

CHARTERED PROFESSIONAL ACCOUNTANTS OF ONTARIO

CHARTERED PROFESSIONAL ACCOUNTANTS OF ONTARIO ACT, 2017

TO: GARY A. ROZON, CPA, CMA

AND TO: The Discipline Committee of CPA Ontario

The Professional Conduct Committee of CPA Ontario hereby makes the following Allegations of professional misconduct against Gary A. Rozon, CPA, CMA, a member of CPA Ontario:

1. THAT the said Gary A. Rozon, in or about the period October 1, 2016 through April 5, 2023, while engaged in the practice of public accounting or providing accounting services to the public, did contravene the provisions of the Bylaws and Regulations contrary to Rule 101 of the CPA Ontario Code of Professional Conduct in that he engaged in the practice of public accounting or provided accounting services to the public without registering a firm with CPA Ontario.
2. THAT the said Gary A. Rozon, in or about the period October 1, 2016 through April 5, 2023, associated with a corporation engaged in Canada in the practice of public accounting, contrary to Rule 409 of the CPA Ontario Code of Professional Conduct, in that he practiced public accounting through the corporation Gary Rozon CMA Inc.
3. THAT the said Gary A. Rozon, in or about the period October 1, 2016 through April 5, 2023, while performing Elections Canada audits, failed to sustain professional competence by keeping informed of, and complying with, developments in professional standards in all functions in which the member provides professional services, namely Elections Canada audits, contrary to Rule 203 of the CPA Ontario Code of Professional Conduct.
4. THAT the said Gary A. Rozon, in or about the period April 5, 2018 through April 5, 2023, while performing Elections Canada audits, failed to take reasonable steps to maintain information for which the Member is responsible, including retaining for a reasonable period of time such working papers, records, or other documentation which reasonably evidence the nature and extent of the work done in respect of any professional service, in that he did not consistently retain files related to Elections Canada audits for at least five years from the date of the auditor's report, contrary to Rule 218 of the CPA Ontario Code of Professional Conduct.
5. THAT the said Gary A. Rozon, in or about the period of August 1, 2021 to August 31, 2022, while engaged to perform an audit of "JC"'s Candidate's Electoral Campaign Return for the 44th general election, failed to perform his professional services in accordance with generally accepted standards of practice of the profession, contrary to Rule 206.1 of the CPA Code of Professional Conduct, in that:

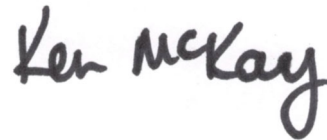
- a. He failed to obtain a signed engagement letter;
 - b. He failed to perform an assessment of independence;
 - c. He failed to obtain an understanding of the control environment relevant to the preparation of the financial statements;
 - d. He failed to identify and assess the risks of material misstatement in the financial statements due to fraud or error and therefore did not respond to those risks by designing and performing appropriate audit procedures;
 - e. He failed to calculate materiality;
 - f. He failed to document any misstatements;
 - g. He failed to design and perform audit procedures on the individual contributions to ensure that the contributions were eligible and in compliance with the *Canada Elections Act*;
 - h. He failed to design and perform substantive audit procedures over revenue;
 - i. He failed to document the audit procedures performed on the expenses and outflows of the campaign returns;
 - j. He failed to conduct subsequent event procedures;
 - k. He failed to conduct required communications with management regarding the audit;
 - l. He failed to conduct required communications with those charged with governance regarding the audit; and
 - m. He failed to obtain a signed representation letter.
6. THAT the said Gary A. Rozon, in or about the period of September 1, 2019 to March 31, 2020, while engaged to perform an audit of "MN"'s Candidate's Electoral Campaign Return for the 43rd general election, failed to perform his professional services in accordance with generally accepted standards of practice of the profession, contrary to Rule 206.1 of the CPA Code of Professional Conduct, in that:
- a. He failed to obtain a signed engagement letter;
 - b. He failed to perform an assessment of independence;
 - c. He failed to obtain an understanding of the control environment relevant to the preparation of the financial statements;

- d. He failed to identify and assess the risks of material misstatement in the financial statements due to fraud or error and therefore did not respond to those risks by designing and performing appropriate audit procedures;
 - e. He failed to calculate materiality;
 - f. He failed to document any misstatements;
 - g. He failed to design and perform audit procedures on the individual contributions to ensure that the contributions were eligible and in compliance with the *Canada Elections Act*;
 - h. He failed to design and perform substantive audit procedures over revenue;
 - i. He failed to document the audit procedures performed on the expenses and outflows of the campaign returns;
 - j. He failed to conduct subsequent event procedures;
 - k. He failed to conduct required communications with management regarding the audit;
 - l. He failed to conduct required communications with those charged with governance regarding the audit; and
 - m. He failed to obtain a signed representation letter.
7. THAT the said Gary A. Rozon, in or about the period of January 1, 2022 to March 31, 2022, while engaged to perform an audit of "NTCA"'s Financial Transactions Return for the fiscal period ending December 31, 2021, failed to perform his professional services in accordance with generally accepted standards of practice of the profession, contrary to Rule 206.1 of the CPA Code of Professional Conduct, in that:
- a. He failed to obtain a signed engagement letter;
 - b. He failed to perform an assessment of independence;
 - c. He failed to obtain an understanding of the control environment relevant to the preparation of the financial statements;
 - d. He failed to identify and assess the risks of material misstatement in the financial statements due to fraud or error and therefore did not respond to those risks by designing and performing appropriate audit procedures;
 - e. He failed to calculate materiality;
 - f. He failed to perform substantive audit procedures over revenue;

- g. He failed to document the audit procedures performed over expenses;
 - h. He failed to document the accumulation of misstatements and any steps taken in respect of the misstatements;
 - i. He failed to conduct any subsequent event procedures;
 - j. He failed to conduct required communications with management;
 - k. He failed to conduct required communications with those charged with governance; and
 - l. He failed to obtain a signed representation letter;
- 8. THAT the said Gary A. Rozon, in or about the period of January 1, 2020 to February 24, 2020, while engaged to perform an audit of "BAA"'s Financial Transactions Return for the fiscal period ending December 31, 2022, failed to perform his professional services in accordance with generally accepted standards of practice of the profession, contrary to Rule 206.1 of the CPA Code of Professional Conduct, in that:
 - a. He failed to obtain a signed engagement letter;
 - b. He failed to perform an assessment of independence;
 - c. He failed to obtain an understanding of the control environment relevant to the preparation of the financial statements;
 - d. He failed to identify and assess the risks of material misstatement in the financial statements due to fraud or error and therefore did not respond to those risks by designing and performing appropriate audit procedures;
 - e. He failed to calculate materiality;
 - f. He failed to document discrepancies between his audit working papers and the financial transaction return that was submitted to Elections Canada;
 - g. He failed to perform substantive audit procedures over revenue;
 - h. He failed to document the audit procedures performed over expenses;
 - i. He failed to document the accumulation of misstatements and any steps taken in respect of the misstatements;
 - j. He failed to conduct any subsequent event procedures;
 - k. He failed to conduct required communications with management;
 - l. He failed to conduct required communications with those charged with governance; and

- m. He failed to obtain a signed representation letter.
9. THAT the said Gary A. Rozon, in or about the period of January 1, 2018 to August 31, 2019, while engaged to perform an audit of “WNCA”’s Financial Transactions Return for the fiscal period ending December 31, 2018, failed to perform his professional services in accordance with generally accepted standards of practice of the profession, contrary to Rule 206.1 of the CPA Code of Professional Conduct, in that:
- a. He failed to ensure that the total assets on the balance sheet equaled the total liabilities and net assets.

Dated at Markham, Ontario this 7 day of June, 2023.



K. A. McKay, CPA, CA – CHAIR
PROFESSIONAL CONDUCT COMMITTEE