

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

**ADMISSION AND REGISTRATION COMMITTEE**

**IN THE MATTER OF:** A good character hearing into A [REDACTED] M [REDACTED], an applicant for admission to membership with the Chartered Professional Accountants of Ontario, pursuant to Regulation 7-1: Admission to Membership, Obligations and Standing, Section 14: Good Character on Admission, as amended.

**BETWEEN:**

A [REDACTED] M [REDACTED]

-and-

**Chartered Professional Accountants of Ontario  
Registrar**

**APPEARANCES:**

<b>For the Applicant, A [REDACTED] M [REDACTED]:</b>	Present Norm Emblem and Camila Maldj, Counsel
<b>For the Registrar:</b>	Teagan Markin, Counsel
Heard:	September 9, 2025
Decision and Order effective:	September 16, 2025
Release of written reasons:	October 7, 2025

**REASONS FOR THE DECISION AND ORDER MADE SEPTEMBER 16, 2025**

**I. INTRODUCTION**

- [1] This hearing was held as a hybrid hearing, in person and by videoconference, to determine whether A [REDACTED] M [REDACTED] (the “Applicant”) was of good character at the time of the hearing and thereby met the requirements for admission to membership with the Chartered Professional Accountants of Ontario (“CPA Ontario”).
- [2] On or about May 14, 2024, the Applicant applied for membership with CPA Ontario. In her application, the Applicant answered “Yes” to the following question:

*Are you, or have you ever been, subject to a disciplinary proceeding by an academic institution or a professional or regulatory body, or is there any complaint or allegations outstanding against you?*

- [3] As a result of this disclosure, the Registrar referred the Applicant's application for membership with CPA Ontario to the Admission and Registration Committee (the "ARC").
- [4] At the outset of the hearing, the Registrar informed the Panel that she took no position on the Applicant's admission to membership. At the conclusion of the hearing, having heard the evidence adduced by the Applicant, the Registrar reiterated that she took no position.
- [5] For reasons set out below, the Panel found the Applicant had met her onus to prove, on a balance of probabilities, that she was a person of good character at the time of the hearing. The Panel directs the Registrar to admit the Applicant as a member of CPA Ontario.

## **II. FACTS**

- [6] The Applicant and the Registrar signed an Agreed Statement of Facts ("ASF"), marked as Exhibit 1 to the hearing. The parties also filed a Joint Book of Documents, marked as Exhibit 2. These exhibits comprised the totality of the documentary evidence before the Panel.
- [7] In addition, four witnesses testified on behalf of the Applicant: the Applicant, ZK, JM, and JB.

### *1. The Misconduct*

#### *i. Background to the Misconduct*

- [8] The Applicant has a Bachelor of Arts in Accounting and Commerce. While she was a student, she worked part time at the Canada Revenue Agency ("CRA"). She first worked at the CRA in the summer of 2018. She continued to work part-time at the CRA for the next two years, while she was completing her degree.
- [9] In the winter of 2020, the Applicant was informed she would be bridged in as a permanent employee of the CRA. At the time, she was working in the Compliance Division of the Charities Directorate. The nature of the Applicant's work involved corporate reporting, statistics, and auditing charities for compliance with the *Income Tax Act*.

[10] Unfortunately, the Applicant's transition from a student contract to full time permanent employment was delayed because of the COVID-19 pandemic. This caused considerable stress for the Applicant. She was concerned about the impact of the pandemic on her job security and her financial stability. Ultimately, In July 2020, she was offered and accepted a permanent position.

ii. The Applicant's Misconduct

[11] Between April 16, 2020 and June 2, 2020, while employed by the CRA, the Applicant applied for and received Canada Emergency Response Benefits ("CERB") for two benefit periods totaling \$4,000.

[12] The criteria for receiving CERB were set out on the CRA website and are listed below for ease of reference:

- Must reside in Canada;
- Must be at least 15 years old;
- Must have stopped working because of reasons related to COVID-19 or were eligible for Employment Insurance regular or sickness benefits or have exhausted their Employment Insurance regular benefits or Employment Insurance fishing benefits;
- Must have had employment and/or self-employment income of at least \$5,000 in 2019 or in the 12 months prior to the date of their application;
- Must have not quit their job voluntarily;
- Must not have earned more than \$1,000 in employment and/or self-employment income for 14 or more consecutive days within the four-week benefit period of the claim; and
- When submitting subsequent claims, must not have earned more than \$1,000 in employment and/or self-employment income for the entire four-week benefit period of their new claim.

[13] The Applicant reported her CERB payments on her personal tax return for the 2020 tax year.

[14] The CRA determined that the Applicant was not eligible for CERB because she earned more than \$1,000 in gross employment income for 14 consecutive days within the four-week benefit period of the claim.

iii. The CRA Investigation

- [15] In July 2023, more than three years after the Applicant had received her CERB payments, the Internal Affairs Division (“IAD”) of the CRA commenced a review of CERB payments received by CRA employees, including the Applicant. On October 19, 2023, the IAD notified the Applicant that they had conducted an investigation and determined that the Applicant was not eligible for the CERB she had received. The Applicant was put on notice that she would be required to repay the amount she had received. She was also given 30 days to contest the finding.
- [16] The Applicant chose not to contest the finding. On October 26, 2023, she received a Notice of Redetermination for COVID-19 Benefits and was informed she was required to pay the CRA \$4,000.
- [17] On December 11, 2023, the Applicant received a Notice of Collection and on December 12, 2023, she paid the \$4,000 amount owing in full.
- [18] Until this point, the CRA had not informed the Applicant that her conduct, specifically regarding the receipt of CERB benefits for which she was ineligible, was under investigation. The Notices she received focused solely on eligibility and the requirement for repayment. None of the documents provided to the Applicant prior to December 12, 2023, mentioned any investigation into a potential breach of the CRA’s *Code of Integrity and Professional Conduct* applicable to its employees.
- [19] On January 8, 2024, the Applicant received an email from the Director of the Compliance Division, Charities Directorate, informing her that an investigation had been conducted into her conduct. The Director informed the Applicant that the investigation concluded that the Applicant had breached the *Code of Integrity and Professional Conduct* governing employees of the CRA by receiving CERB payments for which she was not eligible while she was an employee of the CRA.
- [20] The email from the Director went on to inform the Applicant that she was required to attend a disciplinary hearing, one of the stated purposes of which was to provide the Applicant with an opportunity to provide any relevant information or explanations. The email informed the Applicant that the outcome of the disciplinary process could include actions up to and including termination of employment.

[21] An Investigation Report, dated December 22, 2023, was attached to the Director’s email. The Investigation Report concluded that the information verified by the IAD was deemed sufficient to establish, on a balance of probabilities, that in applying for and receiving CERB benefits for which she was not eligible, the Applicant had contravened the *Code of Integrity and Professional Conduct* and committed fraud.

[22] The Investigation Report also confirmed that the finding of fraud was made in the absence of an interview with the Applicant and noted that the Applicant would have an opportunity to address the finding of fraud in the disciplinary process.

iv. The CRA Disciplinary Process and Outcome

[23] The Applicant’s disciplinary hearing was held on January 10, 2024. The hearing consisted of two Microsoft Teams meetings between the Applicant and the Director, Charities Directorate. Attending at the Microsoft Teams meetings were a Human Resources representative and a union representative. During these meetings, the Applicant and the Director reviewed the Investigation Report and the Applicant was given an opportunity to provide an explanation for her conduct. The Director issued her decision on the disciplinary matter over eight months later in August 2024.

[24] Subsequent to the disciplinary hearing but prior to being notified of the outcome, the Applicant took a leave of absence from the CRA. The leave of absence was not related to the ongoing disciplinary matter. Instead, the Applicant had been informed by CPA Ontario that she would not be able to meet her practical experience requirements solely through her work in the Charities Directorate. As a result, she obtained permission from her direct manager, JM, and the Director, Charities Directorate, to take a leave of absence for one year. In May 2024, the Applicant commenced her leave of absence to work at a private accounting firm in the town where she was born and raised, where she continues to work to date. The Applicant has been very successful at the firm and has remained a valuable employee ever since. Prior to the conclusion of her one-year leave, the Applicant informed her manager at the CRA that she would not be returning.

[25] In a decision dated August 20, 2024, the Director determined that the Applicant had improperly applied for and received benefits that she “ought reasonably to have known” she was not entitled to. The Director found that in so doing, the Applicant violated the *Canada Emergency Response Benefit Act* (“CERBA”) and the CRA’s *Code of Integrity and Professional Conduct* by committing misconduct which “may be harmful to the CRA’s

reputation.” The Director did not make an explicit finding that the Applicant had engaged in fraud.

[26] The Director ordered that the Applicant be suspended for ten days without pay from May 12, 2025 to May 23, 2025. The Applicant, however, was already employed at the private accounting firm and did not have the opportunity to serve the suspension. Notably, the Director did not order the termination of the Applicant’s employment.

## *2. Evidence Led at the Applicant’s Good Character Hearing*

### *i. The Applicant’s Remorse*

[27] The Applicant acknowledged her misconduct and expressed remorse. She explained at the time she applied for CERB she had recently moved in with her boyfriend and acquired a puppy. Because of the pandemic, her bridging to a permanent position was placed indefinitely on hold. The Applicant acknowledged that she made rough calculations regarding her income and determined that she met the financial eligibility requirements to apply for and receive CERB.

[28] In determining that she met the financial eligibility requirements to receive CERB, the Applicant viewed the amounts that had been deposited into her bank account in the preceding two months, representing employment income from the CRA. The Applicant deduced that because she had received \$808.99 for the month of March and \$956.54 for the month of April, she met the financial eligibility requirements. The Applicant testified that she was not certain whether the \$1,000 ceiling related to gross or net income, but she assumed that any deductions taken from her gross income, when added to her net income, would not exceed the \$1,000 threshold. Moreover, the Applicant did not have access to her pay stubs and therefore could not determine whether her assumptions were correct.

[29] The Applicant expressed remorse for failing to utilize the resources available to her as an employee of the CRA to verify her eligibility for the CERB. She acknowledged that her net income was very close to the \$1,000 threshold, which, if exceeded, would have rendered her ineligible for the benefit. In light of this, she conceded she should have taken steps to confirm her eligibility rather than making assumptions.

[30] The Panel heard evidence that nowhere on the CRA website relating to eligibility for CERB, is the \$1,000 threshold characterized as gross or net employment income. The

Applicant was candid with the Panel when she stated she was not sure if the \$1,000 threshold related to gross or net income, but she assumed she was eligible either way.

[31] When asked what she had learned since being investigated and ultimately disciplined by the CRA, the Applicant stated that at the time she applied for CERB she was very scared and it was a difficult time, but that she made assumptions, and she now recognizes one should never make assumptions about taxes. She confirmed she would never do that again. The Applicant further remarked that she works in a firm with professionals she respects, and in the future, if she has any doubts or questions about a course of conduct, she will avail herself of the resources she has at her disposal and seek advice.

ii. The Applicant's Conduct Since Her Misconduct/Rehabilitation Efforts

[32] The Applicant worked in the Charities Directorate at the CRA for over four years since applying for and receiving CERB payments she was not eligible for. After being hired for a permanent position in June 2020, the Applicant quickly demonstrated her diligence and competence and was promoted to the position of Senior Program Analyst in the Charities Directorate.

[33] JM, the Applicant's manager at the CRA for four years, testified on her behalf. JM became the Applicant's manager after the Applicant had applied for and received the benefits she was ineligible for. JM described the Applicant as always professional and courteous, meticulous in her documentation, someone who took on new tasks unhesitatingly, and a team player. JM described the Applicant as having a strong work ethic which was a significant factor in the Applicant's rapid advancement at the CRA. In a letter JM wrote on the Applicant's behalf (amended to protect the Applicant's identity) she described the Applicant as follows:

During [AM's] time at the CRA, I got to know her very well. [AM] demonstrated exceptional character, professionalism and work ethic. She consistently upheld the highest standards of integrity and ethics, of which are essential for public servants of the CRA. [AM]'s ability to maintain confidentiality and handle sensitive information with discretion earned her trust with colleagues and management. [AM] always delivered high-quality work within the structured and regulated environment of the CRA. She consistently adhered to agency policies and procedures while maintaining attention to detail in her tasks, including conducting charity audits. Her communication skills and collaborative approach contributed to ensuring compliance with federal regulations. In all interactions with colleagues, management and clients, she was always honest, respectful and professional.

- [34] JM's observations about the Applicant's character were echoed by SM, a colleague of the Applicant who worked with her at the CRA. SM did not testify but wrote a positive and enthusiastic letter in support of the Applicant.
- [35] As an example of the Applicant's integrity and ethical conduct, JM described a recent incident wherein the Applicant was considering taking a volunteer position in her community as the treasurer for a small local charity. Prior to taking the position, the Applicant identified a potential conflict of interest given her previous role at the CRA. The Applicant contacted JM to disclose her intention to take the position and to seek approval from the Director.
- [36] During her tenure at the CRA, while working full time, the Applicant completed a Masters in Accounting. In addition, she completed the CPA Professional Education Program.
- [37] ZK is a member of CPA Ontario and a partner at the firm the Applicant is currently employed with. He wrote a letter and testified in support of the Applicant. ZK described the Applicant as having a strong character, very professional, eager to learn and a team player. ZK described the manner in which the Applicant informed him about her disciplinary history with the CRA. He said the Applicant was forthright and that she expressed remorse over her mistake. He described the Applicant as visibly upset and crying when she disclosed the circumstances that led to the necessity for a good character hearing. The Applicant told ZK that when she applied for CERB, she ought to have taken more time and further steps to fully understand whether she was eligible for the benefits.
- [38] ZK spoke in glowing terms about the Applicant's work and leadership at the firm. He testified that one of the reasons she is a leader at the firm and someone colleagues seek out for advice is because she has a "care factor" that not everyone in the field possesses. ZK said he has high hopes for the Applicant moving forward and believes she would be a valuable member of CPA Ontario.
- [39] JB is a friend of the Applicant's and known her since childhood. She testified that the Applicant has always been a trustworthy person of integrity, and a caring friend. JB testified that when the Applicant disclosed her disciplinary history with CRA to her, she was upset about making the mistake she had made.

### **III. PRELIMINARY ISSUES**

[40] Aside from the parties raising a potential technological issue with one of the Applicant's witnesses testifying electronically (via videoconference), neither party raised any preliminary issues.

#### **IV. ISSUE**

[41] The issue before this Panel was whether the evidence provided by the Applicant demonstrated, on a balance of probabilities, that she was of good character at the time of the hearing and could be admitted as a member with CPA Ontario.

#### **V. DECISION**

[42] The Panel finds that the Applicant has established, on a balance of probabilities, she was of good character at the time of the hearing. As such, the Panel directs the Registrar to admit the Applicant as a member with CPA Ontario.

#### **VI. REASONS FOR DECISION**

##### *1. Definition of Good Character*

[43] All individuals applying for membership with CPA Ontario must meet the requirement that they are of good character (Section 3.4 of Regulation 7-1). If an applicant fails to provide evidence of good character, the Registrar shall refer the matter to an oral hearing before the ARC.

[44] At a good character hearing, the onus is on the applicant to prove, on a balance of probabilities, that they are of good character. A balance of probabilities means that it is more likely than not that the applicant is of good character.

[45] Good character has been defined by previous panels of CPA Ontario in the following manner:

Character is that combination of qualities or features distinguishing one person from another. Good character connotes moral or ethical strength, distinguishable as an amalgam of virtuous attributes or traits which would include, among others, integrity, candour, empathy and honesty.<sup>1</sup>

[46] The Hearing Panel in *Re E.T.*, cited Madam Justice Southin of the British Columbia Court of Appeal who further defined good character, in part, as follows:

The moral fibre to do that which is right, no matter how uncomfortable the

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<sup>1</sup> *G. B. v Chartered Professional Accountants of Ontario*, 2019 ONCPA 20, ¶ 17

doing may be and not to do that which is wrong no matter what the consequences may be to oneself.<sup>2</sup>

[47] The purpose of the good character requirement is threefold:<sup>3</sup>

- i. to protect members of the public who retain accounting professionals;
- ii. to ensure that the accounting profession maintains a reputation for high professional and ethical standards; and
- iii. to demonstrate that CPA Ontario is able to effectively regulate Chartered Professional Accountants.

[48] As is set out above, public protection is the paramount goal of a self-regulating profession. The possibility of self-transformation and the potential for redemption through rehabilitation are recognized by CPA Ontario as values that enhance rather than endanger public protection. In that vein, the onus is on an applicant to demonstrate they are of good character at the time of the hearing, notwithstanding the severity of their past conduct.

[49] While the onus is on the Applicant to prove her good character on a balance of probabilities, she is not required to demonstrate that her admission as a member presents no risk that she will abuse the public trust in the future. The test does not require perfection or certainty.<sup>4</sup>

## 2. *Factors Determining Good Character*

[50] In considering whether the Applicant had proved, on a balance of probabilities, that she was of good character, the Panel took into account the following factors:

- a. the nature and duration of the misconduct;
  - b. whether the applicant is remorseful;
  - c. what rehabilitative efforts, if any, had been taken and the success of such efforts;
  - d. the applicant's conduct since the misconduct; and
  - e. the passage of time since the misconduct.<sup>5</sup>
- i. The Nature and Duration of the Misconduct

[51] The misconduct was brief in duration. Between April 16, 2020 and June 2, 2020, while employed by the CRA, the Applicant applied for and received CERB benefits for two

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<sup>2</sup> *E. T. v Chartered Professional Accountants of Ontario*, 2021 ONCPA 15 ¶ 32

<sup>3</sup> *K. H. v Chartered Professional Accountants of Ontario*, 2022 ONCPA 15 ¶ 96

<sup>4</sup> *A. A. v Chartered Professional Accountants of Ontario*, 2023 ONCPA 11 ¶ 64

<sup>5</sup> Re G.B., *supra*, ¶ 19

benefits periods. This can be contrasted with situations where an applicant has engaged in misconduct which lasts months or even years.

- [52] The nature of the misconduct is less straightforward. The disciplinary decision of the Director made an explicit finding that the Applicant breached the *Code of Integrity and Professional Conduct* governing employees of CRA. However, the Director did not make an explicit finding of fraud. Moreover, the Director stated that the Applicant improperly applied for and received benefits that she “ought reasonably to have known” she was not entitled to.
- [53] The Panel struggled with determining whether “ought reasonably to have known” connotes recklessness or merely negligence. Both parties submitted that the language employed by the Director connotes a mistake rather than intentional fraud. The Registrar agreed that the *mens rea* of recklessness requires a subjective turning of the mind to a risk and choosing to proceed despite that risk. The Registrar’s position was that on her reading of the Director’s decision, the Director did not find that the Applicant had the *mens rea* of recklessness.
- [54] Given the Applicant’s testimony, the parties’ submissions on this point, and the absence of a specific finding of fraud in the Director’s reasons, the Panel was willing to accept that the Applicant’s actions did not constitute fraud. However, the Applicant’s violation was not trivial.
- [55] At the time the Applicant applied for and received the CERB payments, she was an employee of the CRA. She had worked at the CRA on a part-time basis for approximately two years prior to applying for CERB. The Panel finds that as an employee of CRA, the Applicant ought to have been far more careful when determining whether she was eligible for this benefit.
- [56] The Panel acknowledges that the Applicant was frightened and under financial strain. She had recently moved in with her boyfriend and acquired a puppy when the onset of the COVID-19 pandemic disrupted her plans, leaving her without the permanent employment she had been counting on. In a moment of desperation, the Applicant made the regrettable decision to apply for a benefit she ought to have known she may not have been entitled to receive. Yet it is precisely in such moments that one’s character is tested. Those with the moral fortitude to do what is right—even when it is difficult—distinguish themselves. In

making the choice she did, the Applicant failed to distinguish herself as a person of good character.

[57] Having said that, the Panel acknowledges that there are significant mitigating factors at play. The beginning of the COVID-19 pandemic was a time of uncertainty, chaos and fear for most people. The Applicant had just graduated from university and was only 23 years old at the time. Additionally, when the Applicant filed her personal tax return for 2020, she claimed the CERB payments; in other words, she was not trying to hide the fact that she had received them. Finally, the Applicant reimbursed the CRA when it was determined she had received a benefit she was not entitled to.

[58] It is noteworthy that the disciplinary penalty was not termination of employment. Clearly the CRA did not view the misconduct as sufficiently serious to result in the end of the Applicant's career with the CRA. To the contrary, the Applicant's former manager, JM, described the Applicant as a valued employee who would be welcomed back should she choose to return to the CRA.

[59] Overall, the Panel finds that the Applicant's conduct is not the most egregious conduct that could occur. However, because she was an employee of the CRA, and the misconduct involved the receipt of public funds she was not entitled to, the Panel is troubled by the Applicant's conduct and considers it to be deserving of scrutiny.

ii. Remorse

[60] The Applicant expressed genuine remorse. She acknowledged her error, stated she was disappointed in herself, and took responsibility for failing to make further inquiries to determine her eligibility for CERB. The Applicant expressed genuine emotion at her hearing when listening to some of the other witnesses testify.

[61] The Applicant's character witnesses described how upset she was when discussing the incident with them. They also testified or wrote that she was genuinely remorseful for the mistake she had made.

[62] The Panel notes that the Applicant was upfront and honest with CPA Ontario on her application form and was cooperative throughout the process.

[63] The Panel has no trouble finding that the Applicant is genuinely remorseful for her conduct and is confident that the risk of the Applicant committing similar misconduct in the future is low.

iii. Rehabilitative Efforts/Conduct Since the Misconduct

[64] As is set out above, the Applicant committed the misconduct in question five and a half years ago. Since then, she has proven herself to be a valuable employee at the CRA and in the private accounting firm where she is currently employed. She has not had any other disciplinary proceedings before or since the events in question.

[65] Since the time of the misconduct, the Applicant has achieved her Masters in Accounting and has met all the professional experience requirements to become a member of CPA Ontario.

[66] The Applicant is, by all accounts, a valued and dependable employee who is entrusted in leadership roles and who exemplifies the qualities of honesty, integrity, empathy and candour.

iv. Passage of Time

[67] The passage of time between an applicant's misconduct and the application is related to the ability of the applicant to rehabilitate themselves. The more serious the misconduct, the more time is required between the events in question and the hearing to provide the applicant with an opportunity to sufficiently rehabilitate themselves. As previous panels have noted, a sufficient amount of time must pass between the conduct and the hearing to demonstrate to a panel, and satisfy the public, that the applicant's character is no longer defined by their past misconduct.<sup>6</sup>

[68] As noted above, the Applicant's misconduct took place when she was 23 years of age – five and a half years prior to her hearing. The Applicant is a valued employee at the private accounting firm she is currently with, she was a valued employee at the CRA for four years post-misconduct, and she has acquired a Masters in Accounting while working full time. It has been over 20 months since the Applicant was informed that the CRA considered her conduct to be a breach of the *Code of Integrity and Professional Conduct*, and 13 months since she was informed of the disciplinary decision. The Panel is satisfied that a sufficient period of time has elapsed since the misconduct and that the Applicant has used that time to rehabilitate herself.

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<sup>6</sup> A.A., *supra*, ¶ 78

[69] Having been advised by the Registrar that the Applicant has otherwise met all of the requirements of admission, and for the reasons set out above, the Panel finds that the Applicant has demonstrated she is of good character as of the date of the hearing. On September 16, 2025, the Panel made an order directing the Registrar to admit the Applicant as a member of CPA Ontario.

**DATED** this 7<sup>th</sup> day of October, 2025

A handwritten signature in black ink, appearing to read 'A. Finkel', with a stylized flourish at the end.

Alexandra Finkel, CPA, CA  
Admission and Registration Committee – Deputy Chair

Members of the Panel

Incheol (Charlie) Baek, CPA, CMA  
Nancy Tran, Public Representative

Independent Legal Counsel

Lisa Freeman, Barrister & Solicitor