



AAT

PROFESSIONAL STANDARDS

ORDER BY CONSENT

In the matter of

David Cross MAAT, 10038611

Misconduct

David Cross' conduct was found to be in breach of the *Code of Professional Ethics* and to have posed a risk to the public and/or undermine public confidence in the Association and its members as follows:

1. For an unknown period up until on or around 21 August 2020, he did not comply with his obligations under the Money Laundering Regulations in force while providing accountancy services on a self-employed basis. Specifically, he failed to:
 - a. have an adequate anti-money laundering policy in place
 - b. carry out a compliance review of his firm's anti-money laundering controls and procedures
 - c. carry out a firm-wide anti-money laundering risk assessment
 - d. perform an anti-money laundering risk assessment for one or more clients
 - e. carrying out ongoing client due diligence in respect of one or more clients
 - f. ensure that relevant persons had received appropriate anti-money laundering training
 - g. apply to AAT for approval of two beneficial owner/officer/manager appointments to his accountancy practice.

Finding

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

Order

David Cross is hereby:

1. Reprimanded; the reprimand will expire 12 months from the date of this Order
2. Deemed ineligible to apply for fellow membership whilst the Reprimand is 'live'
3. Warned about his future conduct.

Consent

David Cross consented to the decision of the Investigations Team in accordance with Regulation 6 of the *Disciplinary Regulations*.

01 August 2021