# Ayinde v Haringey and Al-Haroun v Qatar National Bank: fake citations before the High Court

IMPLEMENTED 2025–2026 · PROFESSIONAL SERVICES · UK · BAND F · PROVED
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In two unrelated cases, court documents cited cases that do not exist. A Divisional Court referred lawyers to their regulators and said guidance on AI alone is not enough. It did not find that AI was used in the first case. Since then, courts have applied the judgment to law firms and the AI tools they provide, and in 2026 a disciplinary tribunal struck off a lawyer over AI misuse for the first time.

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NOTICE WORDING LAST UPDATED 16 NOVEMBER 2026

## AT A GLANCE

What went wrong: AI output or malfunction; Weak oversight or controls.

AI used: Generative AI tools, suspected or admitted, used to find or draft legal citations; the court did not name the tools. In Al-Haroun the litigant said he used publicly available AI tools, legal search engines and online sources. In Ayinde the barrister denied using AI and the court did not find that she did..

Implemented: 2025–2026.  Grade: band F, Failure, Proved.

Headline result, as reported: Divisional Court, 6 June 2025: fake citations in two cases, including 18 of 45 authorities that did not exist in one; lawyers referred to regulators and the court said guidance alone is insufficient

## 1 · The case

The facts, as reported by the 8 sources listed at the end. Where a source is silent, the field says "Not reported".

### Organisation

Legal profession in England and Wales, as addressed by the Divisional Court of the King's Bench Division. The legal profession in England and Wales, addressed by a Divisional Court of the High Court under its Hamid jurisdiction, which enforces lawyers' duties to the court. The individuals named below are named in the judgment. Canvas block: 8. Governance and risk. Also 5. People and skills.

### Business challenge

The challenge. The court says the risks of using generative AI for legal research are now well known: freely available tools can produce plausible but false responses, and may cite sources that do not exist.

How it was addressed. In Ayinde, grounds for judicial review settled by a barrister, Ms Forey, cited five cases that do not exist and misstated section 188(3) of the Housing Act 1996. The defendant's solicitor raised this in February 2025. Ritchie J ordered Ms Forey and Haringey Law Centre to pay £2,000 each in wasted costs and referred the matter to the regulators. In Al-Haroun, witness statements for a £89.4 million claim relied on 45 citations, of which 18 cases do not exist; the client said the citations came from publicly available AI tools, legal search engines and online sources, and his solicitor, Mr Hussain, had relied on him without checking. The Divisional Court, led by Dame Victoria Sharp, gave judgment on 6 June 2025. [1] [2] [3] [4] [5] [6] [7] [8]

### Who implemented it

Not reported: the judgment does not name the AI tools or any vendor.

### Technology (SEAM pillar E)

SEAM types: T1 Chat assistants. Deployment: Not reported. Vendors and products: LEAP (Ndaryiyumvire only), LEAP legal software research function (Ndaryiyumvire only).

Where it was built in: Not reported. Mr Al-Haroun said he used publicly available AI tools, legal search engines and online sources; the tools were not named. The court did not find that AI was used in the Ayinde grounds. Later cases named the tools: the research function of LEAP case management software (Ndaryiyumvire) and an AI pilot at Pinsent Masons, whose tool is not named in the judgment (Cork v Smith).

### What changed

Before: guidance on AI had been published by the Bar Council, the SRA and the judiciary. After: the court referred Ms Forey to the Bar Standards Board and Mr Amadigwe and Mr Hussain to the Solicitors Regulation Authority, said guidance alone was insufficient, and said it will ask in future Hamid hearings whether leaders have met their responsibilities. The BSB issued AI guidance in May 2026 and the SRA a warning notice in August 2026, both citing the judgment.

## Cost of failure

£2,000 each against Ms Forey and Haringey Law Centre in wasted costs (Ayinde, as reported in the judgment). Costs in Al-Haroun were reserved at referral; the outcome is not reported in the sources opened. Outcomes of the regulator investigations: Not reported. Later cases: wasted costs against Gordon & Thompson Solicitors, amount left for submissions (Ndaryiyumvire); Pinsent Masons meeting its former clients' costs, including instructing new solicitors (Cork v Smith); amounts: Not reported.

## What it saved

Not applicable [1] [2] [3] [4] [5] [6] [7] [8]

## Governance and control

The court said lawyers who use AI for research must check it against authoritative sources, that the duty cannot be passed to a lay client or to a trainee, and that heads of chambers, managing partners and regulators must take practical measures. It found the Law Centre's response to the defendant's letter inadequate.

**S2 · Accountable owner · Missing (independent source shows it was absent)**
The court found the supervising solicitor's steps in response to the defendant's letter inadequate, and said heads of chambers and managing partners must now take practical measures; the Law Centre had not checked counsel's citations. [1]

**A1 · Safe use · Evidenced**
Guidance existed: the Bar Council (January 2024), the SRA (November 2023) and the judiciary (December 2023, updated April 2025) had warned about AI-generated false citations, but the court found it was not followed. [1]

**A2 · Human in the loop · Missing (independent source shows it was absent)**
The court found a lamentable failure to check material put before it in Al-Haroun, and in Ayinde the Law Centre did not verify counsel's citations. [1]

**A3 · Monitoring and assurance · Evidenced**
The court said it will ask in future Hamid hearings whether leadership responsibilities have been fulfilled, and the SRA later said it had received reports of potential breaches from senior members of the judiciary. In August 2026 the Solicitors Disciplinary Tribunal decided its first case on a lawyer's use of AI and struck the lawyer off. [1] [2] [6]

**A4 · Vendor AI · Missing (independent source shows it was absent)**
Vendor AI was not understood in a later case: a firm's staff filed fictitious cases suggested by the research function of its LEAP case management software, which the solicitor said he was never told could generate fictitious cases. The June 2025 judgment did not name any tools. [7]

**A5 · Agent controls · Not reported**
No agents described.

**A6 · Standards and regulation · Outside scrutiny (a regulator, court, auditor or similar body acted)**
The court referred lawyers to the BSB and SRA and sent the judgment to the Bar Council, the Law Society and the Council of the Inns of Court; the BSB (May 2026) and SRA (August 2026) then issued guidance and a warning notice citing it. Later courts made wasted costs orders and regulator referrals on the same basis, and the Solicitors Disciplinary Tribunal issued its first strike-off for AI misuse in August 2026. [1] [2] [3] [6] [7] [8]

## What worked, what did not, what is unproven

WORKED

– The defendant's solicitor found the fake cases and raised them in February 2025, and a judicial assistant's schedule identified the false citations in Al-Haroun.

– Mr Hussain referred himself to the Solicitors Regulation Authority and Mr Al-Haroun accepted responsibility, which the court noted.

– Later courts applied the judgment consistently: wasted costs against a firm whose staff filed unchecked AI suggestions, and regulator referrals where false material reached the court.

DID NOT

– Five cases cited in the Ayinde grounds do not exist, and the grounds misstated the effect of section 188(3) of the Housing Act 1996.

– In Al-Haroun, 18 of 45 cited cases do not exist; many of the others did not contain the quotations attributed to them.

– Existing guidance did not prevent the incidents; the court said promulgating guidance on its own is insufficient.

– Guidance and the June 2025 warning did not stop further cases, including ones where the AI was supplied by the firm: a research function in widely used case management software (Ndaryiyumvire) and a firm's own AI pilot (Cork v Smith).

UNPROVEN

– Whether AI was used in the Ayinde grounds: Ritchie J said he could not determine it, Ms Forey denied it, and the Divisional Court set out two possible scenarios without deciding between them.

– Outcomes of the BSB and SRA investigations into the lawyers named in June 2025: Not reported.

– How far training, supervision and chambers practice contributed in Ayinde: Ms Forey and her chambers gave differing accounts, and the court left it to the regulator.

– How many of the incidents in the public UK tracker involve AI: its author says inclusion is not proof of an AI hallucination, and confirmed, suspected and disputed entries sit in one list.

## Timeline

Feb 2025 Defendant's solicitor tells Haringey Law Centre that five cited cases cannot be found, then confirms they do not exist [1]

Apr 2025 Ritchie J hears the wasted costs application and later orders Ms Forey and Haringey Law Centre to pay £2,000 each [1]

May 2025 Dias J refers Al-Haroun to the Hamid judge on 9 May; the Divisional Court hears both cases on 23 May [1]

Jun 2025 Divisional Court gives judgment on 6 June, refers lawyers to regulators and invites

May 2026 Bar Standards Board publishes AI guidance citing the Ayinde judgment [3]

Aug 2026 Solicitors Regulation Authority publishes its Misuse of AI warning notice citing the judgment [2]

Oct 2025 County Court at Birmingham orders wasted costs against Gordon & Thompson Solicitors after an application cited two fictitious cases suggested by the research function of its LEAP case management software [7]

May 2026 In Cork v Smith the High Court finds a junior associate at Pinsent Masons used the firm's AI to research a point and the AI invented a rule; the firm refers itself to the SRA and meets its former clients' costs [8]

Aug 2026 Solicitors Disciplinary Tribunal strikes off a registered foreign lawyer who used generative AI in his own defence, the first AI case it has decided, citing the Ayinde invitation to regulators [6]

Sept 2026 A barrister's public UK tracker lists 101 confirmed, suspected or disputed AI citation incidents [5]

## 2 · Grade and SEAM assessment

MarLuc's opinion, made on the evidence above. How cases are graded: marluc.co.uk/case-studies/how-we-rate

### Level of change and impact

Claimed: Not applicable. Grade: F, Failure. Proof: Proved. Level of change: Not graded.

No level assessed: band F, a proved failure in the use of AI in legal work. The judgment concerns individual lawyers' unchecked citations and describes no organisational deployment.

Graded F. A court found that false authorities were put before it in both cases, made a costs order in one, and referred lawyers to the Bar Standards Board and the Solicitors Regulation Authority. The harm is to the administration of justice and the lawyers concerned. The judgment concerns individual lawyers' unchecked use or suspected use of generative AI, and no organisational deployment is described.

### The SEAM view and lessons learnt

The failure sat at the join between a tool's output and the professional duty to verify it, and the later cases show that join moving inside firms. In Ndaryiyumvire the AI was a research function in the firm's case management software, which the solicitor said he was never told could invent cases; in Cork v Smith it was the firm's own AI pilot, and neither the junior associate nor the supervising solicitors checked its output. The AI's part can be separated: in each case it produced the false material, and the harm came from no one checking it. What drove the result was supervision, not the tool. Before copying any AI research tool, a leadership team should answer: which of our systems already contain AI features; who must check AI output before it leaves the organisation, and how we would show that check happened; and whether supervisors know when juniors are using AI on a matter.

1. Verify every citation against an authoritative source before it goes to a court.
2. Treat research from clients, juniors and counsel as unchecked until you have checked it.

4. Find out which systems already contain AI features, including research functions inside case management software, and train staff on what they can get wrong.

### Evidence

Score 3 of 4. Independent: a High Court judgment with written reasons, later County Court, High Court and Solicitors Disciplinary Tribunal decisions applying it, and SRA and BSB documents citing it. Limits: the court did not decide whether AI was used in Ayinde, and regulator outcomes for the lawyers named in June 2025 are not reported.

Evaluation method. Court or tribunal finding: R (Ayinde) v London Borough of Haringey; Al-Haroun v Qatar National Bank [2025] EWHC 1383 (Admin), decided after a hearing on 23 May 2025.

Sources disagree. The British Institute of International and Comparative Law commentary describes the submissions as suspected to have been generated by AI tools. The judgment says Ms Forey denied using generative AI and that the court did not decide the point; in Al-Haroun the client said he used publicly available AI tools. The judgment also records that Ms Forey said she received little supervision, while her chambers disputed this.

Status. Closed as to the court: judgment of 6 June 2025. Regulator investigations into the lawyers named: outcome not reported in the sources opened. The wider problem is ongoing: later courts and the Solicitors Disciplinary Tribunal continue to apply the judgment.

## 3 · Original sources

Read these in full. To challenge a fact or a grade, use the contact form at marluc.co.uk or the link on https://marluc.co.uk/case-studies/ayinde-haringey-al-haroun-fake-ai-citations


[1] National Archives, Find Case Law: R (Ayinde) v London Borough of Haringey; Al-Haroun v Qatar National Bank [2025] EWHC 1383 (Admin), 6 June 2025
https://caselaw.nationalarchives.gov.uk/ewhc/admin/2025/1383

[2] Solicitors Regulation Authority: Misuse of AI - Warning notice (17 August 2026)
https://www.sra.org.uk/solicitors/guidance/misuse-ai/

[3] Bar Standards Board: New guidance supports barristers to safely adopt Artificial Intelligence and emerging technologies (18 May 2026)
https://www.barstandardsboard.org.uk/resources/new-guidance-supports-barristers-to-safely-adopt-artificial-intelligence-and-emerging-technologies.html

[4] British Institute of International and Comparative Law: AI Fabricated Citations and the Legal Profession: Lessons from the High Court (16 September 2025)
https://www.biicl.org/blog/116/ai-fabricated-citations-and-the-legal-profession-lessons-from-the-high-court

[5] Natural & Artificial Law (Matthew Lee, barrister): UK AI Hallucination Cases Tracker (dataset reviewed 27 September 2026)
https://naturalandartificiallaw.com/uk-ai-hallucination-cases-tracker/

[6] Solicitors Disciplinary Tribunal: SRA v Abhishek Kumar, case 12884-2026 (hearing 29 July 2026)
https://solicitorstribunal.org.uk/wp-content/uploads/2026/03/12884-2026-Kumar-.pdf

[7] Judiciary of England and Wales: Ndaryiyumvire v Birmingham City University, County Court at Birmingham, judgment of 14 October 2025
https://www.judiciary.uk/wp-content/uploads/2025/11/Ndaryiyumvire-v-Birmingham-City-University.pdf

[8] National Archives, Find Case Law: Cork v Smith [2026] EWHC 1199 (Ch), 22 May 2026
https://caselaw.nationalarchives.gov.uk/ewhc/ch/2026/1199

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VERSION HISTORY

v1.2 17 November 2026 Update: later cases applying the judgment to firms and their AI tools (Ndaryiyumvire, Cork v Smith), the first Solicitors Disciplinary Tribunal strike-off for AI misuse, and the public UK tracker added as a source.
v1.1 15 November 2026 Method update: standards and regulation (A6) relabelled "outside scrutiny" because the evidence is a regulator, court, auditor or similar body acting, not the organisation's own compliance.
v1.0 15 November 2026 First published