

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

DISCIPLINE COMMITTEE

IN THE MATTER OF: Allegations against **HEATHER A. RASO**, a suspended member of the Chartered Professional Accountants of Ontario, under **Rule 104.2** of the CPA Ontario Code of Professional Conduct.

BETWEEN:

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

-and-

Heather A. Raso

APPEARANCES:

For the Professional Conduct Committee: Julia McNabb (she/her), Counsel

For Heather A. Raso: Not Present and Not Represented

Heard: March 13, 2026

Decision and Order effective: March 13, 2026

Release of written reasons: April 10, 2026

REASONS FOR THE DECISION AND ORDER MADE MARCH 13, 2026

I. OVERVIEW

- [1] The Professional Conduct Committee (“PCC”) of the Chartered Professional Accountants of Ontario (“CPA Ontario”) made Allegations that Heather A. Raso (“the Member”) failed to cooperate with the regulatory process of CPA Ontario, contrary to Rule 104.2 of the CPA Ontario Code of Conduct (“the Code”) in that she failed to promptly reply in writing to communications from CPA Ontario. The Allegations, dated November 24, 2025, arose from two complaints made against the Member by former clients following which Standards Enforcement (“SE”) staff at CPA Ontario repeatedly wrote to the Member requesting a prompt written reply, which the Member failed to do.
- [2] The onus was on the PCC to show on a balance of probabilities that the Member’s conduct breached Rule 104.2 of the Code and constituted professional misconduct.
- [3] For the reasons set out below, the Panel made findings of professional misconduct as alleged

in the Allegations.

II. THE COMPLAINT AND THE ALLEGATIONS

- [4] The PCC alleged that, between July 30, 2025 and November 12, 2025, the Member failed to cooperate with the regulatory process of CPA Ontario, in that she failed to promptly reply in writing to communications from SE staff regarding two complaints from former clients.

III. PRELIMINARY ISSUES

- [5] The Member was not in attendance at the hearing, nor did she have a representative appear on her behalf.
- [6] To proceed in the absence of the Member, the Panel had to be satisfied that the Member received proper notice of the Allegations and of the hearing. The Affidavit of Krystle Rose Medley King, affirmed March 2, 2026 (Exhibit 1), established that the Member was served with the Allegations on December 2, 2025 by email using her preferred email address as listed on her CPA Ontario member profile. CPA Ontario effected email service after unsuccessful attempts to serve the Member personally using a process server at her residential and business addresses. On January 19, 2026, the Tribunals Office provided the parties by email with a Notice of Hearing for a one-day hearing to be held electronically on March 13, 2026, commencing at 9:30 a.m. The Notice of Hearing noted that, “[i]f you choose not to attend the hearing, the Discipline Committee may proceed in your absence and you will not be entitled to further notice of proceedings.”
- [7] Rule 8 of CPA Ontario’s *Rules of Practice and Procedure* permits service by email.
- [8] Based on this affidavit evidence, the Panel was satisfied that the Member had been provided proper notice of the Allegations and the hearing and determined that it would proceed in the Member’s absence.

IV. ISSUES

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

V. DECISION

- [10] The Panel found that the evidence established, on a balance of probabilities, the facts on which the Allegations by the PCC were based.
- [11] The Panel was satisfied that the facts alleged constituted breaches of Rule 104.2 of the Code, and having breached this Rule, the Member had committed professional misconduct.

VI. REASONS FOR THE DECISION ON MISCONDUCT

Findings Regarding the Conduct of the Member

Allegation 1(a): Between July 31, 2025 and November 12, 2025, the Member failed to cooperate contrary to Rule 104.2 with respect to IL's complaint

- [12] The evidence in support of this Allegation is contained in the Affidavit of Stephanie Chow ("Chow"), a SE Officer with CPA Ontario, affirmed March 2, 2026 (Exhibit 2).
- [13] On June 9, 2025, CPA Ontario received a complaint made against the Member by IL, a former client. IL alleged that she engaged the Member to prepare and submit the income tax returns for herself and her late husband. In or around April 2025, IL met with the Member to provide her with the necessary documentation, including prior years' tax returns. According to IL, she attempted to follow up with the Member over the following weeks by visiting her office, which she found to be locked, and by calling her, but received no response. Toward the end of May 2025, IL contacted the Member through her residential phone number to arrange the retrieval of her documents. IL alleged that the Member became agitated upon being contacted at her residence and subsequently hung up the phone.
- [14] Starting on July 30, 2025, SE staff wrote to the Member at her preferred email address on record with CPA Ontario, advising that correspondence had been uploaded to FileCloud, a secure file transfer location. This correspondence notified the Member of the complaint and requested a response in accordance with Rule 104 of the Code by August 14 2025. The email was not returned as undeliverable. SE staff attempted to follow up with the Member regarding her overdue response, either through phone calls to her business phone number or emails to her preferred email address, on August 18, 2025, August 28, 2025, August 29, 2025, September 8, 2025, September 9, 2025, September 16, 2025 and September 23, 2025. The phone calls and emails all went unanswered.
- [15] The facts in Chow's affidavit establish that the Member did not promptly reply in writing to communications from CPA Ontario to which a written reply was required. The Panel was satisfied that this evidence clearly and cogently demonstrated that the facts set out in Allegation 1(a) were established on a balance of probabilities.

Allegation 1(b): Between July 31, 2025 and November 12, 2025, the Member failed to cooperate contrary to Rule 104.2 with respect to KB's complaint

- [16] The Evidence in support of this Allegation is also contained in Chow's affidavit, affirmed on March 2, 2026.
- [17] On May 23, 2025, CPA Ontario received a complaint made against the Member by KB, a former client. KB alleged that he engaged the Member to prepare and submit both his and his spouse's income tax returns. On April 10, 2025, KB delivered the supporting documentation to the Member at her office and was informed that the tax returns would be completed by April 28, 2025. However, KB later discovered that the Member's office had closed and that she had stopped responding to phone calls and emails.
- [18] Starting on July 31, 2025, SE staff wrote to the Member at her preferred email address on

record with CPA Ontario, advising that correspondence had been uploaded to FileCloud. This correspondence notified the Member of the complaint and requested a response in accordance with Rule 104 of Code by August 15, 2025. The email was not returned as undeliverable. SE staff attempted to follow up with the member regarding her overdue response, either through phone calls to her business phone number or emails to her preferred email address, on August 18, 2025, August 28, 2025, August 29, 2025, September 8, 2025, September 9, 2025, September 16, 2025 and September 23, 2025. The phone calls and emails all went unanswered.

- [19] As with Allegation 1(a), the facts in Chow's affidavit establish that the Member did not promptly reply in writing to communications from CPA Ontario to which a written reply was specifically required in relation to Allegation 1(b). The Panel was satisfied that this evidence clearly and cogently demonstrated that the facts set out in the Allegation 1(b) were established on a balance of probabilities.

Finding of Professional Misconduct

- [20] Rule 104.2 of the Code requires members to cooperate with the regulatory processes of CPA Ontario. For ease of reference Rule 104.2 is set out in relevant part below:

104.2 A member or firm shall:

- (a) promptly reply in writing to any communication from CPA Ontario in which a written reply is specifically required;
- (b) promptly produce documents when required to do so by CPA Ontario; and...

- [21] The Member was properly notified of the two complaints against her and the requirement that she respond. In the face of repeated communications, both in writing and by way of telephone calls and messages, the Member did not provide any response.
- [22] Absent credible evidence that demonstrates an inability to respond, the Member's failure to respond promptly constitutes a breach of Rule 104.2 of the Code and constitutes professional misconduct. Accordingly, this Panel found that the Member's failure to cooperate with the regulatory processes of CPA Ontario, contrary to Rule 104.2, constituted professional misconduct.

VII. DECISION AS TO SANCTION

Evidence in Relation to Sanction

- [23] In any discipline proceeding, a panel must consider all principles of sanction, including aggravating and mitigating factors, and may have a view to those articulated in section 15 of [Regulation 6-2](#). These include protection of the public interest, general and specific deterrence, denunciation and rehabilitation of the Member.
- [24] The PCC did not lead any evidence on sanction. The Panel was disappointed that the Member was not present for the hearing. As a result of her absence, there was no explanation for her failure to cooperate, nor any expression of remorse. The Panel is mindful that the

absence of remorse is not an aggravating factor on sanction. However, having failed to cure the failure to cooperate, provide an explanation or a statement of remorse, the Member was not afforded the benefit of any mitigating circumstances, other than the fact that she had no prior discipline history.

Decision on Sanction

[25] After considering the evidence, the law and the submissions of the PCC, the Panel ordered that:

- i) The Member shall cooperate with the regulatory process of CPA Ontario by responding to the correspondence from SE staff dated July 30, 2025 and July 31, 2025, by April 12, 2026;
- ii) The Member pay a fine of \$7,500 payable to CPA Ontario by September 13, 2026;
- iii) Notice of this Decision and Order disclosing the Member's name to be given in the form and manner determined by the Discipline Committee: to all members of CPA Ontario and to all provincial bodies, and shall be made available to the public;
- iv) Failure to comply with the terms of the Order shall result in suspension and ultimately revocation with additional newspaper publication in the *Welland Tribune*, the costs for which are to be borne by the Member.

VIII. REASONS FOR THE DECISION AS TO SANCTION

[26] In matters where a member has failed to cooperate in the context of one investigation, the standard fine is \$5,000. In this matter, the Member failed to cooperate with SE staff with respect to two investigations. In light of this, the Panel finds that a fine of \$7,500 is appropriate.

[27] This is in line with the case of *Dawe*.¹ In *Dawe*, the parties jointly proposed a \$7,500 fine for failing to cooperate with two investigations. In finding that a \$7,500 fine was appropriate the panel in *Dawe* relied on the prior case of *Hametaj* where the Panel had imposed an \$8,000 fine for failing to cooperate with three investigations. The panel in *Hametaj* considered as aggravating factors the length of time over which Hametaj failed to cooperate and the fact that he failed to cooperate with three separate investigations. The panel observed that a failure to cooperate of this length and breadth shows a lack of respect for the process and undermines CPA Ontario's ability to fulfill its public mandate to effectively regulate its members.²

[28] The Panel also agrees with these observations and their application to the conduct of the Member before us. The Member failed to respond to correspondence from SE staff for approximately three months in relation to two complaints and by the time of the hearing – a further four months – had still not responded. The public must know that CPAs will be held accountable for their failure to comply with the Code governing their professional conduct

¹ *Chartered Professional Accountants of Ontario v. Dawe*, [2025 ONCPA 16](#) [*Dawe*].

² *Chartered Professional Accountants of Ontario v. Hametaj*, [2021 ONCPA 7](#) at para 46.

and that if non-compliance is suspected, complaints will be thoroughly investigated, and if warranted, CPAs will be prosecuted for their misconduct. Prompt and complete responses are essential so that investigations can move forward. Here, the Member's failure to cooperate has left her two clients in the dark about what happened with their matters. A fine of \$7,500 is appropriate in these circumstances.

[29] The remaining terms of the order are standard terms ordered in virtually every failure to cooperate case.³

IX. COSTS

[30] The law is settled that an order for costs with respect to disciplinary proceedings is not a penalty. Costs are intended to indemnify the PCC, based on the underlying principle that the profession as a whole should not bear all of the costs of the investigation, prosecution and hearing arising from misconduct.

[31] Costs are ordered at the discretion of the Discipline Committee. It has become customary for the PCC to file a Costs Outline in the same form as used in civil proceedings, and to seek two-thirds of the costs incurred in the investigation and prosecution of the matter.

[32] The PCC's Costs Outline is found at Exhibit 3. The PCC sought approximately two-thirds of the actual costs (\$4,283.51).

[33] The Panel found that the amount of actual costs was reasonable, and that it was appropriate for the Member to pay approximately two-thirds. Accordingly, costs were set at \$2,800 to be paid to CPA Ontario by September 13, 2026.

DATED this 10th day of April, 2026



Jim Huang, CPA, CGA
Discipline Committee – Deputy Chair

Members of the Panel

Robert Barber, Public Representative
Pamela Bourne-Chase, CPA, CMA

Independent Legal Counsel

Janani Shanmuganathan, Barrister & Solicitor

³ *Dawe*, *supra* note 1, at para 35 and *Chartered Professional Accountants of Ontario v. Latour*, [2025 ONCPA 35](#) at para 36.