



## CHARTERED PROFESSIONAL ACCOUNTANTS OF ONTARIO

### *CHARTERED PROFESSIONAL ACCOUNTANTS OF ONTARIO ACT, 2017*

**TO:** Howard L. Bromberg, CPA, CA

**AND TO:** The Discipline Committee of CPA Ontario

The Professional Conduct Committee of CPA Ontario hereby makes the following Allegations of professional misconduct against Howard L. Bromberg, CPA, CA, a member of CPA Ontario:

1. THAT the said Howard Bromberg, in or about the period of August 29, 2016 through April 15, 2019, while engaged in the practice of public accounting, failed to maintain the good reputation of the profession and its ability to serve the public interest, contrary to Rule 201.1 of the CPA Code of Professional Conduct (Code), in that he provided public accounting services to six clients without the benefit of a valid public accounting license as required by the *Public Accounting Act*, S.O. 2004, c.8., in particular:
  - a) An audit of the financial statements of "BH Ltd.", for the years ended November 30, 2016, 2017, 2018;
  - b) An audit of the financial statements of "HFM Inc.", for the years ended November 30, 2016, 2017, 2018;
  - c) An audit of the financial statements of "(Numbered) Ontario Limited", for the years ended July 31, 2016, 2017, 2018;
  - d) An audit of the financial statements of "TLCLC", for the years ended August 31, 2016, 2017, 2018;
  - e) An audit of the financial statements of "TTDCC Inc.", for the years ended December 31, 2016, 2017, 2018; and
  - f) An audit of the financial statements of "WH Ltd.", for the year ended October 31, 2016, 2017, 2018.
  
2. THAT the said Howard Bromberg, in or about 2016, while engaged in the practice of public accounting, signed or associated himself with a Practice Inspection Report which he knew or should have known was false or misleading, contrary to Rule 205 of the Code, in that he filed a Practice Inspection report with CPA Ontario for 2015 representing that he was not performing any audit engagements when he in fact was performing assurance engagements.

3. THAT the said Howard Bromberg, on or about June 23, 2016, while engaged in the practice of public accounting, submitted to CPA Ontario a Public Accounting Licence Experience Certification Report (Form 9-1E) covering January 1, 2010 to December 31, 2015, in which he certified that the reported information was accurate, complete and current, thereby associating himself with a report, statement or representation which he knew or should have known was false or misleading, contrary to Rule 205 of the Code, in that:
- a) He certified that from January 1, 2010 to December 31, 2015, he performed "0" chargeable hours in assurance and "0" documented hours in assurance; and
  - b) He provided a client listing which he knew or should have known was incomplete.
4. THAT the said Howard Bromberg, in or about 2018, while engaged in the practice of public accounting, completed a Practice Inspection Report in which he declared that his accounting practice was restricted to compilation engagements thereby associating himself with a report, statement or representation which he knew or should have known was false or misleading, contrary to Rule 205 of the Code, in that he failed to include in the client listing the 2016, 2017 and 2018 audit engagements he performed.
5. ~~THAT the said Howard Bromberg, in or about November 2019 while engaged in the practice of public accounting, signed or associated himself with a report, statement or representation which he knew or should have known was false or misleading, contrary to Rule 205 of the Code, in that he submitted correspondence to CPA Ontario representing that he had performed long term assurance engagements for three clients when he in fact had been performing long term assurance engagements for six clients:~~  
***Withdrawn by the Professional Conduct Committee, October 8, 2020 with leave of the panel***

Dated at Aurora, Ontario, this 19<sup>th</sup> day of June 2020.



H.G. FAGAN, FCPA, FCA, DEPUTY CHAIR  
PROFESSIONAL CONDUCT COMMITTEE

CHARTERED PROFESSIONAL ACCOUNTANTS OF ONTARIO  
CHARTERED PROFESSIONAL ACCOUNTANTS OF ONTARIO ACT, 2017

**DISCIPLINE COMMITTEE**

**IN THE MATTER OF:** Allegations, as amended, against **HOWARD L. BROMBERG, CPA, CA**, a member of the Chartered Professional Accountants of Ontario, under **Rule 201.1** and **Rule 205** of the Rules of Professional Conduct and the CPA Code of Professional Conduct ('Code').

**TO:** Howard L. Bromberg

**AND TO:** The Professional Conduct Committee

**DECISION AND ORDER MADE OCTOBER 8, 2020**

**DECISION**

The allegations, as amended, that Howard L. Bromberg has breached Rule 201.1 and Rule 205 of the the Rules of Professional Conduct and the CPA Code of Professional Conduct ('Code') are established and constitute professional misconduct.

**ORDER**

IT IS ORDERED THAT:

1. Howard L. Bromberg be reprimanded in writing by the Chair of the hearing;
2. Howard L. Bromberg shall pay a fine of \$10,000 to the Chartered Professional Accountants of Ontario ("CPA Ontario") by October 7, 2022;
3. Howard L. Bromberg's membership with CPA Ontario is revoked;
4. Notice of this Decision and Order, disclosing Howard L. Bromberg's name, is to be given in the form and manner determined by the Discipline Committee:
  - (a) to all members of CPA Ontario;
  - (b) to all provincial bodies;and shall be made available to the public;
5. Notice of this Decision and Order disclosing Howard L. Bromberg's name is to be given by publication on the CPA Ontario website and in the *Globe and Mail*. Howard L. Bromberg shall pay all costs associated with the publication, which shall be in addition to any other costs ordered by the Panel.

AND THAT:

6. Howard L. Bromberg shall pay costs of \$5,000 to CPA Ontario by October 7, 2022.

**DATED** at Toronto this 8th day of October 2020.

A handwritten signature in blue ink, appearing to read 'R. Adamkowski', with a large, stylized initial 'R'.

Randal J. Adamkowski  
Discipline Committee – Deputy Chair

CHARTERED PROFESSIONAL ACCOUNTANTS OF ONTARIO  
*THE CHARTERED PROFESSIONAL ACCOUNTANTS OF ONTARIO ACT, 2017*

**DISCIPLINE COMMITTEE**

**IN THE MATTER OF:** Allegations against **HOWARD LESLIE BROMBERG, CPA, CA**, a member of the Chartered Professional Accountants of Ontario, under **Rules 201.1 and 205** of the Chartered Professional Accountants of Ontario Code of Professional Conduct.

**BETWEEN:**

**Chartered Professional Accountants of Ontario  
Professional Conduct Committee**

**-and-**

**Howard Leslie Bromberg**

**APPEARANCES:**

**For the Professional Conduct Committee:** Kelvin Kucey, Counsel

**For Mr. Bromberg:** Rachel Lichtman, Counsel

Heard: October 8, 2020

Decision and Order effective: October 8, 2020

Release of written reasons: November 25, 2020

**REASONS FOR DECISION AND ORDER MADE OCTOBER 8, 2020**

**I. OVERVIEW**

[1] The Professional Conduct Committee of the Chartered Professional Accountants of Ontario (“PCC”) had made Allegations that Mr. Bromberg had failed to maintain the good reputation of the profession by providing public accounting services to six clients in the period from August 2016 to April 2019 when he did not hold a public accounting licence and that he had made statements in various filings with the Chartered Professional Accountants of Ontario (“CPA Ontario”) that he knew or should have known were false or misleading with respect to these services during the period from 2016 to 2019. This hearing was held to

determine whether the Allegations were established and whether the conduct breached Rules 201.1 and 205 of the *CPA Ontario Code of Professional Conduct* (“Code”) and amounted to professional misconduct.

- [2] Mr. Bromberg obtained his CA designation in 1972. He subsequently received a CPA designation and became a member of CPA Ontario upon amalgamation in 2014. In 1986, he commenced an accounting and tax services practice as a sole practitioner, operating under the name Howard L. Bromberg. He engaged in the practice of public accounting while holding a Public Accounting Licence (“PAL”) for much of this time.
- [3] Mr. Bromberg’s PAL was suspended on August 29, 2016 as he did not satisfy the required minimum qualifying practice experience hours, reporting 170 hours of the required 2500 hours for the preceding year. Mr. Bromberg was aware that he was not permitted to sign audit reports upon the suspension of his PAL. However, he continued to sign audit reports for six clients, each of whom were daycare centres that received public funding, over a three year period.
- [4] Between July and November 2019, CPA Ontario received two complaints against Mr. Bromberg with respect to the subject matter of the Allegations.
- [5] Mr. Bromberg admitted the amended Allegations of professional misconduct made by the PCC. The onus was on the PCC to show on a balance of probabilities that Mr. Bromberg’s conduct breached Rules 201.1 and 205 of the Code and constituted professional misconduct.

## **II. PRELIMINARY ISSUES**

- [6] At the outset of the hearing, counsel for the PCC advised the Panel that the PCC was seeking to amend the Allegations by deleting Allegation #5, with the consent of Mr. Bromberg. It was noted that the parties had entered an Agreed Statement of Facts based on the amended Allegations. The Panel allowed the amendment of the Allegations on the consent of the parties.
- [7] The parties also indicated to the Panel at the outset of the hearing that certain materials relating to the medical conditions of Mr. Bromberg and his spouse would be entered in the absence of the public. As these documents were being tendered with respect to sanction, the Panel’s decision was deferred until the sanction portion of the hearing.
- [8] Counsel for Mr. Bromberg initially sought an order that the documents be sealed. After a question was raised by counsel to the Tribunal as to whether such an order properly balanced the privacy interests against the principle that hearings are presumptively to be open to the public, counsel for Mr. Bromberg amended

her request to a non-publication order for the documents in question (being Exhibits 4 and 5). The PCC took no position on the request.

- [9] After considering the importance of hearings being open to the public, and the sensitive nature of the medical information in these particular documents, the Panel decided that it was appropriate to grant the non-publication order, with the caveat that the Panel could refer to the contents of the documents in general terms in its reasons if it was necessary to do so to explain the Panel's decision. In the Panel's view, this result appropriately balanced the competing interests involved.

### **III. ISSUES**

- [10] The Panel identified the following issues arising from the Allegation:
- A. Did the evidence establish, on a balance of probabilities, the facts on which the Allegations by the PCC were based?
  - B. If the facts alleged by the PCC were established on the evidence on a balance of probabilities, did the Allegations constitute professional misconduct?

### **IV. DECISION**

- [11] The Panel found that the evidence established, on a balance of probabilities, the facts set out in the Allegations of professional misconduct.
- [12] The Panel was satisfied that the Allegations constituted breaches of Rules 201.1 and 205 and, having breached these Rules, Mr. Bromberg had committed professional misconduct.

### **V. REASONS FOR THE DECISION**

#### *Findings regarding Conduct of Mr. Bromberg*

- [13] The evidence in support of the Allegations was placed before the Panel by way of an Agreed Statement of Facts (Exhibit 1) and an accompanying Document Brief (Exhibit 2). The Agreed Statement of Facts concisely summarized the facts relevant to the amended Allegations as follows, with the names of the clients redacted in these reasons in the manner reflected in the Statement of Allegations:
- 4. Notwithstanding his lack of PAL qualification Bromberg continued to sign audit reports for two daycare operations, that received public funding from

the Region of Peel, for three years until his conduct was discovered and reported to CPA Ontario.

5. Bromberg signed an audit of the financial statements of [BH Ltd.] for the years ended November 30, 2016, 2017 and 2018.
6. Bromberg signed an audit of the financial statements of [HFM Inc.] for the years ended November 30, 2016, 2017 and 2018.
7. Notwithstanding his lack of PAL qualification Bromberg continued to sign audit reports for four daycare operations, that received public funding from the City of Toronto, for three years until his conduct was discovered and reported to CPA Ontario.
8. Bromberg signed an audit of the financial statements of [(Numbered) Ontario Limited] for the years ended July 31, 2016, 2017 and 2018.
9. Bromberg signed an audit of the financial statements of [TLCLC], for the years ended August 31, 2016, 2017 and 2018.
10. Bromberg signed an audit of the financial statements of [TTDCC Inc.] for the years ended December 31, 2016, 2017 and 2018.
11. Bromberg signed an audit of the financial statements of [WH Ltd.] for the years ended October 31, 2016, 2017 and 2018.
12. Bromberg acknowledges that he signed the audit reports for the six daycares whose financial statements were relied upon by either the Region of Peel or the City of Toronto, to provide public funding for their operations. Bromberg further acknowledges that when he signed the financial statements, he was fully aware that he did not have a valid PAL.
13. Bromberg knowingly provided inaccurate information regarding his practice and his clients in his annual reports to CPA Ontario. Specifically, Bromberg repeatedly failed to identify his audit clients in his reporting, posturing that his practice consisted of client work that excluded assurance engagements. By excluding identification and reporting of audit clients Bromberg fettered and improperly avoided elements of the CPA Ontario practice inspection process.
14. On or about June 23, 2016, Bromberg submitted, with a cover letter, a Public Accounting Licence Experience Certification Report (Form 9-1E) covering January 1, 2010 to December 31, 2015 to CPA Ontario. In the cover letter Bromberg asserts: "During my accounting career, I have done a couple of audits and many review engagements. However, in the last 10 years or so my practice has been limited to only compilation engagements". In the attached report Bromberg represented that the

disclosed information was accurate, complete and current, specifically he stated that from January 1, 2010 to December 31, 2015, he performed “0” chargeable hours in assurance and “0” documented hours in assurance; this information was false.

15. In or about 2016, Bromberg signed and submitted to CPA Ontario his 2015 Practice Inspection Report. Bromberg falsely declared that his practice was limited to compilation engagements. Additionally, he provided a client listing, excluding his audit clients, which he knew or should have known was false and incomplete.
  16. In or about 2018, Bromberg signed and submitted to CPA Ontario his 2017 Practice Inspection Report which he knew or should have known was false or misleading. Specifically, he falsely declared that his accounting practice was restricted to compilation engagements. Bromberg failed to report the multiple audit engagements he performed and failed to report a complete and accurate client listing.
- [14] The Panel was satisfied that the agreed facts, as supported by the admitted documents, provided clear, cogent and compelling evidence to demonstrate that Mr. Bromberg had provided public accounting services, namely signed audit reports, to six clients over a three year period. The Panel also found that the agreed facts demonstrated that Mr. Bromberg filed reports that incorrectly stated that his practice was restricted to compilation agreements (which were not public accounting services), when, to his knowledge, he was performing assurance work by signing audit reports for these six clients.

#### *Finding of Professional Misconduct*

- [15] The *Public Accounting Act*, S.O. 2004, c.8 (“PAA”) establishes the regulatory framework for the provision of public accounting services. Those services are defined in subsection 2(1) of the *PAA* to include assurance engagements, including audit engagements, where it is reasonable to expect that a third party will rely on the accountant’s conclusions in the engagement. There was no doubt that the audits performed by Mr. Bromberg for these six clients, which were then provided to a public funder, constituted public accounting services.
- [16] Subsection 3(1) of the *PAA* requires any person engaging in the provision of public accounting services to have a PAL. Mr. Bromberg did not have a PAL at the relevant times. In the Panel’s view, the *PAA* establishes a regime that is central to the protection of the public who rely on public accountants to undertake assurance engagements. The requirements of the *PAA* protect the same values upon which CPA Ontario’s regulation of the profession is founded. Compliance with those requirements by members who provide public accounting services is

essential to maintaining the good reputation of the profession and its ability to protect the public interest. The Panel found that, by providing public accounting services without a valid PAL, as required under the *PAA*, Mr. Bromberg failed to maintain the good reputation of the profession and protect the public interest, contrary to Rule 201.1 of the *Code*.

- [17] Counsel for Mr. Bromberg drew the Panel's attention to the fact that Mr. Bromberg, in his response to CPA Ontario, dated November 28, 2019 (Exhibit 1, page 116), had indicated that one of the affected clients had learned that he did not have his PAL when he completed their audits, and he had refunded their fees and referred them to another accountant. There was no evidence from the client before the Panel. However, even accepting that the uncorroborated representation by Mr. Bromberg was correct, the Panel found that the fact that a client learned that Mr. Bromberg lacked a PAL after three years of audits were completed did not lead to a conclusion that his conduct was not professional misconduct.
- [18] Mr. Bromberg also provided CPA Ontario with misleading information regarding the services he was providing in his Practice Inspection Report for 2015, his Public Accounting Licence Experience Certification Report (Form 9-1E) covering January 1, 2010 to December 31, 2015, and his Practice Inspection Report covering the years, 2016, 2017 and 2018. In each instance, he did not disclose the assurance work that he had performed. To the contrary, he stated that he had not done any assurance work and had only done compilation work. At the time of each filing, he knew that this was not true.
- [19] Rule 205 of the *Code* prohibits members from signing or associating themselves with any report or statement that the member knows, or should know, is false and misleading. There was no question on the evidence before the Panel that Mr. Bromberg breached this obligation in the circumstances set out in the three Allegations related to that Rule.
- [20] For these reasons, the Panel found that Mr. Bromberg had failed to maintain the good reputation of the profession and protect the public interest, contrary to Rule 201.1 of the *Code*, and further that he had made statements in three reports that he knew were false or misleading. Mr. Bromberg admitted that his conduct breached these Rules and that this amounted to professional misconduct. Based on all of the evidence, and this admission, the Panel concluded that Mr. Bromberg had engaged in professional misconduct.

## **VI. DECISION AS TO SANCTION**

- [21] After considering the evidence, the law and the submissions of both parties, the

Panel concluded that the appropriate sanction was a written reprimand, a fine of \$10,000 payable within 24 months, the revocation of Mr. Bromberg's membership, effective immediately, and the usual order as to publication of the decision to all members of CPA Ontario and the decision being available to members of the public, with the disclosure of Mr. Bromberg's name.

- [22] The Panel also concluded that the fact of the revocation of Mr. Bromberg's membership would be published in the *Globe and Mail*, with the costs to be borne by Mr. Bromberg.

## **VII. REASONS FOR DECISION AS TO SANCTION**

- [23] Three of the four terms sought by the PCC were not contested by Mr. Bromberg. The only term put forward by the PCC that was in dispute was the requirement for the publication of the decision. Mr. Bromberg asked the Panel to not order that the decision of the Panel be made public. Counsel advised that the remaining terms were being advanced as a joint submission.
- [24] With respect to the terms that were jointly submitted by the parties, the Panel recognized that a joint submission was entitled to a high level of deference. The precise test for a review of a joint submission has been described in different ways, but, in essence, a joint submission should be adopted unless it is contrary to the public interest or would bring the regulatory process into disrepute because it was beyond the reasonable range of sanction. The Panel was satisfied that the jointly submitted elements did not meet this high threshold and fell within the reasonable range of sanction. Accordingly, the Panel adopted the joint submission with respect to the reprimand, fine and revocation.
- [25] The Panel concluded that Mr. Bromberg had deliberately disregarded the requirement that an accountant have a PAL before offering public accounting services, such as audits. He was aware of the requirement and decided to simply ignore the requirement. This decision allowed him to avoid the higher level of practice inspection review of his practice that had been implemented to better protect the public when they sought public accounting services. The intention of the PAL was to provide an added level of protection to the public; Mr. Bromberg sidestepped those protections.
- [26] After acting inappropriately with regard to his public accounting services, Mr. Bromberg then proceeded to intentionally deceive CPA Ontario in a number of filings and in correspondence by providing information that suggested that he was not performing audits.
- [27] The Panel observed that Mr. Bromberg described himself as being "stripped of

his licence (“PAL”)” and suggested that this was the product of “ageism” because he was in semi-retirement. In the Panel’s view, this suggested that he perceived this measure to be not the consequence of his failure to maintain his experience level, but an action that was done to him, implicitly without justification. This was not the case. Mr. Bromberg found himself without his PAL because he had not maintained the experience level necessary to adequately protect the public who required public accounting services. Notwithstanding that he had not maintained the necessary experience, he made a deliberate decision to continue providing public accounting services without a PAL or advising his client that he did not have a PAL.

- [28] It was also an aggravating consideration that Mr. Bromberg’s misconduct only ended once complaints were received by CPA Ontario and Standards Enforcement began to make inquiries. Mr. Bromberg did not stop his misconduct of his own volition.
- [29] There were mitigating factors presented in the evidence as well. Mr. Bromberg had been a CA for almost fifty years, and he had not encountered any disciplinary issues until 2016. He had admitted the Allegations, thereby avoiding a longer hearing. His counsel also pointed out that there were no issues regarding the quality of his work, although he was not entitled to perform assurance work.
- [30] With respect to the publication of the Panel’s decision, counsel for the PCC drew the Panel’s attention to the provisions of Regulation 6-2 under the *Chartered Professional Accountants Act, 2017*, which governed the publication of decisions of the Discipline Committee. Section 45 provides that notice of a decision, including the sanction, *shall* be provided to all members and all provincial bodies. Section 52 provides that the same information *shall* be posted on the website of CPA Ontario and be made available to the public. The only discretion that those sections provide to a panel of the Discipline Committee is the discretion to order that the subject member’s name not be disclosed. A panel of the Discipline Committee only has a broader discretion to order that the fact of a member’s revocation would not be published in the newspaper: Regulation 6-2, sections 48 and 49.
- [31] Since the decision of the Appeal Committee of the predecessor of CPA Ontario, the Institute of Chartered Accountants of Ontario (“ICAO”), in *Finkelman (Re)* (May 15, 1990, ICAO Appeal Committee), a member must demonstrate “rare and unusual circumstances” before a member’s name will not be disclosed in a discipline decision. The very high threshold that must be met was demonstrated more recently in *Bogart (Re)*, September 9, 2002, ICAO Discipline Committee, affirmed by ICAO Appeal Committee, May 6, 2003. In that case, the Discipline

Committee refused a request to not disclose the member's name, where there was some evidence that he could commit suicide if that were to happen.

Counsel for Mr. Bromberg asked this Panel to question the correctness of that decision. In the Panel's view, it was not entitled to question an established authority from the Appeal Committee. Even if the Panel could pursue that path, the Panel was not prepared to do so.

[32] The Panel also declined to distinguish *Bogart* on the basis that the misconduct was more serious (involving a significant misappropriation). In the Panel's view, the need for transparency with respect to the exercise of the Discipline Committee's authority to regulate the profession did not fluctuate based on the misconduct involved. To conclude otherwise would undermine the general deterrent value of the sanction imposed. In any event, even if the present case did not involve a large misappropriation, the need for transparency was particularly significant when the provision of public accounting services – to the public – was involved. Contrary to the submission of counsel for Mr. Bromberg, this misconduct had a significant impact on the public.

[33] The Panel was not satisfied that the facts of this case justified a departure from the presumption in favour of the publication of this decision with reference to Mr. Bromberg's name. The Panel found that there was nothing in the circumstances of this case that met the very high standard of rare and unusual circumstances set out in the cases. Although the Panel recognized that Mr. Bromberg had experienced health difficulties since 2012, and he continued to experience health issues at the time of the hearing, those illnesses did not amount to a rare or unusual circumstance. While the publication of a decision would cause anyone stress, the Panel did not find the evidence regarding Mr. Bromberg's health demonstrated an exceptional risk, and not a risk greater than that seen in *Bogart*. Similarly, the Panel was not satisfied that the fact of Mr. Bromberg's wife's unfortunate ill health constituted a rare or unusual circumstance. While the Panel sympathized with the health challenges Mr. Bromberg had faced, these challenges, and the challenges faced by his wife, were not factors so markedly different from the array of stresses faced by other members of the profession to overcome the presumption in favour of the publication of decisions, with the member's name, to justify an encroachment on the transparency of the regulatory process.

[34] In the Panel's view, there was another, even more important, reason for requiring the publication of this decision. The history of this matter demonstrated that Mr. Bromberg had been prepared to engage in conduct, namely the provision of public accounting services without holding a valid PAL, that he was prohibiting from doing. He had performed audits over a number of years, for several clients,

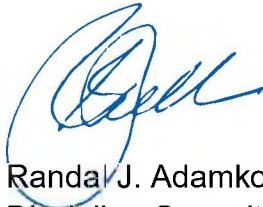
when he was not entitled to do so. There was nothing to stop Mr. Bromberg from engaging in the same or similar conduct in the future if the public was not aware of this decision. The publication of the decision was an essential element of an effective sanction. It needed to be clear to the public who might turn to Mr. Bromberg for assistance that he was not permitted to provide those services.

- [35] The Panel concluded that the fact that Mr. Bromberg now felt remorse for his actions did not provide any greater assurance that he would not engage in similar misconduct in the future if the public was not made aware that he could not act as a Chartered Professional Accountant.

## **VIII. COSTS**

- [36] The PCC asked the Panel to award costs fixed in the amount of \$5,000. Counsel from the PCC noted that this reflected significantly less than an award of two thirds of the costs incurred by the PCC in the prosecution of this matter, as reflected in the Costs Outline filed as Exhibit 3. However, after negotiation between the parties, this was the amount that was jointly submitted as being a reasonable amount in all of the circumstances.
- [37] The Panel found no reason to interfere with the joint submission an order for costs in the amount of \$5,000 and was satisfied that such an order was reasonable in all of the circumstances. The Panel ordered that Mr. Bromberg pay costs in the amount of \$5,000 within 24 months of the order being made.

Dated at Toronto this 25<sup>th</sup> day of November, 2020



Randal J. Adamkowski, CPA, CA  
Discipline Committee – Deputy Chair

### Members of the Panel

Tiffany Cecchetto, CPA, CA, LPA  
Joel Emuan, CPA, CMA  
David Handley (Public Representative)  
Andrea B. Mintz, CPA, CA, LPA

### Independent Legal Counsel

Glenn Stuart, StuartLaw