

HEARING

APPEAL COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of: **Mr Talha Chohan**

Heard on: **23 July 2026**

Location: **Remote link via Microsoft teams**

Committee: **Dr Helen Goulding (Chair),
Mr Kalwant Grewal (Accountant)
Professor Roger Woods (Lay)**

Legal Adviser: **Mr Alastair McFarlane**

Persons present

and capacity: **Mr James Halliday (Case presenter on behalf of
ACCA)
Miss Aimee Murphy (Hearings Officer)**

Outcome: **Appeal allowed. Previous decision of Severe
Reprimand rescinded and substituted with order of
Removal from student register.**

1. ACCA was represented by Mr Halliday. Mr Chohan attended and was unrepresented. The Committee had before it a Permission to Appeal bundle, numbered pages 1 – 26, an application for permission to appeal numbered pages 1-6, the Chair's decision on permission to appeal dated 17 March 2026, numbered pages 1-4, a service bundle numbered pages

1 – 20, and the documents before the Disciplinary Committee on 22 January 2026 including private and public versions of its reasons.

SERVICE

2. Having considered the service bundle, the Committee was satisfied that notice of the hearing was served on Mr Chohan in accordance with the Appeal Regulations 2014 (“AR”).

APPEAL

3. This is an appeal made by the Association of Chartered Certified Accountants (“ACCA”) against the decision of the Disciplinary Committee, heard on the 22 January 2026, with a decision published on 13 February 2026. The sole issue raised on this appeal is whether the sanction imposed on Mr Talha Chohan (“the Respondent”) was one that no reasonable committee would have made.
4. In accordance with Regulation 6 of the Appeal Regulations 2014 (as amended) ACCA made an application for permission to appeal, which was determined by Mr Andrew Gell, Chair, on 17 March 2026.
5. Mr Gell noted that AR 6(2) states that permission to appeal should only be granted where there is both a clear public interest in doing so and there is a real prospect of success and that under AR 5(5) an appeal by ACCA can be made against only one ground:

‘An appeal by the Association against a finding or order made by the Disciplinary Committee…… may only be upheld upon the ground that the decision was one that no Committee acting reasonably …… would have made’.

6. Mr Gell further noted that his role was not to decide on any appeal, but to determine whether any appeal would be in the public interest and if there was a realistic prospect of success, were permission to be granted.
7. Mr Gell granted permission to ACCA to appeal, finding that there was:

“a clear public interest in the ACCA’s submission that the sanction imposed was too lenient being considered at an appeal hearing on the basis that there is a real prospect that an appeal committee would find that the DC’s decision on sanction was one that no committee acting reasonably would have made.”

DECISION OF DISCIPLINARY COMMITTEE ON 22 JANUARY 2026

8. The Allegations before the Disciplinary Committee were as follows:

ALLEGATIONS

Mr Talha Chohan, a registered student of the Association of Chartered Certified Accountants:

1. On 21 October 2022 was found guilty of and received a conviction for, an offence of [PRIVATE] an offence discreditable to the ACCA and/or to the accountancy profession within the meaning of Bye-law 8(a)(ix), and
2. During the period from about October 2021 to about 17 September 2023, failed to bring promptly to the attention of the ACCA or at all, the said criminal charge and/or the conviction, a fact or matters indicating that Mr Chohan may have become liable to disciplinary action, contrary to Bye-law 10(b).
3. By reason of the matters set out above Mr Chohan is:

(a) Guilty of misconduct pursuant to Bye-law 8(a)(i) in respect of allegations 1 and/or 2, or in the alternative:

(b) Liable to disciplinary action:

(i) Pursuant to Bye-law 8(a)(ix) in respect of allegation 1 and/or

(ii) Pursuant to Bye-law 8(a)(iii) in respect of allegation 2.

9. Mr Chohan admitted all the allegations. Pursuant to Regulations 12 (3)(c) of the Complaints and Disciplinary Hearings Regulations 2014, the Disciplinary Committee found Allegations 1 and 2 were found proved by admission. It noted his acceptance that his conduct amounted to misconduct and was satisfied that the allegations were sufficiently serious to amount to misconduct.

10. The Disciplinary Committee noted that on 21 October 2022, Mr Chohan was convicted at Reading Crown Court of:

[PRIVATE]

11. *[PRIVATE]*.

12. The Disciplinary Committee noted that on or about 18 September 2023 Mr Chohan contacted ACCA and applied to be re-instated as an ACCA student (he had been suspended for non-payment of fees in September 2023). He then informed ACCA that he wished to report a conviction.

13. *[PRIVATE]*

14. The Disciplinary Committee stated that:

“Mr Chohan’s conviction was for an offence that strikes at heart of public justice. [PRIVATE].”

and that:

“Mr Chohan’s failure to notify ACCA of his charge and conviction limited ACCA’s ability to conduct effective risk management and regulation and was in breach of his duties as a student.”

15. The Disciplinary Committee stated the following in relation to mitigating and aggravating factors:

“40. By way of mitigating factors the Committee took into account that no previous disciplinary findings had been made against Mr Chohan. It was further noted that Mr Chohan had displayed remorse and developed insight.

41. The Committee considered the reference provided by Mr. Chohan’s Probation Officer but was only able to attach limited weight to it.

42. The Committee went on to consider whether any aggravating factors were present in this case and was mindful to avoid double counting given the nature of the allegations. It found that the misconduct was aggravated by the harm and / or potential harm to the ACCA and the profession in general and the seriousness of the conviction itself.”

16. The Disciplinary Committee had regard to ACCA’s Sanctions Guidance and categorised Allegation 1 as "very serious" and Allegation 2 as "serious".
17. The Disciplinary Committee determined that the appropriate and proportionate sanction was one of a Severe Reprimand. It found that the Respondent had demonstrated;

"...insight into his failings, professional responsibilities and the impact that his misconduct did/could have on the public trust in the profession and ACCA."

It found he had expressed *"genuine regret and was apologetic"*. The Committee noted that a:

"...substantial amount of time... had passed since the underlying criminal conduct [PRIVATE]"

and that he had made:

"...strident successful steps towards rehabilitation and transformed his life by moving abroad, starting a family and severing all ties with his previous social group."

The Committee concluded that the Respondent had cooperated with the investigation and found that the misconduct *"in relation to each allegation was a single isolated incident"*. The Committee considered that there was sufficient evidence to conclude that the respondent was *"no longer a risk to the public"*. It referred to the decision on sanction as *"very finely balanced"* but that his remaining on the student register *"had not been rendered fundamentally incompatible due to the misconduct found proved"*.

ACCA'S SUBMISSIONS

18. ACCA submitted that the decision to allow the Respondent's continued registration with ACCA was one that no committee acting reasonably would have made.
19. ACCA submitted that the proved allegations were of extreme seriousness [PRIVATE]. The Respondent then failed for nearly a full year to notify the Association of his charge and/or conviction.

20. ACCA contended that the Disciplinary Committee fell into error in giving unreasonable weight to factors such as insight, remorse, regret, passage of time and engagement with the disciplinary process. It submitted that the Disciplinary Committee had not considered principles outlined in cases such as Bolton v The Law Society [1994] EWCA Civ 32 where the Court of Appeal held:

“Considerations which would ordinarily weigh in mitigation of punishment have less effect on the exercise of this jurisdiction.

The reputation of the profession is more important than the fortunes of any individual member. Membership of a profession brings many benefits, but that is a part of the price.”

21. ACCA submitted that in order to uphold the standing and trust in the profession, reasonable consideration should have been given to the effect of allowing the Respondent to remain registered with the Association and the public interest in upholding public confidence in the profession. Further, it contended that the Disciplinary Committee had fallen into error in assessing the factors listed within the Guidance for Disciplinary Sanctions for a Severe Reprimand. In particular, it submitted that the conviction [PRIVATE] was intentional and not reckless; the offence did cause harm to the reputation of the Association and the profession, and the factors of insight, remorse, regret and the previous good record only carried limited weight.
22. ACCA contended that irrespective of the factors listed in the Guidance for Disciplinary Sanctions to indicate a Severe Reprimand, it was not a box ticking exercise and that in all the circumstances a Severe Reprimand was not a sufficient sanction and therefore not reasonably open to the Committee. ACCA submitted that such a serious conviction [PRIVATE], in addition to not informing his regulator of the matter for a year, was fundamentally incompatible with continued registration. It

therefore submitted that the appropriate and proportionate sanction in order to maintain confidence in the profession and the regulator was one of removal from the student register.

MR CHOCHAN'S SUBMISSIONS

23. Mr Chohan noted and accepted many of Mr Halliday's submissions in particular that the conviction was very serious. He adopted and repeated the mitigation advanced before the Disciplinary Committee in January 2026 and maintained, in effect, that the sanction was, in all the circumstances, one which a reasonable committee could have reached.

DECISION ON ALLEGATIONS AND REASONS

24. The Committee accepted the advice of the Legal Adviser. It had regard to ACCA's "Guidance for appeal hearings" and to ACCA's Guidance for Disciplinary Sanctions.
25. The Committee noted Regulation 5(5) of the Appeal Regulations, which stated:

"An appeal by the Association against a finding or order made by the Disciplinary Committee, an order made by the Admissions and Licensing Committee, or a finding or order made by the Health Committee may be upheld only upon the ground that the decision was one that no Committee acting reasonably would have made."

26. The Committee noted that it is for ACCA to satisfy the Committee that the grounds of appeal are made out and that the question was not whether it would have imposed a different sanction itself but rather whether the sanction imposed by the Disciplinary Committee was one that no reasonable committee could have reached.

27. The Committee was satisfied that ACCA had established its ground of appeal. Its reasons are as follows.
28. The Committee agreed with the Disciplinary Committee that the conviction was "very serious". [PRIVATE] The Committee was satisfied that the Disciplinary Committee had given too much weight to mitigating factors such as insight, remorse and regret. Further, the Committee considered that the Disciplinary Committee had put too much weight on its view that the majority of the factors list in section C4 of the Guidance for Disciplinary Sanctions were present and had insufficient regard to paragraph C4.2 and C 4.4. In its view the Disciplinary Committee had not properly asked itself whether, in the circumstances, a Severe Reprimand was a sufficient sanction for the seriousness of the conduct, even though many of the factors for such a sanction were present. It had likely given too much weight to Mr Chohan's interests above the public interest, which included the maintenance of the reputation of the profession and the declaring and upholding of proper standards of conduct and behaviour. The Committee concluded that the Disciplinary Committee had not sufficiently considered the fundamental principle in Bolton v The Law Society (above) and that the reputation of the profession was more important than the fortunes of an individual member.
29. Accordingly, the Committee went on to consider its powers under AR 11(3). It noted its powers on sanction were those set out in Regulation 13(4). It had regard to ACCA's Guidance for Disciplinary Sanctions and bore in mind that sanctions are not designed to be punitive and that any sanction must be proportionate.
30. The Committee noted the matters of mitigation and of aggravation listed before the Disciplinary Committee. It was, however satisfied that the only proportionate and appropriate sanction for such serious conduct was Removal from the student register. It considered that such conduct was fundamentally incompatible with registration and only the sanction of

Removal was sufficient to mark such conduct to the association and the profession and to protect public confidence in both.

31. Accordingly, the appeal was allowed on the basis that no committee acting reasonably would have made a decision of Severe Reprimand. The Committee determined that the appropriate and proportionate sanction was to substitute the sanction of Severe Reprimand with one of Removal from the student register.

Dr Helen Goulding
Chair
23 July 2026