

IN THE COURT OF QUEEN'S BENCH FOR SASKATCHEWAN

Between

COURT FILE NUMBER QB 48/20

COURT OF QUEEN'S BENCH FOR SASKATCHEWAN

JUDICIAL CENTRE SASKATOON

APPELLANT RAKESH KAUSHIK

RESPONDENT BOARD OF THE CPA SASKATCHEWAN

Rakesh Kaushik, CPA CA Appellant

- and

"Board" of the Institute of Chartered Professional accountants of Saskatchewan Respondent

NOTICE OF APPEAL

TAKE NOTICE:

1. THAT RAKESH KAUSHIK the above named Appellant hereby appeals to the Court of Queen's Bench from the DECISIONS of the BOARD OF THE INSTITUTE OF CHARTERED PROFESSIONAL ACCOUNTANTS OF SASKATCHEWAN issued on the 13TH day of DECEMBER, 2019.
2. THAT the whole of the DECISIONS are being appealed:
3. THAT the source of the Appellant's right of appeal and the court's jurisdiction to entertain the appeal is: Section 38, of the Accounting Profession Act Statues of Saskatchewan, 2014.

Appeal to court

38 A registrant whose conduct is the subject of an order of the board pursuant to section 37 may appeal that order to a judge of the court within 30 days after the order of the board, and section 37 applies with any necessary modification.

4. THAT the appeal is taken upon the following grounds:

The Board did not consider relevant facts in the Cases #14-04 and #1410-05C

The Board's Decision is biased, lacks reasoning, and is not supported by the underlying facts

An over reach and misapplication of the rules of professional conduct

Lacks professional integrity

The Board had developed a tunnel vision, along with the Discipline Committee, and the Professional Conduct Committees

The audit files were prepared by another CPA prior to November 14, 2014

The Professional Conduct Committee and the Discipline Committee took almost 5 years to conduct the Hearings.

5. THAT the Appellant requests the following relief:

- The Decisions of Cases #14-04 and #1410-05C be quashed,
- Recovery of costs and penalties paid by the Appellant exceeding \$129,600
- Loss of time, and mental anguish penalties - \$600,000
- And any other amounts the courts determines

6. THAT the Appellant's address for service is:

104 – 1640 Idylwyld Drive North, Saskatoon, Saskatchewan, S7L 1B1

Telephone number: 306-242-5822

Fax number: 306-242-5343

The lawyer in charge of the file is: N/A

7. THAT the Appellant requests that this appeal be heard at Saskatoon.

DATED at SASKATOON, Saskatchewan, this 10th day of JANUARY, 2020.



RAKESH KAUSHIK

Name and Signature for the Appellant

TO: BOARD OF INSTITUTE OF CHARTERED PROFESSIONAL ACCOUNTANTS OF SASKATCHEWAN

Institute of Chartered Professional Accountants of Saskatchewan

101 4581 Parliament Avenue Regina, Saskatchewan S4W 0G3

Respondent(s)

8. This Notice of Appeal is issued at the above-named judicial centre on the 10th day of January, 2020.



K. VOLK
DEPUTY LOCAL REGISTRAR

Local Registrar