

HEARING

DISCIPLINARY COMMITTEE OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

REASONS FOR DECISION

In the matter of:	Mr Shane Mosley
Heard on:	Wednesday, 23 September 2026
Location:	Remotely via Microsoft Teams
Committee:	Mr David Tyme (Chair) Dr David Horne (Accountant) Ms Samantha Lipkowska (Lay)
Legal Adviser:	Ms Charlotte Pope-Williams
Persons present and capacity:	Mr Matthew Kerruish-Jones (Case Presenter on behalf of ACCA) Mr Shane Mosley (Member) Mrs Mosley (Member's wife) Ms Aimee Murphy (Hearings Officer)
Summary	Allegations 1 (a) & (b), 2, 3 (a), (b) & (c) and 4 (a) proven. Severe Reprimand.
Costs:	£6,800

1. ACCA was represented by Mr Kerruish-Jones. Mr Mosley attended the hearing, but he was not represented. Mr Mosley's wife, [PRIVATE] Mosley, attended the hearing to provide moral support to her husband. The hearing was conducted remotely through Microsoft Teams.

2. The Committee had before it the following documents: (i) a Bundle of 437 pages (the “**Main Bundle**”); (ii) a 17-page Additional Bundles (iii) a 30-page Service Bundle (iv) 1-page Simple Costs Schedule and (v) a 1-page Detailed Costs Schedule (together “**the bundle of documents**”).

PRELIMINARY APPLICATIONS

3. Mr Mosley applied for part of the hearing to be held in private pursuant to 11(1)(a) of the CDR because sensitive personal information would feature in Mr Mosley’s submissions and his evidence.
4. In response to Mr Mosley’s application for the hearing to be held in private Mr Kerruish-Jones, on behalf of the ACCA stated that the application itself should be held in private given the nature of the sensitive personal information concerned. Mr Kerruish-Jones submitted that ACCA supported Mr Mosley’s application and sought to make it on a joint basis with him. Mr Kerruish-Jones submitted that the central issue from ACCA’s perspective was whether just some or all of the hearing should be heard in private.
5. The Committee accepted the advice of the legal adviser in accordance with 11(1)(a)(ii) of the CDRs.
6. The Committee decided that it would be proportionate, fair and expedient for the entirety of the hearing to be in private considering sensitive personal data relating to Mr Mosley would be bound up in the entirety of the hearing and the nature of the allegations.

ALLEGATIONS

Mr Shane Mosley, an ACCA Fellow:

1. *From 26 June 2017 to about 06 August 2024, contrary to Section B2 of the Code of Ethics and Conduct, failed on behalf of Firm A to comply with (or demonstrate compliance with) the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (“the MLRs”), namely:*

- (a) *Regulation 18(1); and/or*
 - (b) *Regulation 18(4).*
- 2. *Contrary to Global Practising Regulations 2003, Regulation 14(2), failed to supply all the information necessary to enable ACCA to complete its monitoring process efficiently.*
- 3. *Contrary to Regulation 3(1) of the Complaints and Disciplinary Regulations 2014, failed to cooperate fully or at all with an investigation into a complaint in that he failed to provide a response to any or all of ACCA's correspondence dated:*
 - (a) *25 September 2024*
 - (b) *28 October 2024*
 - (c) *21 November 2024*
- 4. *By reason of his conduct:*
 - (a) *Mr Mosley is guilty of misconduct pursuant to bye-law 8(a)(i) in respect of any or all of the matters set out at allegations 1 – 3 above; and/or in the alternative*
 - (b) *Is liable to disciplinary action pursuant to bye-law 8(a)(iii) in respect of allegations 1 - 3.*

BACKGROUND

- 7. On 16 October 2000, Mr Mosley was admitted as an ACCA member. On 16 October 2005 Mr Mosley was admitted as an ACCA Fellow. He is and was therefore bound by ACCA's Byelaws and Regulations at all material times relevant to these proceedings.
- 8. On 19 August 2024, the AML Team at ACCA referred Mr Mosley for investigation following a desk-based monitoring review of Firm A, where Mr Mosley was Principal, to monitor the firm's compliance with the Money Laundering, Terrorist

Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (“**MLRs 2017**”) (the “**Investigation**”). ACCA is the AML supervisor of Firm A.

9. Mr Mosley was the Principal and the Money Laundering Reporting Officer (“**MLRO**”) at all material times covered by the Investigation. Mr Mosley also held a practising certificate at the time of the Investigation.
10. Following completion of the Investigation, ACCA submit that Mr Mosley is liable to disciplinary action as described in allegations 1 to 4 set out above.

DECISION ON FACTS/ALLEGATION(S) AND REASONS

11. The Committee carefully considered all the evidence before it.
12. The Committee took into account the oral submissions made by Mr Kerruish-Jones and the oral submissions made by Mr Mosley who was in attendance at the hearing. The Committee also accepted the advice of the Legal Adviser.
13. The Committee noted and considered the written evidence about Mr Mosley’s character and his personal circumstances during the period to which the Investigation relates from (i) Mr Mosley (ii) his wife; (iii) a friend and accountant and (“**Person A**”) (iv) a friend and colleague (“**Person B**”). The Committee also considered medical evidence [PRIVATE] and two invoices related to Mr Mosley’s personal circumstances at the material time to which the Investigation relates.
14. The Committee kept in mind that the burden of proving the allegations rests with ACCA and that the standard of proof is the balance of probabilities.

Allegation 1

15. As to Allegation 1 the Committee reflected on the requirements of Section B2 of the Code of Ethics and Conduct and Regulation 18 of the MLRs. The Committee considered that Regulation 18(1) of the MLRs provides that: “*A relevant person must take appropriate steps to identify and assess the risks of money laundering and terrorist financing to which its business is subject*” and

Regulation 18(4) of the MLRs which provides that “*A relevant person must keep an up-to-date record in writing of all the steps it has taken under paragraph (1), unless its supervisory authority notifies it in writing that such a record is not required*”.

16. The Committee noted that in Mr Mosley’s Case Management Form dated 01 September 2026, he had given a qualified admission as follows:

“I admit Allegation 1 on the basis that I failed adequately to demonstrate Firm A’s compliance with the relevant requirements of Regulation 18 of the MLRs. In particular, the AML documentation available to demonstrate compliance was deficient and I had not satisfactorily addressed those deficiencies before my departure from Firm A.

17. Mr Mosley repeated the qualified admission to Allegation 1 contained in his Case Management Form in the hearing. He stated that he recalled that the information was available in respect of compliance with the MLRs but that he believed that it was not in a format compatible with ACCA requirements. No evidence supporting this recollection had been provided.
18. The Committee reflected carefully on the precise wording of Allegation 1 and considered that the evidence supported a finding that Mr Mosley had failed to demonstrate compliance with Regulations 18(1) and 18(4) of the MLRs during the relevant period. The Committee observed that whilst on 8 August 2024 Mr Mosley had supplied a copy of a firm wide risk assessment created on 6 August 2024 to ACCA; he had not supplied any other evidence to ACCA demonstrating his compliance with the MLRs on behalf of Firm A for the 7-year period commencing on 26 June 2017 and ending on 06 August 2024
19. In the circumstances, the Committee was satisfied that Mr Mosley had failed to demonstrate compliance with Regulations 18(1) and 18(4) of the MLRs during the relevant period contrary to Section B2 of the Code of Ethics and Conduct.
20. The Committee therefore found that Allegation 1 had been proved.

Allegation 2

21. In considering Allegation 2 the Committee noted that Mr Mosley admitted the allegation both in writing before the hearing and at the start of the hearing when each of the allegations were read out to him by the Hearings Officer.
22. The Committee noted that Mr Mosley's admission to Allegation 2 was consistent with the evidence contained in the bundle of documents. The bundle of documents included evidence of ACCA requesting information from Mr Mosley throughout July 2024 and August 2024 so that ACCA could undertake and complete its AML supervisory work. The Committee noted that despite multiple chaser emails during July to August 2024, Mr Mosley did not provide complete and accurate information to ACCA in respect of its AML supervisory work which resulted in ACCA undertaking the relevant AML review with the limited information available to it at that time.
23. In the circumstances the Committee found that allegation 2 had been proved.

Allegation 3

24. As to Allegation 3, the Committee noted that Mr Mosley admitted the entirety of the allegation both in writing and at the start of the hearing when the allegations were read to him by the Hearings Officer.
25. Further to Mr Mosley's admission to Allegation 3, the Committee noted that the evidence was clear that Mr Mosley had failed to provide substantive and/or timely responses to ACCA's correspondence as part of its investigations of (i) 25 September 2024; (ii) 28 October 2024 and (iii) 21 November 2024.
26. The Committee therefore found that the entirety of Allegation 3 in respect of each piece of ACCA correspondence had been proved.

Allegation 4

27. As to Allegation 4(a) the Committee, having regard to the legal definition of misconduct with particular reference to Lord Clyde's speech in the case of in

Roylance v General Medical Council [2000] 1 AC 311 at 331, asked itself whether the proven conduct amounted to misconduct.

28. The Committee found all of the allegations to be proven. The Committee noted that the failings involved breaches of legal requirements contained in the MLRs. The Committee observed that members must comply with AML legislation and ACCA rules and regulatory requirements in this regard and that the standard of propriety expected of Mr Mosley was found by reference to ACCA's rules and standards. The Committee also noted that a failure of a member such as Mr Mosley to comply with these types of legal and regulatory requirements was serious. It therefore amounted to misconduct.
29. The Committee did not consider whether Mr Mosley was liable for disciplinary action pursuant to Byelaw 8(a)(iii) since this was an alternative allegation where no finding of misconduct was made.

SANCTION AND REASONS

30. The Committee considered what sanction, if any, to impose, taking into account all that it had read in the bundle of documents, ACCA's Guidance for Disciplinary Sanctions dated 10 February 2026 (the "**Sanctions Guidance**"), and the principle of proportionality. The Committee also took account of submissions by Mr Kerruish-Jones and Mr Mosley. It noted the advice from the Legal Adviser which it duly accepted.
31. The Committee considered that the conduct in this case was serious. The Committee had specific regard to the nature of the allegations against Mr Mosley which related to non-compliance with rules and regulatory standards designed to prevent serious financial crime. The Committee noted that the evidence showed that Mr Mosley had failed to demonstrate compliance with the MLRs for a significant period of time i.e., 7 years, together with the seriousness of the lack of cooperation with ACCA's AML review and subsequent investigation in that context. The Committee also had regard to the public interest and the necessity to declare and uphold proper standards of conduct and behaviour.

32. The Committee considered whether any mitigating or aggravating factors featured in this case. The Committee identified several material mitigating factors as follows:

- The relevant misconduct was no longer continuing.
- There was no evidence that the misconduct had caused direct or indirect harm.
- Mr Mosley appeared to demonstrate genuine regret and remorse.
- Mr Mosley had been a member of ACCA since 2000, he had a previous good record, and no previous disciplinary findings had ever been made against him.
- This incident appears to be isolated in nature.
- Mr Mosley had provided genuine testimonials and personal references on which the Committee considered it could rely and which spoke to his character and [PRIVATE] at the time that the misconduct occurred.
- Mr Mosley had changed his life and mode of working since the misconduct had occurred and [PRIVATE].
- [PRIVATE].

33. The Committee placed particular weight on the impact of Mr Mosley's [PRIVATE] and that they had a direct impact on why the misconduct occurred.

34. The only aggravating factors that the Committee identified were:

- Mr Mosley's initial lack of cooperation with ACCA's investigation and the somewhat belated provision of substantive information by Mr Mosley in connection with the investigation on 01 September 2026.
- Mr Mosley did not demonstrate much insight about the AML failings, non-cooperation with ACCA investigation and failure to provide ACCA with

information. Albeit the Committee noted that Mr Mosley did show a great deal of insight about his personal circumstances and how those had impacted on why the misconduct had occurred.

35. Given the Committee's view of the seriousness of Mr Mosley's conduct and that matters of the prevention of financial crime were concerned, it was satisfied that the sanctions of No Further Action, Admonishment and Reprimand were insufficient to highlight to the profession and the public the gravity of the proven misconduct. In considering a Severe Reprimand, the Committee noted that most of the factors listed in the guidance were present and, in particular, there was evidence of genuine remorse. The Committee had regard to Section H of the Guidance in relation to AML allegations. Further to the Guidance, the Committee noted the national importance of AML and that enforcement of AML requirements via sanctioning processes has an important role to play *'in correcting weaknesses in processes and in influencing and fostering a culture that contributes to effective risk management and compliance'*. The Committee was satisfied that a Severe Reprimand was sufficient to mark the seriousness of the misconduct to the profession and the public whilst equally taking into account the various mitigating factors applicable in Mr Mosley's case.
36. Consequently, the Committee concluded that the appropriate, proportionate sanction was to order that Mr Mosley be subject to a Severe Reprimand.

COSTS AND REASONS

37. The member has submitted documents relating to their financial position, which the Committee has considered.
38. The Committee had been provided with a Simple Costs Schedule and a Detailed Costs Schedule relating to the ACCA's claim for costs.
39. The Committee carefully considered the ACCA's Cost Guidance, submissions from Mr Kerruish-Jones, and Mr Mosley. The Committee had particular regard to the documentary financial information provided by Mr Mosley. The Committee also heard from the Legal Adviser whose advice it duly accepted.

40. The Committee made the following decision as to costs: The Committee concluded that the ACCA was entitled to be awarded costs against Mr Mosley since Allegations 1 (a) & (b), 2, 3(a), (b) & (c), 4 (a) were found proved. ACCA had applied for the amount of £7,400 in costs. The Committee noted that the hearing had taken less time than anticipated by around 2.5 hours. In considering the documentary evidence that Mr Mosley had supplied about his financial circumstances, the Committee referred to ACCA's Guidance for Costs Orders and considered amongst other things: Mr Mosley's current income; the existence and nature of any assets belonging to Mr Mosley, Mr Mosley's debts and liabilities [PRIVATE] the amount and reasonableness of Mr Mosley's stated outgoings, [PRIVATE] Accordingly, the Committee reduced the figure of £7,400 to £6,800 and was satisfied that this amount was reasonable and proportionate in the circumstances.

EFFECTIVE DATE OF ORDER

41. This order shall take effect at the expiry of the period allowed for an appeal in accordance with the Appeal Regulations.

Mr David Tyme
Chair
23 September 2026