PRIVATE AND CONFIDENTIAL

Australian Property Institute Ltd.
ABN 49 007 505 866
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8 July 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	Hua Li	Member	Huay Ching "Clarissa" Ngoh (85791)[1]
	102 Miranda Road		1/80 Tarana Avenue
	MIRANDA NSW		GLENROY VIC 3046
	leohuali@yahoo.com.au		clarissa_128@hotmail.com

Professional Conduct Committee

Allen Crawford (Chair), Kym Dreyer and Phillip Lyons

Date of Complaint

15 September 2025

Disciplinary Assessment: 28 October 2025

Date of Professional Conduct Committee Meetings

29 April 2026

1 July 2026

Property Address

303/29 Hunter Street, Parramatta NSW 2150

Property Category

- X Residential
- ☐ Commercial
- ☐ Rural

[1] membership lapsed 4.2.2026

Timeline of Events

28.8.2025	Complainant requested CGT valuation of property for market value when rented in June 2023 from Member by phone via website. Complainant mentioned cladding issues affecting value.
9.9.2025	Member provided preliminary estimate of $900,000 by email without report.
10.9.2025	Desktop report issued
12.9.2025	Complainant raised concerns with report with Member via email.
12.9.2025	Invoice paid
15.9.2025	Professional Review lodged
27.10.2025	Disciplinary Assessment signed by API CEO based on material provided in Professional Review.

Complainant Position

How has this event Affected you?

Makes me nervous and uneasy.

What Outcome are you Seeking?

1. A full refund of $770 due to non-delivery of an adjusted valuation as promised.

2. Termination of the $900,00 pro-forma report, as it is inaccurate, unsolicited, and may affect my CGT obligations.

3. Investigation of Ms Ngoh's conduct to prevent further consumer harm.

Member Position

The report did not represent that I was an API Certified Practicing Valuer. The designation "Certified Practicing Valuer – AVI NO. 20163" refers to AVI certification and was not intended to suggest API CPV membership.

As an accredited Qualified Valuer from AVO (Sydney's Institution) and a qualified residential valuer (RPV) from API, I am qualified and experience in undertaking residential valuations of this nature.

If a PMAPI holds RPV Certification, they are permitted to act as the Primary Valuer for certain residential properties as long as they abide by supervision guidelines (Rule 16).

Both PMAPI or AAPI who holds the certification of RPV (PMAPI RPV or AAPI RPV) can undertake a valuation or desktop of residential property as defined below in Rule 16.5 provided it is not for a 'purpose' described in Rule 16.6.

… For completeness, the full valuation report has been provided.

The report does not state or imply that I am an API Certified Practising Valuer. The designation refers to AVI certification as stated.

The structure, disclosures and methodology adopted are consistent with standard residential valuation practice.

In this context, a reasonable reader would not interpret the report as suggesting CPV membership.

I have nothing further to add at this stage.

Allegations and Considerations

The Complainant alleges the following categories of the Rules of Professional Conduct have been breached by the Member:

Other

Relevant Rules: Rules 1.1, 1.2, 1.7, 1.10, 10.2, 12.4(b), 12.5(c) and 12.6(i)

Complainant stated:

I am lodging an urgent complaint against Clarissa Ngoh of Asia Valuation Company…for suspected fraudulent conduct related to a capital gains tax (CGT) valuation for my property at 303/29 Hunter Street, Parramatta, NSW 2150…I seek a full refund of $770 and termination of her pro-forma valuation report.

She provided a preliminary estimate of $900,000 without a report, which was far above actual market conditions for the same period. I found this unreasonable and, in subsequent phone conversations, repeatedly emphasized the cladding issues and June 2023 market conditions, standing that a $900,000 valuation was implausible. Ms Ngoh promised to revise the valuation to a reasonable range based on this information.

… Without my consent, on the night of 10 September 2025, Ms Ngoh sent a $900,000 pro-forma valuation report, claiming it was sent in error assuming I had paid. She then sent multiple coercive emails from sales@asia-valuation.com.au demanding payment of $770 within 24 hours, threatening to report me to the Australian Taxation Office (ATO) if I did not comply.

…Under pressure from her repeated emails and trusting her phone promise to revise the valuation post-payment, I paid $770 on 12 September 2025 …via mobile banking.

…Since receiving payment, Ms Ngoh has blocked my calls and ignored all emails and texts to her listed contacts…I expected to discuss and finalize an adjusted valuation reflecting the June 2023 rental period and cladding issues, but her failure to respond has prevented this.

Her actions – providing an inflated preliminary estimate and subsequent pro-forma report …, sending an unsolicited pro-forma report, ignoring phone requests for adjustments, using coercive emails to secure payment, and disappearing after payment – violate Australian Consumer Law and the API/AVI professional standards.

Member stated:

The subject property is a standard residential apartment, Unit 303, 29 Hunter Street, Parramatta, NSW 2150, with a retrospective value of $900,000. The valuation report is assessed on the basis of desktop valuation.

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 which upholds the values and reputation of the API.*

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

Rule 1.7 – *A Member must obtain or confirm in writing and maintain a record of all instructions and variations of instructions of the client or the client's representatives.*

Rule 1.10 – *A Member must not provide any report or make any statement, without a reasonable basis unless the report or statement is appropriately qualified or limited and such qualification or limitation brought to the attention of the client.*

Rule 10.2 – *Valuers must also comply with all applicable legal, legislative requirements and any Member obligations published or adopted by the API and applicable at the valuation date.*

Rule 12.4(b) - *When completing a desktop, a Valuer must perform the necessary investigations and processes to permit the Valuer to:...(b) complete the desktop in accordance with practice accepted as proper for a desktop process as set out in the Rules.*

Rule 12.5(c) – *When completing a desktop report in accordance with the written instructions from the client, or the client's representative, the Valuer must take reasonable steps to:...(c) in the absence or deficiency of relevant facts and data, explain in the desktop report the basis on which the qualified opinion is formed and any limitations in the desktop process which could affect reliance upon the desktop report.*

Rule 12.6(i) – *A Valuer who performs a desktop in accordance with the written instructions from the client, or the client's representative, must disclose in the desktop report:...(i) the effect that no inspection of an asset by the Valuer may have on the qualified opinion contained in the desktop report.*

Professional Conduct Committee considered:

- **The Professional Conduct Committee determined the evidence submitted by the Complainant does establish a prima facie finding of a breach of Rules 1.1, 1.2, 1.7, 1.10, 10.2, 12.4(b), 12.5(c), and 12.6(i) of the Rules of Professional Conduct.**

Disciplinary Assessment – Unsupervised student or provisional member

Relevant Rules: Rule 16.3

Complainant (API CEO) stated:

Member was a PMAPI at the time of the relevant valuation (10.9.2025) and should, under the applicable rules of Professional Conduct, have had the valuation counter-signed by a Supervising Member (Rule 16.2)[2]

[2] While the Panel determined that under Rule 16.3 Ms Ngoh was able to do desktop assessments, she in fact breached Rule 16.3 by failing to comply with Rule 12.

Member stated:

If a PMAPI holds RPV Certification, they are permitted to act as the Primary Valuer for certain residential properties as long as they abide by supervision guidelines (Rule 16).

Both PMAPI or AAPI who holds the certification of RPV (PMAPI RPV or AAPI RPV) can undertake a valuation or desktop of residential property as defined below in Rule 16.5 provided it is not for a 'purpose' described in Rule 16.6.

Relevant Rules:

Rule 16.3 – *A PMAPI RPV or AAPI RPV can undertake a desktop of residential property as defined below in Rule 16.5 provided they comply with Rule 12.*

Professional Conduct Committee considered:

- **The Professional Conduct Committee determined a prima facie finding of a breach of Rule 16.3 of the Rules of Professional Conduct.**

Disciplinary Assessment – Fraudulent and dishonest behaviour

Relevant Rules: Rule 1.4

Complainant (API CEO) stated:

Member represented in the valuation report that she was CPV when she was PMAPI RPV (Rule 1.3).

Member stated:

The report did not represent that I was an API Certified Practicing Valuer. The designation "Certified Practicing Valuer – AVI NO. 20163" refers to AVI certification and was not intended to suggest API CPV membership.

... The report does not state or imply that I am an API Certified Practising Valuer. The designation refers to AVI certification as stated.

The structure, disclosures and methodology adopted are consistent with standard residential valuation practice.

In this context, a reasonable reader would not interpret the report as suggesting CPV membership.

Relevant Rules:

Rule 1.4 – *A Member must not falsify or misrepresent their professional qualification, API membership category, certifications or professional expertise and experience.*

Professional Conduct Committee considered:

- **The Professional Conduct Committee determined the evidence submitted by the Complainant being the desktop report does establish a prima facie finding of a breach of**

Rule 1.4 of the Rules of Professional Conduct. The Panel noted that AVI has a designation Certified Property Valuer not Certified Practising Valuer.

Professional Conduct Panel Meeting – 29 April 2026

The Deputy Chair of the Committee formed a Panel to consider the complaint. The Panel was provided with Annexures 001 to 007.

On 29 April 2026, the Deputy Chair of the API's Professional Conduct Committee (Allen Crawford) together with Kym Dreyer and Phillip Lyons ("Panel") 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, 1.4, 1.7, 1.10, 10.2, 12.4(b), 12.5(c), 12.6(i) and 16.3** 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, 1.4, 1.7, 1.10, 10.2, 12.4(b), 12.5(c), 12.6(i) and 16.3** of the API's Rules of Professional Conduct. A Notice of Prima Facie Findings was forwarded to the Member on 4 May 2026.

The Member elected to attend a hearing before the Panel on 18 June 2026.

Hearing

The same Panel met via video link to hear submissions from the Member in accordance with section 13.4 of the API Professional Conduct Policy on 1 July 2026.

At the end of the hearing, the Panel confirmed the findings of Professional Misconduct pursuant to a breach of **Rules 1.1, 1.2, 1.4, 1.7, 1.10, 10.2, 12.4(b), 12.5(c), 12.6(i) and 16.3** of the API's Rules of Professional Misconduct.

The Panel also noted:

- Ms Ngoh has continued to use the PropertyPRO proforma report even though her API membership has lapsed and is therefore breaching API copyright.
- Ms Ngoh purported she held the designation Certified Practicising Valuer when she is only a PMAPI RPV.
- Ms Ngoh demonstrated a lack of understanding on the limits on the use of PropertyPRO reports under the Supporting Memorandum by API members.
- Ms Ngoh demonstrated a lack of understanding of the rules relating to desktop assessments.

- Ms Ngoh has generally demonstrated a lack of appropriate education and training.

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 Panel.

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

a. Ms Ngoh has committed multiple breaches of the Rules.
b. The breaches cannot be easily remedied or rectified.
c. Ms Ngoh has been quite reckless and negligent in her behaviour.
d. Ms Ngoh has expressed some contrition.
e. The Complainant was affected financially by the breaches at least to the extent of the fee paid ($770).
f. The breaches are potentially very harmful to the reputation of the API/APIV.
g. A punitive approach is more appropriate than an educative approach.
h A significant penalty is in the public interest and would withstand public scrutiny.

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

a. Ms Ngoh is censured.
b. Ms Ngoh is ordered to give an undertaking to abstain from using the PropertyPRO template or any reference to the API in her reports.
c. The findings of the Panel are to be published on the API website in their entirety.
d. Ms Ngoh is to pay the API a fine of $3,000.
e. The matter is to be referred to the API Board with a recommendation to suspend any membership application by Ms Ngoh for two years from the date of this decision (1 July 2026).

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	Dates
001	Correspondence	15.9.2025 – 4.2.2026
002	Complainant and CEO Supporting Evidence	9.9.2025 – 28.10.2025
003	Member Supporting Evidence	10.9.2025 – 19.3.2026
004	Professional Review Form	15.9.2025
005	Disciplinary Assessment Form	28.10.2025
006	Member Response Submission	16.3.2026 – 19.3.2026
007	Valuation Report	10.9.2025

I, Allen Crawford, as Deputy Chair of the Professional Conduct Committee and Panel Member 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,

ALLEN CRAWFORD
Deputy Chair | API Professional Conduct Committee
Australian Property Institute Ltd
ProfessionalConduct@api.org.au