

HEARING

**DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF
CHARTERED CERTIFIED ACCOUNTANTS****REASONS FOR DECISION**

In the matter of: **Mr John Demetrios Ioannides**

Heard on: **Tuesday, 20 January 2026**

Location: **Remotely via Microsoft Teams**

Committee: **Ms Melissa D'Mello (Chair)**
Ms Andrea White (Accountant)
Mr Colin Childs (Lay)

Legal Adviser: **Mr David Marshall**

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

Summary: **Excluded from membership with immediate effect.**

Costs: **£7,432.00.**

1. The Committee heard an allegation of misconduct against Mr Ioannides. Mr Wigg appeared for ACCA. Mr Ioannides was not present and not represented.
2. The Committee had a main bundle of papers containing 362 pages, an anonymisation schedule of 1 page, a service bundle relating to a hearing on 11

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December 2025 which contained 22 pages, a decision adjourning that hearing (3 pages) and a correspondence bundle notifying Mr Ioannides and his solicitor of the adjourned date of the hearing (6 pages). At the hearing Mr Wigg provided a copy of the current details of the designation with which this case is concerned (2 pages).

PROCEEDING IN ABSENCE

3. The Committee was satisfied that Mr Ioannides had been served with the documents required by regulation 10(7) of The Chartered Certified Accountants' Complaints and Disciplinary Regulations 2014 in accordance with regulation 22. They were sent by email on 12 November 2025 to Mr Ioannides' solicitor in connection with the hearing listed for 11 December 2025, being at least 28 days notice. That hearing was adjourned and has been re-listed for today. The Complaints and Disciplinary Regulations 2014, Regulation 10(8)(d) states that:

'... an adjournment does not give rise to a requirement to re-serve them [the documents] either 28 days before the date set or at all, save that the relevant person shall be notified of the time and place fixed for the adjourned hearing as soon as practicable.'

4. Mr Ioannides was notified of the details of this hearing in an email dated 22 December 2025 and subsequent correspondence. He was also provided with a further copy of the hearing documents.
5. Mr Ioannides instructed solicitors in or about June 2024. Thereafter all correspondence has been through those solicitors. Initially, the intention was that although Mr Ioannides would not attend personally, he would take part in any hearing through his solicitors and counsel. However, on 18 October 2025 the solicitors notified ACCA that '*Mr Ioannides does not wish to participate in this hearing*' and that he would not be represented at a hearing. That position has been repeated more than once.
6. The Committee had no doubt that Mr Ioannides had made an informed decision

not to attend or be represented at this hearing and that it would be fair, and in the public interest, to proceed in his absence today.

ALLEGATION(S) / BRIEF BACKGROUND

7. Mr Ioannides has been a Member of ACCA since 1967 and a fellow since 1974. He practised for many years in Cyprus but states that he is now retired. The Committee was told that there were no known ACCA disciplinary findings against him and took that into account to his credit when considering the facts.
8. On 31 January 2020, The Russia (Sanctions) (EU Exit) Regulations 2019 ("the 2019 Regulations") came into force by virtue of "exit day" (the date of the United Kingdom leaving the European Union). The 2019 Regulations provided the Secretary of State with powers to designate persons for the purpose of freezing assets and immigration. To exercise these powers, the Secretary of State must: '*(a) Have reasonable grounds to suspect that a person is an "involved person"; and (b) Consider that the designation of a person is appropriate*'.
9. On 10 February 2022, the 2019 Regulations were amended by The Russia (Sanctions) (EU Exit) (Amendment) Regulations 2022 ("the 2022 Regulations"). The 2022 Regulations amended Section 6 of the 2019 Regulations with the effect that an "*involved person*" would include a person who: '*(a) Is or has been involved in obtaining a benefit from or supporting the Government of Russia; (b) Is acting on behalf of or at the direction of a person who is or has been so involved; or (c) Is associated with a person who is or has been so involved*'.
10. On 11 April 2023, the UK Government imposed financial sanctions and an asset freeze on Mr Ioannides as a result of him being designated as an '*involved person*' under the Russia (Sanctions) (EU Exit) Regulations 2019.
11. On 31 July 2023 a Senior Investigations Officer of ACCA sent a letter by email to the email address registered by Mr Ioannides. The letter notified him that ACCA had become aware of his designation by the UK Government and had opened an investigation. It asked a number of questions to be answered by 14 August 2023. The letter pointed out that Mr Ioannides was under a duty to

cooperate under Regulation 3(1). There was no reply. Chasing emails were sent on 31 July and 15 August 2023. Those two emails could not be delivered. The automated 'bounce' message stated, '*Despite repeated attempts to deliver your message, the recipient's email system refused to accept a connection from your email system*'.

12. Mr Ioannides faced the following allegations:

Schedule of Allegations

Allegation 1

- (a) That on or around 11 April 2023, the UK Government imposed financial sanctions and an asset freeze on John Demetrios Ioannides, a Member of ACCA, as a result of him being designated as an involved person under the Russia (Sanctions) (EU Exit) Regulations 2019.
- (b) Mr Ioannides' conduct in respect of Allegation 1(a) is contrary to R115.1 (Professional Behaviour) of ACCA's Code of Ethics and Conduct.

Allegation 2

Contrary to Regulation 3(1)(a) of the Complaints and Disciplinary Regulations 2014, John Demetrios Ioannides, a Member of ACCA, failed to co-operate fully with the investigation of a complaint in that he failed to respond fully or at all to ACCA's correspondence on:

- (a) 31 July 2023
- (b) 15 August 2023
- (c) 31 August 2023

Allegation 3

Pursuant to bye-law 8(a)(vi), John Demetrios Ioannides is liable to disciplinary action by virtue of the disciplinary findings against him made by Taxation

Disciplinary Board on 17 January 2025.

Allegation 4

By reason of his conduct, John Demetrios Ioannides is:

- (a) Guilty of misconduct in respect of any or all the matters set out at allegations 1 to 3, pursuant to bye-law 8(a)(i); or, in the alternative
- (b) Liable to disciplinary action in respect of any or all the matters set out at allegations 1(b) and 2 pursuant to bye-law 8(a)(iii).

PRELIMINARY MATTERS

13. The Committee agreed to receive an up-to-date copy of the UK Government's designation details for Mr Ioannides. This was a public document and receiving it in evidence could not prejudice him.
14. Mr Wigg submitted that it might be necessary to refer to sensitive medical evidence. The Committee decided to hear any such evidence in private. In the event no such evidence was referred to.

DECISION ON FACTS / ALLEGATION(S) AND REASONS

15. The Committee did not receive oral evidence. It based its decision on the extensive written evidence and submissions served by both parties.

Allegation 1

16. There was no dispute that on or around 11 April 2023 the UK Government imposed financial sanctions and an asset freeze on Mr Ioannides. This was a matter of public record and formally admitted. The Committee found Allegation 1(a) proved.
17. On 12 April 2023, the UK Government released a press release stating that Mr

Ioannides had been sanctioned and included on the Consolidated List of Financial Sanctions Targets in the UK (“the Sanctions List”). This confirmed that financial sanctions and an asset freeze had been imposed against Mr Ioannides by the UK Government since 11 April 2023 on the basis that: *“Ioannides is an involved person under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis of the following grounds: (1) Ioannides is acting on behalf of or at the direction of a person who is or has been involved in obtaining a benefit from or supporting the Government of Russia, namely Mr A; (2) Ioannides is associated with a person who is or has been involved in obtaining a benefit from or supporting the Government of Russia, namely Mr A”.*

18. The up-to-date designation details showed that Mr Ioannides remained designated as an involved person. It also showed that a Director Disqualification Sanction was imposed on him on 09 April 2025. That did not affect the Committee’s decisions in this case.
19. Clearly a designation under a sanctions regime of an ACCA member as an ‘involved person’ with the consequent sanctions is a very serious matter. It calls into question the accountant’s fitness to remain on the register. However, the list of matters which render an ACCA member liable to disciplinary action in Bye-law 8(a) does not include this as a specific ground. This is different from, for example, a criminal conviction (Regulation 8(a)(ix)) where the mere fact of conviction is a ground for disciplinary action.
20. In this case, ACCA’s case was based on misconduct (Regulation 8(a)(i)). Mr Wigg went so far as to submit that the mere fact that Mr Ioannides had been designated amounted to misconduct. The Committee did not accept that. It considered that an allegation of misconduct required proof of what the member had done and not what had been done to him.
21. Allegation 1(b) dealt with Mr Ioannides’ own conduct. It alleged that he was in breach of section R115.1 (Professional Behaviour) of ACCA’s Code of Ethics and Conduct.

22. It was common ground that the Russia (Sanctions) (EU Exit) Regulations 2019, regulation 6(2) define an 'involved person' as a person who:

- (a) *is or has been involved in destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine,*
- (b) *is owned or controlled directly or indirectly (within the meaning of regulation 7) by a person who is or has been so involved,*
- (c) *is acting on behalf of or at the direction of a person who is or has been so involved, or*
- (d) *is a member of, or associated with, a person who is or has been so involved.*

23. A person can only be 'designated' for sanctions such as asset-freeze if (amongst other things) the Secretary of State '*has reasonable grounds to suspect that that person is an involved person*'. The record of designation stated that Mr Ioannides was acting for or associated with Mr A.

24. Mr Wigg's submission was that Mr Ioannides had put himself in a position where he was at risk of being suspected of being an involved person, by acting for Mr A. (It was not denied that Mr Ioannides had acted for Mr A some months before the designation). Mr Wigg submitted that this brought Mr Ioannides within section R115.1 and in particular:

A professional accountant shall not knowingly engage in any business, occupation or activity that impairs or might impair the integrity, objectivity or good reputation of the profession, and as a result would be incompatible with the fundamental principles.

25. He submitted that Mr Ioannides had put himself at risk of being designated and was therefore in breach, even if the services he had performed pre-dated the designation.

26. The defence position was set out in the formal Defence served in July 2024. It pointed out the lack of particulars given in the defence and the fact that the designation was the act of the Government and not Mr Ioannides. It made the point that:

[Mr Ioannides] (in common with other providers of legal, financial and other services) undertook lawful and proper work for or on behalf of Mr. A. It is denied (and the contrary is not alleged by ACCA):

- a. that there was anything illegal or improper in that work or in the Respondent undertaking such work;*
- b. that in doing so the Respondent acted in breach of any of his professional conduct duties.*

27. It argued that '*the mere fact of designation proves nothing*' and submitted that the designation itself was flawed.

28. The Committee considered this issue carefully. It bore in mind that it was not a court of law but a regulatory body whose primary duty was to protect the public. While it was essential to act with fairness, the Committee would also be expected not to take an excessively technical approach. The Committee noted that the defence team had consistently said that they would be seeking to have Mr Ioannides removed from the sanctions list. However, in the period since April 2023 this does not seem to have been done.

29. The Russia (Sanctions) Regulations came into force on 31 January 2020. Mr A is a well-known public figure. At the time when Mr Ioannides was acting for him, he must have appreciated that there was a risk to his practice in relation to the Regulations. At that point he could have taken action to divest his involvement with Mr A. In the event, that risk materialised later. Although this was a difficult decision, the Committee concluded that it had been proved on the balance of probabilities that Mr Ioannides was in breach of R115.1 and in particular the section quoted above. The Committee found Allegation 1(b) proved.

Allegation 2

30. Allegation 2 related to failing to co-operate with the investigation 'in that' he failed to respond to three letters. It is not in dispute that he did not respond. The issues were whether in the particular circumstances of this case that constituted

a ‘failure’ on his part to respond and if so, whether the failure was sufficient to justify a finding that he had failed to cooperate. The defence case was that, shortly after the designation in April 2023, the email servers of the business were shut down as a result of the sanctions. For that reason, Mr Ioannides did not receive the emails in question and did not know that an investigation had been launched. On 04 September 2023 a staff member of ACCA contacted Mr Ioannides by telephone and was provided with the alternative email address that had been set up. Thereafter there was a reasonable level of cooperation between the parties.

31. ACCA did not accept that the emails were not received but the Committee found, on the balance of probabilities, that they were not. Two of the emails were returned with a message indicating that it was not possible to deliver them. It was likely that the first email was also not received. The email service was not restored, and it seems entirely plausible that the email system had been shut down as a result of the sanctions.
32. If Mr Ioannides did not receive the emails, it could be argued that he did not ‘fail’ to answer them. However, the obligations of membership include maintaining up-to-date contact details with the regulator. On 24 April 2023 Mr Ioannides wrote to his regulator within the Cyprus Government to notify them of the designation and inform them that he would be winding down the business. By 27 April, the email servers were reported to be ‘down’. Mr Ioannides did not inform ACCA of the designation, nor did he notify ACCA that his registered email address was no longer valid. He put himself in a position where he could not receive emails from ACCA and therefore frustrated the early stages of the investigation. The Committee considered that this amounted to failing to co-operate with the investigation. The Committee found Allegation 2 proved in its entirety.

Allegation 3

33. It was a matter of record that on 17 January 2025 the Taxation Disciplinary Board made an order of expulsion against Mr Ioannides. This was based on the fact of his designation, the failure to notify that ACCA had imposed an

interim order of suspension on him as a result of the designation, and a third charge of failing to make annual returns.

34. Being disciplined by another professional or regulatory body automatically makes a member liable to disciplinary action (bye-law 8(a)(vi)). The Committee found Allegation 3 proved.

Allegation 4(a): misconduct

35. The Committee considered that the findings made in relation to Allegations 1 and 2 were very serious and likely to bring discredit to Mr Ioannides, to the Association and to the accountancy profession. It considered that he was guilty of misconduct.
36. Allegation 3 automatically made Mr Ioannides liable to disciplinary action and was largely the consequence of the matters dealt with in Allegations 1 and 2. The Committee did not consider that it was helpful to characterise it as an additional ground of misconduct.

SANCTION(S) AND REASONS

37. The Committee considered what sanction, if any, to impose in the light of its findings, having regard to ACCA's Guidance for Disciplinary Sanctions. In accordance with the Sanctions Guidance section E3, the Committee considered the seriousness of the conduct which had been found proved before going on to consider sanction. Each of the Allegations 1 to 3 were high up the scale of seriousness. Failing to cooperate and being disciplined by another body are both put into the 'Very serious' category in the Guidance. The Guidance did not deal with the matters raised by Allegation 1, but the Committee considered them to be very serious. It would not be possible for Mr Ioannides to practise as an ACCA member or in any other capacity, because of the effect of the asset freeze, the Trust Services sanctions and the Director Disqualification sanction.
38. The Committee considered mitigating and aggravating factors. The Committee

did not identify any significant mitigating factors. Mr Ioannides was of previous good character but that did not detract from the seriousness of the findings. Mr Ioannides had not apologised nor demonstrated any insight or remorse. There were no testimonials. Aggravating factors included that Mr Ioannides' actions had a significant adverse impact on the reputation of the profession, that he had been designated for a significant period of time (almost three years) and that he had not demonstrated any insight into nor remediation of his conduct.

39. The Committee was satisfied that a sanction was required. It considered the available sanctions in order of seriousness.
40. The Committee first considered the sanctions of admonishment and then reprimand but the guidance made it clear that these were not sufficient. For reprimand, the guidance states '*This sanction would usually be applied in situations where the conduct is of a minor nature and there appears to be no continuing risk to the public*'. The failures of Mr Ioannides could not be described as a minor matter.
41. The Committee next considered the sanction of severe reprimand. The guidance states that this sanction would usually be applied in situations where the conduct is of a serious nature but 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. None of those elements was present in this case. The Committee went through the list of suggested factors but few, if any, of the factors supporting a severe reprimand were present. In any event, a severe reprimand would not be sufficient to mark the seriousness of the issues in this case.
42. The Committee considered that the findings against Mr Ioannides were fundamentally incompatible with remaining as an ACCA member and that the minimum sanction it could impose was exclusion from membership. It was satisfied that the public interest outweighed Mr Ioannides' own interests in this case, particularly since he had retired from practice.

43. A member who has been excluded can normally apply to be re-admitted after one year. The Committee considered whether to extend this period but decided that it was not necessary. If he were to apply for readmission his application would be scrutinised by the Admissions and Licensing Committee.

EFFECTIVE DATE OF ORDER

44. An order does not normally take effect until the end of the appeal period. That is a minimum of 21 days but would be longer if an appeal were made. The Committee considered that it would damage public confidence in the profession if Mr Ioannides were allowed to remain on the register while the sanctions against him were in place, even for a short period. The order will therefore have immediate effect.

COSTS AND REASONS

44. Mr Wigg applied for costs totalling £7,432.00.
45. The Committee was satisfied that the proceedings had been properly brought and that ACCA was entitled in principle to its costs. It concluded that the time spent, and the sums claimed were reasonable. It determined that the appropriate figure was £7,432.00.
46. Mr Ioannides had provided no information or submissions about his means so the Committee could not consider a reduction on the basis of undue hardship or inability to pay.

ORDER

47. The Committee ordered as follows:
 - (a) The current interim suspension order against Mr John Demetrios Ioannides is revoked.
 - (b) Mr John Demetrios Ioannides shall be excluded from membership with

immediate effect.

(c) Mr John Demetrios Ioannides shall pay costs assessed at £7,432.00.

Melissa D'Mello
Chair
20 January 2026