

## AAT

### PROFESSIONAL STANDARDS

#### ORDER BY CONSENT

#### In the matter of

Melanie Brown (184673)

#### Misconduct

Melanie Brown'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. For an unknown period until on or around 10 December 2019, she failed to adequately record the carrying out of client due diligence in respect of one or more clients.
2. For an unknown period until on or around 10 December 2019 she failed to adequately record the carrying out of risk assessments and ongoing monitoring in respect of one or more clients.
3. For an unknown period until on or around 08 August 2019, she failed to carry out any, or any adequate, review of her Anti-Money Laundering policies, controls and procedures.
4. From 26 June 2017 until on or around 07 August 2019, she failed to carry out an adequate firm-wide money laundering risk assessment.
5. For an unknown period up until on or around 16 December 2019 she failed to receive and hold clients' money in accordance with AAT's *Clients' Money* policy

#### Finding

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

#### Order

Melanie Brown is hereby:

- i. Reprimanded. The reprimand will remain live on her record for a period of 24 months.
- ii. Warned that she must take adequate measures to ensure she is aware of and compliant with her obligations pursuant to all relevant money laundering legislation.

#### Consent

Melanie Brown has agreed to submit to the decision of the Investigations Team in accordance with Regulation 6 of the *Disciplinary Regulations*.

27 August 2020