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

DISCIPLINE COMMITTEE

IN THE MATTER OF: Allegations against SAURAB MEHTA, CPA, CMA, a member of the Chartered Professional Accountants of Ontario, under Rules 104, 201.1, and 205 of the CPA Ontario Code of Professional Conduct.

BETWEEN:

Chartered Professional Accountants of Ontario Professional Conduct Committee

-and-

Saurab Mehta

APPEARANCES:

For the Professional Conduct Committee:	Jonathan Smith, Counsel
For Saurab Mehta:	Present James Lane, Counsel
Heard:	December 18, 2024
Decision and Order effective:	December 18, 2024
Release of written reasons:	February 28, 2025

REASONS FOR THE DECISION AND ORDER MADE DECEMBER 18, 2024

I. OVERVIEW

- [1] On October 10, 2024, the Professional Conduct Committee ("PCC") of the Chartered Professional Accountants of Ontario ("CPA Ontario") alleged that Saurab Mehta (the "Member") engaged in professional misconduct when associated himself with information which he knew, or should have known was false and misleading, failed to maintain the good reputation of the profession, and failed to cooperate with the regulatory process of CPA Ontario.
- [2] This hearing was held to determine whether the Allegations were established and whether the alleged conduct of the Member breached Rules 104, 201.1 and 205 of the CPA Code of Professional Conduct (the "Code").

[3] The Member admitted the Allegations made by the PCC and admitted that the conduct both breached the Code and amounted to professional misconduct.

II. THE COMPLAINT AND THE ALLEGATIONS

- [4] The complaint against the Member arose from an investigation into another complaint made by CPA Ontario's Director of Employer Relations against DM, a CPA Student (the "DM Complaint"), who was acquiring practical experience through the Member's firm. The DM Complaint was investigated (the "DM Investigation") by the PCC who identified additional concerns regarding the Member's conduct and statements made during that investigation. Specifically, the PCC was concerned about:
 - The Member's lack of cooperation with the DM Investigation;
 - Allegations by the Member of wrongdoing by PK, another member of CPA Ontario and the former partner of the Member; and
 - The Member's employment and income with another firm while also working at his firm.
- [5] The PCC investigated the complaint against the Member, and on October 10, 2024, issued Allegations against the Member. The Allegations are summarized as follows:
 - a) Contrary to Rule 205 of the Code, the Member signed or associated with letters, reports, statements or representations which he knew, or should have known, were false or misleading, in that he mischaracterized and inflated the qualifying experience and hours of a CPA student, in written response to CPA Ontario's Employer Relations, in or about the period December 1, 2022, through December 31, 2022;
 - b) Contrary to Rule 201.1 of the Code, the Member failed to conduct himself in a manner that would maintain the good reputation of the profession and serve the public interest, as follows:
 - He failed to bill or collect HST, file HST returns or thereafter remit HST to the Canada Revenue Agency (CRA), for income earned from "HS", between August 1, 2021, and March 31, 2022; and
 - He failed to declare more than \$73,000 in income earned between May 2020 and March 2022 on his 2020, 2021 and 2022 personal tax returns filed with the CRA, with respect to income earned from "HS".
 - c) Contrary to Rule 104 of the Code, the Member failed to co-operate with the regulatory process of CPA Ontario, in or about the period January 1, 2024, through February 29, 2024, in context of the DM Investigation, as follows:
 - He made false or misleading statements about another Chartered Professional Accountant, when responding to a CPA Ontario investigator in the course of her investigation;

- He made false or misleading statements about the alleged loss of documentation due to a change in software, when responding to a CPA Ontario investigator in the course of her investigation, and
- He failed to provide documents or other information when requested to do so by the PCC through its investigator.

III. ISSUES

- [6] The Panel proceeded to consider the following:
 - 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 have been established on a balance of probabilities, did the Allegations constitute professional misconduct?

IV. DECISION

- [7] The Member attended the hearing and was represented by counsel. The parties had entered into an Agreed Statement of Facts ("ASF") (Exhibit 1) which contains both facts and admissions made by the Member.
- [8] The parties also filed a Joint Document Brief (Exhibit 2). The PCC filed a Brief of Authorities (not marked as an exhibit) and a Bill of Costs (Exhibit 3).
- [9] The Panel found that the jointly submitted ASF and the admissions contained therein did establish, on a balance of probabilities, the facts on which the Allegations were based.
- [10] The Panel was satisfied that the Allegations constituted breaches of Rules 104, 201.1 and 205 of the Code, and having breached these Rules, in conjunction with the admissions made by the Member, the Member committed professional misconduct.

V. REASONS FOR THE DECISION ON MISCONDUCT

Background – The Firm

- [11] The Member became a member of CPA Ontario through the legacy program after having obtained his Certified Management Accountant designation in 2014. The Member has worked as a credit risk professional with various banks.
- [12] The Member's background was in tax and accounting, and he had never held a Public Accounting Licence. He was a part-time Sessional Leader with CPA Ontario. In 2020, the Member completed the CPA Canada In-Depth Tax Program.
- [13] In 2021, through a colleague at one of his previous employers, the Member became aware of PK, another member of CPA Ontario, who owned and operated a registered accounting firm ("the Firm") and was interested in moving on and selling the Firm.

- [14] The Member had not previously considered owning an accounting firm and had no experience in public accounting. He had never performed or participated in assurance or compilation engagements. The Member did not have experience with Karbon, the cloud-based practice management software used by the Firm for time entry and reporting.
- [15] In considering whether to purchase the Firm, the Member believed PK would continue to run the practice while the Member grew the Firm's business and improved customer service.
- [16] In November 2021 and March 2022, the Member acquired an initial 25% and an additional 50% interest respectively in the Firm from PK, who retained the remaining 25% interest in the Firm. Prior to purchasing the initial and then additional interests in the Firm, the Member conducted limited financial due diligence and did not conduct any due diligence on the responsibilities or obligations associated with running a public accounting firm.
- [17] After March 2022, PK continued to work for the Firm until in or about November 2022, when a shareholder dispute arose between the Member and PK, at which time PK resigned as a partner and left the Firm.
- [18] The Member has retained an outside CPA to conduct the majority of the assurance work for existing clients. The Member has been transitioning the Firm away from public accounting services.

Background – The Member's brother, DM

- [19] DM is the Member's younger brother. In 2019, DM was a registered student with CPA Ontario. In September 2020, DM passed the Common Final Examination.
- [20] In order to obtain their CPA designation, CPA Ontario students are required to work, report and support 30 months of qualifying experience as noted under the Practical Experience Report (PERT) requirements. From September 2020 to October 2021, DM was employed at RBC, at the same time as the Member.
- [21] In or about October 2021, DM signed up for his practical reporting program with CPA Ontario in the Assurance, Compilations and Tax Program ("ACT Program") with PK as his approved mentor. Under the program, DM was required to keep a detailed account of his work, including chargeable hours.
- [22] DM was hired to lead the Firm's bookkeeping division while continuing to being registered under the ACT Program. After March 2022, DM was assigned managerial responsibilities at the Firm with the title of Director. According to time records, DM primarily worked on the Firm's internal administration and bookkeeping. He did not enter the time on a detailed basis as it was primarily non-chargeable work.
- [23] In or about April 2022, PK advised DM that the work he was performing was neither sufficient or appropriate to gain the technical competencies or experience needed to meet the PERT requirements.

- [24] In October 2022, DM submitted a PERT to CPA Ontario for the period of April 2022 to September 2022 regarding his experience and hours worked. On November 4, 2022, PK resigned from the Firm and was no longer DM's mentor.
- [25] On December 1, 2022, an Employer Relations Officer ("ERO") with CPA Ontario wrote to the Member requesting detailed information relating to DM's work with the Firm, including hours to date on audit, review, taxation and compilation. The Member responded on December 6, 2022.

CPA Ontario's Investigation into DM's Conduct ("the DM Investigation")

- [26] In 2023, two complaints were filed against DM specifically by CPA Ontario's Director of Employer Relations (February 2023) and by PK (July 2023) alleging DM had filed false PERTs for the period of April to September 2022 regarding his work experience and hours worked,
- [27] On November 29, 2023, an investigator was appointed by the PCC ("the DM Investigator") to investigate the two complaints. In February 2024, the investigation report was delivered.
- [28] In March 2024, the PCC considered the DM Investigation and determined the matter should proceed to discipline. Allegations were filed and DM's matter was concluded before the Discipline Committee on September 18, 2024.

CPA Ontario's Investigation into the Member's Conduct

- [29] During the DM Investigation, the DM Investigator requested various documents and information from the Member, advised him of the need for an interview and reminded the Member of his duty to cooperate pursuant to Rule 104.1 of the Code.
- [30] The Member's conduct during the DM Investigation resulted in an internal complaint being made against the Member. An investigation into the Member's conduct was commenced in June 2024 and was conducted by another investigator ("the SM Investigator").

Allegation 1: Rule 205

- [31] On December 6, 2022, the Member responded to an ERO request dated December 1, 2022, and reported the hours DM had purportedly worked during the designated period, providing a breakdown of hours obtained on each audit and review engagement.
- [32] During the course of the DM Investigation, in February 2024 the Member provided the DM Investigator with a summary report of DM's hours obtained from the Karbon system but did not provide any detailed daily reports ("Detailed Reports"), citing an inability to do so. However, during the PCC Investigation into his own conduct, the Member provided the Detailed Reports to the SM Investigator.
- [33] Based on the additional documentation, the SM Investigator determined that there were significant discrepancies between the hours as originally reported by the Member to CPA Ontario during the DM Investigation and those presented by the Member during the PCC Investigation.

- [34] The Member advised the SM Investigator that the Firm had attempted to use ChatGPT to reconcile the differences in the hours, but that it could not do so. He further stated that he had attempted unsuccessfully to reconcile the hours. The Member admitted to the SM Investigator that he did not properly understand what could be classified as compilation time and could therefore not reconcile the discrepancies in the reported hours.
- [35] In the ASF, the Member admitted the following facts:
 - a) The Detailed Reports do not reconcile the hours reported to CPA Ontario on an aggregate basis, separate and apart from identifying the different types of work performed;
 - b) There is a difference of over 800 hours between the time reported for Audit, Review, Tax and Compilation to CPA Ontario from the Summary Report, and those hours reflected on the Detailed Reports;
 - c) The information contained in the Detailed Reports would allow an accurate manual allocation of the time that DM actually spent on each file type; and
 - d) Approximately 570 hours of internal work at the Firm performed by DM was improperly included in the compilation time reported by the Member on December 6, 2022.
- [36] The Member also admitted that neither he nor his administrative staff had the expertise required to perform the proper allocations of time to audit, review, tax and compilation. He further admitted that he did not have sufficient knowledge of the PERT requirements to respond to the CPA Ontario inquiries per the email dated December 1, 2022.
- [37] Finally, the Member admitted that he made or associated with information which he knew, or should have known, was false or misleading, whether by statement or by omission, which resulted in a mischaracterization and inflation of qualifying hours to CPA Ontario, contrary to Rule 205 of the Code.

Allegation 2: Rule 201.1

- [38] While the PCC Investigation was ongoing, the Member's "Independent Contractor Agreement" ("the Contract") with HS, another CPA firm, came to light. The Member performed accounting services on behalf of HS under contract until March 2022.
- [39] The Contract included the following relevant terms:
 - a) The Member would invoice HS at the end of each month for services rendered, plus HST; and
 - b) The Member would be paid \$10,000 (plus HST) per calendar month, with an annual performance bonus to be considered by HS.
- [40] The Member provided accounting services to HS between the period May 2020 and March 2022, including the period between November 2021 and March 2021 while concurrently working at the Firm. The Member performed and invoiced HS as follows: \$2,545 for the services rendered in 2020, \$35,827 for services rendered in 2021, and \$35,237.50 for services rendered in 2022 aggregating to \$73,609.50.

- [41] The Member informed the SM Investigator about services provided to HS during 2021 and 2022, but he did not disclose the 2020 services to the SM Investigator. The Member did not bill or collect HST on the invoices submitted to HS for payment in 2021 or 2022. The Member did not file HST returns or remit HST to the CRA for income received from HS in 2021 and 2022.
- [42] The Member also failed to declare any income from HS on his personal tax return files with the CRA for the years 2020, 2021 and 2022. The Member advised that when preparing his personal income tax, he had solely relied on and provided slips downloaded from his CRA account to his accountant. The Member did not provide any documentation relating to his HS income to his accountant in the relevant years.
- [43] The Member advised the SM Investigator that he was working with his accountant to go back ten years, to ensure that all income has been reported to CRA. The SM Investigator was provided with a form T2125 Statement of Business and Professional Activities for 2021, which had not been filed at the time the ASF was signed, as evidence of the Member's recent efforts to report the outstanding income for 2021.
- [44] The Member admitted that in failing to charge, report and remit HST to the CRA on income in 2021 and 2022, and for failing to declare an aggregate of over \$73,000 as income for the years 2020, 2021, and 2022, he failed to maintain the good reputation of the profession and to serve the public interest, contrary to Rule 201.1 of the Code.

Allegation 3: Rule 104

- [45] This Allegation relates to Member's conduct only during the DM Investigation. From January 1, 2024, through February 29, 2024, the Member provided information to the DM Investigator and participated in an interview about his response to CPA Ontario's correspondence in December 2022 regarding DM's hours and experience. This Allegation relates to the Member's responses to the following inquiries and/or information requests made by the DM Investigator:
 - Detailed time logs to support how the Member derived DM's estimated hours worked at the Firm for relevant services;
 - Identification/classification of internal work (by DM) at the Firm as 'compilation hours' while reporting of DM's experience to CPA Ontario; and
 - Documentation and information with respect to the Member's employment with HS.
- [46] In relation to the requested detailed time logs, the Member asserted that he was unable to locate the report that formed the basis of his initial reporting to CPA Ontario in December 2022 regarding DM's hours. He also advised that he was unable to retrieve detailed time log documents from Karbon and that the time log data had been lost during a data migration.
- [47] While the Member provided a letter from the Firm's IT specialist that referenced "data migration", the only software change, according to the IT specialist, was the change in the authorized lead user of the software. The IT specialist advised that no data had been lost as a result of this change.

- [48] The Member was inexperienced in his knowledge and use of Karbon. He failed to take reasonable steps to determine whether the data sought by the DM Investigator was lost or available. In mischaracterizing the state of the information requested to CPA Ontario, the Member knew or out to have known his statements were misleading and impeded the DM Investigation.
- [49] In relation to the identification/classification of internal work, the Member advised the DM Investigator that PK had told him to treat all employment hours, other than those specifically related to audit, review and tax, as compilation hours, regardless of whether those were spent in performing compilations. During the PCC Investigation, the Member acknowledged that the above statement was untrue, and, in fact, PK had provided him with guidance on practice management and time entry and had explained how to classify different types of work. He also subsequently acknowledged that PK's guidance was with respect to overall firm management and not in respect of responding to CPA Ontario requests related to PERT. The Member misunderstood the different classifications and failed to follow up with PK to clarify how to properly classify work hours in the Firm's time logs. The Member admitted that in mischaracterizing PK's involvement in the incorrect reporting of DM's hours and experience, he knew or ought to have known that his statements were misleading and impeded the DM Investigation.
- [50] In relation to the documentation regarding the Member's employment with HS, the Member failed to take sufficient and reasonable steps to obtain the requisite documentation and information and provide it to the DM Investigator. The Member did, however, admit that he had not reported his HS income to the CRA.
- [51] Contrary to his responses to the DM Investigator, the Member was cooperative during the investigation into his own conduct and provided the SM Investigator with Detailed Reports, clarification regarding PK's guidance to him, and information regarding his income from HS necessary to complete the PCC Investigation.
- [52] The Member admits that he failed to appreciate the gravity of the DM Investigator's requests and that he failed to appropriately cooperate with the processes of CPA Ontario, both in the provision of documents and information, at all and/or in a reasonable period of time, and in the nature of his responses to the DM Investigator in the DM Investigation, contrary to Rule 104 of the Code.

Findings of Professional Misconduct

- [53] Based on the facts admitted in the ASF, as well as the admissions made by the Member, the Panel concluded that the Member's conduct breached Rules 104, 201.1, and 205 of the Code. The Panel also found that the breaches of the Code amounted to professional misconduct.
- [54] The Member breached Rule 205 of the Code in or about December 2022 when he mischaracterized and inflated the qualifying experience and hours of DM, a student of CPA Ontario.
- [55] The Member knew that neither he nor his staff had the expertise to properly allocate DM's time to the various categories of services required to meet the PERT requirements. The

Member also knew he could not reconcile differences in the hours performed by DM. The Member did not have sufficient knowledge of the PERT requirements to respond to the inquiries made by CPA Ontario in December 2022. Despite these issues, the Member provided information to CPA Ontario in December 2022 without identifying the frailties inherent in the information.

- [56] When asked during the DM Investigation to provide the Detailed Reports to support the numbers provided, the Member indicated he was unable to obtain the required reports. He would later provide these reports during investigation into his own conduct.
- [57] It is very concerning that the Member submitted information to CPA Ontario which he knew or ought to have known was inaccurate and which would be relied upon to assess whether a student of CPA Ontario meets the requirements to qualify as a CPA. It is even more disconcerting that the student is the Member's brother. Had the discrepancies not been identified, there would be no way of assuring that DM was properly qualified to become a member of CPA Ontario.
- [58] The Member breached Rule 201.1 of the Code when for the tax years of 2020, 2021 and 2022, he failed to report to the CRA a total of \$73,509.50 in income that he had received for performing accounting services for HS as an independent contractor. He also breached Rule 201.1 when he did not collect or remit HST for services rendered as an independent contractor in 2021 and 2022. During the DM Investigation, the Member also did not disclose the additional income he had received prior to August 2021 to the DM Investigator.
- [59] As a Chartered Professional Accountant, the Member is expected to conduct himself in a manner that maintains the good reputation of the profession. By failing to report income and HST, and by not being truthful and fully candid with the DM Investigator, the Member acted in a manner which failed to maintain the good reputation of the profession. As the owner of a firm engaged in providing public accounting services, the Member failed to act in a manner which serves the public interest. Moreover, the failure to be fully candid during an investigation delays the resolution of matters and besmirches the reputation of the profession.
- [60] The requirement to cooperate applies to any communication from CPA Ontario in which a member or firm is asked to promptly produce documents when required to do so. A lack of co-operation by a member includes attempts to delay, mislead or misdirect CPA Ontario by concealing relevant information, providing false, incomplete or misleading statements or information, failing to respond to communications or otherwise obstructing the regulatory processes of CPA Ontario. Lack of co-operation does not include good faith assertions of legal privilege.
- [61] The Member breached Rule 104 when he provided false, misleading and inaccurate information to the DM Investigator during the DM investigation. In addition to providing inaccurate hours, the Member made false statements about guidance received from PK, another member of CPA Ontario. The Member also did not provide documentation, notably the Detailed Reports, to the DM Investigator.
- [62] It would not be until the Member himself was the subject of another investigation that the Member provided the Detailed Reports and clarified the guidance received from PK.

- [63] The Member acknowledges that he failed to appreciate the gravity of the requests made by the DM Investigator. Regardless of whether a member of CPA Ontario appreciates the consequences of providing false, misleading and inaccurate information during an investigation, it should be abundantly clear that such conduct, regardless of the consequences, is unacceptable and amounts to a serious breach of the Code.
- [64] The Member engaged in various forms of deceptive behaviors, involving both CPA Ontario, as well as the CRA and his conduct took place over the course of several years. Such conduct reflects poorly on the integrity of the Member and negatively impacts the reputation of this profession. The ethical obligations of this profession, including acting with candor, integrity and honesty, are integral to maintaining the reputation of the profession and the confidence of the public in our profession.

VI. DECISION AS TO SANCTION

- [65] After considering the evidence, the law, and the joint submission of both parties, the Panel ordered the following sanctions:
 - a) The Member's membership with CPA Ontario shall be suspended until June 18, 2025;
 - b) The Member shall pay a fine in the amount of \$20,000 by June 18, 2025;
 - c) The Member is to attend, and successfully complete professional development courses offered by CPA Ontario by June 18, 2025, specifically: *Professional Ethics, Managing Your Ethical Responsibilities, Ethics for Accountants, and Professional Ethics: The Balancing Act*;
 - d) Notice of the Decision and Order is to be given in the form and manner determined by the Discipline Committee to all members of CPA Ontario, to all provincial bodies and shall be made available to the public; and
 - e) Failure to comply with the terms of the Order will result in suspension and ultimately, revocation with additional publication and costs arising therefrom to be borne by the Member.

VII. REASONS FOR THE DECISION AS TO SANCTION

- [66] The PCC and Member presented a joint submission on sanction.
- [67] Joint submissions should be granted a high level of deference and should be adopted unless to do so would be contrary to the public interest or would bring the regulatory process into disrepute. (<u>R. v. Anthony Cook 2016 SCC 43</u>). In considering whether to reject a joint submission, the Supreme Court of Canada provided further guidance at paragraph 34 of the Cook decision:

Rejection denotes a submission so unhinged from the circumstances of the offence and the offender that its acceptance would lead reasonable and informed persons, aware of all the relevant circumstances, including the importance of promoting certainty in resolution discussions, to believe that

proper functioning of the justice system had broken down. This is an undeniably high threshold.

- [68] In determining the appropriateness of the joint submission, the Panel considered a number of factors including general and specific deterrence, rehabilitation, denunciation and proportionality.
- [69] The aggravating factors in this matter include the Member's lack of diligence when he provided inaccurate information to CPA Ontario, making false statements, and acting in a manner that brings disrepute to the profession. He failed to not only charge and remit HST for services he rendered, the Member also did not disclose his full income to CRA. As a member with a background in tax filings, such conduct is particularly aggravating and taints the reputation of this profession. This conduct continued for a period of three years and the Panel believes that this was not a momentary lapse of judgment. Finally, while the Member was ultimately cooperative during an investigation into his own conduct, his conduct in relation to the DM Investigation caused delay and showed a complete failure to understand the importance of the investigative processes of CPA Ontario and of providing complete and accurate information.
- [70] In considering the mitigating circumstances in this case, the Panel took into consideration the Member's lack of a prior disciplinary history. The Member has admitted to the misconduct alleged and that his conduct amounted to professional misconduct. Such admissions not only shorten the hearing and save significant resources, they also reflect the Member's insight and understanding of how his actions breached the Code. His cooperation during his own investigation and this hearing are hopefully indicative of a greater understanding of his obligations as a member of this profession. The Panel also notes that the Member has brought himself into compliance regarding his obligations to the CRA. We truly hope that the efforts made by the Member to bring himself into compliance and to cooperate fully with the regulatory and disciplinary processes of CPA Ontario are indicative of a true intention to be a better member of this profession.
- [71] The Panel also considered the range of sanctions found in the cases presented by Counsel for the PCC as found in the Brief of Authorities. The six-month suspension proposed in this matter is in keeping with the range of penalties found in the cases presented. The fine proposed is higher, which this Panel finds is appropriate given the Member's failures as they relate in particular to his obligations to collect and remit HST and file accurate tax returns relating to his own personal income. The educational component of the joint submission is appropriate as it is obvious that the Member failed to appreciate his ethical obligations. Finally, the Panel finds that the publication of the Decision and Order will ensure that it is clear to those within this profession and beyond that such conduct will not be tolerated lightly.

VIII. COSTS

[72] The parties jointly proposed costs in the amount of \$20,000 based on the Bill of Costs filed by the PCC. The parties agreed that the costs should be paid within six months of the Order.

- [73] Costs are not intended as a sanction imposed upon a Member. Rather they are intended to indemnify the PCC for the costs of the investigation and prosecution. While discretionary, the awarding of costs against a member is based on the principle that the profession, as a whole, should not bear all the regulatory costs arising from a member's misconduct.
- [74] The Panel reviewed the Bill of Costs provided by counsel for the PCC and found that the costs requested, which were 2/3 of the actual costs, were reasonable. Most of the costs claimed related to disbursements for the fees incurred in relation to the PCC Investigation. The Member should be required to contribute to these costs as they were incurred as a result of his professional misconduct.

IX. SUBSEQUENT MATTERS

[75] Following the hearing and the release of the Panel's Decision and Order, Imran Kamal, the Public Representative of the hearing panel, was appointed as a Justice of the Ontario Court of Justice. Justice Kamal did not participate in the drafting of the reasons, and as such, his name does not appear on these reasons.

DATED this 28th day of February, 2025

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Richa Khanna, CPA, CA, LPA Discipline Committee – Deputy Chair

<u>Members of the Panel</u> Jeremy Cole, FCPA, FCA Michelle Sauvé, CPA, CA

Independent Legal Counsel Nadia Liva, Barrister & Solicitor