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HEARING

DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of:	**Mr Mehmood Jamshed**
Heard on:	**Thursday, 03 July 2025 and Friday, 03 September 2025**
Location:	**ACCA, The Adelphi, 1-11 John Adam Street, London, WC2N 6AU** **Held Remotely by Microsoft Teams**
Committee:	**HH Suzan Matthews KC (Chair)** **Mr George Wood (Accountant)** **Mr Geoff Baines (Lay)**
Legal Adviser:	**Ms Tope Adeyemi**
Persons present and capacity:	**Mr Mehmood Jamshed (Member)** **Mr Richard Ive (Case Presenter)** **Ms Anna Packowska (Hearings Officer)**
Summary:	**Removal from membership**
Costs:	**£12, 493.00**

INTRODUCTION

1. The Disciplinary Committee ("the Committee") met to hear allegations against Mr Mehmood Jamshed (Mr Jamshed). Mr Jamshed was present on all days of the hearing but not represented. ACCA was represented by Mr Richard Ive. The papers before the Committee consisted of a main bundle numbered 1 – 394, a supplementary bundle numbered 1 – 58, a service bundle number 1 – 15 and an additionals bundle, numbered 1 – 26. At the resuming hearing commencing on 3 September 2025, the Committee were provided with 4 further "additionals" bundles numbered 1- 7, 1- 3, 1- 6 and 1 -11.

BACKGROUND

2. Mr Jamshed become an ACCA member in April 2021. On 19 April 2022 a complaint was received by ACCA which alleged that he had been holding out and conducting public practice without an ACCA practising certificate.

3. ACCA conducted a review of the information available relating to Mr Jamshed's practice and a search of Companies House for Mr Jamshed was conducted which found a company called, Company A. The nature of business was recorded as accounting and auditing activities and 'Tax consultancy.' Mr Jamshed was recorded to have been a director of Company A since 07 February 2022. Companies House records also showed that he had described his occupation on appointment as a director and as a Certified Chartered Accountant. From 10 February 2022, Mr Jamshed was the sole shareholder in the company. As Mr Jamshed did not hold an ACCA practising certificate during this period, ACCA assert that Mr Jamshed had been holding out to be in public practice without holding an ACCA practising certificate.

4. The concerns were put to Mr Jamshed by letter on 8 December 2022 and he was asked a series of questions. ACCA also set out in the letter, details of how Mr Jamshed could regularise his position whilst an investigation was conducted into alleged breaches of the Regulations. Mr Jamshed responded to ACCA on

19 December 2022, however ACCA state that he did not respond to many of the questions posed to him.

5. Mr Jamshed was asked to provide details of what Company A did and his role in the company. Mr Jamshed explained in his response, '*Company A - Please find attached the confirmation statement, i have removed accounting services from it. The website is not existed for this company yet as we only provide admin, business support and bookkeeping activities under this company. I have asked web developer to create website for my company which is still under construction, it will take few months to show everything on website. Hopefully by April / May this year, I will have ACCA PC and i will then be able to do public practice. Can you please let me know if i need to change the name of company if it is causing any problem. I am not sure if i need to change the name'* Mr Jamshed also explained that he wished to regularise his position and to begin with, had amended the SIC code for Company A at Companies House to '*other business support services*'

6. Mr Jamshed was asked to explain his role, responsibilities and duties, when they began and if he continued to hold them. He explained:

"*Role Company A - This company is subcontractors to accountancy firms and perform following functions. My tax advisor limited do not take any responsibility for any work carried out as for any accountancy practice - Work on preparing bookkeeping for personal tax return and send to main accountancy firm for review and sign off. - Provide admin support such as resolving general quires in relation to bookkeeping, taking phone calls and replying to emails. - Prepare accounts up to trial balance and doing full bookkeeping on software for accountants. - Prepare staff cover for the shortage of staff on subcontract basis to different accountancy firms. This is involved preparing annual accounts, payroll and tax returns where work is supervised. We do not have website at the moment as most work is carried out for other firms"*

7. As Mr Jamshed had not fully regularised his position, ACCA requested that he provide a written undertaking confirming he would not carry on public practice until he had obtained a practising certificate issued by ACCA. Mr Jamshed provided a written assurance to ACCA on 17 March 2023, confirming that *'Company A or I will not be offering those services deemed as public practice until such a time I have been issued with a practising certificate".* Mr Jamshed was informed that the name of Company A gave the impression that it provided services involving tax and public practice and that if he wished to continue to be the director and shareholder of the company without being in breach of ACCA's regulations, he would have to amend the company name in addition to ensuring that he did not provide public practice work. ACCA state that Mr Jamshed was asked a range of further questions about his firm to which he did not respond. The questions included confirmation of who the firm's anti-money laundering supervisor was within the meaning of the Money Laundering, Terrorist Financing and Transfer of Funds (information on the payer) Regulations 2017, during the period that he did not hold a practising certificate.

8. ACCA sent a further letter to Mr Jamshed on 17 March 2023. He requested an extension of time to respond and on 22 March 2023 provided ACCA with a '*change of name'* certificate he had submitted to Companies House, which showed that the name of Company A had been changed to 'Company B' on 20 March 2023. ACCA assert no other response was received.

9. As ACCA had not received a response to its questions from Mr Jamshed, an email was sent to him on 5 April 2023 (attaching ACCA's previous letter to him) advising him that his response remained outstanding. A reply was received on 10 April 2023 in which Mr Jamshed stated that *"Again i have cleared my position before and regularise myself as per the options given. Not sure what else to write here".* When asked to confirm whether he held a practising certificate or license with any other accountancy professional body and to provide a copy of details of it, he stated, *"I have yet to receive it in post which will be provided when i receive it."* In relation to describing the firm, Mr Jamshed explained, *"I think Company X have 4 or 5 employees. Most of people working from home*

after covid-19 so i do not get to see everyone." In relation to requests for copies of the business cards and copies of the firm's letterhead, Mr Jamshed asked *"Do you need Company X or Company B".*

10. Mr Jamshed stated that the firm held professional indemnity insurance but that he did not have the documents and would ask for and provide them later. In response to questions around the firm's anti-money laundering supervisor, Mr Jamshed stated, "*HMRC is supervisor. This has been provided previously, please check your files."* Mr Jamshed said he did not have evidence of the new stationary, business cards and signage as yet and that the "*email address and website was in process*". Mr Jamshed also confirmed that he had submitted his last annual CPD declaration (for the year to 2022) to ACCA in January 2023. Mr Jamshed had been provided with and referred to the wording of ACCA's 2022 annual CPD return, which at that point was the last CPD return ACCA held for him. He was asked to comment on his interpretation of specific parts of the declaration. Mr Jamshed's response was as follows, "*I have established the company to provide external accountancy services as subcontractor for other companies*"

11. On 9 June 2023, Mr Jamshed sent an email to ACCA enclosing an Institute of Financial Accountants (IFA) practising certificate in his name for the period between 1 January 2023 to 31 December 2023. ACCA acknowledged receipt and asked Mr Jamshed to reply to the outstanding queries and also to confirm and provide evidence of any further practising certificate he had held with IFA. Mr Jamshed then submitted a further IFA practising certificate in his name for the period 5 April 2022 to 31 December 2022. He also submitted a copy of the professional indemnity insurance policy for Company A and Company B, covering the period 22 October 2022 to 21 October 2023. Mr Jamshed explained on 5 July 2023 that his website had gone live and asked to be informed if anything was missing. ACCA replied to Mr Jamshed on 10 July 2023 setting out what further information and documentation was still required from previous ACCA requests to him. ACCA allege the response received did not

provided answers to the questions and instead stated that he would be applying for a practicing certificate.

12. ACCA wrote to Mr Jamshed again on 8 August 2023, reminding him of the outstanding questions that remained unanswered and asking him to provide his full response to them within a new timeframe. After this exchange, ACCA found out through searches at Companies House, that Company B's name had been changed on Companies House, to *Company C*, a name combining that of Company A and Company B. ACCA wrote to Mr Jamshed, querying what had occurred. In the correspondence, ACCA highlighted that Mr Jamshed had informed ACCA on 19 December 2022 that he had amended the SIC code on Companies House for Company A from '*accounting and auditing activities'* to '*other business support activities'* and that he had informed ACCA on 22 March 2023 that he had changed the name of Company A to Company B on 20 March 2023. He was also reminded of the terms of the written assurance he provided ACCA with on 17 March 2023. ACCA state that Mr Jamshed's actions were all contrary to the written assurance he had provided and to his confirmation to ACCA that he wished to regularise his position and not be in further breach of ACCA's regulations.

13. ACCA conducted further investigations into Mr Jamshed which included typing Company C into a search engine on 24 August 2023. The search brought up a *website 1*, which, when clicked, took ACCA and potentially any member of the public, to a home page and website for Company C. The home page set out the following statement, '*Company C is a firm of dedicated tax advisers, certified accountants and business consultants. We are supporting individuals and businesses in taking care of their tax affairs*.' ACCA state that the website for *'*Company C' set out in great detail and advertised the provision of accountancy services including services within ACCA's definition of public practice.

14. ACCA assert that the information obtained showed that Mr Jamshed had, in order to regularise his position, only changed the name of the company for less than one month before reverting to a name that was in breach of GPR 4 from

15 April 2023 onwards. Companies House records are also said to have showed that Mr Jamshed remained a director of the company throughout the period as well as the sole shareholder. The website of the company showed that it advertised and provided accountancy services including public practice activities. In response to ACCA's further evidence and enquiries regarding it, Mr Jamshed wrote to ACCA on 24 August 2023 stating, *"Please email me directly so I can read and reply to your queries"*. ACCA sent the emails to Mr Jamshed again but state no response to the email was received.

15. In a document dated 18 June 2025 Mr Jamshed set out what he described as his '*Formal Response to Disciplinary Allegations*'. In the response he stated that he had not engaged in public practice as an ACCA member during the period alleged and that "*Company A never represented itself as an ACCA firm*". He went to address the information on Companies House in the following terms, "*I acknowledge that my companies house records briefly included "Chartered Certified Accountant" as occupation due to a transitional oversight".* In respect of the CPD declarations, Mr Jamshed stated that he "*truthfully declared no ACCA public practice conducted because I operated under IFA"*. Addressing the concerns about the alleged breach of the written assurance given to ACCA, Mr Jamshed stated that *"My email to ACCA was sent in panic, not dishonesty. Upon reviewing my IFA PC, I adjusted Company A's operations as I was allowed to do public practice. Company website went live on 5th July 2023 (Exhibit 21: letter from web developer) which I have also sent confirmation email to ACCA".* Regarding the AML registration matter, Mr Jamshed stated that he applied for AML registration in March 2022 and that "*Delays were due to HMRC processing".* Mr Jamshed denied any misrepresentation, harm or misconduct and raised concerns about procedural unfairness and the fairness of the investigation stating that "*The investigation was selective and omitted exculpatory evidence"*.

ALLEGATIONS

16. Mr Jamshed faces the following allegations:

Mr Mehmood Jamshed (Mr Jamshed) an ACCA member:

1. Between 7 February 2022 and 5 December 2023 engaged in public practice without a practising certificate contrary to regulation 3(1)(a) of the Global Practising Regulations 2003.

2. Between 7 February 2022 and 5 December 2023 was a director of Company A (a firm which carried on public practice) contrary to regulation 3(2)(a) of the Global Practising Regulations 2003 (as applicable in 2022-2023).

3. Between 10 February 2022 and 5 December 2023 held shares in Company A, which in effect put him in the position of being a principal in the firm, contrary to Global Practising Regulation 3(2)(b) (as applicable in 2022-2023).

4. Submitted annual CPD returns as set out in Schedule A below, in which he declared or otherwise confirmed that he had not engaged in public practice or words to that effect without holding an ACCA practising certificate.

5. Mr Jamshed's conduct in respect of allegation 4 above was dishonest in that the declarations he provided or any of them were, as he knew, false in that he was at the material time carrying on public practice and did not have an ACCA practising certificate.

6. Failed to comply with a written assurance he had provided to ACCA on 17 March 2023, in order to regularize his position of engaging in public practice without a practicing certificate by confirming to ACCA that, *"[Company A] or I will not be offering those services deemed as public practice until such a time I have been issued with a practicing certificate…*." But continued to engage in public practice without a practising certificate.

7. Mr Jamshed's conduct in respect of allegation 6 above was dishonest in that within one month of providing the written assurance, he had changed the name of Company A, as well as its 'SIC Code' and subsequently advertised public practice activities on its website, with the clear implication that Company A and Mr Jamshed were engaged in public practice activities, contrary to his written assurance and in breach of ACCA's Global Practising Regulations.

8. If Mr Jamshed's conduct, if not found to be dishonest in respect of allegations 4 and 6 above, such conduct in the alternative demonstrates a lack of integrity.

9. In the further alternative the conduct referred to in allegation 4 above, was reckless in that Mr Jamshed failed to have any or sufficient regard to the need to ensure that the declaration he gave was true.

10. Between 7 February 2022 and 31 January 2023 Mr Jamshed provided accountancy services through Company A but failed to register Company A for anti- money laundering purposes in accordance with the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017.

11. In light of any or all of the facts set out at allegations 1 to 10 above, Mr Jamshed is:

    a. Guilty of misconduct pursuant to bye-law 8(a)(i) or
    b. In respect to allegations 1-3 only, liable to disciplinary action pursuant to bye-law 8(a)(iii).

Schedule A

Annual Return	Date of submission (on or about)

2022	10 January 2023
2022	6 October 2023
2023	22 November 2023

PRELIMINARY ISSUES

Admission of further evidence

17. The hearing commenced on 3 July 2025. The Committee heard oral evidence from ACCA's witness and from Mr Jamshed. ACCA had also provided its closing submissions and had closed its case. Due to insufficient time, the Committee was unable to conclude closing submissions from Mr Jamshed and as a result an additional day was scheduled for the hearing to reconvene.

18. The day before the scheduled reconvened hearing, the Committee were informed that Mr Jamshed wished to submit additional documents in support of his case. These documents were said to include a skeleton argument and information from Companies House (amongst other things). ACCA stated in correspondence that it objected to the admissibility of the documents.

19. Once the hearing started Mr Jamshed was asked whether he still wished to submit further documents and to indicate what the documents were. Mr Jamshed stated that as he was aware ACCA would likely object to any application, he did not wish to pursue it. In explaining what the documents were, he stated that one of them included a skeleton argument which provided an overview of his case and the main points he wished to highlight. Mr Jamshed was invited to consider submitting the skeleton argument. He chose not to do so and confirmed that instead he would take the Committee through the points set out in the skeleton argument referred to.

20. To assist the Committee in its consideration of the matter, the Legal Adviser referred the Committee to Regulation 10(4)(a)(i), (ii), and (c) of the Chartered

Certified Accountants' Complaints and Disciplinary Regulations 2014, as amended ('the Regulations') which provides the following:

(a) Subject to any order or direction made at a case management meeting, no later than 21 days before the hearing of their case the relevant person must submit:

(i) if the allegation(s) are denied, a statement of defence;

(ii) such additional documentary evidence and witness statements, whether informal form or otherwise, as the relevant person may wish to be drawn to the Disciplinary Committee's attention;

(c) Evidence submitted less than 21 days prior to the hearing will only be considered by the Disciplinary Committee in exceptional circumstances having regard to the public interest, any prejudice to the Association, and the overall interests of justice.

21. The Committee's attention was also drawn to Regulation 12 (1) and the general provision that sets out that "*Subject to this regulation 12 and to these regulations generally, the Disciplinary Committee shall conduct the hearing in its discretion having regard to the interests of justice, the public, of the relevant person, and of the profession as a whole."*

22. The Committee determined to proceed with the hearing with reference only to the documents that had already been submitted, bearing in mind that no formal application to adduce new evidence was made and that Mr Jamshed stated he would take the Committee orally through the information in his skeleton argument.

Previous regulatory matters

23. Following the Committee's announcement of its determination on the facts and prior to it hearing Mr Jamshed's submissions on sanction, ACCA informed the Committee that Mr Jamshed had a previous regulatory history with ACCA. The complaint related to conduct from 2019 when Mr Jamshed was an ACCA affiliate. A conclusion had been made by an ACCA investigations officer that there was a case to answer in respect of a breaches of Regulations 6 and 8. The complaint did not proceed to a disciplinary committee and was left to rest on Mr Jamshed's file for 5 years. The decision was said to be contained in a '*file note'*.

24. It was proposed that the Committee be provided with a copy of the relevant '*file note'* relating to the concern dated 17 September 2019. Mr Jamshed did not object to the Committee receiving the file note but stated that he wished to submit documents relating to the matter which provided his perspective. In response to this, Mr Ive stated that having reviewed the documents Mr Jamshed proposed to submit, he did not consider they took matters much further but that it was the Committee's decision whether to admit them.

25. The Committee having heard submissions from Mr Jamshed and ACCA determined in the exercise of its discretion that it was both fair and in the public interest for the file note to be admitted and for Mr Jamshed's documents relating to the matter to also be admitted. Both documents were collated into one document and provided to the Committee in a single 15-page bundle labelled "*tabled additionals bundle (5)".*

DECISION ON FACTS AND REASONS

26. The Committee considered with care all the evidence presented, and the submissions made by Mr Jamshed and Mr Ive. It also accepted the advice of the Legal Adviser and bore in mind that it was for ACCA to prove its case and to do so on the balance of probabilities. During closing submissions Mr Jamshed had said that he had been unable to lip read some members of the

Committee during the virtual hearing. He was asked whether he was content to proceed and he confirmed he was.

Allegation 1 - Proved

27. The Committee were provided with records held by ACCA relating to Mr Jamshed's membership which showed that he did not have a practicing certificate between 7 February 2022 and 5 December 2023. Mr Jamshed accepted during cross examination that he had not held a practising certificate during that period. It was also noted by the Committee that it was part of the agreed facts between parties that Mr Jamshed had not held an ACCA practising certificate.

28. The Committee considered whether there was evidence Mr Jamshed engaged in public practice during February 2022 and December 2023 and found clear evidence that he had. Screenshots from Mr Jamshed's website at the time recorded that he was offering to the public accountancy and tax advice which included the provision of public practice activities. Further, records from Companies House showed that on dates during the relevant period, Mr Jamshed had recorded that his firm, Company A, was called [REDACTED]. In light of the evidence that Mr Jamshed engaged in public practice between 7 February 2022 and 5 December 2023 with no practising certificate, the Committee found allegation 1 proved.

Allegation 2 - Proved

29. The records from Companies House indicated that Mr Jamshed was director of Company A between 7 February 2022 and 5 December 2023. Mr Jamshed did not dispute that he was director of the Company A during that period. It was also noted that in correspondence with ACCA dated 22 March 2023, Mr Jamshed admitted that he held a directorship within Company A and was the owner of shares within the Company. Taking the evidence together, the Committee was satisfied that allegation 2 was found proved.

Allegation 3 - Proved

30. The documentary evidence showed that Mr Jamshed held shares within Company A during the relevant period. Mr Jamshed did not dispute the evidence and in an email to ACCA dated 22 March 2023, admitted that he had been the owner of shares within Company A. It followed that the Committee found allegation 3 proved.

Allegation 4 - Proved

31. The Committee were provided with copies of three annual CPD returns completed by Mr Jamshed in 2022 and 2023. The forms were submitted on the dates set out within Schedule A. Under the sections titled *'Declaration'*, Mr Jamshed had checked the boxes within the returns to confirm he was not in public practice, he then signed his signature at the bottom of each of page.

32. Based on the content of the forms, the Committee was satisfied Mr Jamshed had declared to ACCA that he had not engaged in public practice. As the Committee had already found that during the period in which the returns were completed and submitted that Mr Jamshed did not have a practising certificate, it was allegation 4 was therefore found proved.

Allegation 5 – Proved

33. The Committee moved on to consider whether in regards to allegation 4 Mr Jamshed's acted dishonestly. His conduct was considered having regard to the test for dishonesty as set out at paragraph 74 in the case of *Ivey v Genting Casinos (UK) Ltd t/a Crockfords [2017] UKSC 67 ("Ivey"):*

34. *"When dishonesty is in question the fact-finding tribunal must first ascertain (subjectively) the actual state of the individual's knowledge or belief as to the facts. The reasonableness or otherwise of his belief is a matter of evidence (often in practice determinative) going to whether he held the belief, but it is not*

an additional requirement that his belief must be reasonable; the question is whether it is genuinely held. When once his actual state of mind as to knowledge or belief as to facts is established, the question whether his conduct was honest or dishonest is to be determined by the factfinder by applying the (objective) standards of ordinary decent people. There is no requirement that the defendant must appreciate that what he has done is, by those standards, dishonest."

35. The Committee considered Mr Jamshed's submission that he held a Practising Certificate with the IFA and that problems with the presentation of the form on the screen contributed to, or caused him, to complete the forms in the manner that he did. The Committee however were mindful that the wording that preceded the section where Mr Jamshed had declared he was not in public practice was straightforward, specifically referencing ACCA and in turn leaving no doubt as to what was being asked. As a result, it would have been clear to Mr Jamshed that holding a Practising Certificate with the IFA was not relevant when making the declaration. The Committee also did not find evidence to support that IT issues or the manner in which the information appeared on the screen could have contributed or caused Mr Jamshed to make the declarations he did. Overall, the Committee found that Mr Jamshed knowingly completed and signed the returns to confirm that he was not engaged in public practice when he was fully aware that he was. It was satisfied that by the ordinary standards of decent people, such conduct was dishonest. Allegation 5 was therefore found proved.

Allegations 6 – Proved

36. The Committee were provided with a copy of an email Mr Jamshed sent to ACCA, dated 17 March 2023. It was considered that the wording of the letter represented an assurance by Mr Jamshed that he would not engage in public practice until he had been issued with a Practicing Certificate. The Committee was satisfied that Mr Jamshed was under an obligation to comply with the

assurance he made to ACCA in the letter due to his status as a member of ACCA and a regulated individual.

37. Screenshots provided to the Committee after the email was sent record that on 15 April 2023 Mr Jamshed changed the name of his company to Company C and amended the nature of business code on Companies House (SIC) code to '*Accounting and Auditing activities' and 'tax consultancy'*. Mr Jamshed also referred to his occupation as *'Chartered Certified Accountant'*. The Committee considered that such actions represented a failure to comply with the written assurance he had provided ACCA with on 17 March 2023 as the steps he took were consistent with engagement in public practice, yet he had not been issued with a Practicing Certificate. Overall, the Committee found that Mr Jamshed had continued to practice without a practicing certificate contrary to the assurance he had made. It therefore found allegation 6 proved.

Allegation 7 - Proved

38. Having found that Mr Jamshed had acted contrary to his written assurance, the Committee went on to consider whether his conduct in relation to allegation 6 was dishonest.

39. Mr Jamshed had changed the name of Company A and the SIC Code on Companies House and had also advertised public practice on his website within one month of providing the written assurance. The Committee considered that all the actions were undertaken knowingly. This, together with the short time frame in which Mr Jamshed began to act contrary to the assurance given by him to ACCA, strongly indicated that at the time he made the assurance, he had no intention of ceasing public practice without a practising certificate. Taking all the evidence together the Committee concluded that Mr Jamshed gave a false assurance to ACCA and that his conduct was dishonest.

Allegation 8 – N/A

40. As allegation 5 was found proved, the Committee did not go on to consider allegation 8 which was drafted in the alternative.

Allegation 9 – N/A

41. As allegation 5 was found proved, the Committee did not go on to consider allegation 9 which was drafted in the alternative.

Allegation 10 – Proved

42. Mr Jamshed did not deny Company A was not AML registered between 7 February 2022 and 31 January 2023. He explained in evidence that he had applied to HMRC for Company A to be registered, paying the appropriate fees in March 2022. However, due to not receiving the relevant codes from HMRC Mr Jamshed stated he had been unable to register Company A within the time period.

43. The Committee accepted that it may have taken some time for the process of AML registration to be completed. Notwithstanding any delay in the process, the Committee found that there remained a requirement for AML registration to be complete prior to accountancy services being provided by Company A. This had not occurred. In light of this, allegation 10 is found proved.

Allegation 11 – Proved

44. Mr Jamshed's behaviour found proved involved him acting dishonestly, acting contrary to an assurance he had given to ACCA and in violation of applicable rules and regulations. The Committee also considered that members of the Public could have been misled into believing that Mr Jamshed was providing accountancy services in compliance with Global Practising regulations, with the potential for them to have engaged his services on that basis.

45. The Committee took into account the concerns raised by Mr Jamshed around how ACCA had treated him, which included that he had been sent confusing and intimidating communications. The Committee considered all the communications between Mr Jamshed and ACCA. It found nothing from the tenor and tone of the emails to be oppressive or unfair. Although Mr Jamshed stated that he did not understand what was being asked, the Committee considered that ACCA were clear and explicit about what information he needed to provide. Overall, the Committee found Mr Jamshed's conduct to have had the potential to undermine public confidence in the accountancy profession and the ACCA as a regulatory body. Such behaviour fell far short of what was expect in the circumstances and was very serious. The Committee therefore found Mr Jamshed's actions to amount to misconduct. Allegation 11 was therefore found proved.

SANCTION AND REASONS

46. In reaching its decision on sanction, the Committee took into account the submissions made by Mr Jamshed and Mr Ive. The Committee referred to the Guidance for Disciplinary Sanctions issued by ACCA and had in mind that the purpose of sanctions was not to punish Mr Jamshed but to protect the public. Furthermore, any sanction must be proportionate. The Committee accepted the advice of the Legal Adviser and considered the sanctions, starting with the least serious sanction first.

47. The Committee turned first to consideration of the aggravating and mitigating features in this case. The Committee acknowledged that Mr Jamshed had engaged with the regulatory process to a degree. This was considered to be to his credit. Aggravating features were also identified. The Committee found that Mr Jamshed acted deliberately, had shown no insight into his conduct and noted that at no point had he shown any remorse. His conducted was also sustained over a period of years and had the potential to cause reputational harm to the accountancy profession.

48. Set against those mitigating and aggravating factors and taking into account all the circumstances of the case, the Committee did not think it was appropriate, nor in the public interest to take no further action. Neither did it consider it would be appropriate to order an admonishment in a case where (as here) an ACCA Member had acted dishonestly and failed to comply with ACCA's rules and regulations.

49. The Committee then considered whether to reprimand Mr Jamshed. The guidance indicates that a reprimand would be appropriate in cases where the conduct is of a minor nature, and there is sufficient evidence of an individual's understanding and genuine insight into the conduct found proved. The guidance goes on to state that a reprimand may be appropriate where the conduct was not in deliberate disregard of professional obligations and the period of misconduct was stopped as soon as possible. The Committee did not find any of those factors to be present in the current instance. Mr Jamshed was found by the Committee to have shown no insight, his conduct was prolonged and it was not considered to be of a minor nature.

50. The Committee moved on to consider whether a severe reprimand would adequately reflect the seriousness of the case. The guidance indicates that such a sanction would usually be applied in situations where the conduct is of a serious nature but where there are particular circumstances of the case or mitigation advanced which satisfy the Committee that there is no continuing risk to the public and that corrective steps had been taken to address the conduct and ensure such behaviour was not repeated. The Committee was not provided with evidence to show these criteria to be met and Mr Jamshed's conduct in totality was considered to be too serious for a severe reprimand.

51. The Committee went on to consider the guidance relating to exclusion from membership. Mr Jamshed had acted dishonestly over a sustained period, shown no remorse and had acted in a way that had the potential to bring the profession into disrepute. The Committee considered his actions to be fundamentally incompatible with being an ACCA Member and that in all the

circumstances, removal from the register was the most appropriate and proportionate sanction.

COSTS AND REASONS

52. ACCA applied for costs in the sum of £12,493.50. The application was supported by schedules providing a breakdown of the costs incurred by ACCA in connection with the hearing. Mr Jamshed completed a Statement of Financial Position and provided further details relating to his finances in oral evidence.

53. The Committee were satisfied of ACCA's entitlement to its costs, considering them to have been fairly incurred. It noted the investigation into the allegations had been lengthy and protracted but found this to be the case due to Mr Jamshed's conduct. The Committee took into account Mr Jamshed's evidence [PRIVATE] but noted there was an absence of documentary evidence to support his position and that his assertions relating to his finances were conflicting. Overall, the Committee did not consider the evidence provided by Mr Jamshed regarding his finances to be reliable and determined that ACCA was entitled to its costs in the sum of £12,493.00.

EFFECTIVE DATE OF ORDER

54. In accordance with Regulation 20(1)(b) of the Regulations, the order relating to Mr Jamshed's exclusion from membership will take effect immediately. The Committee considered this appropriate in light of the reputational and public protection risks identified.

HH Suzan Matthews KC
Chair
29 September 2025