

CONSENT ORDER HEARING

**CONSENT ORDER CHAIR OF THE ASSOCIATION OF
CHARTERED CERTIFIED ACCOUNTANTS****REASONS FOR DECISION**

In the matter of: Mrs Irina Stucere

Heard on: Thursday, 17 July 2025

Location: Remotely, via Microsoft Teams

Chair: Mr Andrew Gell

Legal Adviser: Ms Giovanna Palmiero

Outcome: The Chair made orders in the terms of the Consent Order:
Draft Agreement that Mrs Irina Stucere be reprimanded and
pay costs to ACCA in the sum of £2,219.50.

1. This matter has been referred to a Chair of the Disciplinary Committee of ACCA ("the Chair") pursuant to Regulation 8(8) of The Chartered Certified Accountants' Complaints and Disciplinary Regulations 2014, as amended ("the Regulations") for the Chair to determine, on the evidence before him, whether to approve or reject the Consent Order: Draft Agreement that has been agreed by ACCA and Mrs Irina Stucere.

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2. The Chair had before him a COC Bundle of Papers, numbered pages 1-6, COC Consent Order Committee Referral Form, numbered pages 1 and a Referral to Consent Orders Chair Consent Order: Draft Agreement, numbered pages 1-5.
3. The Chair considered the proposed consent order in the absence of the parties and without a hearing in accordance with Regulation 8(9) of the Regulations.
4. The Chair was satisfied that Mrs Irina Stucere was aware of the terms of the proposed Consent Order and noted that she had signed the proposed consent order on 12 June 2025.
5. The Chair noted the terms of the 'Consent Order: Draft Agreement' as follows:

"The Association of Chartered Certified Accountants (ACCA) and Mrs Irina Stucere ("the Parties), agree as follows:

1. Mrs Irina Stucere, an ACCA member, admits the following:
 - a) Between 29 December 2020 and 20 May 2025, she was a director of a firm holding out to be in public practice, contrary to Membership Regulation 8(2)(a)(iii) (while an ACCA student and affiliate) and Global Practising Regulation 3(2)(a) (as while an ACCA member).
 - b) Between 29 December 2020 and 20 May 2025, held rights in a firm holding out to be in public practice which in effect put her in a position of principal of the firm, contrary to Membership Regulation 8(2)(a)(iv) (while an ACCA student and affiliate) and Global Practising Regulation 3(2)(b) (while an ACCA member).
 - c) Between December 2020 and October 2024, provided accountancy services within the terms of the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 and failed to obtain anti-money laundering supervision with HMRC or another body recognised for such purposes, as required by Membership Regulation 8(2)(j) (while an ACCA student and affiliate)

and Global Practising Regulation 3(2) of Annex 1 (while an ACCA member).

- d) By reason of the conduct above, Mrs Stucere is guilty of misconduct pursuant to bye-law 8(a)(i)

2. That Mrs Irina Stucere shall be reprimanded and shall pay costs to ACCA in the sum of £2,219.50.

BRIEF BACKGROUND

6. On 04 February 2013, Mrs Stucere became a student of ACCA, an affiliate on 12 April 2021 and a member of ACCA on 27 May 2021.
7. On 28 June 2024, a complaint was raised against Mrs Stucere.
8. The complaint was put to Mrs Irina Stucere by ACCA and she provided a response.
9. Mrs Stucere was the sole director and 100% shareholder in the firm, Firm A (“the firm”) since incorporation on 29 December 2020 to when the firm was finally dissolved by voluntary strike off on 20 May 2025.
10. During the relevant period, Mrs Stucere’s main focus was in full-time employment with another company. However, her firm also provided administration and bookkeeping services such as keeping a record of bills and receipts in software and in Excel.
11. Mrs Stucere failed to obtain anti-money laundering supervision for the firm with HMRC or another body recognised for such purposes.
12. Although the firm did not carry out public practice work, it was holding out as available to carry on public practice activities, as defined by Global Practising Regulation 4(1), by virtue of:
 - The word “Accounting” in its name;

13. Mrs Stucere's LinkedIn profile also referred to her as a "Chartered Certified Accountant" and a partner of "Outsourced ACC Chartered Accountants & Business Consultants".
14. Following correspondence with ACCA, Mrs Stucere regularised her position, so she was no longer in breach of ACCA's regulations. She updated her LinkedIn profile and the firm stopped operating in October 2024 and was dissolved by voluntary strike off on 20 May 2025.
15. ACCA proposed that the matter be disposed of via a consent order and Mrs Stucere agreed to the disposal.

DECISION AND REASONS

16. Under Regulation 8(8) of the Regulations the Chair must determine, on the evidence before him, whether it is appropriate to approve or reject the draft consent order or to recommend any amendments.
17. The Chair was satisfied that there was a case to answer and that the Investigating Officer had followed the correct procedure. The Chair considered the bundle of documents together with Mrs Irina Stucere's admissions and found Allegations 1a, 1b, 1(c), and 1(d) proved. The Chair was satisfied that Mrs Irina Stucere's actions and omissions amounted to misconduct and had brought discredit to herself, the Association and the accountancy profession.
18. The Chair noted that under Regulation 8(12), he should only reject the signed consent order if he is of the view that the admitted breaches would, more likely than not, result in exclusion from membership.
19. The Chair considered the seriousness of the allegations and the public interest, which includes the protection of the public, the maintenance of public confidence in the profession, and the declaring and upholding of proper standards of conduct and performance. He considered the principle of proportionality and balanced the public interest against Mrs Irina Stucere's own interests.

20. In considering this matter the Chair accepted the advice of the Legal Adviser and paid due regard to the ACCA documents 'Guidance for Disciplinary Sanctions' and 'Consent Orders – Frequently Asked Questions'.

21. The Chair found the following to be aggravating factors:

- Mrs Stucere's conduct fell below the standards expected of a qualified ACCA member and brought discredit upon herself, ACCA and the accountancy profession.
- The length of time that Mrs Stucere provided bookkeeping services with no AML supervision.

22. The Chair found the following to be mitigating factors:

- Mrs Stucere has been an ACCA member in continuous good standing since 2021.
- Mrs Stucere has no previous complaint or disciplinary history.
- Mrs Stucere's conduct appears to have arisen due to a misunderstanding of the requirements regarding AML supervision and ACCA's regulations.
- Mrs Stucere regularised her position and ACCA considers that the conduct was a one off and is unlikely to be repeated.
- Mrs Stucere has promptly and fully co-operated with the investigation.
- Mrs Stucere has made admissions early in the investigatory process and admitted her conduct and demonstrated insight.
- The limited scope and amount of work performed.
- There is no evidence of harm.

- ACCA does not consider that the conduct reaches the threshold for dishonesty
23. The Chair was satisfied that the allegations admitted by Mrs Irina Stucere would be unlikely to result in her exclusion from membership of ACCA and that, under Regulation 8(12), there was no basis for him to reject the Consent Order.
24. The Chair paid due regard to ACCA's Guidance for Disciplinary Sanctions (updated 14 February 2024). He found the following factors in relation to the sanction of a reprimand were relevant in this case:
- a. The misconduct was as a result of misunderstanding on Mrs Irina Stucere's part, rather than a deliberate attempt to circumvent ACCA's rules and regulations.
 - b. The misconduct ceased as soon as Mrs Irina Stucere became aware that she was engaging in public practice without being the holder of a practising certificate and as soon as she became aware that she required to have AML supervision.
 - c. Mrs Irina Stucere has demonstrated a willingness to comply with directions and advice provided by ACCA.
 - d. Corrective steps have been taken by Mrs Irina Stucere and the Firm to ensure that there is no repeat of the misconduct.
 - e. There appears to have been no adverse consequence – the misconduct has not caused material distress, inconvenience or loss.
 - f. There has been early and genuine acceptance of the misconduct and Mrs Irina Stucere made early admissions to her misconduct.
25. The Chair, having considered all the documentary evidence before him, was satisfied that the sanction of a reprimand was the appropriate and proportionate sanction in this case. The Chair noted that Mrs Irina Stucere had agreed to pay

ACCA costs in the sum of £2,219.50. The Chair, accordingly, pursuant to his powers under Regulation 8 of the Regulations, made an Order in the terms of the draft Consent Order.

ORDER

- i. Mrs Irina Stucere shall be reprimanded.
 - ii. Mrs Irina Stucere shall pay costs to ACCA in the sum of £2,219.50.
26. By virtue of Regulation 8(17) there is no right of appeal against this Order. The Order will, therefore, come into effect immediately.

Mr Andrew Gell
Chair
17 July 2025