

## HEARING

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

#### REASONS FOR DECISION

**In the matter of:** Ms Junnan Liu

**Heard on:** Thursday, 19 June 2025

**Location:** Remotely via Microsoft Teams

**Committee:** Ms Wendy Yeadon (Chair)  
Dr David Horne (Accountant)  
Mr Andrew Skelton (Lay)

**Legal Adviser:** Ms Valerie Charbit (Legal Adviser)

**Persons present  
and capacity:** Mr James Halliday (Case Presenter on behalf of ACCA)  
Miss Mary Okunowo (Hearings Officer)

**Summary:** Removed from the student register with immediate effect.

**Costs:** £7,700.00 payable by Ms Junnan Liu to ACCA.

#### SERVICE OF PAPERS

1. The Committee convened to consider two allegations against Ms Liu. It had before it a Disciplinary Committee report and bundle of 95 pages, a Service bundle of 26 pages and following announcement of its decision on sanction, a detailed and simple costs schedule totalling 3 pages.

2. The Committee noted that Ms Liu was notified of the hearing date and time with the associated documentation in accordance with the Chartered Certified Accountants' Complaints and Disciplinary Regulations 2014 (CDRs). It further noted that she had been sent links to ACCA's Guidance for Disciplinary Committee hearings, ACCA's Disciplinary Committee Sanctions Guidance, and ACCA's guidance on Requests for Adjournments and Costs.
3. The Committee was also satisfied that Ms Liu was aware of the time and date of the hearing by virtue of the correspondence between her and ACCA.

### **PROCEEDING IN ABSENCE**

4. Ms Liu was not present, and she was not legally represented.
5. In correspondence with ACCA, Ms Liu initially asked for the hearing to take place in August 2025. However, after being informed that she would need to apply to adjourn the hearing date and having been referred to ACCA's guidance on Requests for Adjournments, Ms Liu stated that she would not be seeking to apply for an adjournment and that she was unable to attend the hearing because she was 'extremely busy with work'. She confirmed on 30 May 2025 in a short email that she was content for proceedings to take place in her absence.
6. The CDR gave the Committee a discretion as to whether to proceed in the absence of Ms Liu. The Committee noted that Ms Liu had decided not to apply for any adjournment and that she had chosen not to attend the hearing. It therefore decided that she had waived her right to be present at the hearing.
7. Having considered ACCA's guidance on proceeding in a member's absence, the Committee decided that it would exercise its discretion to proceed in Ms Liu's absence. It did so because she had voluntarily waived her right to attend the hearing and because it concluded that she was unlikely to attend a future hearing if the hearing was adjourned. Further, it was in the Committee's view that it was in the public interest that disciplinary hearings were concluded expeditiously.

### **ALLEGATIONS / BRIEF BACKGROUND**

8. Ms Liu came before the Disciplinary Committee in relation to the following allegations:

Ms Junnan Liu, an ACCA student:

1. On 09 March 2024, submitted or caused to be submitted to ACCA, false documents, namely a certificate for a degree of Bachelor of Accounting (Accelerate) and an accompanying transcript (together, “the Documents”), purporting to be issued by the University A in order to gain exemptions.
  - a. Ms Liu’s conduct was dishonest in that she knew that some or all of the documents were false as she did not graduate from the University A as alleged or at all; or in the alternative:
  - b. Ms Liu’s conduct demonstrates a failure to act with integrity.
2. By reason of her conduct, is:
  - a. Guilty of misconduct pursuant to bye-law 8(a)(i), or in the alternative;
  - b. Liable to disciplinary action pursuant to bye-law 8(a)(iii).
9. On 19 March 2019, Ms Liu became an ACCA registered student.
10. On 09 March 2024, Ms Liu wrote to ACCA from her registered email address to request exemptions. In her email Ms Liu enclosed three documents:
  - a. A scanned copy of her passport from the People’s Republic of China.
  - b. A degree certificate from the University A (the “Certificate”).
  - c. An academic transcript from the University A (the “Transcript”).
11. On 25 March 2024, ACCA wrote to the University A to verify the authenticity of Ms Liu’s Certificate and Transcript.
12. On 12 April 2024, ACCA wrote to the University A again requesting a response to the previous email.
13. On 16 April 2024, the University A responded to ACCA confirming Ms Junnan Liu was not a graduate of the University. The University also confirmed that the Certificate and Transcript did not correctly reflect the University’s courses.

14. On 23 April 2024, the matter was referred internally to ACCA's Professional Conduct Department.
15. On 13 May 2024, ACCA's Investigating Officer wrote to Ms Liu to inform her of the referral and to seek her response to a series of questions. No response was received. On 04 June 2024, ACCA's Investigating Officer wrote to Ms Liu a second time requesting her cooperation with the ongoing investigation. No response was received. On 09 July 2024, ACCA's Investigating Officer wrote to Ms Liu a third time requesting her cooperation with the ongoing investigation. No response was received. On 02 August 2024, ACCA's Investigating Officer wrote to Ms Liu a fourth time requesting her cooperation with the ongoing investigation.
16. On 06 August 2024, Ms Liu responded to ACCA in two emails and made the following comments:

*"I'm sorry that I just saw the email. I never submitted the above documents. I think maybe my account has been compromised. I logged in to my account and found that I was indeed exempt, but I did not know about it, can you help me solve it?..... I only have the email address [REDACTED], which I have never used to provide false information to acca [sic]. I am not a student of Universiti [sic] A and I have never submitted a certificate. I don't know why you received a false document.....It is also the first time for me to see these fake documents. I think it is because someone stole my account and modified my email address to submit the fake documents.....I am not a student of Universiti [sic] A and I do not know why this happened. Please cancel the exam exemption and guarantee the security of my account."*

17. ACCA submitted that the email received on 09 March 2024 was sent from Ms Liu's registered email address. The email contained a clear and unambiguous request to "apply for exemptions". Ms Liu's email also contained the Certificate, the Transcript, and a copy of her passport to verify her identity.
18. ACCA submitted that Ms Liu was the only person who stood to gain from her request to apply for exemptions in the email dated 09 March 2024. When challenged by ACCA, Ms Liu denied any wrongdoing and claimed not to have sent the 09 March 2024 email. Ms Liu claimed someone "stole [her] account and modified [her] email address to submit the fake documents". Ms Liu acknowledged the documents were false.

19. Mr Halliday noted that since Ms Liu was the only person likely to gain from the exemptions and therefore it was likely that she had known that false documents had been submitted on her behalf. He submitted that if Ms Liu had the correct documentation, it would be unusual for that to have not reached ACCA directly rather than through a third party. Mr Halliday was not able to inform the Committee as to whether ACCA had since received any subsequent exemption application from Ms Liu, but he did confirm that Ms Liu would have had to have provided her ACCA login details to a third party in order to make the exemption application.
20. Mr Halliday submitted that Ms Liu had by her conduct acted dishonestly or alternatively without integrity by not carrying any due diligence in asking a third party to make the exemptions application on her behalf.

### **DECISION ON FACTS / ALLEGATIONS AND REASONS**

21. The Committee noted that ACCA had confirmed with the University A that the documents were false. It decided that on Ms Liu's own admission and on the evidence from University A, that false documents had been submitted to ACCA as set out in the allegations.
22. The Committee was further satisfied on the evidence provided to it, that Ms Liu had asked a third party to submit those documents to ACCA, she had therefore 'caused' those documents to be submitted to ACCA. It based this finding upon the text conversation translated for it that was supplied between Ms Liu and a third party.
23. The Committee noted that the third party had told Ms Liu that there was a 'guaranteed a 100% success rate' in making the exemption application which in the Committee's view was likely to relate to the fact that the third party was making the application with false documents because an application with genuine documents would be unlikely to need to speak about a 'success rate'. Further any third party in the Committee's view would most likely have used genuine documents had they been available to it. The Committee also decided that the time taken to correspond with a third party would have in all likelihood taken as long, if not longer, as if Ms Liu made the exemption application herself. The Committee concluded her reasons for paying to use a third party was because it was likely it provided false documents for the exemption application. Further it noted that Ms Liu would not have had to provide her personal ACCA

login details to a third party if she had made the application herself and had genuine documents to advance for exemptions.

24. The Committee further decided that in making the exemption application Ms Liu had acted dishonestly. It was satisfied that when first confronted by ACCA, she had suggested that her ACCA account had been hacked into, and then only later did she say that a third party had assisted her in making the application for an exemption. It found her to be lacking in her willingness to tell ACCA what exactly had happened, and it observed that the first time she had corresponded with ACCA appeared to be on the same date that she attempted to correspond with the third party. The screen grabs Ms Liu took of these communications did not demonstrate any reply from the third party, and in this communication thread, Ms Liu states “ *if you don’t reply to me I will have to state my account was hacked.*” Further, Ms Liu had not provided what looked like a full transcript of the conversation between her and the third party and she had never provided genuine documents to ACCA which could justify the exemptions she was seeking.
25. The Committee concluded for all these reasons Ms Liu had acted dishonestly in submitting false documents to ACCA, her regulator. Furthermore, it concluded that dishonest conduct for a student accountant fell not only below but far below the standard to be expected of any member of ACCA. Such conduct was deplorable and damaged the public interest and the reputation of ACCA and its members. The Committee therefore found the conduct proved amounted to misconduct. Accordingly, it found Allegation 1, 1(a) and 2(a) proved.
26. Since Allegation 1(b) was an alternative allegation to Allegation 1(a), which the Committee had found proved, the Committee did not consider Allegation 1(b).
27. Similarly, since Allegation 2(b) was an alternative allegation to Allegation 2(a), which the Committee had found proved, the Committee did not consider Allegation 2(b).

## **SANCTION AND REASONS**

28. The Committee heard that Ms Liu had no previous disciplinary findings against her. It found no other mitigation.

29. The Committee noted that Ms Liu had not fully engaged with ACCA in answering these allegations e.g. she had not supplied any genuine paperwork to show that she was able to apply for exemptions on a valid basis. The Committee considered that the allegations found proved were serious and Ms Liu had no insight into the serious nature of them or any genuine remorse in relation to her conduct. The Committee was therefore satisfied that Ms Liu continued to pose a risk of harm to the public due to having acted dishonestly and because she had not demonstrated that she had taken any rehabilitative steps to remediate.
30. The Committee referred to ACCA's Guidance on Disciplinary Sanctions (GDS) when deciding what sanction to impose. It was satisfied that serious misconduct which included dishonesty required the imposition of a sanction.
31. The Committee first considered the sanctions of 'admonishment' and 'reprimand'. It was satisfied that Ms Liu had chosen to use a third party to apply dishonestly for exemptions using her ACCA account. It noted the factors set out in the GDS for when such sanctions maybe appropriate and it did not find a sufficient number of the factors set out which could justify the sanction of admonishment or reprimand. It had not found that Ms Liu had been the subject of misfortune by using a third party but rather that she had acted dishonestly in allowing the third party to submit documents on her behalf. The Committee noted that sanctions of admonishment or reprimand were available if students acknowledged wrongdoing and had some insight into their conduct. There was no evidence that Ms Liu had any such insight, nor had she taken any corrective steps to ensure she did not act similarly in the future.
32. The Committee went on to consider whether the sanction of a severe reprimand was the proportionate sanction, noting that the list of factors which the GDS indicated for such a sanction to be appropriate were almost entirely missing in this case. The factors indicated but missing were:
- a. The misconduct was not intentional and is no longer continuing, though the member may have acted recklessly;
  - b. Evidence that the conduct would not have caused direct or indirect harm;
  - c. Insight into failings;
  - d. Genuine expression of regret/apologies
  - g. Rehabilitative/corrective steps taken to cure the conduct and ensure future errors do not occur
  - h. Relevant and appropriate references

- i. Co-operation during the investigations stage
33. The only two factors that were present in this case were (e) and (f):
- e. Previous good record
  - f. No repetition of failure/conduct – it was an isolated incident.
34. The Committee also considered paragraphs E.2.2 and E2.3 of the GDS which said:

*E2.2 The public is entitled to expect a high degree of probity from a professional who has undertaken to abide by a code of ethics. The reputation of ACCA and the accountancy profession is built upon the public being able to rely on a member to do the right thing in difficult circumstances. It is a cornerstone of the public value which an accountant brings.*

*E2.3 The Committee should bear these factors in mind when considering whether any mitigation presented by the member is so remarkable or exceptional that it warrants anything other than exclusion from membership or removal from the student register.*

35. It therefore decided, taking into account the factors set out in the GDS for removal from the student register, that because there had been a serious departure from ACCA's standards, an adverse impact on members of the public, dishonesty and a lack of insight and an attempt at covering up the misconduct (by blaming it on a third party), the sanction of removal from the student register was the only appropriate and proportionate sanction.

## **COSTS AND REASONS**

36. ACCA applied for £8517.50 in costs. Mr Halliday invited the Committee to make a small reduction since the hearing had not lasted all day.
37. The Committee have not received any documentary evidence as to Ms Liu's financial circumstances, and having considered ACCA's guidance as to Costs, accordingly, it inferred that Ms Liu is able to meet the costs as assessed by the Committee.



38. The Committee decided since the hearing did not take all day that a small reduction in some of the costs was justified. It therefore decided that Ms Liu should pay £7,700.00 in costs to ACCA.

#### **EFFECTIVE DATE OF ORDER**

39. The Committee was satisfied that Ms Liu continued to pose a risk to the public because she had tried to use false documents to claim an exemption and had because she had no insight into the seriousness of her conduct. It therefore decided that removal from the student register should be effective immediately.

**Ms Wendy Yeadon**  
**Chair**  
**19 June 2025**