporate liability – renewed calls for change](#)

From recent [speeches](#) from the Serious Fraud Office we expect a focus on compliance and the efficiency of compliance programmes and given the call to extend corporate liability (as above) this will be pivotal.

There is also likely to be an increase in the use of civil recovery powers in relation to the proceeds of crime.

The focus on virtual currencies and the use of crypto-assets is also going to be enhanced with the Government confirming that they will use the consultation on the 5MLD to assess the regulatory regime in relation to supervision of crypto-assets and a recent parliamentary inquiry leading the FCA confirming that they will take steps to look the regulatory perimeter in relation to this new model of finance.

See our related blogs:

- [Cryptocurrencies the new face of economic crime](#)
- [FCA sharpens focus on crypto cowboys](#)

Preparations for Brexit

Much of the political rhetoric is about ensuring that the UK maintains its position as a global financial centre and safe place to do business. We can expect these statements to continue regardless of what the final outcome of the UK's exit looks like or results in. It is unlikely that the UK will row back on money laundering enforcement. It will also remain a member of the Financial Action Task Force independently.

As to legislation we have been told that the UK will consult on how to implement the provisions of the 5th Money Laundering Directive into UK law in the coming months. In addition as regards the current regime a draft regulation [Statutory Instrument](#) has been published which will make amendments to anti-money laundering law. This is to ensure that it continues to operate effectively in a UK context once the UK leaves the EU, "in any scenario". A draft [instrument](#) relating to law enforcement in the event of a "No-Deal" more broadly has been published.

So a lot to look forward to in an ever changing AML landscape but what is clear is that the regime is going to get tougher and every business will be under scrutiny.

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