

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

DISCIPLINE COMMITTEE

IN THE MATTER OF: Allegations against **Peter Choy, CPA, CGA**, under **Rules 201.1, 203, 205, and 206.1** of the CPA Ontario Code of Professional Conduct.

BETWEEN:

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

-and-

Peter Choy

APPEARANCES:

For the Professional Conduct Committee:	Kelvin Kucey, Counsel
For Peter Choy:	Not Present and Not Represented
Heard:	March 19, 2026
Decision and Order effective:	March 20, 2026
Release of written reasons:	April 21, 2026

REASONS FOR THE DECISION AND ORDER MADE MARCH 20, 2026

I. OVERVIEW

- [1] The Professional Conduct Committee (“PCC”) of the Chartered Professional Accountants of Ontario (“CPA Ontario”) made Allegations of professional misconduct against Peter Choy (the “Member”). The Allegations included that he failed to meet his continuing professional development (“CPD”) requirements; failed to implement a quality management system as required; submitted a filing to CPA Ontario containing a false or misleading statement; and while engaged to perform compilations of financial statements for four different companies, failed to perform his professional services in accordance with the generally accepted standards of practice of the profession.
- [2] A hearing was held before this Panel of the Discipline Committee of CPA Ontario to determine whether the Allegations were established and whether the conduct breached Rules 201.1, 203, 205 and 206.1 of the CPA Code of Professional Conduct (the “Code”).
- [3] The onus was on the PCC to prove on a balance of probabilities that the Member’s conduct breached the Code and constituted professional misconduct.
- [4] For the reasons that follow, the Panel found that the Allegations were made out against the Member, that his conduct constituted professional misconduct, and ordered sanctions against him.

II. THE COMPLAINT AND THE ALLEGATIONS

- [5] The Member obtained his CGA designation in 1983. He did not hold a Public Accounting Licence (“PAL”) at the time of the hearing, nor during the time of the alleged misconduct.
- [6] The Allegations against the Member traced their origin to recent practice inspections. Having failed the practice inspection process twice in a row, a complaint against the Member was made to the PCC by the Director of Practice Inspection on behalf of the Practice Inspection Committee (“PIC”). An investigator, Paul Gibel (“Gibel”), was appointed on July 31, 2025, to conduct an investigation.
- [7] For the investigation, Gibel looked at the two files from the most recent practice inspection and selected two additional files that were more current to, among other things, assess whether the Member had implemented any of the recommendations of the PIC. Gibel also investigated the Member’s quality management system as well as his compliance with CPD requirements.
- [8] Following the investigation, the PCC brought the Allegations against the Member. The eight Allegations are summarized as follows:
1. Between January 1, 2023, and November 30, 2025, the Member failed to conduct himself in a manner that will maintain the good reputation of the profession and serve the public interest, contrary to Rule 201.1 of the Code, in failing to meet his CPD requirements for 2023 and 2024 and failing to implement a quality management system (Allegation #1(a) and #1(b)).
 2. Between January 1, 2023, and November 30, 2025, the Member failed to sustain his professional competence by keeping informed of, and complying with, developments in professional standards contrary to Rule 203 of the Code (Allegation #2).
 3. Between January 1, 2024, and November 30, 2025, the Member submitted a signed, mandatory annual registration filing to CPA Ontario which contained a statement or representation which he knew, or should have known, was false and/or misleading, contrary to Rule 205 of the Code (Allegation #3).
 4. Between August 1, 2024, and December 31, 2024, while engaged to perform a compilation of the financial statements of “25XOnt. Inc.”, for the year ended August 31, 2024, the Member failed to perform his professional services in accordance with the generally accepted standards of practice of the profession, contrary to Rule 206.1 of the Code (Allegation #4).
 5. Between July 1, 2024, and December 31, 2024, while engaged to perform a compilation of the financial statements of “PBGI Inc.”, for the year ended July 31, 2024, the Member failed to perform his professional services in accordance with the generally accepted standards of practice of the profession, contrary to Rule 206.1 of the Code (Allegation #5).

6. Between January 2, 2025, and July 31, 2025, while engaged to perform a compilation of the financial statements of “KJF Inc.” for the year ended January 31, 2025, the Member failed to perform his professional services in accordance with the generally accepted standards of practice of the profession, contrary to Rule 206.1 of the Code (Allegation #6).
7. Between November 1, 2024, and February 28, 2025, while engaged to perform the compilation of the financial statements of “RFP Inc.” for the year ended November 30, 2024, the Member failed to perform his professional services in accordance with the generally accepted standards of practice of the profession, contrary to Rule 206.1 of the Code (Allegation #7).
8. Between December 15, 2023, and November 30, 2025, while engaged in the practice of public accounting, the Member failed to design, implement, operate, and subsequently evaluate a system of quality management as required by Canadian Standards on Quality Management, contrary to Rule 206.1 of the Code (Allegation #8).

III. PRELIMINARY ISSUES

[9] There were two preliminary issues for the Panel’s determination:

- (a) whether to proceed with the hearing in the Member’s absence; and
- (b) whether to qualify Gibel as an expert witness.

(a) Proceeding in the Member’s Absence

[10] The Member did not attend or have a representative attend on his behalf at the hearing.

[11] In order to proceed in his absence, the Panel had to be satisfied that the Member had been provided notice of the hearing pursuant to Rule 7.02(1) of the [Rules of Practice and Procedure](#). The affidavit of Alyssa Girardi (“Girardi”), affirmed March 10, 2026 (Exhibit 1), established that, on December 18, 2025, the Member was served with the Allegations dated December 16, 2025. The Member responded by email on January 13, 2026, to advise that he had read the “memo issued by the Chartered Professional Accountants of Ontario dated December 16, 2025”, that “all the allegations contained in the memo are true and fair”, and he “[was] not planning to attend further meetings of the Discipline Committee of CPA Ontario to save time and cost”. The affidavit of Girardi further established that the Member was served with the Notice of Hearing by email from the Tribunals Office on February 2, 2026.

[12] At the start of the hearing, while not required to do so, the Panel, as a matter of courtesy, directed the Tribunals Office to contact the Member via email used by him to inform him that the hearing had commenced. The Member neither responded nor attended the hearing.

[13] Based on this affidavit evidence and the Member’s email response on January 13, 2026 (that he would not be participating further in the process), the Panel was satisfied that the Member had been provided proper notice of the Allegations as well as the hearing and determined to proceed in his absence.

(b) Qualifying Mr. Gibel to Give Expert Testimony

- [14] The PCC put forward one witness for the hearing: Gibel. In addition to being a fact witness as the investigator in this matter, the PCC sought to have him qualified to give expert testimony on generally accepted standards of practice of the accounting profession — specifically:
- Canadian Standard on Related Services 4200 (“CSRS 4200”), *Compilation Engagements*, effective for compiled financial information for periods ending on or after December 14, 2021, and
 - Canadian Standard on Quality Management 1 (“CSQM 1”), *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements*, effective for firms performing only compilation engagements as of December 15, 2023.
- [15] The PCC submitted an Expert Evidence Motion Record. Tabs 1 and 2 of the Expert Evidence Motion Record, comprising Gibel’s signed Acknowledgement of Expert’s Duty and an executive-summary version of his Curriculum Vitae, were marked as Exhibit 2.
- [16] Gibel obtained his CA designation in 1982 and his FCA designation in 2009. Prior to his retirement on December 31, 2020, he practised as a partner at a national accounting firm. His practice included audit, review and compilation engagements. Per his own oral testimony, Gibel had been qualified to provide expert opinion on accounting standards on 15-20 occasions before the Discipline Committee of CPA Ontario as well as the Ontario Superior Court of Justice.
- [17] Although both the CSRS 4200 and CSQM 1 came into effect after Gibel’s retirement from practice, it was clear from Gibel’s answers to questions posed by PCC counsel as well as the Panel that he has kept himself up to date with his specialized knowledge, particularly in relation to these standards. In the Panel’s view, he met the definition of a properly qualified expert as stated by the Supreme Court of Canada in [R. v. Mohan, \[1994\] 2 SCR 9](#), namely, “a witness who is shown to have acquired special or peculiar knowledge through study or experience in respect of the matters on which he or she undertakes to testify.”
- [18] In addition to having the necessary knowledge about CSRS 4200 and CSQM 1, the Panel was satisfied that Gibel was willing and able to provide opinion evidence in accordance with the duty of an expert.
- [19] The Panel further determined that the two-step test for the admission of expert opinion evidence as set out in *R. v Mohan* and clarified in *White Burgess Langille Inman v Abbott and Haliburton Co*, 2015 SCC 23 at paras 23-24, was met. With respect to step one, we were satisfied that the evidence proposed to be given was:
- logically relevant to the Allegations made against the Member;
 - necessary in the sense of usefully clarifying the applicable standards for the Panel considering the technical nature of the standards;
 - not contrary to an exclusionary rule; and
 - proffered by a properly qualified expert.
- [20] Under step two, the Panel considered the potential risks and benefits of admitting the

evidence. The Panel determined that the potential helpfulness of the evidence justified the potential risks that might result from its admission. The probative value of the proposed evidence was worth what would cost in terms of time and considering the low risk of misuse.

- [21] The Panel determined that Gibel was qualified to provide expert evidence on CSRS 4200 and CSQM 1 in this hearing.

IV. ISSUES ON CONDUCT

- [22] The two issues for the Panel's determination were:
- (a) Did the evidence establish, on a balance of probabilities, the facts on which the Allegations made 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?

V. DECISION

- [23] The Panel determined that the evidence established, on a balance of probabilities, the facts set out in the Allegations of professional misconduct. In addition to oral evidence by way of Gibel's testimony and the documentary evidence put forward by the PCC, the PCC pointed out the Member had admitted in his January 13, 2026 email correspondence to the Tribunals Office that the Allegations were true. Having said that, the Panel noted that the burden of proof remained with the PCC. The Panel was satisfied that the Allegations were proven.
- [24] The Panel was satisfied that the proven Allegations constituted breaches of Rules 201.1, 203, 205, 206.1 of the Code, and having breached the Code, the Member committed professional misconduct.

(a) Allegations #2 and #3: Breach of Rules 203 and 205 of the Code

- [25] Rule 203 of the Code requires a member 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 or is relied upon because of the member's calling.
- [26] Rule 205 of the Code prohibits a member from making or associating with any statement or representation that they know, or should know, is false or misleading.
- [27] To comply with Rule 203, a member must, at minimum, meet the CPD requirements set out in Regulation 7-2. According to Regulation 7-2, a member must complete a minimum of 120 hours of CPD every three years (triennial period), with at least 60 hours being verifiable, including four verifiable hours of professional ethics. Annual requirements include a minimum of 20 hours (of which 10 hours must be verifiable).
- [28] Gibel testified that he had asked the Member to provide a log of the CPD that he had completed. The Member failed to produce any log. Subsequently, when he interviewed the Member, he again asked the Member for his CPD log. The Member's response was that he had not done any CPD, and specifically, he did not complete any coursework in 2023 and

2024. When asked to explain why, the Member indicated that there was no reason for him to do so since he would not remember what would be covered in a course and that his clients had been with him for a long time, and they knew what he was doing for them.

- [29] On May 29, 2025, the Member submitted his Annual Membership Dues and CPD Declaration. His Declaration included a section regarding CPD Obligation Information where the Member indicated that he:
- a) complied with the annual CPD requirements for 2024 and completed the annual minimum 20 hours, of which at least 50% was verifiable; and
 - b) complied with the overall three-year CPD cycle requirements of 120 hours, of which at least 50% was verifiable.
- [30] Gibel testified that upon receipt of the Member's CPD Declaration from the Registrar's office (subsequent to his interview with the Member), he noted that the Member's representation of full compliance with the CPD requirements on his Declaration did not align with what the Member stated during the interview, namely, that he did not complete any CPD. Gibel put this contradiction to the Member in an email and asked how he fulfilled the CPD requirements that he attested to fulfilling on his Declaration. The Member provided a vague response of "through various sources" without providing any details or supporting documentation.
- [31] Considering the absence of any CPD logs provided by the Member and Gibel's testimony in relation to his communications with the Member on this issue, the Panel concluded that the Member had not met his CPD requirements and had made an attestation on his CPD Declaration that he knew, or should have known, was false and/or misleading.
- [32] The Panel was satisfied that the alleged facts underlying Allegations #2 and #3 were proved on a balance of probabilities and the Member breached Rules 203 and 205 of the Code.

(c) Allegations #4-8: Breach of Rule 206.1 of the Code

- [33] Compliance with CSRS 4200 and CSQM 1 is part and parcel of performing professional services in accordance with the generally accepted standards of practice of the profession under Rule 206.1 of the Code.
- [34] As part of his investigation, Gibel investigated the Member's compilation engagements for four entities: 25XOnt. Inc., PBGI Inc., KJF Inc. and RFP Inc. Since these compilation engagements pertain to periods after December 14, 2021, compliance with CSRS 4200 was required.
- [35] Gibel testified that based on his review of the documentation provided by the Member for the compilation engagements, the Member failed to comply with several requirements of CSRS 4200.
- [36] Gibel testified to the deficiencies he found in each of the four compilation engagements. As he noted, notwithstanding a few differences, there was an identifiable pattern of non-compliance in the services performed by the Member because his approach to all four engagements was similar. Below is a chart outlining the alleged deficiencies and the

engagement(s) in which each deficiency was found:

Deficiency	Engagement
a) Failure to document inquiries of management regarding the intended use of the compiled financial information prior to accepting or continuing the engagement (as required by CSRS 4200.24(a), 4200.41)	25XOnt. Inc. PBGI Inc. KJF Inc. RFP Inc.
b) Failure to document an acknowledgement from management of the basis of accounting expected to be applied in the preparation of the compiled financial information prior to accepting or continuing the engagement (as required by CSRS 4200.24(b), 4200.41)	25XOnt. Inc. PBGI Inc. KJF Inc. RFP Inc.
c) Failure to agree the terms of the engagement with management prior to performing the engagement (as required by CSRS 4200.26)	25XOnt. Inc.
d) Failure to include the required terms and acknowledgments in the engagement letter (as required by CSRS 4200.27)	25XOnt. Inc.
e) Failure to document whether he may be seen by a reasonable observer as lacking independence (as required by CSRS 4200.21, 4200.41)	25XOnt. Inc. PBGI Inc. KJF Inc. RFP Inc.
f) Failure to document a description of the entity's business, operations, accounting system, the applicable basis of accounting and the accounting policies used in the preparation of the financial statements (as required by CSRS 4200.29, 4200.41(b))	25XOnt. Inc. PBGI Inc. KJF Inc. RFP Inc.
g) Failure to document a reconciliation of the entity's accounting records to the compiled financial information (as required by CSRS 4200.41(c))	25XOnt. Inc. PBGI Inc. KJF Inc. RFP Inc.
h) Failure to adequately detail, in the note to the financial statements, how the compiled financial information was prepared (as required by CSRS 4200.8)	25XOnt. Inc. PBGI Inc. KJF Inc.
i) Failure to reference which specific note disclosed the basis of accounting applied in the compilation engagement report (as required by CSRS 4200.39(f))	25XOnt. Inc. PBGI Inc. KJF Inc.
j) Failure to date his report when management took responsibility for the final version of the compiled financial information (as required by CSRS 4200.40)	25XOnt. Inc. PBGI Inc. KJF Inc. RFP Inc.

Deficiency	Engagement
k) Failure to include the required terms and acknowledgments in the engagement letter (as required by CSRS 4200.27)	PBGI Inc.
l) Failure to obtain an engagement letter (as required by CSRS 4200.27)	KJF Inc. RFP Inc.
m) Failure to include a basis of accounting note (as required by CSRS 4200.8)	RFP Inc.
n) Made reference to non-existent “Notes, which describes the basis of accounting applied” in the compilation engagement report (CSRS 4200.39(f))	RFP Inc.

- [37] In addition to the above deficiencies, with respect to the compilation of KJF Inc.’s financial statements, the Member incorrectly reported the foreign exchange amount related to a US long term investment in Balance Sheet item, under the financial statement caption – Cash; incorrectly reported an amount receivable from a related party in Balance Sheet item, under the financial statement caption – Accounts receivable; and failed to agree the Balance Sheet item, Property, Plant & Equipment, with Note 2 to the financial statements.
- [38] CSQM 1 requires accounting firms to design, implement and operate a system of quality management. It requires firms to take a more proactive risk-based management approach in assessing the risks to take on considering firm competencies. Although there is no explicit need for a standalone Quality Assurance Manual, a firm must have sufficient and appropriate documentation in place to respond to quality risks that have been identified.
- [39] Apart from non-compliance with CSRS 4200, in the course of his investigation, it became clear to Gibel that the Member failed to design and implement a system of quality management as required by CSQM 1. There is no evidence that the Member performed the mandatory risk assessment process to identify risks. Quality management policies and procedures appeared non-existent as the Member was unable to produce any. Gibel testified that it did not appear that the Member even knew about the existence of CSQM 1. When Gibel asked the Member how he accessed the CPA Canada Handbook and the CPA Ontario Member’s Handbook, he was told by the Member that he did not access them as he had never used them.
- [40] Taken together, the facts upon which Allegations #4-8 were based have been proven on a balance of probabilities. The Member’s failure to perform his professional services in accordance with the generally accepted standards of practice of the profession, including CSRS 4200, and his failure to put in place a system of quality management as required by CSQM 1, were contrary to Rule 206.1 of the Code.

(c) Allegations #1(a) and 1(b): Breach of Rule 201.1 of the Code

- [41] Rule 201.1 of the Code requires members to conduct themselves in a manner that will maintain the good reputation of the profession and serve the public interest.

- [42] The Allegations made by the PCC in relation to Rule 201.1 related to the Member's failure to meet his CPD requirements for 2023 and 2024 and his failure to implement a quality management system as required. The facts underlying Allegations #1(a) and 1(b) for breach of Rule 201.1 are essentially the same as the facts underlying Allegation #2 and #8, for breach of Rule 203 and Rule 206.1 respectively. As explained above, the Panel found that the facts underlying Allegations #2 and #8 have been proved. Maintaining proper CPD requirements and implementing an established system of quality management are key to sustaining one's professional competence and ensuring that one can perform professional services in accordance with the generally accepted standards of practice of the profession. They are also key to maintaining the good reputation of the profession and serving the public interest.
- [43] The Panel was satisfied that the alleged facts underlying Allegations #1(a) and 1(b) were proved on a balance of probabilities and the Member breached Rules 201.1 of the Code.

VI. DECISION AS TO SANCTION

- [44] Considering the facts, the law and the submissions of the PCC, the Panel concluded that the appropriate sanction was:
- (a) Immediate revocation of the Member's membership with CPA Ontario;
 - (b) Fine of \$15,000 payable within six months of the Decision and Order (i.e., by September 21, 2026); and
 - (c) Publication of the Decision and Order, including newspaper publication, to all members of CPA Ontario, all provincial bodies, and to the public.

VIII. REASONS FOR THE DECISION AS TO SANCTION

- [45] Pursuant to Regulation 6-2, in determining appropriate sanctions a panel must consider aggravating and mitigating factors, and may consider the relevant principles of sanction, including protecting members of the public, promoting public confidence in the profession, denouncing the misconduct, achieving specific and general deterrence, maintaining high ethical standards of the profession, and facilitating rehabilitation. The Panel took all of these considerations into account in determining the appropriate sanction.
- [46] This was not the first time that the Member had come before the Discipline Committee. In 2020, he was found to have engaged in professional misconduct for failing to cooperate with the regulatory process of the CPA Ontario: [*Chartered Professional Accountants of Ontario v Choy, 2020 ONCPA 18*](#). The panel in that decision emphasized that "membership in CPA Ontario includes important responsibilities as well as benefits" (para 26) and stated that a written reprimand would hopefully impress this message upon the Member. Unfortunately, it appears that the message fell on deaf ears. The Member's subsequent conduct, which brought him before this Panel, suggests a continued disregard for the professional obligations that are inseparable from the privilege of having the CPA designation. The Panel considered the Member's prior disciplinary history to be an aggravating factor.
- [47] Another aggravating factor is the seriousness of the Member's misconduct. Making a false statement to CPA Ontario is egregious conduct. It is dishonesty. In addition, as Gibel

testified, the Member failed practice inspections twice. He advised the PIC and Standards Enforcement that he would implement changes, and yet, based on what Gibel saw, the Member did not implement any changes. The Member's conduct revealed a fundamental lack of interest in professional improvement and a cavalier attitude towards his practice lapses. His indifference to his professional responsibilities is further underscored by his decision not to participate in this discipline hearing so as "to save time and cost", as he wrote in his January 13, 2026 email to the Tribunals Office.

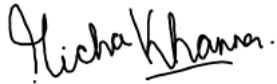
- [48] The Panel did not find any mitigating factors.
- [49] Revocation of membership is the most serious sanction for a professional. Considering the seriousness of the Member's misconduct and his prior disciplinary history, revocation of his membership in CPA Ontario was a reasonable and appropriate sanction.
- [50] The case law provided by the PCC led the Panel to conclude that a fine was also appropriate in the circumstances. In [Chartered Professional Accountants of Ontario v Bromberg, 2020 ONCPA 20](#), which concerned a member who provided public accounting services without a PAL and then made false statements regarding the services he was providing in filings with CPA Ontario contrary to Rules 201.1 and 205 of the Code, a fine of \$10,000, together with revocation and a written reprimand, was ordered. The PCC referred to several cases involving breach of Rule 206.1: [Chartered Professional Accountants of Ontario v Saparno, 2024 ONCPA 2](#); [Chartered Professional Accountants of Ontario v Sweeney, 2019 ONCPA 11](#); [Chartered Professional Accountants of Ontario v Tejani, 2023 ONCPA 15](#); [Jakubos](#) (2023 Settlement); and [Maynard](#) (2024 Settlement). While the standards of the profession and the extent of the deficiencies at issue in those cases are not identical to the case at bar, and some of those cases involved settlements (a mitigating factor), they provided the Panel with a sense of the range in quantum (\$7,500 to \$75,000) and payment period (3 to 24 months) that may be appropriate for a fine, where Rule 206.1 was breached. What was sought by the PCC in this case (\$15,000, payable within 6 months) falls within that range, which is fairly wide.
- [51] It is important for this Panel to send a clear message that dishonesty with the regulator, indifference to one's professional obligations, and failure to perform work in accordance with the standards of the profession are not to be tolerated. The imposition of a fine and revocation would help convey that message. Revocation is necessary to protect members of the public, and along with the fine, promote public confidence in the profession and deter CPA Ontario members from engaging in similar misconduct.
- [52] The Panel ordered standard publication provisions. In addition, notice of the revocation was ordered to be published in the *Globe and Mail* newspaper in accordance with section 48 of Regulation 6-2.

IX. COSTS

- [53] The law is settled that an order against a member 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 should not bear all of the costs of the investigation, prosecution and hearing arising from a member's misconduct.
- [54] The PCC sought costs of \$18,000 payable within 6 months. The amount is approximately

2/3 of the amount claimed in the Costs Outline submitted by the PCC (Exhibit 4). The Panel noted that the amount in the Costs Outline was based on 14 hours of counsel time for attendance at hearing. Given that the hearing concluded in one day instead of the two originally scheduled, that figure should be halved. Otherwise, the Panel considered the costs sought to be reasonable and fair. The Panel awarded costs of \$16,500, payable within six months of the Decision and Order.

DATED this 21st day of April, 2026



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

Members of the Panel

Brian Killah, CPA, CGA, LPA
Jana Marečková, Public Representative

Independent Legal Counsel

Anna Wong, Barrister & Solicitor