

## HEARING

### DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

#### REASONS FOR DECISION

**In the matter of:** Mr Mahmoud Eid Mohamed Mostafa

**Heard on:** 26 May 2026

**Location:** Held Remotely by Microsoft Teams

**Committee:** Dr Helen Goulding (Chair)  
Ms Fiona MacNamara (Accountant)  
Dr Jackie Alexander (Lay)

**Legal Adviser:** Ms Tope Adeyemi

**Persons present  
and capacity:** Mr Ryan Ross (Case Presenter on behalf of ACCA)  
Ms Aimee Murphy (Hearings Officer)

**Summary:** Removal from the student register

**Costs:** £6,282.50

#### INTRODUCTION

1. The Disciplinary Committee (“the Committee”) met to hear allegations against Mr Mahmoud Eid Mohamad Mostafa (Mr Mostafa). Mr Mostafa was not present at the hearing and was not represented. ACCA was represented by Mr Ryan Ross. The papers before the Committee included a main bundle numbered 1 – 155, and a service bundle numbered 1 - 20.

## **PRELIMINARY MATTERS**

### ***Service of papers***

2. The Committee first considered whether the appropriate documents had been served on Mr Mostafa in accordance with the Complaints and Disciplinary Regulations (“the Regulations”). The Committee took into account the submissions made by Mr Ross on behalf of ACCA and it also took into account the advice of the Legal Adviser on service.
3. Included within the Service Bundle was the Notice of Hearing dated 28 April 2026 (thereby satisfying the 28-day notice requirement) which had been sent to Mr Mostafa’s email address as it appears on ACCA’s register. The Notice included the correct date, time and remote venue for the hearing and also Mr Mostafa’s right to attend the hearing by telephone or video link, to be represented and to request an adjournment if he wished. The service bundle also included an email dated 28 April 2026 to Mr Mostafa which included a secure link to the documentation regarding the hearing and a delivery receipt dated the same day.
4. Having considered the relevant documents, the Committee was satisfied that notice had been served in accordance with the Regulations.

### ***Proceeding in absence***

5. Having concluded that proper notice had been served in accordance with the regulations, the Committee went on to consider whether to exercise its discretion to proceed in the absence of Mr Mostafa. The Committee bore in mind that Mr Mostafa had been sent a number of emails by ACCA’s Hearings Officer asking if he would be attending the hearing with no response being received. The most recent email had been sent on 19 May 2026. It noted that no request for an adjournment had been made by Mr Mostafa and that the allegations were serious.
6. The Committee was of the view that Mr Mostafa’s attendance was unlikely to be secured if the hearing was held on a different date, he had not engaged at

all with ACCA, had not sought an adjournment and in the Committee's judgement had voluntarily absented himself. Balancing the interests of Mr Mostafa against the public interest, the Committee concluded that it was in the interests of justice that the matter proceed notwithstanding Mr Mostafa's absence.

### ***Admissibility of evidence***

7. ACCA sought to adduce the witness statement and exhibits of two of its staff, Person A and Person B. ACCA stated that it had invited Mr Mostafa to comment on their evidence within the Case Management Form sent out in advance of the hearing, receiving no response. It was not proposed that they be called and therefore an application was made to adduce their evidence as hearsay.
8. The Committee considered that the evidence of portions of Person A and Person B evidence could be described as 'hearsay'. Regulation 12 (2) of the Chartered Certified Accountants' Complaints and Disciplinary Regulations 2014 ('CDR') allows the Committee, "*subject to the requirements of justice and fairness*", to admit evidence "*Whether or not that evidence would be admitted in a court of law*". The Regulations go on to add that the "*Disciplinary Committee shall take into account the fact that any disputed oral evidence of a witness has not been tested in cross-examination when considering what weight, if any, should be attached to it*". The Committee also took into account the case law regarding the admissibility of hearsay, in particular the guidance referred to by the Legal Adviser as set out in the case of *Thorneycroft v Nursing and Midwifery Council* [2014] EWHC 1565 Admin.
9. In considering the application the Committee took into account that both witnesses had been available to give evidence but in the absence of comments from Mr Mostafa had been stood down. The Committee also bore in mind that Person A and Person B were professional witnesses and that there was no information to show their evidence was disputed. With these points in mind the Committee determined to admit the statements and accompanying exhibits of Person A and Person B.

### ***Application to amend allegation***

10. An application was made by ACCA to amend the stem of allegation 1 – 4 and to amend allegation 1. Specifically, ACCA sought to remove reference to “*during the exam on 06 June 2025*” from the stem of the allegation and to add that text to allegation 1. Allegation 1 would therefore read as follows: “*During a centre-based ACCA Diploma in International Financial Reporting (DiplIFR) exam (“the exam”) on 06 June 2025, copied and/or reproduced ACCA Exam content and/or permitted another to do the same, contrary to Examination Regulation 13*”. It was submitted by ACCA that the proposed changes did not affect the gravamen of the allegations or create any prejudice to Mr Mostafa.
11. Regulation 10(5) of the Chartered Certified Accountants’ Complaints and Disciplinary Regulations 2014 (‘CDR’) allows the Committee at any stage, upon the application of either party or on its own motion, to amend the allegations provided the relevant person is not prejudiced in the conduct of their defence.
12. The Committee did not consider that the proposed changes materially changed the allegations and was satisfied that no prejudice or unfairness would be caused to Mr Mostafa if they were permitted. It was therefore content to grant the application.

## **BACKGROUND**

13. Mr Mostafa was first registered as a student of ACCA on 02 September 2021. On 06 June 2025 Mr Mostafa sat the Diploma in International Financial Reporting (DiplIFR) exam at ACCA’s Giza, Cairo exam centre. As a student of ACCA, Mr Mostafa is bound by the Association’s Bye-laws and Regulations, including the Examination Regulations and Examination Guidelines. As part of the exam process, Mr Mostafa would have agreed to and be bound by ACCA’s Code of Ethics and Conduct, Bye-laws and Regulations, including the Examination Regulations and Guidelines.
14. On or about 10 and 11 June 2025, ACCA received emails from two whistleblowers reporting student malpractice in relation to the DiplIFR exam. The witness statement of Person A at ACCA details the review of the evidence provided by the whistleblowers which was two images from a

Facebook profile named 'Spicy IFRS with Mahmoud Eid' (the Facebook profile). The images showed summaries of exam content covered in four DipIFR June 2025 questions.

15. A review of the Facebook profile itself was conducted by ACCA which it states revealed three additional posts that featured ACCA DipIFR June 2025 exam content and multiple posts relating to mock exams, exam preparation and analysis of historic exam content. A witness statement was provided by Person B at ACCA. Person B reviewed the content and determined that a number of the images were from an ACCA June 2025 Exam. The profile was also found to use 'ACCA' and 'ACCA Content Partner' branding.
16. The Facebook profile details the name Mahmoud Eid with a telephone number and email address. The telephone number was found by ACCA to match the number Mr Mostafa provided to ACCA as contact information. Due to the information arising from the review, the complaint was referred for investigation.
17. On 10 September 2025, ACCA wrote to Mr Mostafa, advising him that ACCA were in receipt of concerns regarding his conduct at his ACCA DipIFR exam of June 2025. The letter set out allegations as well as a number of questions for him to answer. Mr Mostafa is said to not have provided a response to the email of 10 September 2025.
18. As ACCA had not received a response from Mr Mostafa to their letter of 10 September 2025, ACCA sent Mr Mostafa further emails on 26 September 2025. ACCA also attempted to telephone Mr Mostafa on the number he had registered with ACCA. A note records that the line rang once, then was switched off and there was no facility to leave a message.
19. As ACCA had not received a response to their letters, emails and telephone call, a further password protected email was sent to Mr Mostafa, by ACCA on 22 October 2025. ACCA also sent an unencrypted email to Mr. Mostafa on the same date. The password protected email asked Mr Mostafa to respond to ACCA's letter of 10 September 2025 and advised him that due to his failure to co-operate with the investigation, an allegation under Complaints and

Disciplinary Regulation 3(1) may be raised against him, if ACCA did not receive a satisfactory response from him. ACCA also attempted to telephone Mr Mostafa, on his registered ACCA telephone number. No response was received and therefore further emails were sent to Mr Mostafa on 31 October 2025. He was asked to respond to the contents of ACCA's letter to him of 10 September 2025 and reminded that due to his failure to co-operate with ACCA's investigation, an allegation under Complaints and Disciplinary Regulation 3(1) would be raised against him. ACCA also attempted to telephone Mr Mostafa on his ACCA registered telephone number. There was no answer to the call and no facility to leave a message.

## **ALLEGATIONS**

20. Mr Mostafa faces the following allegations as amended:

Mr Mahmoud Eid Mohamed Mostafa, a student of the Association of Chartered Certified Accountants (ACCA);

1. During a centre based ACCA Diploma in International Financial Reporting (DiplIFR) exam ("the exam") on 06 June 2025, copied and/or reproduced ACCA Exam content and/or permitted another to do the same, contrary to Examination Regulation 13.
2. Distributed, and/or allowed distribution of ACCA Examination content, contrary to Exam Regulation 13.
3. Since about 10 June 2025, contrary to Section B4 of ACCA's Code of Ethics and Conduct, used ACCA's name and/or logo on Facebook publications when not permitted to do so.
4. Mr Mostafa's conduct in respect of any or all of the above was dishonest in that:
  - (a) He sought to exploit copied and/or reproduced examination material belonging to ACCA for commercial gain and/or:

- (b) He intended to gain an unfair advantage for himself and/or another in future examinations; and or:
  - (c) He sought to assert an affiliation with and/or endorsement by ACCA to which he was not entitled.
- 5. In the alternative in respect to of any or all of the above conduct Mr Mostafa failed to demonstrate integrity.
- 6. Failed to co-operate with the consideration or investigation of this complaint in that he failed to respond to any or all of ACCA's correspondence set out below, contrary to Regulation 3(1) of the Complaints and Disciplinary Regulations 2014, on the following dates:
  - (a) 10 September 2025;
  - (b) 26 September 2025;
  - (c) 22 October 2025;
  - (d) 31 October 2025
- 7. By reason of his conduct, Mr Mostafa is:
  - (a) Guilty of misconduct and liable to disciplinary action pursuant to bye-law 8(a)(i), or in the alternative,
  - (b) In respect of Allegations 1, 2, 3 and/or 6, is liable to disciplinary action pursuant to bye-law 8(a)(iii).

## **DECISION ON FACTS AND REASONS**

- 21. The Committee considered with care all the evidence presented, and the submissions made by Mr Ross. 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.

### **Allegation 1 - Proved**

22. The Committee had been provided with copies of screenshots from a Facebook profile called 'Spicy IFRS with Mahmoud Eid' (the Facebook profile). The screenshots had been shared by the whistleblowers who had complained to ACCA. Further Facebook screenshots had subsequently been exhibited by Person A and Person B at ACCA.
23. In their statement, Person A set out that ACCA's analysis confirmed that the screenshots from the profile provided by the whistleblowers featured ACCA DipIFR June 2025 exam content and that three additional posts from the Facebook profile also featured such content. Person A had also noted that the Facebook profile included a telephone number that exactly matched the telephone number provided to ACCA by Mr Mostafa. Person B commented that a selection of the screenshots provided from the Facebook profile that had been provided to them to review featured a breakdown of live questions from the June 2025 exam.
24. The Committee accepted the evidence of Person A and Person B, finding that there was clear evidence that real exam content had been copied and reproduced on the Facebook profile bearing Mr Mostafa's name and registered contact details. In light of the evidence, the Committee was satisfied that allegation 1 was found proved.

### **Allegation 2 – Proved**

25. The Committee next considered whether Mr Mostafa had distributed, and/or allowed distribution of ACCA exam content. It bore in mind when considering the allegation that the concerns had been brought to ACCA's attention by whistleblowers who had found the information in the public domain. The information was subsequently confirmed by ACCA to be ACCA content from the exam that Mr Mostafa had sat in June 2025. The Committee found there to be no other likely explanation as to how the content would have been available on Facebook had Mr Mostafa not been involved in putting it there. Therefore, in all the circumstances, the Committee found allegation 2 proved to the relevant standard.

### **Allegation 3 – Proved**

26. Person A in their statement sets out that the concerns raised by the two whistleblowers were received by ACCA on or about 10 June 2025 and 11 June 2025. Person A added that additional profiles bearing Mr Mostafa's name (Mahmoud Eid) are included on Facebook sites and use ACCA branding. Screenshots from those profiles have been provided to the Committee who note that they do include ACCA's name or logo in multiple places.
27. The Committee went on to consider whether Mr Mostafa was permitted to use ACCA's logo. Section B4 of ACCA's code of ethics stated that ACCA's logo can only be used by members who hold a current and valid practising certificate. As Mr Mostafa is recorded on ACCA's database as being a student, he is not entitled to use ACCA's branding. Taking all the evidence together, the Committee was satisfied that Mr Mostafa used ACCA's name and logo on Facebook publications when not permitted to do so. It follows that allegation 3 was found proved.

### **Allegation 4**

28. The Committee moved on to consider whether Mr Mostafa's conduct was dishonest in the manner alleged by ACCA. His conduct in this regard 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"):

*"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."*

**Allegation 4 (a) – Proved**

29. The Committee found that Mr Mostafa had knowingly distributed ACCA exam content on his Facebook pages featuring his name and telephone number. He appeared to be charging for this service. The Committee was therefore satisfied that Mr Mostafa had reproduced examination material belonging to ACCA for commercial gain. Both actions were considered by the Committee to be dishonest by the standards of ordinary decent people. In all the circumstances, the Committee found allegation 4 (a) proved.

**Allegation 4 (b) – Proved**

30. In reproducing ACCA exam material and placing it in the public domain, the Committee found that Mr Mostafa had provided others with the opportunity to gain an unfair advantage in future ACCA exams. The Committee found such conduct to be clearly dishonest.

**Allegation 4 (c) – Proved**

31. The Committee had already found that Mr Mostafa was responsible for the exam related content on the Facebook profiles featuring his name and the ACCA logo. It also found that Mr Mostafa would have been aware he did not have permission to use ACCA's logo and that by doing so he was giving the impression that he had an affiliation with ACCA, when he did not. Such conduct was found by the Committee to be dishonest by the standards of ordinary decent people. Allegation 4 (c) was therefore found proved.

**Allegation 5 – N/A**

32. As the Committee found the conduct was dishonest it was not necessary for it to consider whether his behaviour failed to demonstrate integrity as this was alleged in the alternative.

### **Allegation 6 (a) – (d) - Proved**

33. Copies of letters sent by email to Mr Mostafa following the referral of the matter to ACCA's investigation team were provided. The letters dated 10 September, 26 September 22 October and 31 October 2025 contained information on the nature of the concerns about his conduct and requested that he respond to ACCA by specific dates. There is no evidence that any responses were received from Mr Mostafa. The screenshots from ACCA's records show that all the emails were sent to the email address Mr Mostafa had provided ACCA with and successful delivery receipts have been provided. Overall, the Committee was satisfied that Mr Mostafa had received the correspondence.
34. The Committee was of the view that consistent efforts had been made to contact Mr Mostafa using the details he had provided to ACCA. There was a duty on him to co-operate and by not replying to the emails sent to him or returning the calls made to him, he had failed in that duty. It followed therefore that allegations 6 (a) – (d) were found proved.

### **Allegation 7(a)**

35. The Committee turned to consider whether the matters found proved amounted to misconduct.
36. The matters found proved concerning Mr Mostafa related to his dishonest actions in sharing ACCA exam content on the internet for commercial gain. He had also used ACCA's logo without permission and failed to co-operate with ACCA's investigation.
37. Such conduct was considered by the Committee to fall far short of what was expected of a student of ACCA and to be very serious. His behaviour also had the potential to undermine the integrity of ACCA's examination process and to undermine the public's confidence in the accountancy profession. In all the circumstances the Committee found Mr Mostafa's actions to amount to misconduct. It follows that allegation 7 (a) was found proved.

### **Allegation 7 (b)**

38. As allegation 7 (a) was found proved, the Committee did not go on to consider Allegation 7 (b) which was drafted in the alternative.

### **SANCTION AND REASONS**

39. In reaching its decision on sanction, the Committee took into account the submissions of ACCA. 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 Mostafa 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.
40. The Committee turned first to consideration of the aggravating and mitigating features in this case. The Committee were made aware that Mr Mostafa had no previous disciplinary history and considered this to amount to mitigation.
41. Aggravating factors were identified. Mr Mostafa was found to have provided others with the opportunity to gain an unfair advantage in ACCA examination. By doing so he undermined the integrity of ACCA's examination process and could have enabled individuals who did not have the relevant competence to gain ACCA qualifications thereby causing harm to the public. Furthermore, Mr Mostafa's conduct took place over a period of time and he had provided no evidence of insight or remediation into his conduct.
42. Taking into account all the circumstances of the case and bearing in mind the seriousness of the matters found proved, 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 student had acted dishonestly and failed to co-operate with his regulator.
43. The Committee then considered whether to reprimand Mr Mostafa. 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 that the period over which misconduct took place was short and it was stopped as soon as possible. The Committee did not find those factors to be present.

44. 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. There was no evidence that Mr Mostafa had taken any corrective steps, and it was noted that the exam content on the Facebook profiles bearing his name appeared to still be live, presenting a continued risk to the public.
45. The Committee went on to consider the guidance relating to removal from the student register. Mr Mostafa's misconduct involved dishonesty, had been repeated and also had the potential to undermine the integrity of ACCA's examination process. Such conduct was considered to be a serious departure from the standards expected of him and fundamentally incompatible with student membership. In all the circumstances the Committee considered removal from the student register to be the most appropriate and proportionate sanction

## **COSTS AND REASONS**

46. ACCA applied for costs in the sum of £6,282.50. The application was supported by a schedule providing a detailed breakdown of the costs incurred by ACCA in connection with the hearing. A simple costs schedule was also provided. No information had been provided by Mr Mostafa about his finances.

47. The Committee was satisfied that ACCA's costs were reasonable and properly incurred and therefore in its discretion awarded costs against Mr Mostafa in the full amount of £6,282.50.

**EFFECTIVE DATE OF ORDER**

48. The Committee determined that in the interests of the public the sanction of removal from the student register should take effect immediately in accordance with Regulations 20(1)(b) of the Regulations.

**Dr Helen Goulding**  
**Chair**  
**26 May 2026**