

## HEARING

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

#### REASONS FOR DECISION

**In the matter of:** Mr Tonderai Luwisi

**Heard on:** Wednesday, 8 October 2025

**Location:** Hearing held remotely via Teams

**Committee:** Ms Ilana Tessler (Chair)  
Mr Abdul Samad (Accountant)  
Ms Deborah Fajoye (Lay Member)

**Legal Adviser:** Mr Richard Ferry-Swainson

**Persons present  
and capacity:** Mr Mazharul Mustafa (ACCA Case Presenter)  
Miss Nicole Boateng (Hearings Officer)

**Summary:** Facts found proved, misconduct, member excluded,  
and costs ordered.

#### INTRODUCTION

1. The Disciplinary Committee ("the Committee") convened to consider an Allegation against Mr Luwisi, who did not attend and was not represented.
2. The papers before the Committee were in a Bundle numbered 1 to 157. There was also a Service Bundle and a Costs Schedule.

## SERVICE AND PROCEEDING IN ABSENCE

3. The Committee first considered whether the appropriate documents had been served in accordance with the Complaints and Disciplinary Regulations (“the Regulations”). The Committee took into account the submissions made by Mr Mustafa on behalf of ACCA and the advice of the Legal Adviser.
4. Included within the Service Bundle was the Notice of Hearing dated 10 September 2025, thereby satisfying the 28-day notice requirement, which had been sent to Mr Luwisi’s email address as it appears in the ACCA Register. It was also sent to Mr Luwisi’s Legal Representative, Person A. The Notice included details about the time, date and remote venue for the hearing and also Mr Luwisi’s right to attend the hearing, by telephone or video link, and to be represented, if he so wished. In addition, the Notice provided details about applying for an adjournment and the Committee’s power to proceed in Mr Luwisi’s absence, if considered appropriate. There was an email receipt indicating that the email address for Mr Luwisi could not be found. This was the only email address on record for Mr Luwisi, as he had not provided an updated one. However, there was an email receipt confirming the email had been delivered to Mr Luwisi’s Representative, Person A.
5. The Committee was directed to Complaints and Disciplinary Regulation 22(2), which states:

*“(2) Where the relevant person is represented by a solicitor or a professional body, a copy of the notice served in accordance with regulation 22(1) may also be:*

- (a) sent or delivered to the solicitor’s practising address;*
- (b) sent or delivered to the professional body’s business address; or*
- (c) sent by electronic mail to an electronic mail address of the solicitor or professional body, where the address has been notified to the Association as an address for communications.”*

6. The Committee was thus satisfied that the Notice for the hearing had been served in accordance with the Regulations, which require ACCA to prove that the documents were sent, not that they were received.
7. The Committee therefore went on to consider whether to proceed in Mr Luwisi's absence. The Committee bore in mind that although it had a discretion to proceed in the absence of Mr Luwisi, it should exercise that discretion with the utmost care and caution, particularly as it was unclear whether Mr Luwisi continued to be represented. The only communication received from Person A was an email dated 3 February 2025 in response to the allegation.
8. Neither Mr Luwisi nor Person A responded to the Notice of Hearing.
9. The Committee was aware that Mr Luwisi was serving a prison sentence and incarcerated in [REDACTED] and thus unlikely to be in a position to participate in this hearing or receive emails.
10. The Committee noted that on 20 January 2025, ACCA sent a letter to Mr Luwisi at [REDACTED], notifying him that ACCA was investigating a complaint against him relating to his conviction for murder. The letter told Mr Luwisi that his case would be referred to the Disciplinary Committee in order to request that he be removed from the ACCA Register of Members.
11. On 3 February 2025, ACCA received a letter from Person A of Company A in [REDACTED], saying they had been retained by Mr Luwisi to act for him in this matter as Mr Luwisi is in *"state custody, with limited contact with the outside world. Kindly note our professional interest."*
12. On 25 September 2025, the Hearings Officer sent an email to Person A asking them to confirm whether they would be attending the hearing on behalf of Mr Luwisi and if not, whether they were content for the hearing to proceed in their absence. An email delivery receipt confirmed the email had been delivered. Person A did not respond to that email.

13. On 6 October 2025, the Hearings Officer sent a further email to Person A again asking them to confirm whether they would be attending the hearing on behalf of Mr Luwisi and if not, whether they were content for the hearing to proceed in their absence. An email delivery receipt confirmed the email had been delivered. Person A did not respond to that email.
14. On 7 October 2025, the Hearings Officer sent to Person A the link for the hearing so that they could attend, if they wished to do so. An email delivery receipt confirmed the email had been delivered. Person A did not attend on behalf of Mr Luwisi.
15. The Committee was of the view that Mr Luwisi faced serious allegations and that there was a clear public interest in the matter being dealt with expeditiously. The Committee noted that neither Mr Luwisi nor his Representative, Person A, had responded to any of ACCA's many attempts to get in touch with them in connection with this hearing. The Committee acknowledged that as Mr Luwisi was in prison and his email address no longer worked, he may not know directly that this hearing is taking place. However, since the last contact with Mr Luwisi had been through his Legal Representative, Person A, and their email address was still working, the Committee considered it to be a reasonable inference to draw that Mr Luwisi should be aware of this hearing.
16. In light of his complete lack of engagement throughout the investigation and in relation to the hearing, apart from the email dated 3 February 2025 from Person A, the Committee concluded that an adjournment would serve no useful purpose because it seemed unlikely that Mr Luwisi would be able to attend for a significant time and furthermore he had not applied for an adjournment, nor had his representative. In all circumstances, the Committee decided that it was in the interests of justice and in the public interest that the matter should proceed, notwithstanding the absence of Mr Luwisi. No adverse inference would be drawn from his non-attendance.

## **ALLEGATIONS/BRIEF BACKGROUND**

17. It is alleged that Mr Luwisi is liable to disciplinary action on the basis of the following Allegations:

### **Allegations**

Mr Tonderai Luwisi, an ACCA member:

1. On 29 August 2023 Mr Tonderai Luwisi was convicted of the following offence by the High Court of Zambia (criminal division), which is an offence discreditable to the Association and to the accountancy profession:
    - i) On 10 December 2022, at Lusaka, the Republic of Zambia, Mr Luwisi murdered Person B, contrary to section 200 of the Penal Code Chapter 87 of the Laws of Zambia.
  2. In relation to Allegation 1, Mr Tonderai Luwisi failed to bring promptly to the attention of ACCA that he may have become liable to disciplinary action by reason of the conviction referred to in Allegation 1(i) above, contrary to byelaw 10(b).
  3. By reason of the matters referred to in Allegations 1 to 2 above:
    - (a) Mr Luwisi is guilty of misconduct pursuant to bye-law 8(a)(i); and/or in the alternative:
    - (b) Mr Luwisi is liable to disciplinary action pursuant to bye-laws 8(a)(iii) and/or 8(a)(ix).
18. Mr Luwisi became an ACCA member on 15 November 2010 and a Fellow of ACCA on 15 November 2015.

19. On 29 August 2023, Mr Luwisi was convicted by the High Court of Zambia (criminal division) for the offence of murder, contrary to section 200 of the Penal Code Chapter 87 of the Laws of Zambia. From the judgement of the presiding Judge, it is stated that Mr Luwisi murdered Person B by repeatedly stabbing them with a knife. The evidence of the pathologist was that the deceased had multiple stab wounds, most of them defensive, with the fatal wound being 11cm deep. The murder was witnessed by their [REDACTED], who was also repeatedly stabbed by Mr Luwisi when they tried to intervene. The [REDACTED] testified at the trial, Mr Luwisi having entered a not guilty plea. Their [REDACTED] returned home to discover the body of Person B. They also gave evidence at the trial and referred to a WhatsApp message from [REDACTED] saying, *inter alia*, “I am sorry [REDACTED] and [REDACTED] but I had to kill Person B and myself, because [they were] stubborn, rude and not appreciative. [They] had forgotten how [they] got here in [REDACTED] ...” There was also evidence from [REDACTED] that Mr Luwisi did at times argue with Person B in their presence and threaten to kill Person B if they ever left him.
20. Mr Luwisi testified at the trial as well. He claimed Person B told him they were leaving him and that he was not the [REDACTED]. A fight then ensued with Person B repeatedly stabbing him with a knife (he was later found with several knife wounds). He said he lost control, overpowered Person B, grabbed the knife they had used on him and stabbed them. The Judge said Mr Luwisi’s actions and text message raised the question of whether the stab wounds to his neck had been self-inflicted and then, having failed to commit suicide in that manner, Mr Luwisi then threw himself in the path of oncoming cars. The Judge said he found Mr Luwisi’s evidence to be “*most inconsistent, contradictory and not believable.*”
21. Accordingly, the Judge rejected Mr Luwisi’s defence of provocation and found him guilty of murder. He was sentenced to 20 years imprisonment.
22. ACCA was notified of the conviction by another regulatory body.

23. From 8 November 2023 until 13 January 2025, ACCA wrote to various ACCA and external parties to trace Mr Luwisi's whereabouts. On 9 January 2025, ACCA contacted ACCA Zambia to seek their assistance in tracing Mr Luwisi's whereabouts. On 10 January 2025, ACCA Zambia informed ACCA that Mr Luwisi was incarcerated at [REDACTED].
24. On 16 January 2025, ACCA contacted Mr Luwisi at [REDACTED] where he was notified that an ACCA investigation case file had been opened. Mr Luwisi was invited to provide his comments.
25. On 3 February 2025, Mr Luwisi responded to the allegations through his Legal Representative, Person A, who stated that Mr Luwisi had appealed the conviction, and the appeal was pending. Person A said, *"... while the matter is on appeal and we still hope that our client may be acquitted, even if the case went otherwise, we contend that the offence of murder does not constitute an act of professional misconduct under the Bye-Laws governing ACCA."*
26. On 25 May 2025, ACCA wrote to Mr Luwisi's legal representative enclosing the report of disciplinary allegations. No response was received and there has been no further contact from either Mr Luwisi or Person A.
27. Bye-law 10(b) (as applicable in 2023) states:

*"10 (b) Subject to any legislative or other legal obligation to the contrary, it shall be for every member and for any person to whom these bye-laws relate to bring promptly to the attention of the Secretary any facts or matters indicating that a member or relevant firm or registered student may have become liable to disciplinary action (including any facts or matters relating to himself or itself); and in any such case the Secretary shall lay the facts and matters before the relevant committee of Council or individual if he or she is of the opinion that the complaint ought to be investigated by that committee or individual."*
28. Bye-law 8 sets out the details of the events which could lead to disciplinary action. These events include (but are not limited to) the following:

- Breach of ACCA bye-laws or regulations;
  - Criminal conviction and/or caution;
  - Misconduct – this includes (but is not limited to) any act, or failure to act, that is likely to discredit you or ACCA or the accountancy profession.
29. At no time has Mr Luwisi informed ACCA of his conviction for murder. It was ACCA's case that, in accordance with Bye-law 8, the conviction meant that Mr Luwisi may have become liable to disciplinary action, and he was therefore duty bound by Bye-law 10(b) to bring that fact promptly to the attention of ACCA.
30. The only response from Mr Luwisi, was that received on 3 February 2025, where his Representative submitted, "*we contend that the offence of murder does not constitute an act of professional misconduct under the Bye- Laws governing ACCA.*"

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

31. In reaching its decisions on the facts the Committee took into account all the evidence provided, together with the submissions made by Mr Mustafa. The Committee heard and accepted the advice of the Legal Adviser and kept in mind that it was ACCA that brought the case and ACCA that had to prove it. The standard of proof was on the balance of probabilities. Neither Mr Luwisi nor Person A had provided any written representations for the Committee to consider, beyond the letter from Person A dated 3 February 2025. The Committee did take the content of that letter into account.

### **Allegation 1 - Proved**

1. On 29 August 2023 Mr Tonderai Luwisi was convicted of the following offence by the High Court of Zambia (criminal division), which is an offence discreditable to the Association and to the accountancy profession:



- i) On 10 December 2022, at Lusaka, the Republic of Zambia, Mr Luwisi murdered Person B, contrary to section 200 of the Penal Code Chapter 87 of the Laws of Zambia.

- 32. ACCA relied on the Judgment of Mr Justice Mbewe in the High Court for Zambia at the Principal Registry (Criminal Division) in Lusaka, together with some contemporary reporting of the conviction and sentence. The Committee saw no reason to doubt the authenticity of the unchallenged documentation before it. Indeed, the only correspondence linked to Mr Luwisi was the email from Person A, wherein it was acknowledged that Mr Luwisi had been convicted of murder.
- 33. Bye-law 8(a)(ix) states *“A member, relevant firm or registered student shall, subject to bye-law 11, be liable to disciplinary action if:*  
  
*(ix) before a court of competent jurisdiction in the United Kingdom or elsewhere, he or it has pleaded guilty to, been found guilty of, or has accepted a caution in relation to, any offence discreditable to the Association or to the accountancy profession;”*
- 34. Bye-law 8(e) states, inter alia, that for the purposes of bye-law 8(a)(ix), a copy of any final judgment given in criminal proceedings shall be conclusive proof of the conviction and of any facts or matters found.
- 35. Accordingly, based on the Judgment of Mr Justice Mbewe, the Committee found the fact of the conviction proved together with the findings made by the Judge. The fact that it is said the conviction is being appealed is irrelevant to the Committee, which is only concerned with the current status of the conviction.
- 36. The Committee then considered whether the offence was discreditable to the Association and the accountancy profession. The Committee noted that, at the time of the offence, Mr Luwisi had held a senior position at a well-known global accounting firm [REDACTED], and his conviction and place of employment were widely reported in the press. Notwithstanding Person A’s contention that

*“murder does not constitute an act of professional misconduct”*, the Committee was in no doubt that such an offence was discreditable to the Association and the accountancy profession. It is if not the most, certainly one of the most, serious offences that one can be convicted of, all the more so given the gruesome nature of the murder and the involvement of [REDACTED].

37. Accordingly, the Committee found Allegation 1 proved in its entirety.

### **Allegation 2 - Proved**

2. In relation to Allegation 1, Mr Tonderai Luwisi failed to bring promptly to the attention of ACCA that he may have become liable to disciplinary action by reason of the conviction referred to in allegation 1(i) above, contrary to byelaw 10(b).
38. Bye-law 8 makes it clear that a conviction could lead to disciplinary action if the offence concerned is discreditable to the Association or the accountancy profession and bye-law 10(1)(b) makes it clear that a member of ACCA is duty bound to bring promptly to the attention of the Secretary any facts or matters indicating that a member *may* have become liable to disciplinary action.
39. The Committee was thus satisfied that Mr Luwisi was duty bound by the bye-laws he was subject to by virtue of being a member of ACCA, to bring the fact of the conviction promptly to the attention of ACCA. He was convicted on 29 August 2023. At no stage has he brought that fact to the attention of ACCA. Indeed, ACCA was only made aware of the matter as a result of a news report forwarded by another accountancy Regulator.
40. The Committee thus found this allegation proved.

### **Allegation 3**

Allegation 3(a) proved in relation to Allegation 1

Allegation 3(b) proved in relation to Allegation 2

3. By reason of the matters referred to in Allegations 1 to 2 above:
- (a) Mr Luwisi is guilty of misconduct pursuant to bye-law 8(a)(i);  
and/or in the alternative:
  - (b) Mr Luwisi is liable to disciplinary action pursuant to bye-laws  
8(a)(iii) and/or 8(a)(ix).
41. The Committee next considered whether Mr Luwisi was guilty of misconduct in relation to Allegation 1. Bye-law 8(a) states that a member shall be liable to disciplinary action if he, whether in the course of carrying out his professional duties or otherwise, has been guilty of misconduct. Bye-law 8(c) states that for the purposes of bye-law 8(a), misconduct includes (but is not confined to) any act or omission which brings, or is likely to bring, discredit to the individual or relevant firm to the Association or to the Accountancy profession. The Legal Adviser provided further guidance by reference to Case law, where misconduct has been described as a word of general effect involving some act or omission that falls short of what would be proper in the circumstances. Any professional misconduct established has to be serious and the courts have indicated that something would be considered serious if found to be deplorable by other members of the profession.
42. The Committee noted the assertion by Person A in February 2025, that *“murder does not constitute an act of professional misconduct”*. Person A appeared to believe that in order to amount to misconduct the act or omission would have to amount to, or involve, dishonesty. He referred to bye-law 8(d), which states, *“For the purposes of bye-law 8(a), in considering the conduct alleged (which may consist of one or more acts or omissions), regard may be had to the following:*
- i. ...
  - ii. *whether the acts of omission have amounted to or involved dishonesty on the part of the individual or relevant firm in question;*
  - iii. ...

43. However, all bye-law 8(d) states is that regard *may* be had to such a factor, not that it *has* to include an element of dishonesty in order to amount to misconduct. The Committee was satisfied that the brutal murder of Person B brought discredit upon Mr Luwisi, the Association and the accountancy profession. It is conduct which falls far short of that expected of a professional accountant and member of ACCA. It is also conduct that other members of the profession and the public at large would find it utterly deplorable. The Committee was in no doubt that the matters referred to in Allegation 1 amounted to misconduct.
44. Having found misconduct in relation to Allegation 1, it was not necessary for the Committee to consider allegation 3(b) in relation to Allegation 1, as it was alleged in the alternative.
45. The Committee then considered whether Allegation 2 amounted to misconduct. It is clearly important that ACCA members comply with the requirements to notify their regulatory body of convictions. The process of regulation relies on members complying with the bye-laws regulating their behaviour. A failure to do so can prevent ACCA from being aware of a conviction and about whether an investigation is required. ACCA's overarching objective is to protect members of the public by ensuring its members are properly regulated. A member of ACCA should not be able to frustrate or delay an investigation into their alleged conduct by failing to notify the Associate of their conviction.
46. However, the Committee could not know whether Mr Luwisi had deliberately withheld the conviction from ACCA, or whether it had been an oversight, albeit a negligent one, due to all that was occurring in his life at the time, or indeed whether he was relying on erroneous legal advice. The Legal Adviser advised the Committee that it is established law that mere negligence or careless acts fall short of misconduct, unless they are particularly serious or repeated. On the evidence available, the Committee did not consider this conduct could be characterised as particularly serious or repeated in the specific context and circumstances of the matters found proved in this case.

47. The Committee therefore found allegation 3(a) not proved in relation to Allegation 2.
48. As a question of proven fact, Mr Luwisi failed to bring promptly to the attention of ACCA that he may have become liable to disciplinary action by virtue of his conviction. It follows therefore that he is liable to disciplinary action pursuant to bye-law 8(a)(iii), in relation to his conduct as found proved at Allegation 2.
49. The Committee therefore found Allegation 3(b) proved in relation to Allegation 2.

### **SANCTION AND REASONS**

50. In reaching its decision on sanction, the Committee took into account the submissions made by Mr Mustafa and all matters of mitigation. The Committee referred to the Guidance for Disciplinary Sanctions issued by ACCA and had in mind the fact that the purpose of sanctions was not to punish Mr Luwisi, but to protect the public, maintain public confidence in the profession and maintain proper standards of conduct, and that any sanction must be proportionate. The Committee accepted the advice of the Legal Adviser.
51. When deciding on the appropriate sanction, the Committee carefully considered the aggravating and mitigating features in this case.
52. The Committee considered there to be the following aggravating features:
- Immeasurable harm [REDACTED] - the murder was committed in the presence of [REDACTED], and [REDACTED] discovered the body of their Person B.
  - A lack of insight
  - A lack of remorse
53. When considering mitigating factors, the Committee took into account the following:

- No previous disciplinary matters
54. The Committee considered all the options available from the least serious upwards.
55. The Committee did not think it appropriate to take no further action or order an admonishment in a case where a member had received a criminal conviction for murder, which is discreditable to the Association and the accountancy profession. Mr Luwisi had also failed to bring promptly to the attention of ACCA that he may have become liable to disciplinary action by way of the conviction, contrary to bye-law 10(b).
56. The Committee then considered whether to reprimand Mr Luwisi. The guidance indicates that a reprimand would be appropriate in cases where the conduct is of a minor nature, there appears to be no continuing risk to the public and there has been sufficient evidence of an individual's understanding, together with genuine insight into the conduct found proved. The Committee did not consider Mr Luwisi's conduct to be of a minor nature, and he had shown no insight into his behaviour. Accordingly, the Committee could not be satisfied that he represented no continuing risk to the public. The Committee therefore concluded that a reprimand would not adequately reflect the seriousness of the conduct in this case.
57. The Committee then considered 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 there is evidence of the individual's understanding and appreciation of the conduct found proved. The Committee considered none of these criteria to be met. The guidance adds that this sanction may be appropriate where most of the following factors are present:
- The misconduct was not intentional and no longer continuing;
  - Evidence that the conduct would not have caused direct or indirect harm;

- Insight into failings;
- Genuine expression of regret/apologies;
- Previous good record;
- No repetition of failure/conduct since the matters alleged;
- Rehabilitative/corrective steps taken to cure the conduct and ensure future errors do not occur;
- Relevant and appropriate references
- Co-operation during the investigation stage.

58. The Committee considered that almost none of these factors applied in this case and that accordingly a severe reprimand would not adequately reflect the seriousness of Mr Luwisi's behaviour. His misconduct was intentional, he has not demonstrated any insight into his conduct, nor made any apology; he does have a previous good record; his behaviour has not been repeated, but he has been in prison; there has been no evidence of effective rehabilitative steps; no references; and there has been a lack of co-operation during the investigation stage.

59. The Committee thus moved on to consider exclusion from membership. The guidance states that this sanction is likely to be appropriate when the behaviour is fundamentally incompatible with being a member. This is the most serious sanction that can be imposed on a member. Exclusion may be appropriate when the conduct involves any or all of the following circumstances (this list is not exhaustive):

- (a) Serious departure from relevant professional standards, such as repeated defective work;
- (b) Actual loss or adverse impact on client and/or members of the public;
- (c) Abuse of trust/position;
- (d) Dishonesty;
- (e) Lack of understanding and insight into the seriousness of the acts/omissions and the consequences thereof;
- (f) Conduct continued over a period of time;
- (g) Affected or had the potential to affect a substantial number of clients/ members of the public;

- (h) Attempted to cover up the misconduct;
  - (i) Persistent denial of misconduct;
  - (j) Breach of regulatory order;
  - (k) Convictions or cautions involving any of the conduct set out above;
  - (l) Collusion to cover up conduct.
60. The Committee considered (a), (e), (i) and (k) to all be engaged in this case and noted that the guidance indicates exclusion may be appropriate when the conduct involves any of these factors. There was no doubt this was a very serious departure from the relevant professional standards. Mr Luwisi brutally murdered Person B by stabbing them repeatedly with a knife. Their [REDACTED] witnessed some of the attack and according to the judgement was themselves stabbed multiple times when they tried to intervene. Their [REDACTED] returned home to find Person B's body. It is difficult to imagine the impact of this crime on [REDACTED], who in addition have effectively ended up losing both their [REDACTED]. Through his Representative, Mr Luwisi has denied that his behaviour amounted to misconduct, and his lack of insight, remorse and regret suggests he represents an ongoing risk to the public. His conduct was compounded by his failure to promptly report the conviction to ACCA.
61. Accordingly, the Committee decided that the only appropriate and proportionate sanction was exclusion from membership. The appalling murder of Person B and the surrounding circumstances whereby [REDACTED] were involved and thereafter he tried to claim his injuries had been caused by Person B attacking him, when in fact the Judge considered they were more likely self-inflicted, was conduct fundamentally incompatible with membership of ACCA.
62. The Committee acknowledged the impact this decision would have on Mr Luwisi after a long and unblemished career. However, this intentional conduct was such a serious breach of bye-law 8 and the complete lack of insight, and the concern that he represents an ongoing risk to the public, meant that no other sanction would adequately reflect the gravity of his offending behaviour. The Committee considered that a failure to exclude a member who was prepared to murder Person B would seriously undermine public confidence in



the profession and in ACCA as its Regulator. In order to maintain public confidence and uphold proper standards in the profession it was necessary to send out a clear message that this sort of behaviour would not be tolerated.

63. The Committee therefore ordered that Mr Luwisi be excluded from membership of ACCA.

### **COSTS AND REASONS**

64. ACCA applied for costs in the sum of £8,132.00. The Committee was provided with a Schedule of costs. The Committee was satisfied that the costs claimed were appropriate and reasonable and that the case was correctly brought. The Committee noted, as raised by Mr Mustafa, that the case was listed for a day but in the event less than a day was required for Mr Mustafa and the Hearings Officer and accordingly it was appropriate to make a reduction to reflect this.
65. Mr Luwisi did not provide any details of his means or provide any representations about the costs requested by ACCA. There was, therefore, no evidential basis upon which the Committee could make any reduction on that ground.
66. In light of its observations above, the Committee reduced the amount requested to reflect the actual costs more likely to have been incurred and made an order in the sum of £7,125.00.

### **EFFECTIVE DATE OF ORDER**

67. In light of its decision and reasons to remove Mr Luwisi from ACCA's Register and the seriousness of his misconduct, the Committee decided it was in the interests of the public to order that the sanction have immediate effect.

**Ms Ilana Tessler**  
**Chair**  
**8 October 2025**