



OFFICE OF ATTORNEY GENERAL  
STATE OF OKLAHOMA

ATTORNEY GENERAL OPINION  
2018-423A

Randall A. Ross, Executive Director  
Oklahoma Accountancy Board  
201 N.W. 63<sup>rd</sup> Street, Suite 210  
Oklahoma City, OK 73116

November 6, 2018

Dear Executive Director Ross:

This office has received your request for a written Attorney General Opinion regarding agency action that the Oklahoma Accountancy Board intends to take pursuant to a consent order with respect to the certified public accountant firm (“CPA Firm”) in Board case 2189. The CPA Firm received three consecutive substandard peer review reports. The CPA Firm has admitted to the violation. The Board proposes to assess a \$5,000 fine and costs of \$948.17. Additionally, the CPA Firm will be required to submit all non-issued reports for pre-issuance reviews and will not be allowed to perform attest work for three years.

The Act authorizes the Board to impose penalties on any individual, firm, or entity found to have violated the Act, to include “[r]evok[ing] any certificate...issued pursuant to the provisions of the Oklahoma Accountancy Act,” “[a]ssess[ing] a fine not to exceed \$10,000 for each separate offense,” and “[r]equir[ing] the registrant . . . to pay all costs incurred by the Board as a result of hearings conducted regarding accountancy actions of the registrant[.]” 59 O.S.2011, § 15.24(A)(2), (9), (10). The Act requires all licensees to comply with the Board’s professional code of conduct. *Id.* § 15.14B(5). The Board’s code of conduct incorporates the American Institute of CPAs (“AICPA”) Code of Professional Conduct. OAC 10:15-39-1. That code requires licensees to “observe the profession’s technical and ethical standards.” AICPA Code of Professional Conduct § 0.300.060.01. The Board may reasonably believe that the proposed action will deter future violations.

It is, therefore, the official opinion of the Attorney General that the Oklahoma Accountancy Board has adequate support for the conclusion that the proposed actions described herein advance the State's policy of upholding statutory standards of CPAs.



MIKE HUNTER  
ATTORNEY GENERAL OF OKLAHOMA



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