

**SANCTION DECISION OF THE  
DISCIPLINARY COMMITTEE OF THE GENERAL LEGAL COUNCIL**

COMPLAINT NO. 177 of 2024

**IN THE MATTER OF ALLISON JOANNA BECKFORD v  
ANTONEITA A. HALL, an Attorney-at-Law.**

**AND**

**IN THE MATTER OF THE LEGAL PROFESSION ACT, 1971**

PANEL:                   Ms. Tana’ania Small, KC - Chairperson  
                              Mr. Kevin O. Powell, KC  
                              Ms. Delrose Campbell

APPEARANCES:       Ms. Allison Joanna Beckford

1. The Panel delivered its decision on the Complaint against the Attorney on November 22, 2025 finding the Respondent Attorney guilty of professional misconduct. The sanction hearing was scheduled for January 31, 2026. The Attorney was not present. The Panel satisfied itself that the Attorney had been notified of the sanction hearing.
2. In considering the appropriate sanction, the findings on the complaint are relevant, and were that the Attorney was found guilty of professional misconduct for breach of Canon VI(d) which states that “...an Attorney shall not give a professional undertaking which he cannot fulfil and shall fulfil every such undertaking which he gives.”
3. In Fuglers LLP et al v Solicitors Regulatory Authority [2014] EWHC 179 Justice Popplewell addressed what should be the correct approach of a Solicitors Disciplinary Tribunal to sanction as follows:

*“28. There are three stages to the approach which should be adopted by a Solicitors Disciplinary Tribunal in determining sanction. The first stage is to assess the seriousness of the misconduct. The second stage is to keep in mind the purpose for which sanctions are imposed by such a tribunal. The third stage is to choose the sanction which most appropriately fulfils that purpose for the seriousness of the conduct in question.*

*29. In assessing seriousness, the most important factors will be (1) the*

*culpability for the misconduct in question and (2) the harm caused by the misconduct. Such harm is not measured wholly, or even primarily, by financial loss caused to any individual or entity. A factor of the greatest importance is the impact of the misconduct upon the standing and reputation of the profession as a whole. Moreover, the seriousness of the misconduct may lie in the risk of harm to which the misconduct gives rise, whether or not as things turn out the risk eventuates. The assessment of seriousness will also be informed by (3) aggravating factors (eg previous disciplinary matters) and (4) mitigating factors (eg admissions at an early stage or making good any loss).” (Emphasis Added)*

4. The principles in **Fuglers LLP** have been applied by subsequent tribunals and courts including our Court of Appeal in cases such as **Minett Lawrence v General Legal Council (Ex parte Kaon Northover [2022] JMCA Misc 1,(Paragraphs 108-114).**
5. With regards to the seriousness of the misconduct of the Attorney we accept that the misconduct for which the Attorney was found guilty is of a serious nature insofar as an undertaking is a personal, binding, and solemn commitment; failure to honour it is often treated as *prima facie* evidence of misconduct.
6. The Complainant was the purchaser and the Attorney was the vendor in relation to the sale of an apartment. The Attorney issued a letter on her professional letterhead identifying her as an attorney-at-law to the National Commercial Bank dated September 20, 2023 in which she stated: **“I, Antoneita Hall, hereby give my professional undertaking to pay all outstanding maintenance fees associated with the unit at captioned up to date of possession.”** The sum in question was \$369,764.24. The transfer of title from the Attorney to the Complainant was registered on November 2, 2023.
7. Despite this undertaking, the Attorney did not pay the outstanding maintenance and on August 8, 2024 the Complainant was informed by the management company that based on the account balance they were “required to initiate the power of sale application.” Despite writing to the Complainant by email dated October 28, 2024 reminding her of the obligation, the Attorney did not respond or pay. The Complainant filed the complaint on November 9, 2024. The Complainant wrote to the Attorney again on November 13, 2024 and reminded her of the professional undertaking she had given. The Attorney did not make any payment until March 2025, following an email sent to her by the Complainant’s

brother. Even then, the Attorney did not make payment in full and there remained a balance of \$20,543.24. There has not been any further payment by the Attorney.

### Discussion

8. The complaint is that the Attorney failed to fulfil her professional undertaking. The seriousness of failing to fulfil a professional undertaking is not in doubt. In **Sylvester Morris v General Legal Council, ex parte Alpart Credit Union**<sup>1</sup> the Court of Appeal had this to say in describing the importance of a professional undertaking:

“Undertakings take many forms and may be given by an attorney to the court, to a client or to third parties. When the court enforces these undertakings, it is taking punitive action against its officers to ensure a uniform code of honorable conduct. This is made quite clear in the old case of In Re Hilliard (1845) 2 Dow. & L. 919 at pp. 920 - 921 where Coleridge J observed:

“It seems to me that the court does not interfere merely with a view of enforcing contracts, on which actions may be brought, in a more speedy and less expensive mode; but with a view to securing honesty in the conduct of its officers, in all such matters as they undertake to perform or see performed, when employed as such, or because they are such officers. The Court acts on the same principle, whether the undertakings be to appear, to accept declaration, or other proceedings in the course of the cause, or to pay the debt and costs. It does not interfere so much as between party and party to settle disputed rights; as criminally to punish by attachment, misconduct, or disobedience in its officers.”

....  
“The importance of undertakings in the world of commerce and conveyancing cannot be overemphasized. The practice of attorneys giving undertakings relating to certificates of title has been of long standing and the whole business, especially of conveyancing would be brought to a halt parties whether they be attorneys or financial institutions could no longer rely on the word of a member of an honourable profession.”

9. In **Sylvester Morris**, the Court of Appeal considered that the attorney’s “undoubtedly unethical conduct” was greatly aggravated by his cavalier response to the complaint and remarked that the sanction of a reprimand and fine was mild and did not fully reflect the seriousness of the breach.
10. An Attorney’s professional undertaking is one of the most solemn obligations an attorney can assume. The failure to honour it is regarded as serious professional misconduct because it strikes at the core of the profession’s integrity and the administration of justice. It is a binding personal obligation given by an attorney in her professional capacity and it is enforceable summarily by the court because third parties including the court rely on it

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<sup>1</sup> (1985) 22 JLR 1

without further security. Moses LJ stated the position this way in **Izzet v Law Society [2009] EWHC 3590 (Admin)**:

“Again it is with regret that I record that this mitigation demonstrates a complete failure to understand and appreciate the duties of a solicitor. It seems to suggest that some undertakings are more important than others, that if the undertaking relates to a trivial matter may be breached with little serious consequence. It's shorter requires no emphasis that the solicitors profession depends for its integrity on the acknowledgement by each of those who are solicitors coupled with the understanding of the public that if an undertaking is given by a solicitor it will be honored. That proposition goes to the root of the standing and indeed justification for the profession.”

11. The case of **Bolton v The Law Society [1994] 1 WLR 512** sets out the fundamental principle and purposes of the imposition of sanctions by the Tribunal:

“Any solicitor who is shown to have discharged his professional duties with anything less than complete integrity, probity and trustworthiness must expect severe sanctions to be imposed upon him by the Solicitors Disciplinary Tribunal.”

“... a penalty may be visited on a solicitor ... in order to punish him for what he has done and to deter any other solicitor tempted to behave in the same way ...”

“... to be sure that the offender does not have the opportunity to repeat the offence; and”

“... the most fundamental of all: to maintain the reputation of the solicitors' profession as one in which every member, of whatever standing, may be trusted to the ends of the earth ... a member of the public ... is ordinarily entitled to expect that the solicitor will be a person whose trustworthiness is not, and never has been, seriously in question. Otherwise, the whole profession, and the public as a whole, is injured. A profession's most valuable asset is its collective reputation and the confidence which that inspires.” (per Bingham, then Master of the Rolls)

12. The breach of the Canon occurred from the time when the payment was due, which would be by the date when of transfer of the title of the property to the Complainant in November 2023 or a reasonable time thereafter. The Attorney only made partial payment in March 2025, after demands had been made upon her and eight months after the complaint was filed.

13. An 18 month delay in honouring the undertaking (in part) is extremely significant and even though the remaining balance is a small sum, it reflects lack of integrity and disregard for professional obligations. The fact that some payment was made after the Complaint had been filed suggests that this was more likely done from pressure rather than conscience.

14. The Panel took into account that although the Attorney was aware of the Complaint, she did not participate in the proceedings, not even to give an explanation or excuse for the failure to honour her undertaking. One mitigating factor is that there have not been any previous findings of misconduct against the Attorney.

## CONCLUSION

15. Failure to honour a professional undertaking warrants the most serious penalty of striking off in many cases, even where dishonesty is not established, because it is misconduct of the utmost seriousness and the Attorney's departure from the standards of integrity, probity, and trustworthiness expected of a legal practitioner is not to be countenanced.

16. Having considered the matter, the Panel is of the view that a fine alone would be insufficient to mark the gravity of the misconduct, while striking off would be disproportionate; accordingly, the appropriate sanction is an order for a suspension from practice for a period of six months. The Panel therefore imposes the following sanction:

- A. The Attorney Antoneita Hall is suspended from practice for a period of six (6) months.
- B. Costs in the sum of \$200,000.00. is to be paid by the Attorney Antoneita Hall as to which \$150,000.00 is to be paid to the General Legal Council and \$50,000.00 is to be paid to the Complainant.
- C. The sums of money referred to at paragraph B above must be paid on or before April 30, 2026.

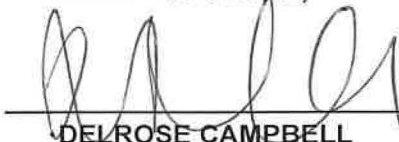
Dated the 28<sup>th</sup> day of February 2026



TANA'ANIA SMALL, KC



KEVIN O. POWELL, KC



DELROSE CAMPBELL