

**Clarke, Anthony Robert**

**22 December 2021**

On 21 December 2021 the Legal Profession Complaints Committee (**Committee**) resolved, pursuant to section 426 of the *Legal Profession Act 2008* (WA) (**Act**), that it was satisfied there was a reasonable likelihood that the practitioner would be found guilty by the State Administrative Tribunal of unsatisfactory professional conduct within the meaning of sections 402 and 438 of the Act by, and in the course of representing his client at the Family Court, making assertions of criminality, including an allegation of fraud, against the other party to the proceeding, as well as members of their family, that were not reasonably supported by evidence in breach of rule 36 of the *Legal Profession Conduct Rules 2010* (WA).

Outcome:     Fine: \$1,000  
                  Public Reprimand