IN THE DISCIPLINARY TRIBUNAL OF THE TAXATION DISCIPLINARY BOARD **Ref. TDB/2021/8**

THE TAXATION DISCIPLINARY BOARD **TDB**

-and-

Mr IAN MIDDLETON (ATT No 165760) **Defendant**

DECISION AND REASONS

Date of Hearing	19 November 2024
Venue	Virtual using Microsoft Teams
Tribunal Members	
Legally Qualified Chair	Brett Wilson
Professional Member	Janet Wilkins
Lay Member	Helen Wagner
Tribunal Clerk	Nigel Bremner
Taxation Disciplinary Board ('TBD')	Represented by Mr Hamil of counsel

Mr Middleton Not in attendance

Background

1. The TDB's case is that on 21 October 2021, the Defendant was dismissed from his employment with [xxxx] (the 'Employer') for gross misconduct. The Employer conducted an investigation and found that in a period from May 2019 to September 2021, the Defendant falsified a number of tax returns for 4 clients which, in each case, resulted in a generation of a refund of tax from HMRC. Those refunds were paid into the Defendant's bank account.

2. The TDB alleged that the Defendant amended a number of tax returns with false information which resulted in refunds being issued by HMRC and paid into his personal bank account and taking steps to ensure that the clients (in whose names the tax returns had been made) were not made aware of the claims.

3. The TDB alleged that in doing so, the Defendant used personal data of four clients of the Employer to improperly and dishonestly receive the tax refunds.

4. The Charges and the relevant aspects of the PRPG are set out in Annex 1.

Preliminary Issues

5. The Defendant did not attend the hearing and the TDB applied for the Tribunal to proceed in his absence. The Tribunal had regard to rules 17.3 and 17.4 of The Taxation Disciplinary Scheme Regulations 2014 (as amended November 2016 and January 2024) (the 'Regulations') which allowed the Tribunal to proceed in the absence of the Defendant.

6. The Tribunal was satisfied that the aforementioned version of the Regulations applied as the Regulations state that they take effect from 1 January 2024 and that the version to be used is that which is effective on the date of the decision to refer the Charge to the

Disciplinary Tribunal. The Tribunal noted that the Investigation Committee decision which referred the matter to the Disciplinary Tribunal was made on 6 February 2024.

7. In deciding whether to proceed in the absence of the Defendant, the Tribunal had to be satisfied that he had been served with the bundle no later than 35 days before the hearing (pursuant to rule 14.1 of the Regulations) so that he had been given reasonable notice of the hearing and a reasonable opportunity to prepare his case.

8. The Tribunal also had to act reasonably and, in making its decision, the Tribunal had regard to the guidance provided in the criminal courts when deciding whether to proceed in the absence of an accused.

9. The Tribunal therefore considered decided cases such as *Hayward* [2001] EWCA Crim 168 and *Jones (Anthony William)* [2002] UKHL 5. The Tribunal also considered the principles arising from *GMC v Adegoba GMC v Visvardis* [2016] UKHL 5 which allows a disciplinary tribunal, when considering whether to proceed in the absence of a defendant, to have regard to the principles arising out of criminal cases but also that it should also consider the need to act for the protection of the public. In particular, the Tribunal considered the following matters:

    a. the likelihood of the Defendant attending in the future if the hearing was adjourned was low;

    b. the prejudice that could be caused to the TDB if the hearing was adjourned;

    c. the impact that an adjournment could have on the ability of the TDB to protect the public;

    d. the Defendant had not responded to the TDB's emails of 4 October 2024, 4 November 2024 and 12 November 2024

10. As to service, the Tribunal noted that the TDB had written to the Defendant at addresses in Shrewsbury and Telford, to which he confirmed receipt, and it had also emailed him at a 'gmail' email address from which the Defendant had responded.

11. The Tribunal was of the view that the 'gmail' email address was one which the TDB could reasonably infer would be accessed by the Defendant to receive correspondence and papers relating to this hearing.

12. The Tribunal accepted submissions on behalf of the TDB that rule 14.1 of the Regulations does not require all documents listed in sub-paragraph (a) to (f) to have been sent in a single letter or email. The Tribunal was satisfied that the Defendant had received the papers concerning the Investigation Committee by email on 30 January 2024 and that the TDB's email of 4 October 2024 provided him with the hearing bundle and a number of documents which included the Professional Rules and Practice Guidelines 2018 (as amended in 2021 and hereinafter referred to as the 'PRPG') and the TDB Scheme and guidance. The email set out the date and time of the hearing and stated that it would take place using Microsoft Teams. The Tribunal was satisfied that this provided the Defendant with the required 35 days' notice of the hearing (as required by rule 14.1 of the Regulations) and provided him with the items listed in sub-paragraphs (a) to (f) of rule 14.1.

13. Further, the Tribunal noted that on 18 November 2024, the clerk to the Tribunal sent the Defendant an email which contained a link to the hearing. The Tribunal was informed that the Defendant had not responded to that email.

14. The Tribunal was satisfied that the Defendant had been served in accordance with regulations 31.1 and 31.3 of the Regulations and that he had been given a reasonable opportunity to prepare his case. The Tribunal was satisfied that there was nothing to suggest that the Defendant would attend a future hearing, and an adjournment could undermine the ability of the TDB to carry out its functions of protecting the public. The Tribunal therefore decided to proceed in the absence of the Defendant.

Evidence

15. The Tribunal did not hear oral evidence. It was provided with a bundle of documentary evidence consisting of 33 pages and a supplementary bundle of 6 pages.

16. The Tribunal was entitled to consider hearsay evidence and attach such weight to that evidence as it considered appropriate.

17. The bundles contained correspondence between the Defendant and the TDB, correspondence between the Employer and the ATT and correspondence between the TDB and the Defendant. Of particular significance was a letter from the Employer to the ATT dated 15 March 2023 in which it sets out the investigation that it undertook, the conclusion that it reached and a detailed explanation of how the Defendant was able to obtain payment from HMRC. It stated that in a meeting on 30 September the Defendant made an admission regarding a particular client and that over the course of further interviews he admitted the other cases. The letter confirmed that the Defendant was dismissed from the Employer's employment for gross misconduct on 21 October 2021.

18. The Tribunal also noted that in a letter from the Defendant to the TDB which was undated but had a date stamp of '8 Jan' (the year is not shown), the Defendant stated, '*With regard to [xxxx] they did a thorough internal investigation at the time & I did not deny any of the relevant facts & findings'.* The Tribunal noted that the Defendant went on to explain that his debt with HMRC had been moved to a debt management company with whom he was in mitigation.

19. The Tribunal considered a further letter from the Defendant to the TDB which was undated but had a date stamp of '23 FEB 2024', in which the Defendant stated that in relation to the amounts owed to HMRC these were being dealt with by a debt management agency and he was arranging time to pay. He stated that he was no longer a member of the ATT as he did not renew his membership since October 2021.

Findings

20. In considering the Charges and the evidence the Tribunal reminded itself that the burden of proof in this case rests with the TDB and the standard of proof was on the balance of probabilities.

21. The Tribunal considered all the evidence before it. The Tribunal reminded itself of regulations 30.1, 30.2 and 30.4 of the Regulations. These:

a. required the Tribunal to conduct the hearing in a manner consistent with the principles of natural justice;

b. allowed the Tribunal to adopt any method of procedure which it may consider fair and which gave each party any opportunity to have their case presented; and

c. provided that the strict rules of evidence do not apply, allowing the Tribunal to admit any evidence, whether oral or written, whether direct or hearsay, and whether or not that evidence would be admissible in a court of law.

22. These regulations allowed the Tribunal to admit and then consider the letter from the Employer dated 15 March 2023. The letter was hearsay but the Tribunal attached significant weight given that it was clear and unambiguous, it described the investigation that it had undertaken, set out the process which it had established had been used by the Defendant in obtaining the monies from the HMRC, the meetings it held with the Defendant and confirmed that it had dismissed the Defendant from its employment on the basis of gross misconduct as a result of these matters.

23. The Tribunal also noted that in his correspondence with the TDB, the Defendant had confirmed that the Employer had undertaken a thorough investigation. This was also a factor that the Tribunal considered when deciding what weight to attach to the Employer's letter.

24. The Tribunal noted that the Defendant did not complete a response form but also, in his correspondence, he has not denied obtaining the monies in the manner described by the Employer.

25. The Tribunal was made aware that an interim suspension order had been made in respect of the Defendant but the Tribunal did not attach any weight to that in its decision regarding the factual allegations as an interim order is made on a risk basis and without any finding of fact being made.

Charge 1

26. Charge 1 consisted of 3 aspects set out in charges 1.1, 1.2 and 1.3 (as shown in Annex 1). The Tribunal considered each charge in turn.

27. As to charge 1.1, the Employer's letter of 15 March 2023 confirmed that the Defendant was employed by the Employer as a tax client manager. Given the weight that the Tribunal attached to the letter, the Tribunal found, on the balance of probabilities, charge 1.1 was proved.

28. As to charge 1.2, the Tribunal noted the Employer's email of 6 December 2021 and its letter of 15 March 2023 confirmed that the amount obtained by the Defendant was £52,145.29. The letter also listed the dates upon which the Defendant falsely claimed the tax refunds and the Tribunal found that these accorded with the dates set out in charge 1.2. Further, the letter identified the four clients and explained how their personal data had been used by the Defendant to receive the monies by way of tax refunds from HMRC.

29. The letter explained that, in essence, the Defendant submitted tax returns for the four clients to HMRC using their personal data. The Employer confirmed that all four clients were outside the self-assessment system. Whilst there were subtle variations on how the tax returns were produced for each client, the Defendant had to use information such as the client's name, address and unique taxpayer reference.

30. Having submitted the return, the Defendant then amended the return using the HMRC portal to change the taxpayer address. This meant that any notice regarding a refund would be sent to him and a copy to the office rather than to the client. The Employer explained that the Defendant then amended the tax return to trigger a tax refund.

31. The refunds were paid to the Defendant. Afterwards, the Defendant would enter the HMRC portal and change the client's address back to the original one.

32. The Employer's letter confirmed that the copy of the refund notice received at their office was then passed to the Defendant for filing.

33. As aforesaid, the Tribunal attached significant weight to the Employer's letter. The Tribunal considered the conduct of the Defendant (as described in the letter) against the test for dishonesty which is established in the case of *Ivey v Genting Casino* [2017] UKSC 67. The Tribunal concluded that the facts known to the Defendant were that the clients were not entitled to a refund and he had not identified any legitimate reason to amend those submitted tax returns. Therefore, an objective bystander would be likely to consider his actions and the subsequent receipt of the monies from HMRC as dishonest. It follows, that, on the balance of probabilities, the Defendant's actions were improper.

34. Accordingly, the Tribunal found, on a balance of probabilities, that all elements of charge 1.2 were proved.

35. The Employer's letter of 15 March 2023 confirmed that the Employer dismissed the Defendant for gross misconduct on 21 October 2021 and that was not contested by the Defendant. Therefore, the Tribunal found charge 1.3 of Charge 1 proved.

36. The outcome is that the Tribunal found, on the balance of probabilities, Charge 1 proved, in its entirety.

Charge 2

37. The Tribunal was then required to apply the factual matrix arising from its findings in respect of the Charge 1 to the PRPG and consider whether that amounts to a breach of rules, 2.2.1, 2.2.3, 2.5.2, 2.5.3, 2.6.1, 2.6.2, 2.6.3 and 5.1.1.

38. Having found that the Defendant acted dishonestly, the Tribunal concluded that it follows that he had breached rule 2.2.1 of the PRPG as that requires a member to be honest in their professional work. For the avoidance of doubt, the Tribunal found that the misconduct was committed in the Defendant's professional work as the Defendant was working for the Employer at the material time and it was this which gave him access to the personal data and IT systems which were necessary.

39. The Tribunal did not find that the Defendant breached rule 2.2.3 of the PRPG as the Tribunal had not seen evidence or heard submissions to show that the money in fact

belonged to the clients absolutely or beneficially. The Tribunal had concluded that the monies were improperly obtained by the Defendant directly from HMRC. Therefore, it was more likely than not that the monies were HMRC monies rather than client monies.

40. The Tribunal found that the Defendant had breached rules 2.5.2 and 2.5.3 as the process by which the Defendant obtained monies from HMRC involved him submitting tax returns (which would have included personal data) to a third party (namely HMRC) and therefore personal data was sent outside the Employer's organisation. Given that the Employer confirmed (and the Tribunal had accepted) that the clients were outside the self-assessment system, it could not be said that the Defendant had a legal or professional duty to divulge the personal data and there was no evidence to show that the Defendant obtained the specific consent from any of the affected clients. On the contrary, there is evidence to show that the Defendant attempted to hide his actions from clients, his employer and HMRC. Given that the Data Protection Act 2018 requires the processing of personal data to be with the consent of a data subject and for lawful means, the use of the personal data, by the Defendant in these circumstances means that he did not comply with the legal requirements for handling data.

41. The Tribunal found that rule 2.6.1 of the PRPG is engaged and accepted that, as the rule states, professional behaviour encompasses a member's business dealings and, in certain circumstances as set out in rule 2.6.3 of the PRPG, conduct in a member's personal life or private capacity.

42. The Tribunal found that, consequently, given its findings about the dishonest misconduct of the Defendant, it follows that the Defendant has breached rules 2.6.1, 2.6.2 and 2.6.3 of the PRPG as these rules require the Defendant to:

    a. uphold the professional standards of the CIOT and ATT as set out in the Laws of the CIOT and ATT;

    b. take due care in their professional conduct and dealings;

    c. avoid practicing improperly, inefficiently, negligently or incompletely to avoid bringing themselves, the CIOT or ATT or the tax profession into disrepute;

d. avoid breaching the Laws of the CIOT or ATT; and

e. conducting himself in an unbefitting, unlawful or illegal manner which could bring discredit on him and/or harm the standing of the profession and/or the CIOT or ATT.

43. The Tribunal noted that the definition of the Laws of the CIOT and ATT include the PRPG and therefore it found that, by breaching aspects of the PRPG, by default the Defendant has not upheld and has failed to avoid breaching the said laws.

44. Given the misconduct, with the element of dishonesty, the Tribunal found that the Defendant had not taken due care in his professional conduct and dealings. The Tribunal found that if he had taken due care, he would not have embarked upon the process to obtain the monies from HMRC in the first place. The Tribunal found, for the same reasons, that the Defendant failed to avoid behaving improperly. This means that, it goes without saying, that he has acted inefficiently, negligently or incompletely and that his conduct was unbefitting.

45. The Tribunal was not presented with evidence to suggest that any criminal proceedings had been initiated by the Police or HMRC although the matter had been reported to the Police by the Employer. However, the Tribunal concluded that a broad interpretation of unlawful and illegal means that, on the balance of probabilities, the Defendant has acted unlawfully and illegally even if that has not resulted in criminal proceedings.

46. In conclusion, the Tribunal found that the Defendant had breached rules 2.6.1, 2.6.2 and 2.6.3 of the PRPG.

47. Finally, the Tribunal concluded that the Defendant had breached 5.1.1 by virtue of his dishonest conduct. By misusing the client personal data in the manner described herein to obtain monies from HMRC to which he was not entitled, it follows that he has breached his duty of care to his clients.

48. The Tribunal concluded that, on the balance of probabilities, Charge 2 is proved in part. The element of Charge 2 which avers that the Defendant has breached rule 2.2.3 of the PRPG is dismissed.

Sanction

49. In considering sanction, the Tribunal had regard to the TDB's Indicative Sanctions Guidance ('ISG'). The Tribunal asked counsel for the TDB to confirm if the sanctions guidance issued in 2024 applied. Whilst there was suggestion that it might, the Tribunal during its deliberations established that the revised guidance in 2024 did not apply. That version of the guidance applies to cases considered by a Disciplinary Tribunal on or after 1 January 2025.

50. In reaching its decision on sanction, the Tribunal applied the ISG dated December 2020 (revised January 2022 and May 2023).

51. The Tribunal reminded itself that the sanctions are not intended to be punitive. The purpose of sanction is protection of the public. The Tribunal had to impose a sanction which was proportionate, and it had to adopt an approach whereby it considered the most lenient sanction first, and only if it was of the view that this did not reflect the seriousness of the misconduct, should the Tribunal consider a more severe sanction.

52. The Tribunal was aware of the interim suspension order. The Tribunal was not made aware of any previous disciplinary findings against the Defendant and it therefore proceeded on the basis that there were none.

53. The Tribunal noted the options available to it pursuant to regulation 20.7(f) of the Regulations and that it was able to consider combining a fine with another sanction.

54. The Tribunal was of the view that the overall conduct of the Defendant could be considered in two parts. Firstly, there is the misuse of client data and, secondly, there is the dishonest obtaining of monies from HMRC.

55. The Tribunal considered the categories of misconduct set out in section 4 of the ISG. The Tribunal noted submissions that the conduct straddled (6) – Failure in dealing with client money and (7) – Unethical conduct. The Tribunal was of the view that the misconduct relating to the dishonest obtaining of monies from HMRC fell more into category 7 as it had already found that there was not a misuse of client monies per se. However, the Tribunal would consider all options bearing in mind the purpose of sanction.

56. The Tribunal was of the view that the misconduct fell more into category of 'unethical conduct' as examples provided in the ISG includes misleading HMRC, dishonesty, failing to act with integrity and providing false or misleading information. The Tribunal was of the view that all of those elements were present in this case. The Tribunal had regard to the guidance which states, *'As has already been stated, the TDB views dishonesty as a very serious matter, given the reliance placed on members' advice and actions by their clients and tax authorities. In most cases of proven dishonesty, a sanction of expulsion will be appropriate'.*

57. The Tribunal considered the descriptions of the available sanctions in section 3 of the ISG. The Tribunal considered the less onerous sanctions first. The sum obtained, the number of clients (namely 4) and the number of transactions (namely 10) over a period of 2 years and 3 months were important factors which meant sanctions of 'no further action', 'order to reset on file', 'warning' and 'apology' were inappropriate as these related to minor instances of misconduct. The Tribunal was of the view that this was not a minor matter due to the presence of the aforementioned factors and the element of dishonesty.

58. The Tribunal considered the appropriateness of censure. It was of the view that whilst the ISG provides that this was aimed at serious misconduct, it was not appropriate in this case as there was significant loss to HMRC, the misconduct was not an isolated incident, it was deliberate, and there was no insight or remorse expressed in any of the Defendant's emails or letters to ATT or TDB. These features were not, in the Tribunal's view, balanced by the apparent previous good character. Further, the Tribunal noted that whilst confirming that the Employer had undertaking a thorough investigation, explaining that

he was suffering with some difficulties and not contesting the allegations, the Defendant has not provided any insight into his behaviour, nor had he considered the impact on the Employer, their clients, his profession or the ATT. There was no submission from the Defendant that would reassure the Tribunal that there was a low risk of repetition.

59. The Tribunal considered that whilst a fine would be punitive and could serve as a deterrent to a repetition of this misconduct, the Tribunal noted that in the bundle of papers before it, the Defendant had not paid a previous costs order and therefore a fine may not have the effect of protecting the public. However, further consideration of a fine was given and this is addressed further in this decision.

60. For the reasons set out in relation to censure, the Tribunal was of the view that it could not be confident that there was no risk of recurrence in this case so that the public could be protected by a temporary exclusion from membership. The Tribunal therefore concluded that suspension was not an appropriate sanction in this case.

61. Therefore, having considered the guidance set out in the ISG regarding the appropriateness of expulsion, the Tribunal was of the view that this sanction was appropriate and proportionate given the serious nature of the Defendant's misconduct.

62. Given that this was a case of serious and premeditated dishonesty and due to the lack of reflection, insight or remorse from the Defendant and due to there being little to reassure the Tribunal that there would be no repetition of the misconduct, the Tribunal concluded that expulsion was the only means of protecting the public. The Tribunal also concluded that the misconduct in this case arose out of a breach of trust given the Defendant's position in the Employer's organisation. That position meant that when the notices were received into the Employer's office, he received them which allowed him to conceal his behaviour. This Tribunal had found dishonesty at the heart of the misconduct and the persistent nature over a prolonged period demonstrated that this was a deliberate and planned course of conduct.

63. The Tribunal decided not to impose a minimum term before which the Defendant could reapply for membership. The Tribunal was of the view that to do so would fetter the discretion of the ATT or CIOT.

64. The Tribunal then repeated the same exercise regarding the second feature of this case which was the misuse of client's personal data. Again, the Tribunal was of the view that this element of the misconduct could also be addressed by consideration of the guidance regarding unethical conduct as one example is the misuse of confidential information. The Tribunal was of the view that the use of the clients personal data to make the tax returns was serious as it was unlawful and a breach of trust. Therefore, the sanctions of 'no further action', 'order to reset on file', 'warning' and 'apology' were inappropriate as these related to minor instances of misconduct.

65. The Tribunal next considered the appropriateness of a fine. It was of the view that a fine was an appropriate and proportionate sanction for this aspect of the misconduct and noted that it was entitled to combine a fine with other sanctions. The Tribunal hopes that this will act as a reminder to the Defendant about the importance of using personal data lawfully and that the Tribunal will seek to ensure that members do not benefit from such misuse.

66. The Tribunal had not received information from the Defendant about his circumstances such as his ability to pay. The Tribunal was of the view that the Defendant had been given reasonable opportunity to make representations but had failed to do so. He had also failed to explain the reasons for his failure to pay the recent costs order. The Tribunal was entitled (as per the guidance in the ISG) to assume that the Defendant can pay whatever fine it imposed. The Tribunal was of the view that a fine of £5,000 is proportionate in this case.

67. Therefore the sanctions are:

    a. expulsion; and

    b. fine of £5,000.

68. The Tribunal expects either the TDB and/or ATT to ensure that the Defendant does not continue to hold himself out as being a member.

Costs and Publication

69. The Tribunal proceeded to consider the issues of costs and publication. The Tribunal saw no exceptional reasons as to why the Defendant should not pay the TDB's costs. The Tribunal considered the TDB's costs schedule. The Tribunal was of the view that the amount of costs claimed was confined only to the various stages of the disciplinary tribunal process and the personnel involved (such as the Presenter and Clerk). The Tribunal found, in the circumstances that the costs claimed by the TDB were reasonable and proportionate and ordered that the Defendant do pay the TDB costs assessed at £1,905. Rule 27 of the Regulations applies.

70. There were no submissions from the Defendant to cause the Tribunal to disapply the general rule in favour of publication and therefore the Tribunal ordered publication pursuant to rule 28 of the Regulations.

Brett Wilson
Chair
24 November 2024

ANNEX 1

SCHEDULE OF CHARGES

The charges set out below make reference to the following rules of the Professional Rules and Practice Guidelines 2018 (the "PRPG") of the Chartered Institute of Taxation (the "CIOT") and the Association of Taxation Technicians (the "ATT"), as amended from 1 January 2021:

Rule 2.2.1

A member must always be honest in all their professional work. In particular, a member must not knowingly or recklessly supply information or make any statement which is false or misleading, nor knowingly fail to provide relevant information.

Rule 2.2.3

A member must ensure that clients' money is properly accounted for and maintained separately.

Rule 2.5.2

Information acquired in the course of a member's work must not be divulged in any way outside their organisation without the specific consent of the client or employer unless there is a legal or professional right or duty to disclose.

Rule 2.5.3

A member must comply with the legal requirements on the handling of data.

Rule 2.6.1

Professional behaviour encompasses a member's business dealing and in certain circumstances as set out below in 2.6.3, conduct in a member's personal life or private capacity.

Rule 2.6.2

A member must:

- Uphold the professional standards of the CIOT and ATT as set out in the Laws of the CIOT and ATT;
- Take due care in their professional conduct and professional dealings.

Rule 2.6.3

A member must not:

- Perform their professional work, or conduct their practice or business relationships, or perform the duties of their employment improperly, inefficiently, negligently, or incompletely to such an extent or on such number of occasions as to be likely to bring discredit to themselves, to the CIOT or ATT or to the tax profession;
- Breach the Laws of the CIOT or ATT;
- Conduct themselves in an unbefitting, unlawful or illegal manner, including in a personal, private capacity, which tends to bring discredit upon a member and/or may harm the standing of the profession and/or the CIOT or ATT (as the case may be). For the avoidance of doubt, conduct in this context includes (but is not limited to) conduct as part of a personal or private life.

Rule 5.1.1

A member has a duty of care to their client which is recognised in law. A member must exercise reasonable skill and care when acting for a client. An engagement letter or other correspondence with the client may limit or define duty of care.

Charge 1

1.1 The Defendant was previously employed by [xxxx] as a client tax manager.

1.2 Between 23 May 2019 and 20 September 2021, the Defendant obtained refunds of tax from HMRC to the total sum of £52,145.29 using the personal data of four clients of

[xxxx] such refunds being improperly and dishonestly paid to his personal bank account rather than to the clients.

1.3 The Defendant was dismissed by [xxxx] for Gross Misconduct 0n 21 October 2021.

Charge 2

Consequent on the facts and matters set out in Charge 1, the Defendant is in breach of the following rules of the PRPG: Rule 2.2.1, 2.2.3, 2.5.2, 2.5.3, 2.6.1, 2.6.2, 2.6.3 and 5.1.1.

END OF CHARGES