



AAT

PROFESSIONAL STANDARDS

ORDER OF AAT

In the matter of

Levent Kubilay 10011336

Misconduct

Levent Kubilay's professional or personal conduct, was found to be in breach of the *Code of Professional Ethics* and to have posed a risk to the public or was likely to undermine public confidence in the Association or its members; namely:

1. Between on or around 31 May 2012 and or around 18 April 2019, he failed to have adequate anti-money laundering policies and/or procedures in place.
2. Between on or around 26 June 2017 and or around 18 April 2019, he failed to carry out and/or record an adequate firm-wide money laundering risk assessment.
3. Between on or around 31 May 2012 and or around 18 April 2019, he failed to apply appropriate Anti-Money Laundering client due diligence measures and/or ongoing monitoring.
4. Between on or around 31 May 2012 and or around 18 April 2019, he failed to have in place adequate Anti-Money Laundering training for his relevant employees.
5. Between on or around 31 May 2012 and or around 18 April 2019, he failed to regularly review his Anti-Money Laundering policies, controls and procedures.
6. Between on or around 14 November 2017 and 14 November 2018, on one or more occasions, he received and retained a commission or other reward in return for a client introduction without obtaining client consent to do so.
7. For an unknown period until on or around 13 March 2019, he provided self-employed accountancy services outside the scope of his AAT licence.
8. For an unknown period until on or around 13 March 2019, he acted as a trust or company service provider without being registered by HMRC to do so.

Finding

Grounds for disciplinary action existed and the matter was suitable for exercise of the Investigations Team's powers under paragraphs 6 and 31 of the *Disciplinary Regulations*.

Order

The following sanctions have been imposed:

- i. Mr Kubilay's fellow membership has been removed for a period of five years. During this time, he will only be permitted to refer to himself as a full member of AAT and may only use the designatory letters "MAAT".
- ii. Reprimand, with the reprimand remaining live on Mr Kubilay's record for a period of five years.
- iii. Warning about future conduct.
- iv. Specific condition on Mr Kubilay's licence; namely, Mr Kubilay must submit to a follow-up practice assurance review at his own expense.

Consent

Levent Kubilay is deemed to have agreed to submit to the decision of the Investigations Team, in accordance with Regulation 6 of the *Disciplinary Regulations*.

16 March 2020