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HEARING

DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of:	**Mr Nizam Mahmudov**
Heard on:	**Thursday, 5 November 2026**
Location:	**Remote via Microsoft Teams**
Committee:	**Dr Mike Kelly (Chair)** **Mr Kalwant Grewal (Accountant)** **Ms Victoria Smith (Lay)**
Legal Adviser:	**Mr Charles Apthorp**
Persons present and capacity:	**Ms Kimberly Clifton (Case Presenter on behalf of ACCA)** **Miss Nicole Boateng (Hearings Officer)**
Summary:	**Allegations 1, 2a(i), (ii), 3(i), (ii), (iii), (iv) and 4(i) proved** **Allegations 2b and 4(ii) not considered as alternatives**
Sanction:	**Exclusion from Membership**
Costs:	**£10,000**

INTRODUCTION

1. The Committee confirmed that it was not aware of any conflicts of interest in relation to the case.

2. In accordance with Regulation 11(1)(a) of the Chartered Certified Accountants' Complaints and Disciplinary Regulations 2014 ("the Regulations"), the hearing was conducted in public.

3. The hearing was conducted remotely through Microsoft Teams.

4. ACCA was represented by Ms Clifton, Counsel.

SERVICE OF PAPERS

5. Mr Nizam Mahmudov ("Mr Mahmudov") did not attend the hearing nor was he represented.

6. The Committee considered the Service Bundle with pages numbered (1-18) in order to determine whether the Notice of Hearing ("the Notice") dated 5 October 2026 had been served in accordance with the provisions of the Complaints and Disciplinary Regulations 2014 (amended 2020) ("the Regulations").

7. The Committee noted that the Notice had been sent to Mr Mahmudov's registered email address held by ACCA more than 28 days prior to the date listed for hearing and complied with the other requirements of the Regulations.

8. The Committee was satisfied that this was effective service in accordance with the Regulations.

PROCEEDING IN ABSENCE

9. The Committee, having satisfied itself that the requirements of Regulations 10 and 22 of the Regulations had been complied with, went on to consider whether to proceed in the absence of Mr Mahmudov.

10. The Committee noted in addition to the service of the notice that ACCA attempted on 29 October 2026 to telephone Mr Mahmudov on the number registered with ACCA, however the call did not ring as the "number was not defined". On the same day a chaser email had been sent to Mr Mahmudov's email address advising him an attempt had been made to contact him by telephone. The email asked him to contact the hearings team to enable the

arrangements for his attendance to be made.

11. A further attempt to call Mr Mahmudov was made on 3 November 2026 followed up by an email by the hearings team inviting him to confirm whether he would be attending the hearing. On 4 November 2026 a hearings link was sent to Mr Mahmudov and he was invited to attend at 08.00 am to speak to the case presenter and Legal Adviser.

12. The Service Bundle includes a delivery receipt for each of the emails sent to Mr Mahmudov.

13. The Committee took into account the submissions of Ms Clifton. The Committee accepted and took into account the advice of the Legal Adviser, who referred it to Regulation 10(7) of the Regulations, ACCA document 'Guidance for Disciplinary Committee hearings and the relevant principles from the cases of *R v Jones* [2002] UKHL 5, and *GMC v Adeogba and GMC v Visvardis* [2016] EWCA Civ 162.

14. The Committee bore in mind that its discretion to proceed in the absence of Mr Mahmudov must be exercised with the utmost care and caution.

15. The Committee noted that ACCA had sent a Notice of Hearing and further correspondence to Mr Mahmudov at his registered email address. It noted that Mr Mahmudov had not responded to contact from ACCA.

16. On the basis of the evidence set out above, the Committee was satisfied that ACCA had made reasonable efforts to notify Mr Mahmudov about today's hearing and that Mr Mahmudov knew about the hearing, having received the emails at his registered email address. The Committee noted that Mr Mahmudov had not applied for an adjournment of today's hearing and there was no indication that such an adjournment would secure his attendance on another date. The Committee was mindful that there is a public interest in dealing with regulatory matters expeditiously.

17. Having balanced the public interest with Mr Mahmudov's own interests, the Committee decided that it was fair and in the interests of justice to proceed in his absence and that he had voluntarily absented himself.

Allegations

Mr Nizam Mahmudov ('Mr Mahmudov'), at all material times an ACCA member:

1. Between January 2022 and 29 April 2025, while employed at the Firm, improperly claimed any or all of the personal expenses particularised in Schedule A totalling about £15,036.55, in breach of Firm A's UK Travel and Expenses Policy.

2. In respect of Allegation 1 above, any of all his conduct was:

    (a) Dishonest, in that Mr Mahmudov claimed expenses from Firm A when:

        (i) He knew he was not entitled to claim any or all such expenses; and/or

        (ii) He deliberately modified receipts to inflate the cost of his expenses he claimed from Firm A; or in the alternative.

    (b) Mr Mahmudov's conduct demonstrates failure to act with integrity.

3. Failed to cooperate with the consideration and/or investigation of this complaint in that he failed to respond sufficiently or at all to any or all of ACCA's correspondence below, contrary to Regulation 3(1) of the Complaints and Disciplinary Regulations 2014:

    (i) 25 November 2025
    (ii) 10 December 2025
    (iii) 6 January 2026
    (iv) 29 January 2026

4. By reason of any or all of the conduct above Mr Mahmudov is

    (i) Guilty of Misconduct and liable to disciplinary action pursuant to Bye-law 8(a)(i); or in the alternative:

(ii) Liable to disciplinary action pursuant to Bye-law 8(a)(iii) in respect of Allegation 3.

Schedule A

Description	**Amount in GBP**
Submission of Firm A's Corporate Credit Card to transfer funds to family member's PayPal account	2,300
Submission of expense claims supported by receipt that appeared to have been modified of Visa renewal application	900
Submissions of expense claims supported by receipts that appeared to have been modified inflating the actual costs of taxis	1,005.41
Submissions of expense claims supported by receipts that appeared to have been modified inflating the actual costs of hotels	2,330
Submission of expense claims between 12 March 2024 to 12 April 2024 with missing receipts for taxi and meals	8,501.14
Total	15,036.55

18. The Committee had considered the following documents: a Hearing Bundle (pages 1 to 115) and a Service Bundle (pages 1 to 19).

Brief Background

19. Mr Mahmudov became a member of ACCA on 14 October 2021.

20. Mr Mahmudov was employed by Firm A as an Assistant Manager from 4 January 2022 to 29 April 2025 in Audit. He was dismissed by Firm A on 29 April 2025 following a disciplinary meeting. It was alleged that Mr Mahmudov had wrongfully claimed £17,238.78 of expenses from the firm.

21. On 28 July 2025, Mr Mahmudov wrote to ACCA stating, *'I am writing to self-report a matter in accordance with my obligations as a member under ACCA Bye-law 10. I was employed by Firm A until 29 April 2025.'* Mr Mahmudov also provided ACCA with the disciplinary outcome letter.

22. Following his self-reporting he was referred to the Investigations team, who wrote to Firm A seeking the Firm's expenses and travel policy and all evidence it had gathered.

23. Firm A provided the following documentation, a video recorded interview on 16 January 2025 with Mr Mahmudov and Firm A's Investigation Officers, the Disciplinary Outcome Letter dated 29 April 2025 and Firm A's UK Travel and Expenses Policy Also included was 'Appendix 2,' containing visa payments, a statement and application result. A 'CCC' (Corporate Credit Card) folder, containing a statement for the corporate credit card 'Nizam receipts' containing various folders of receipt invoices, including invoice, email chain, flights, hotels, meals, taxi, train and visa. 'Appendix 3'; an excel spreadsheet containing the analysis and comments of Firm A's investigation.

24. During the video recorded interview, of which the Committee reviewed a written summary in ACCA's Report, Mr Mahmudov was questioned about his expenses and made the following responses:

Corporate Credit Card

25. In response to '*when did you obtain the corporate credit card?'* Mr Mahmudov stated *'I obtained my cooperate (sic) credit card in December 2024…because I need to apply to visa application first, I have tried to put my claw back letter to expense portal and then get the reimbursement and by that way so I can pay my visa expenses. But because I didn't like attach documents for my claim, I think that's the reason I didn't get it. So, then I applied for a corporate card just to get it, and you know, pay it that way.'*

26. In response to '*what does the policy say about corporate credit cards?'* He responded *'To be honest, because I got it like recently, I didn't get too much details about the corporate card and but overall like yeah I'm aware that like it should be like mostly it should be like business related expenses etcetera, this kind of stuff'.*

27. In response to the CCC PayPal transfer to [REDACTED]. He stated *'That is* [PERSON A]*….normally when I paid for my expenses, I requested my money*

from [PERSON A] *just to pay for my visa expenses…* [PERSON A] *gave me around 2.5 and I for now I'm just able to pay* [PERSON A] *back 2000 by corporate card…I didn't put it into any company claims because I was just going to pay by myself not related to company'. (sic)*

28. In response to the question *'So you've effectively paid a debt to* [PERSON A] *using Firm A's money'.* Mr Mahmudov responded *'Yeah, but I thought if I'm not attaching it to any claim, if I still pay it like myself'. (sic)*

29. In response to the question *'Why did you not use this corporate card to incur the cost for the Visa rather than borrowing money from* [PERSON A]*?'* Mr Mahmudov stated that he left the visa application to the last minute and only obtained the CCC 16 December 2024 and the visa application was due by 19 December 2024.

30. In response to why he did not apply for a corporate card prior to the visa application, Mr Mahmudov stated *'probably that's the reason I just kept to the last-minute thinking of I will have money and will apply for visa. But I think it just didn't work out because of like I didn't have enough money in my account. So that's why I applied to the Amex'. (sic)*

31. In response to *'have you used the corporate card for anything else other than those two transfers?'* Mr Mahmudov responded *'yes to be honest yes, as I mentioned I did not know that exactly. Like if I am not claiming and if I am paying it myself, I thought I can use it. But now to be honest, I'm aware I can't'.*

32. Mr Mahmudov further stated he had read the policy but had missed the personal expense use on the CCC part of the policy.

33. In summary, Mr Mahmudov was loaned £3,500 by [PERSON A] to his current account for his visa payment on 17 December 2024. Mr Mahmudov obtained a corporate card and transferred money into [PERSON A's] PayPal account. He transferred £2000 on 2 January 2025 and £300 on 5 January 2025**.**

Accommodation

34. Mr Mahmudov stated that for his business trips to Guernsey he booked directly

with the hotel with 'Premier Inn' and when he was asked why he booked directly and did not book through CWT as per policy, he responded; *' So the hotel I booked directly, it was Premier Inn….it's like quicker to book and I know that like the hotel name is on the company portal, so it's not like a different hotel or wrong something. So I thought it was fine'. (sic)*

35. When asked *'so you thought it was ok to breach the company policy by booking hotel directly because it was quicker.'* He responded, *'no I mean I didn't think that it's a breach of policy…yeah I definitely understand that, I need to be very careful with expense policy in terms of corporate usage as well as booking everything with company portal'.*

36. Mr Mahmudov was notified that invoices he submitted for accommodation were booking confirmations. The Investigating Officers stated that the booking confirmations were not accepted and would need invoices for accommodation expenses he submitted.

37. Mr Mahmudov was shown a hotel confirmation booking receipt dated 20 September 2024 at Premier Inn in Guernsey for £342. In response Mr Mahmudov stated *'yeah but just telling it's the same problem again, probably I changed the values here as well. (sic)*

38. In response to *'is there any other documents you'd changed values?'* He stated that *'yeah I mean, I changed PDFs definitely yeah'.* He admitted that this was to get more money and had changed most of his stays with Premier Inn Guernsey.

39. In response to *'was there any kind of pattern or you just kind of uplifted randomly of what happened.'* Mr Mahmudov stated he uplifted randomly and stated *'I think it's a little bit financial pressure as well, which makes me do this. But I definitely understand this is something wrong and I shouldn't do it'.*

40. Mr Mahmudov admitted he modified most of the accommodation invoices for Premier Inn inflating the actual amount that was paid**.**

Taxis

41. In response to *'how do you book taxis, what can be, what taxis can you claim*

and what document should be provided?'. He responded *'normally what I was doing like most of taxis I did to be honest it depends….I prebooked through FreeNow or Uber depending on like price and availability. It depends on timing how I book taxis like if it's so early in the morning where like my flights to Gurnsey required me to book for very early 4am, 5am in the morning taxis….so basically I paid through card then reimbursed it'.(sic)*

42. Mr Mahmudov was shown a taxi receipt incurred on 9 September 2024 with FreeNow for £340 for a journey from Wantage Road to Gatwick Airport. Mr Mahmudov stated that he received emails from FreeNow when he booked a taxi. He was asked to share the email on screen with the investigating officers however declined to do so stating *'it's my personal email address'.*

43. In response to *'was anything changed on these documents. Have you modified any of them? What did you change on them'* He responded, *'I'm just trying to remember, maybe if you check it…..Yeah I think I did….the value.'*

44. In response to *'why did you changed the value?'* He responded *'I mean yeah, I understand as I mentioned my wrongdoing and I'm ready to repay whatever it is, like deduction from my salary or something….I mean I don't remember exactly the reason but overall I did it because I don't know.' (sic)*

45. In response to *'so on your apo there you said this journey is on your app and what's the value on that invoice or receipt on the app the 9 September?'* Mr Mahmudov stated that value of this invoice was £223 and admitted to inflating the total price by £117.

46. When asked if he had done this with any other documents? Mr Mahmudov admitted that he did so approximately five to six times on taxi receipts and that there was '*no specific reason, probably I just wanted to get more money*.'

47. In response to *'did you think that as a regulated auditor it was reasonable to inflate?'* Mr Mahmudov responded *'I'm aware of what I did and I just want to like cover whatever cost and like deduction from my salary or how you decide it'.*

48. Mr Mahmudov admitted he modified most of his taxi expenses with FreeNow inflating the actual amount that was paid.

Visa application

49. Mr Mahmudov had to submit his visa application by 19 December 2024. In response to *'who approved the amount you could claim?'* He stated that *'I think so that happens through the portal, the* [REDACTED] *portal, the process. And so I received the letter if I'm not mistaken.'*

50. In response to *'how did you receive the letter?'* He responded, *'it should be email or the portal, but to honest I don't exactly remember.'*

51. In response to '*how much was approved?*'. He responded stating that he could not recall.

52. Mr Mahmudov was asked about the visa renewal claw back letter. Mr Mahmudov showed Firm A's Investigating Officers that he received the claw back letter on 25 September 2009 allowing him to make a reimbursement for the associated Government fees of £5,832. As per the letter, Mr Mahmudov confirmed that he did not pay the fees upfront and then claim it back with Firm A.

53. In response to *'is anything being changed on that document from the document that was provided to you?* And *'this is definitely the document that was provided to you through that portal?'* He responded *'No I am not aware of any change…..this is what I received and I uploaded to the portal.'*

54. In response to *'so that document that you submitted flagged off an expense hub and basically said there has been changes on the document.'* Mr Mahmudov was shown the original document source which came through the portal which had shown the reimbursement fee of £4,932. He stated that *'Is there any chance that there was a different letter than being changed, because I don't remember this one…..it feels like looks I changed it'. (sic)*

55. Mr Mahmudov was shown the document properties of the claw back letter for reimbursement fees of £5,832 and it being created on 25 September 2024 and modified on 25 November 2024. Mr Mahmudov stated that *'I don't aware what's that and why it's a modified because I actually can't modify it as I'm aware PDF etcetera, we can modify or adjust in* [REDACTED]*'. (sic)*

56. The Investigating Officer stated that was modified and the difference between the two documents were the prices which went from £4,932 to £5,832. The Investigating Officers stated that the expense claim was submitted on 12 November 2024 on the portal. Mr Mahmudov was asked whether he attached anything to support this expense claim. Mr Mahmudov stated, *'I think at first I didn't attach anything and I didn't get then attached the claim letter, if I'm not mistaken.' (sic)* The expense team had contacted him querying the missing receipt.

57. On 3 December 2024 Mr Mahmudov attached the receipt to the claim. In response to *'how could this possible be somebody else rather than you if we look at the dates?* Mr Mahmudov stated, *'ok ok I think I might do some adjustments to it because I thought maybe like the expenses will be more or something so that's why I did it…..I corrected it earlier this week and put the right one'. (sic)* Mr Mahmudov admitted to inflating the visa renewal claw back letter by £900.

58. The visa renewal claw back letter stated that Firm A would support with the visa renewal application, including reimbursement for the associated Government fees of £4,932. Mr Mahmudov had submitted a visa renewal claw back letter of £5,832 even though he had not incurred that cost at time he submitted this expense.

59. Mr Mahmudov admitted during the interview that he only changed the visa claw back letter on the portal after he had been contacted by Firm A's Investigating Officers and prior to the interview on 16 January 2025.

Expenses occurred between 12 March 2024 to 12 April 2024

60. Mr Mahmudov submitted expenses for taxis and hotels for this duration totaling £8,501.14. He stated that due to a busy period he did not attach receipts as per the policy on the portal and instead attached an email approved by Firm A's partner. He was advised by Firm A's investigating officers that proof of payment, any receipts and invoices should be provided

61. In response to *'is there a reason why we're not providing any receipt.'* Mr Mahmudov stated that there were *'lots of claims'* and that if he would *'normally*

to be honest the approach I made was like claiming it and then attaching the receipts'. Receipts relating to this period were not provided by Mr Mahmudov to Firm A.

Firm A UK Travel and Expenses Policy November 2024

Corporate Credit Card

62. The policy for the corporate card states *'The corporate card must not be used for any personal expenditure….The professional must also submit an expense report within the expense system as Personal Pay Responsibility in order to clear the Amex buffer. Personal expenses must never be reclaimed from the firm''*.

Visas

63. The policy states *'UK sponsored visas may be claimable depending on what has been agreed within the terms of this sponsorship. Professionals who have a UK visa sponsorship from the Firm should consult their sponsorship policy and/or contract of employment to determine claimable expenses. These documents must be attached as evidence along with associated visa claims.''*

Accommodation

64. The policy states *'all bookings must be made through myCWT to ensure appropriate allowance limits are applied.'*

Taxi

65. The policy states:

'Taxi may be used when travelling:

- *Between client site and firm's offices*
- *To/from business events*
- *Between a temporary work location and a station, airport or port.*
- *Taxis should be booked via the firms preferred Taxi Vendors.*

Claim must include:

- *A dated receipt*
- *Details of start/end points.*
- *The business event attended, or purpose of trip.*
- *The time must also be stated where a taxi is taken for returning home after 9pm.'*

Allegation 3

66. Following referral of this matter to ACCA's Investigation team, on 25 November 2025, ACCA Investigations Officer wrote to Mr Mahmudov to request all supporting documentation relating to the allegations made by the Firm, including any correspondence, internal reports, or evidence they may have cited and relevant records or explanations that may assist in clarifying the nature and context of the claims submitted with a covering email.

67. The letter also referred to Complaints and Disciplinary Regulation 3(1) requiring Mr Mahmudov to cooperate with the investigation by responding to the questions by the deadline. This email was sent encrypted with a password.

68. Shortly after this encrypted email was sent, an Outlook email was sent to Mr Mahmudov on the same day asking him to check if he had received the encrypted email and if not to let ACCA know. A delivery receipt was obtained to confirm the email was delivered successfully.

69. An extract taken from ACCA's records for Mr Mahmudov on the day the above emails were sent records that the email address for Mr Mahmudov used for these emails was the email address on ACCA's system that day.

70. Given that Mr Mahmudov did not respond by the above deadline, a further encrypted email was sent on 10 December 2025 (first reminder) with a copy of the letter attached to the previous email. In the covering email Mr Mahmudov was reminded of his obligation to cooperate by responding to the questions in the letter and to do so by 5 January 2026.

71. Shortly after this encrypted email was sent, an Outlook email was sent to Mr

Mahmudov on the same day asking him to check if he had received the encrypted email and if not to let ACCA know. A delivery receipt confirmed the email was delivered successfully.

72. No response was received to this first reminder and therefore a second reminder was sent to Mr Mahmudov on 6 January 2026 with a copy of the letter attached to the initial email. In the covering email Mr Mahmudov was again reminded of his obligation to cooperate by responding to the questions by 14 January 2026 and that if he failed to do so ACCA would raise an allegation of failure to cooperate against him.

73. Shortly after this encrypted email was sent, an Outlook email was sent to Mr Mahmudov on the same day asking him to check if he had received the encrypted email and if not to let ACCA know. A delivery receipt confirmed the email was delivered successfully. No response was received to this final reminder.

74. On 26 January 2026, ACCA's Investigating Officer received evidence from Firm A which included a video recorded interview with Mr Mahmudov, receipt expenses for Credit Corporate Card (CCC), receipt invoices for taxis, meals, hotels, trains and flights.

75. On 29 January 2026, Mr Mahmudov was notified of the evidence received from Firm A and given a final opportunity for his response. Mr Mahmudov was again reminded of his obligation to cooperate by responding by 5 February 2026.

76. Shortly after this encrypted email was sent, an Outlook email was sent to Mr Mahmudov on the same day asking him to check if he had received the encrypted email and if not to let ACCA know. A delivery receipt confirmed the email was delivered successfully. No response was received to this final reminder.

77. On 6 February 2026, ACCA investigating officer called the number recorded on ACCA system for Mr Mahmudov. The number was unavailable and the call disconnected. On 17 March 2026, ACCA investigating officer wrote to Mr Mahmudov to inform him a report of disciplinary allegations would be referred to an independent assessor for review. Mr Mahmudov was invited to submit any

comments for the assessor's attention. No response was received.

78. On 21 April 2026, ACCA investigating officer wrote to Mr Mahmudov to inform him that the assessor decided to refer the report of disciplinary allegations for consideration before ACCA's Disciplinary Committee. Mr Mahmudov was asked to complete and return the Case Management Form (CMF) by 12 May 2026. No response was received.

79. On 19 August 2026, ACCA's Adjudications Department wrote to Mr Mahmudov's registered email address, via ACCA's case management system, requesting completion of the CMF by 26 August 2026. The case management system shows that the email was opened on the same date at 15:14. Shortly after this encrypted email was sent, an Outlook email was sent to Mr Mahmudov on the same day asking him to check if he had received the encrypted email and if not to let ACCA know. A delivery receipt confirmed the email was delivered successfully.

80. On 20 August 2026 and 10 September 2026, ACCA's Adjudications Department wrote to Mr Mahmudov's registered email address via ACCA's case management system, notifying Mr Mahmudov of the scheduled disciplinary hearing, and requesting completion and return of the CMF by 17 September 2026. The case management system shows that the emails were opened respectively on 20 August 2026 at 14:12 and on 11 September 2026 at 11:01.

ACCA's Submissions

81. At the outset of the hearing Ms Clifton referred the Committee to ACCA's written submissions and submitted that Allegation 1 was capable of proof by reference to the documents in the bundle. She submitted that Mr Mahmudov had admitted during his interview at Firm A to have modified and inflated personal expenses amounting to £15,036.55 which he was not entitled to claim from the firm.

82. Ms Clifton submitted that Allegation 2 was capable of proof by reference to the responses of Mr Mahmudov and the documents in the bundle. She further submitted that Mr Mahmudov was aware he was making false expense claims which he admitted he should not have made. She further submitted that his conduct would be considered by ordinary members of the public to be

dishonest.

83. Ms Clifton informed the Committee that if dishonesty was not found proved the Committee should go on to consider whether Mr Mahmudov in making inflated expense claims lacked integrity and referred the Committee to the case of *Wingate and Evans*.

84. Ms Clifton made submissions in respect of allegation 3, Misconduct and referred the Committee to the case of *Roylance* and stated that misconduct was a matter of professional judgment for the Committee. In addition, she invited the Committee to consider whether Mr Mahmudov's conduct in failing to cooperate with the investigation was a breach of CDR Regulation 3(1) and by virtue of Bye-law 8(a)(iii).

Member's Response

85. The Committee took into account Mr Mahmudov's responses to the questions put to him during the investigation by Firm A.

DECISION ON FACTS/ALLEGATION(S) AND REASONS

86. The Committee considered the oral and written submissions carefully, reviewed the exhibits, took account of the written submission of ACCA and responses of Mr Mahmudov. The Committee received advice from the Legal Adviser, which it accepted.

Allegation 1

87. The Committee found Allegation 1 proved.

88. The Committee found that Mr Mahmudov at the relevant time was employed by Firm A and he was aware of and subject to the firms UK Travel and Expenses Policy.

89. The Committee had regard to the clear admissions made by Mr Mahmudov during his interview. For example Mr Mahmudov admitted to inflating the visa renewal claw back letter by £900 and admitted that he inflated claim five to six

times on taxi receipts and that there was '*no specific reason, probably I just wanted to get more money*.' He also admitted that he modified most of the accommodation invoices for Premier Inn inflating the actual amount that was paid**.**

90. The Committee reviewed Schedule A and concluded that there was documentary evidence which, on the balance of probabilities, proved to the satisfaction of the Committee that he had improperly claimed the sums set out in Schedule A.

91. The Committee therefore found Allegation 1 proved.

Allegation 2

92. The Committee in reaching its determination took into account the submissions made on behalf of ACCA and the legal advice. It noted and took account of Mr Mahmudov being, prior to these allegations, of good character.

93. The Committee found Allegations 2(a)(i) and 2(a)(ii) proved.

94. The Committee found that Mr Mahmudov knew, by his own admission, when he completed the expenses claims that (i) he was not entitled to claim those expenses and (ii) that he had falsely inflated the sums claimed. The Committee also noted the widespread and repeated false claims made by Mr Mahmudov which indicated a degree of pre-planning and a systematic approach in inflating his expense claims. Having determined what Mr Mahmudov knew when he submitted the claims the Committee went on to determine that Mr Mahmudov's conduct, by the standards of ordinary decent people, in misleading his employer by submitting false expenses claims, to be dishonest.

95. The Committee having found Allegation 2(a)(i) and 2(a)(ii) proved did not go onto consider the alternative Allegation 2(b).

Allegation 3

96. The Committee found Allegation 3 (i) - (iv) proved.

97. The Committee had regard to the documents in the bundle and the submissions of Ms Clifton. In the Committee's view there was a clear pattern of a failure to cooperate with ACCA's investigation by failing to respond to the correspondence sent to Mr Mahmudov's email address and received by him. It therefore found allegation 3 (i) - (iv) proved.

MISCONDUCT AND LIABILITY TO DISCIPLINARY ACTION

Allegation 4

98. The Committee found Allegation 4 proved.

99. The Committee noted its findings above in respect of Allegation 2 that Mr Mahmudov had been dishonest in his claims for expenses. The Committee considered the seriousness of the Allegations found proved. It determined that the breaches found proved were serious failures and not minor or technical breaches.

100. The Committee considered that the widespread and systematic false and exaggerated claims for expenses fell far below the standard of conduct expected of an accountant and would be considered by other members of the profession as appalling misconduct.

101. The Committee therefore found Allegation 4(i) proved.

102. Having determined that Allegation 4(i) was found proved it did not go on to determine Allegation 4(ii), being put in the alternative to 4(i).

SANCTION AND REASONS

103. The Committee considered what sanction, if any, to impose, taking into account all it had read in the bundle of documents, ACCA’s Guidance for Disciplinary Sanctions, and the principle of proportionality. It had also listened to the submissions of Ms Clifton and noted Mr Mahmudov's responses and the legal advice from the Legal Adviser, which it accepted.

104. The Committee was mindful of the fact that its role was not to be punitive and

that the purpose of any sanction was to protect members of the public, maintain public confidence in the profession and in ACCA, and to declare and uphold proper standards of conduct and performance.

105. The Committee first considered the seriousness of the conduct of Mr Mahmudov. It considered that his dishonest conduct was very serious and noted the degree of sophistication in the preparation of the false expense claims and wide-ranging nature of the claims. In addition the conduct of Mr Mahmudov undermined the reputation of the profession and the regulatory regime by his failure to cooperate with the investigation.

106. The Committee considered whether any mitigating or aggravating factors featured in this case.

107. In mitigation the Committee took into account the admissions made by Mr Mahmudov during Firm A's investigation. It also noted he had no previous disciplinary findings made against him.

108. As for aggravating factors, the Committee found Mr Mahmudov had failed throughout to show an appropriate level of insight, particularly with regard to his misconduct. It also found that the failure to cooperate with the investigation by his regulator was a serious breach of his obligations as a member of the accountancy profession. Further there was limited evidence of remorse shown by Mr Mahmudov.

109. The aggravating factors also included:

- A serious departure from standards;
- Failure to comply with professional standards over a significant period;
- Multiple acts of dishonesty;
- Abuse of trust;
- Loss of significant sums to Firm A
- Serious reputational damage to the profession;

110. The Committee considered the available sanctions in increasing order of severity having decided that it was not appropriate, given the level of seriousness, to conclude the case with no further action.

111. On the basis of its findings, the Committee concluded that an admonishment would not represent a sufficient and proportionate outcome. Such a sanction would not adequately reflect the seriousness of the Committee's findings.

112. The Committee then considered whether a reprimand would be an appropriate sanction. On balance, and reflecting on the criteria suggested in the Guidance, the Committee concluded a reprimand would not represent a sufficient and proportionate outcome given the seriousness of the misconduct, the lack of insight, the risk to the public and the negative impact on the reputation of the profession.

113. The Committee considered a severe reprimand. It took into account Mr Mahmudov's limited admissions and assessed the risk of repetition, given his apparent attitude towards compliance, of future misconduct as high.

114. The Committee considered that there was a continuing risk to the public and there was no evidence provided by Mr Mahmudov on which it was able to assess his insight into the impact of his dishonest conduct, as an accountant submitting false claims, on public confidence in the profession. The Committee also concluded that Mr Mahmudov fundamentally failed to grasp the impact of his misconduct.

115. The Committee concluded that, given the serious breaches which occurred over a prolonged period and the impact on public confidence in the profession, a severe reprimand was insufficient to protect the public.

116. The Committee decided that exclusion from Membership was the appropriate and proportionate sanction. The Committee took account of the damaging impact on public confidence in the profession, Mr Mahmudov's persistent lack of insight, the potential of a serious risk to the public of permitting a dishonest accountant to continue in practice. The Committee also took into account the inevitable impact of exclusion on Mr Mahmudov, both financially and on his reputation.

117. The Committee, having taken all matters into account, determined that Mr

Mahmudov be excluded from membership of ACCA.

118. The Committee determined that Mr Mahmudov, presented an immediate risk to the public. It therefore concluded that the public needed to be protected from a seriously dishonest accountant, by the making of an immediate order.

COSTS AND REASONS

119. The Committee had been provided with a detailed costs schedule relating to ACCA's claim for costs.

120. The Committee concluded that ACCA was entitled to be awarded costs against Mr Mahmudov, given the majority of allegations had been found proved against him. The amount of costs for which ACCA applied was £10,300.93**.** The Committee did not consider that the claim was unreasonable but reduced the sum as the hearing had taken less time than estimated.

121. Mr Mahmudov had failed to provide ACCA with documentary evidence of his means during the hearing, which indicated that he had the means to pay ACCA's reasonable costs.

122. In all the circumstances, and in exercising its discretion, the Committee considered that it was reasonable and proportionate to award costs to ACCA in the sum of £10,000.

123. The Committee made the following order:

a. Mr Mahmudov be excluded from membership.
b. The order shall come into effect immediately.
c. Mr Mahmudov shall make a contribution to ACCA's costs in the sum of £10,000.

Dr Mike Kelly
Chair
5 November 2026