

21 April 2026

Professional Conduct Committee | Panel Report

Produced by the Professional Conduct Committee
pursuant to Section 13.13 of the API Professional Conduct Policy

Details

Complainant		Member	Dragan Lukic

Professional Conduct Committee

Date of Complaint

7 June 2024

Date of Professional Conduct Committee Meetings

18 February 2026

20 April 2026

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Timeline of Events

This is a summary of a timeline of events alleged by the Complainant in their submitted evidence:

Insofar as what we are aware of, a summary of these breaches is provided by way of the attached Letter of Termination to [REDACTED], marked Appendix B, which should be self explanatory.

At Appendix C we have attached the invoice in question, along with our standard invoice template.

The attached correspondence summarises communication with [REDACTED] [REDACTED]. Whilst initially denying all allegations, these were progressively acknowledged and accepted although we do not know the full extent of the activities. We are aware this has occurred on more than one occasion and in different forms since 2018, with clearly the most relevant and fraudulent being the readdressing of company invoices.

22.5.2024	[REDACTED] clients contacted firm to confirm bank details of invoice with [REDACTED] letterhead sent from Member's personal email.
22.5.2024	During phone call with Complainant, Member admitted amending invoice to provide for payment to personal bank account
23.5.2024	At 6:58 am, Member admitted via email to amending the invoice. Member's employment suspended.
23.5.2024	[REDACTED] review of Member's company mobile device revealed Member diverted business away from the Company and invoiced a client of the Company with his personal ABN in 2018.
27.5.2024	Member admitted the action in 2018 and advised that he accrued a total fee of \$3750 from these private jobs.
27.5.2024	Member's employment terminated for serious misconduct.

Complainant Position

How has this event Affected you?

Unfortunately, this has left us with no option than to terminate a department head, and we had placed considerable trust in him to not only oversee that department, but also to train and mentor that team. To have that department head behave in this manner is not only extremely disappointing but also potentially reflects on our and the API's reputation and the premise upon which our businesses are structured, namely ethical, honest and professional behaviour.

In essence, there is potential financial, reputational and brand damage associated with this, together with younger members of our team and API members having their mentor terminated.

What Outcome are you Seeking?

Termination of Membership.

Member Position

I am writing this letter, in response to the complaint towards me from [REDACTED]. In regard to the ethical and fraudulent behaviour against me, the facts provided from [REDACTED] are correct and words cannot describe my disappointment/sadness of my actions. Without going into detail ... clearly my emotional side of me has made some very poor decisions. I in any way don't want this to be used as excuse, I have owned up to my mistakes, doing my best mentally to keep going and not let my family down.

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I have sincerely apologised to [REDACTED] for my actions, I don't agree, in regard to putting the API in disrepute for my actions.

All I please ask, if you can humanly possible, taken into account my 20 plus years of services I have provided to the industry, from training/mentoring valuers, compliance/risk, previous involvement in API discussion groups and my passionate for the industry. I know I'm a good person with good integrity, I am so upset at myself for my actions and I please ask committee members to give me a second chance.

Allegations and Considerations

The Complainant alleges the following categories of the Rules of Professional Conduct (31 March 2024 – 31 August 2024) have been breached by the Member:

Relevant Rules: Rule 1.1

Complainant stated: It is not considered ethical for a member of the institute to attempt to defraud their employer of fees by doctoring invoices as occurred in this instance.

It is also not considered ethical that a member of the institute would receive enquiries for instructions in their role as an associate director of a division and to then channel that work to themselves personally, and charge for that personally, on their employer's time and by utilising the employer's information.

Member stated: I am writing this letter, in response to the complaint towards me from [REDACTED]. In regards to the ethical and fraudulent behaviour against me, the facts provided from [REDACTED] are correct and words cannot describe my disappointment/sadness of my actions.

Relevant Rules: Rule 1.1- A Member must undertake their professional services ethically, with honesty, and in good faith, without personal bias, and in a manner that upholds the values and reputation of the API.

Professional Conduct Committee considered:

- evidence showed that the Member did not undertake his professional services ethically, with honesty or in good faith. Member was clearly not upholding the values and reputation of the API.
- evidence showed that behaviour appeared to occur over a period of time.
- **The Professional Conduct Committee determined the evidence submitted by the Complainant does establish a prima facie finding of a breach of rule 1.1 of the Rules of Professional Conduct.**

Relevant Rules: Rule 1.2

Complainant stated: By reference to part 7 herein, this will become very clear, however [REDACTED] actions are nothing less than fraudulent and dishonest, and by his own admission have been occurring in varying forms since 2018.

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Member stated: : I am writing this letter, in response to the complaint towards me from [REDACTED]. In regards to the ethical and fraudulent behaviour against me, the facts provided from [REDACTED] are correct and words cannot describe my disappointment/sadness of my actions.

Relevant Rules: Rule 1.2 – A Member must comply with any applicable law when undertaking professional services.

Professional Conduct Committee considered:

- that while there is a lack of criminal prosecution, the Member admitted to the conduct in his Response.
- that the Member appears to have also breached employment laws.
- **The Professional Conduct Committee determined the evidence submitted by the Complainant does establish a prima facie finding of a breach of rule 1.2 of the Rules of Professional Conduct.**

Relevant Rules: Rule 5.2

Complainant stated: The actions of [REDACTED] not only compromise [REDACTED], but also compromise the reputation of the API to members of the public, who are led to believe that the API is an ethical and reputable organisation.

In this regard, it is noted that the potential client in this instance questioned the fraudulent invoice that had been raised with our office, and therefore become aware of the actions of [REDACTED], who is a member of the institute.

In addition, redirecting work initially directed to [REDACTED] to himself personally, clearly undermines the API's reputation to have members who would be prepared to do this, albeit some potential users of services may also have similar low standards.

Member stated: I have sincerely apologised to [REDACTED], for my actions. I don't agree, in regard to putting the API in disrepute for my actions.

Relevant Rules: Rule 5.2 - Members must not maliciously or carelessly say or do anything to injure or potentially injure, directly or indirectly, the reputation or business of other Members or the API.

Professional Conduct Committee considered:

- that the Member has injured the reputation of [REDACTED] the API and the valuation profession by his calculating behaviour;
- that if the API did not appropriately address this deliberate behaviour, it will have a negative impact on the reputation of the API;
- that the Member was in a senior position of trust and mentored other valuers.
- **The Professional Conduct Committee determined the evidence submitted by the Complainant does establish a prima facie finding of a breach of rule 5.2 of the Rules of Professional Conduct.**

Professional Conduct Panel Meeting – 18 February 2026

The Deputy Chair of the Committee formed a Panel to consider the complaint. The Panel was provided with Annexures 001 to 005.

On 18 February 2025, [REDACTED] together with [REDACTED] considered this complaint pursuant to clause 11.1(a) of the API Professional Conduct Policy. The Committee together with API representatives, acting as observers, convened by videoconference.

The Professional Conduct Panel gave due consideration to the alleged breaches of the API Rules of Professional Conduct based on their extensive knowledge and understanding of the API valuation and property standards. No conflict of interest was identified amongst the committee from the material provided.

Professional Conduct Panel Determination

In accordance with section 11.1(b)(i) of the API Professional Conduct Policy, the Professional Conduct Panel determined the evidence submitted by the Complainant does establish a prima facie finding of professional misconduct in relation to **Rules 1.1, 1.2 and 5.2** of the API's Rules of Professional Conduct.

Notice of Prima Facie Findings

The Member was charged with Professional Misconduct pursuant to a breach of **Rules 1.1, 1.2 and 5.2** of the API's Rules of Professional Conduct. A Notice of Prima Facie Findings was forwarded to the Member on 23 February 2026.

The Member elected to attend a hearing before the Panel on 10 March 2026 but advised via email on 19 April 2026 that he was unable to attend.

The Member provided written representations on 19 April 2026 (Annexure 006).

Consideration of Written Representations

The same Panel met to consider the Member's written representations (Annexure 006) on 20 April 2026.

At the end of the meeting, the Panel confirmed the findings of Professional Misconduct pursuant to a breach of **Rules 1.1, 1.2 and 5.2** of the API's Rules of Professional Misconduct.

The Panel also noted

- the Member has referred to medical issues in his representations but has not provided any documentary evidence in support;
- the Member abused a position of trust and, worryingly, has been involved in the training and mentoring of valuers.

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Sanctions

Prior to determining the penalty to be imposed on the Member pursuant to clause 14.1 of the Professional Conduct Policy, the considerations set out in clause 14.3 of the Policy have been considered by the Complaints Committee.

Specifically, the Professional Conduct Committee has considered the following factors:

- a. no police or other action has been taken with respect to the Member's conduct;
- b. the breach of the Rules is a very serious breach with implications for the reputation of PRP and the API;
- c. the breach is unable to be remedied or rectified;
- d. the Member has expressed contrition;
- e. the Member admitted repeat conduct to their employer;
- f. the breach as serious potential to harm the reputation of the API is it goes to the crux of honesty;
- g. the findings are in the public interest and should be published and show that the API does not condone this behaviour and will call it out.

Taking the above matters into consideration, it is determined that the following sanctions are appropriate:

- a. Publication of findings of the Professional Review on the API website with the names of the Panel Members redacted'
- b. Member to pay the API a penalty of \$5000;
- c. Matter to be referred to the API Board with a recommendation to suspend the Member's API and APIV membership for 10 years.

Member Rights

The Member is informed that a right of appeal exists pursuant to clause 16.1 of the Professional Conduct Policy. Any such appeal must be commenced within 15 business days of receipt of this decision.

Pursuant to Section 16.3 of the Professional Conduct Policy, the Complainant is not entitled to appeal a decision of the Complaints Committee.

Annexures

Number	Name	Date(s)
001	Correspondence	7.6.2024 – 19.4.2026
002	Complainant Supporting Evidence	7.6.2024
003	Member Supporting Evidence	26.6.2025
004	Professional Review Form	7.6.2024
005	Member Response Submission	26.6.2025
006	Member's Written Representations	19.4.2026

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I, [REDACTED] confirm that this is an accurate account of the decision of the Panel formed from the Professional Conduct Committee in relation to this Complaint.

Yours faithfully,

[REDACTED]

[REDACTED]

Australian Property Institute Ltd
ProfessionalConduct@api.org.au