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# Report on

# 2015 Inspection of Calvetti Ferguson, P.C.
**(Headquartered in Houston, Texas)**

**Issued by the**

## Public Company Accounting Oversight Board

**October 29, 2015**

**THIS IS A PUBLIC VERSION OF A PCAOB INSPECTION REPORT**

**PORTIONS OF THE COMPLETE REPORT ARE OMITTED FROM THIS DOCUMENT IN ORDER TO COMPLY WITH SECTIONS 104(g)(2) AND 105(b)(5)(A) OF THE SARBANES-OXLEY ACT OF 2002**

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PCAOB
Public Company Accounting Oversight Board

# 2015 INSPECTION OF CALVETTI FERGUSON, P.C.

## Preface

In 2015, the Public Company Accounting Oversight Board ("PCAOB" or "the Board") conducted an inspection of the registered public accounting firm Calvetti Ferguson, P.C. ("the Firm") pursuant to the Sarbanes-Oxley Act of 2002 ("the Act").

Inspections are designed and performed to provide a basis for assessing the degree of compliance by a firm with applicable requirements related to auditing issuers. For a description of the procedures the Board's inspectors may perform to fulfill this responsibility, see Part I.C of this report (which also contains additional information concerning PCAOB inspections generally). The inspection included reviews of portions of selected issuer audits. These reviews were intended to identify whether deficiencies existed in the reviewed audit work, and whether such deficiencies indicated defects or potential defects in the Firm's system of quality control over audits. In addition, the inspection included a review of policies and procedures related to certain quality control processes of the Firm that could be expected to affect audit quality.

The Board is issuing this report in accordance with the requirements of the Act. The Board is releasing to the public Part I of the report and portions of Part IV of the report. Part IV of the report consists of the Firm's comments, if any, on a draft of the report. If the nonpublic portions of the report discuss criticisms of or potential defects in the firm's system of quality control, those discussions also could eventually be made public, but only to the extent the firm fails to address the criticisms to the Board's satisfaction within 12 months of the issuance of the report. Appendix A presents the text of the paragraphs of the auditing standards that are referenced in Part I.A. in relation to the description of auditing deficiencies there.

## PROFILE OF THE FIRM[1]

| | |
|---|---|
| Offices | 2 (Houston and San Antonio, Texas) |
| Ownership structure | Professional corporation |
| Partners/professional staff[2] | 8/26 |
| Issuer audit clients | 5 |
| Lead partners on issuer audit work[3] | 3 |
| Other names used in audit reports | CalvettiFerguson[4] |

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[1] The information presented here is as understood by the inspection team, generally as of the outset of the inspection, based on the Firm's self-reporting and the inspection team's review of certain information. Additional information, including additional detail on audit reports issued by the Firm, is available in the Firm's filings with the Board, available at http://pcaobus.org/Registration/rasr/Pages/RASR_Search.aspx.

[2] The number of partners and professional staff is provided here as an indication of the size of the Firm, and does not necessarily represent the number of the Firm's professionals who participate in audits of issuers.

[3] The number of lead partners on issuer audit work represents the total number of Firm personnel who had primary responsibility for an issuer audit (as defined in AS No. 10, *Supervision of the Audit Engagement*) during the twelve-month period preceding the outset of the inspection.

[4] The Firm filed a special report on PCAOB Form 3 describing a change in its legal name from Calvetti, Ferguson & Wagner, P.C. to Calvetti Ferguson, P.C. effective January 30, 2014.

# PART I

## INSPECTION PROCEDURES AND CERTAIN OBSERVATIONS

Members of the Board's inspection staff ("the inspection team") conducted primary procedures for the inspection from February 2, 2015 to February 9, 2015.[5]

## A. Review of Audit Engagements

The inspection procedures included a review of portions of two issuer audits performed by the Firm. The inspection team identified matters that it considered to be deficiencies in the performance of the work it reviewed.

The description of the deficiencies in Part I.A of this report includes, at the end of the description of each deficiency, a reference to specific paragraphs of the auditing standards that relates to that deficiency. The text of those paragraphs is set forth in Appendix A to this report. The references in this sub-Part include only standards that primarily relates to the deficiencies; they do not present a comprehensive list of every auditing standard that applies to the deficiencies. Further, certain broadly applicable aspects of the auditing standards that may be relevant to a deficiency, such as provisions requiring due professional care, including the exercise of professional skepticism; the accumulation of sufficient appropriate audit evidence; and the performance of procedures that address risks, are not included in any references to the auditing standards in this sub-Part, unless the lack of compliance with these standards is the primary reason for the deficiency. These broadly applicable provisions are described in Part I.B of this report.

Certain deficiencies identified were of such significance that it appeared to the inspection team that the Firm, at the time it issued its audit report, had not obtained sufficient appropriate audit evidence to support its opinion that the financial statements were presented fairly, in all material respects, in accordance with the applicable

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[5] For this purpose, "primary procedures" include field work, other review of audit work papers, and the evaluation of the Firm's quality control policies and procedures through review of documentation and interviews of Firm personnel. Primary procedures do not include (1) inspection planning, which is performed prior to primary procedures, and (2) inspection follow-up procedures, wrap-up, analysis of results, and the preparation of the inspection report, which extend beyond the primary procedures.

financial reporting framework. In other words, in these audits, the auditor issued an opinion without satisfying its fundamental obligation to obtain reasonable assurance about whether the financial statements were free of material misstatement.

The fact that one or more deficiencies in an audit reach this level of significance does not necessarily indicate that the financial statements are materially misstated. It is often not possible for the inspection team, based only on the information available from the auditor, to reach a conclusion on those points.

Whether or not associated with a disclosed financial reporting misstatement, an auditor's failure to obtain the reasonable assurance that the auditor is required to obtain is a serious matter. It is a failure to accomplish the essential purpose of the audit, and it means that, based on the audit work performed, the audit opinion should not have been issued.[6]

The audit deficiencies that reached this level of significance are described below–

A.1. Issuer A

(1) the failure to perform sufficient procedures to test the valuation of assets acquired in an acquisition, including the failures to (a) evaluate the reasonableness of the significant assumptions used by the appraiser and management, (b) evaluate the objectivity of an issuer-engaged specialist, and (c) test the accuracy and completeness of data provided by the issuer

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[6] Inclusion in an inspection report does not mean that the deficiency remained unaddressed after the inspection team brought it to the Firm's attention. Depending upon the circumstances, compliance with PCAOB standards may require the Firm to perform additional audit procedures, or to inform a client of the need for changes to its financial statements or reporting on internal control, or to take steps to prevent reliance on its previously expressed audit opinions. The Board expects that firms will comply with these standards, and an inspection may include a review of the adequacy of a firm's compliance with these requirements, either with respect to previously identified deficiencies or deficiencies identified during that inspection. Failure by a firm to take appropriate actions, or a firm's misrepresentations in responding to an inspection report, about whether it has taken such actions, could be a basis for Board disciplinary sanctions.

to the specialist (AU 328, paragraphs .26, .28, and .36; AU 336, paragraphs .10 and .12); and

(2) the failure to perform sufficient procedures to determine the occurrence and valuation of revenue (AS No. 13, paragraph 13).

A.2. Issuer B

the failure to perform sufficient procedures to test the completeness of contributions to a defined contribution benefit plan (AS No. 13, paragraphs 8 and 13).

## B. Auditing Standards

Each deficiency described above could relate to several applicable provisions of the standards that govern the conduct of audits. The paragraphs of the standards that are cited for each deficiency are those that most directly relate to the deficiency. The deficiencies also relate, however, to other paragraphs of those standards and to other auditing standards, including those concerning due professional care, responses to risk assessments, and audit evidence.

Many audit deficiencies involve a lack of due professional care. AU 230, *Due Professional Care in the Performance of Work*, paragraphs .02, .05, and .06, requires the independent auditor to plan and perform his or her work with due professional care and sets forth aspects of that requirement. AU 230, paragraphs .07 through .09, and AS No. 13, *The Auditor's Responses to the Risks of Material Misstatement*, paragraph 7, specify that due professional care requires the exercise of professional skepticism. These standards state that professional skepticism is an attitude that includes a questioning mind and a critical assessment of the appropriateness and sufficiency of audit evidence.

AS No. 13, paragraphs 3, 5, and 8, requires the auditor to design and implement audit responses that address the risks of material misstatement, and AS No. 15, *Audit Evidence*, paragraph 4, requires the auditor to plan and perform audit procedures to obtain sufficient appropriate audit evidence to provide a reasonable basis for the audit opinion. Sufficiency is the measure of the quantity of audit evidence, and the quantity needed is affected by the risk of material misstatement (in the audit of financial statements) and the quality of the audit evidence obtained. The appropriateness of evidence is measured by its quality; to be appropriate, evidence must be both relevant and reliable in providing support for the related conclusions.

The paragraphs of the standards that are described immediately above are not cited in Part I.A, unless those paragraphs are the most directly related to the relevant deficiency.

B.1. List of Specific Auditing Standards Referenced in Part I.A.

The table below lists the specific auditing standards that are referenced in Part I.A of this report, cross-referenced to the issuer audits for which each standard is cited.

| PCAOB Auditing Standards | Issuers |
|---|---|
| AS No. 13, *The Auditor's Responses to the Risks of Material Misstatement* | A and B |
| AU 328, *Auditing Fair Value Measurements and Disclosures* | A |
| AU 336, *Using the Work of a Specialist* | A |

## C. Information Concerning PCAOB Inspections that is Generally Applicable to Triennially Inspected Firms

A Board inspection includes a review of certain portions of selected audit work performed by the inspected firm and a review of certain aspects of the firm's quality control system. The inspections are designed to identify deficiencies in audit work and defects or potential defects in the firm's system of quality control related to the firm's audits. The focus on deficiencies, defects, and potential defects necessarily carries through to reports on inspections and, accordingly, Board inspection reports are not intended to serve as balanced report cards or overall rating tools. Further, the inclusion in an inspection report of certain deficiencies, defects, and potential defects should not be construed as an indication that the Board has made any determination about other aspects of the inspected firm's systems, policies, procedures, practices, or conduct not included within the report.

C.1. Reviews of Audit Work

Inspections include reviews of portions of selected audits of financial statements and, where applicable, audits of internal control over financial reporting ("ICFR"). For these audits, the inspection team selects certain portions of the audits for inspection, and it reviews the engagement team's work papers and interviews engagement personnel regarding those portions. If the inspection team identifies a potential issue that it is unable to resolve through discussion with the firm and any review of additional work papers or other documentation, the inspection team ordinarily provides the firm with a written comment form on the matter and the firm is allowed the opportunity to provide a written response to the comment form. If the response does not resolve the inspection team's concerns, the matter is considered a deficiency and is evaluated for inclusion in the inspection report.

The inspection team selects the audits, and the specific portions of those audits, that it will review, and the inspected firm is not allowed an opportunity to limit or influence the selections. Audit deficiencies that the inspection team may identify include a firm's failure to identify, or to address appropriately, financial statement misstatements, including failures to comply with disclosure requirements,[7] as well as a firm's failure to perform, or to perform sufficiently, certain necessary audit procedures. An inspection may not involve the review of all of a firm's audits, nor is it designed to identify every deficiency in the reviewed audits. Accordingly, a Board inspection report should not be understood to provide any assurance that a firm's audit work, or the relevant issuers' financial statements or reporting on ICFR, are free of any deficiencies not specifically described in an inspection report.

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[7] When it comes to the Board's attention that an issuer's financial statements appear not to present fairly, in a material respect, the financial position, results of operations, or cash flows of the issuer in conformity with the applicable financial reporting framework, the Board's practice is to report that information to the Securities and Exchange Commission ("SEC" or "the Commission"), which has jurisdiction to determine proper accounting in issuers' financial statements. Any description in this report of financial statement misstatements or failures to comply with SEC disclosure requirements should not be understood as an indication that the SEC has considered or made any determination regarding these issues unless otherwise expressly stated.

In some cases, the conclusion that a firm did not perform a procedure may be based on the absence of documentation and the absence of persuasive other evidence, even if the firm claimed to have performed the procedure. AS No. 3, *Audit Documentation*, provides that, in various circumstances including PCAOB inspections, a firm that has not adequately documented that it performed a procedure, obtained evidence, or reached an appropriate conclusion must demonstrate with persuasive other evidence that it did so, and that oral assertions and explanations alone do not constitute persuasive other evidence. In reaching its conclusions, an inspection team considers whether audit documentation or other evidence that a firm might provide to the inspection team supports the firm's contention that it performed a procedure, obtained evidence, or reached an appropriate conclusion. In the case of every matter cited in the public portion of a final inspection report, the inspection team has carefully considered any contention by the firm that it did so but just did not document its work, and the inspection team has concluded that the available evidence does not support the contention that the firm sufficiently performed the necessary work.

Identified deficiencies in the audit work that exceed a significance threshold (which is described in Part I.A of the inspection report) are summarized in the public portion of the inspection report.[8]

The Board cautions against extrapolating from the results presented in the public portion of a report to broader conclusions about the frequency of deficiencies throughout the firm's practice. Individual audits and areas of inspection focus are most often selected on a risk-weighted basis and not randomly. Areas of focus vary among selected audits, but often involve audit work on the most difficult or inherently uncertain areas of financial statements. Thus, the audit work is generally selected for inspection based on factors that, in the inspection team's view, heighten the possibility that auditing deficiencies are present, rather than through a process intended to identify a representative sample.

[8] The discussion in this report of any deficiency observed in a particular audit reflects information reported to the Board by the inspection team and does not reflect any determination by the Board as to whether the Firm has engaged in any conduct for which it could be sanctioned through the Board's disciplinary process. In addition, any references in this report to violations or potential violations of law, rules, or professional standards are not a result of an adversarial adjudicative process and do not constitute conclusive findings for purposes of imposing legal liability.

C.2. Review of a Firm's Quality Control System

QC 20, *System of Quality Control for a CPA Firm's Accounting and Auditing Practice*, provides that an auditing firm has a responsibility to ensure that its personnel comply with the applicable professional standards. This standard specifies that a firm's system of quality control should encompass the following elements: (1) independence, integrity, and objectivity; (2) personnel management; (3) acceptance and continuance of issuer audit engagements; (4) engagement performance; and (5) monitoring.

The inspection team's assessment of a firm's quality control system is derived both from the results of its procedures specifically focused on the firm's quality control policies and procedures, and also from inferences that can be drawn from deficiencies in the performance of individual audits. Audit deficiencies, whether alone or when aggregated, may indicate areas where a firm's system has failed to provide reasonable assurance of quality in the performance of audits. Even deficiencies that do not result in an insufficiently supported audit opinion may indicate a defect or potential defect in a firm's quality control system.[9] If identified deficiencies, when accumulated and evaluated, indicate defects or potential defects in the firm's system of quality control, the nonpublic portion of this report would include a discussion of those issues. When evaluating whether identified deficiencies in individual audits indicate a defect or potential defect in a firm's system of quality control, the inspection team considers the nature, significance, and frequency of deficiencies;[10] related firm methodology, guidance, and practices; and possible root causes.

Inspections also include a review of certain of the firm's practices, policies, and processes related to audit quality, which constitute a part of the firm's quality control system. This review addresses practices, policies, and procedures concerning audit

[9] Not every audit deficiency suggests a defect or potential defect in a firm's quality control system, and this report may not discuss every audit deficiency the inspection team identified.

[10] An evaluation of the frequency of a type of deficiency may include consideration of how often the inspection team reviewed audit work that presented the opportunity for similar deficiencies to occur. In some cases, even a type of deficiency that is observed infrequently in a particular inspection may, because of some combination of its nature, its significance, and the frequency with which it has been observed in previous inspections of the firm, be cause for concern about a quality control defect or potential defect.

performance, training, compliance with independence standards, client acceptance and retention, and the establishment of policies and procedures.

END OF PART I

PARTS II AND III OF THIS REPORT ARE NONPUBLIC
AND ARE OMITTED FROM THIS PUBLIC DOCUMENT

## PART IV

## RESPONSE OF THE FIRM TO DRAFT INSPECTION REPORT

Pursuant to section 104(f) of the Act, 15 U.S.C. § 7214(f), and PCAOB Rule 4007(a), the Firm provided a written response to a draft of this report. Pursuant to section 104(f) of the Act and PCAOB Rule 4007(b), the Firm's response, minus any portion granted confidential treatment, is attached hereto and made part of this final inspection report.[11]

[11] The Board does not make public any of a firm's comments that address a nonpublic portion of the report unless a firm specifically requests otherwise. In some cases, the result may be that none of a firm's response is made publicly available. In addition, pursuant to section 104(f) of the Act, 15 U.S.C. § 7214(f), and PCAOB Rule 4007(b), if a firm requests, and the Board grants, confidential treatment for any of the firm's comments on a draft report, the Board does not include those comments in the final report at all. The Board routinely grants confidential treatment, if requested, for any portion of a firm's response that addresses any point in the draft that the Board omits from, or any inaccurate statement in the draft that the Board corrects in, the final report.

Calvetti Ferguson
Advising beyond Accounting

September 1, 2015

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Helen A. Munter, Director
Division of Registration and Inspections
Public Company Accounting Oversight Board
1666 K Street, N.W.
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Re: Calvetti Ferguson
Response to Draft Report on 2014 Inspection

Dear Ms. Munter,

We appreciate the time that the Public Company Accounting Oversight Board ("PCAOB" or "the Board") took to inspect specific audit files. We are dedicated to the continued improvement of our audit practice and believe that inspection – both external and internal – is essential to achieve that. To this end, we also employ an internal review policy which consists in part of monitoring the processes, methodologies, and procedures used in our audit practice, especially those regarding quality control. Our goal is to actively identify and implement any changes which could enhance the quality of our audits.

Thus, after thorough consideration of the Board's comments in the Draft Report, we must respectfully disagree with some of their findings. These consist of the issues regarding:

1. Responses to Part IA – Inspection Procedures and Certain Observations and Part IIA – Detailed Discussion of Inspection Results
    a. Issuer A – Valuation of Acquired Assets
    b. Issuer A – Occurrence and Valuation of Revenue
    c. Issuer B – Completeness of Contributions

Issuer A: Valuation of Acquired Assets

Regarding the valuation of acquired assets, the Board states that the Firm failed to perform sufficient procedures to test the valuation of assets acquired by the issuer, evaluate the objectivity of the appraiser, and test the accuracy and completeness of the issuer-provided data used in developing the fair values.

We discussed the valuation process and procedures with the appraiser and management, including the inputs and assumptions, and concluded that the fair values calculated were reasonable. We also evaluated the appraiser's competency, capabilities, and objectivity. We also tested the inputs used in the valuation through observation, inquiry, and vouching. Therefore, we believe that we did perform sufficient procedures to reach our conclusion. In response to the 2014 Inspection, we have updated the documentation in our files to appropriately document the procedures done.

Issuer A: Occurrence and Valuation of Revenue

Regarding Revenue Recognition, the Board stated that the Firm failed to perform sufficient procedures to test revenue.

We tested controls for effectiveness and performed substantive testing on the relevant assertions and significant risks. The issuer is in a specialized industry, and we performed our testing based on the specific revenue procedures of that industry. In our work paper files, we identified the risk and assertions. Though implied throughout our work papers, we did not have a work paper that specifically identify the link between the testing and the assertions and risks. We have taken your comment and implemented new audit work programs and forms that provide clear linkage between our assertions and risks. However, for the point raised in your review, we believe we performed adequate substantive testing to base our conclusion.

<u>Issuer B: Completeness of Contributions</u>

Regarding Contributions, the Board states that the Firm failed to perform sufficient procedures to test the completeness of the participant and employer contributions.

We agree that this specific procedure was not clearly documented in our files for this audit. In our audit program, we indicated that this procedure was done, but the evidence was not clearly indicated in the appropriate work papers. We did our own internal review of our files and were able to demonstrate that we do perform this procedure in our other audits. Thus, we do not believe that this is an issue on our audits, but rather a documentation point on one specific audit.

We appreciate the feedback of the review team. We believe our audit work supports the opinions issued and was done in accordance with auditing standards. We will take the feedback of your team and continue to enhance the quality of our audit documentation.

Sincerely,

Manish Seth
Partner

## APPENDIX A

## AUDITING STANDARDS REFERENCED IN PART I

This appendix provides the text of the auditing standard paragraphs that are referenced in Part I.A of this report. Footnotes that are included in this Appendix, and any other Notes, are from the original auditing standards that are referenced. While this Appendix contains the specific portions of the relevant standards cited with respect to the deficiencies in Part I.A of this report, other portions of the standards (including those described in Part I.B of this report) may provide additional context, descriptions, related requirements, or explanations; the complete standards are available on the PCAOB's website at http://pcaobus.org/STANDARDS/Pages/default.aspx.

| AS No. 13, *The Auditor's Responses to the Risks of Material Misstatement* | | |
|---|---|---|
| **Responses Involving the Nature, Timing, and Extent of Audit Procedures** | | |
| AS No. 13.8 | The auditor should design and perform audit procedures in a manner that addresses the assessed risks of material misstatement for each relevant assertion of each significant account and disclosure. | Issuer B |
| **RESPONSES TO FRAUD RISKS** | | |
| AS No. 13.13 | *Addressing Fraud Risks in the Audit of Financial Statements*. In the audit of financial statements, the auditor should perform substantive procedures, including tests of details, that are specifically responsive to the assessed fraud risks. If the auditor selects certain controls intended to address the assessed fraud risks for testing in accordance with paragraphs 16-17 of this standard, the auditor should perform tests of those controls. | Issuer A and B |

| AU 328, *Auditing Fair Value Measurements and Disclosures* | | |
|---|---|---|
| **Testing Management's Significant Assumptions, the Valuation Model, and the Underlying Data** | | |
| AU 328.26 | The auditor's understanding of the reliability of the process used by management to determine fair value is an important element in support of the resulting amounts and therefore affects the nature, timing, and extent of | Issuer A |

| AU 328, *Auditing Fair Value Measurements and Disclosures* | | |
|---|---|---|
| | audit procedures. When testing the entity's fair value measurements and disclosures, the auditor evaluates whether:<br><br>a. Management's assumptions are reasonable and reflect, or are not inconsistent with, market information (see paragraph .06).<br>b. The fair value measurement was determined using an appropriate model, if applicable.<br>c. Management used relevant information that was reasonably available at the time. | |
| AU 328.28 | Where applicable, the auditor should evaluate whether the significant assumptions used by management in measuring fair value, taken individually and as a whole, provide a reasonable basis for the fair value measurements and disclosures in the entity's financial statements. | Issuer A |
| AU 328.36 | To be reasonable, the assumptions on which the fair value measurements are based (for example, the discount rate used in calculating the present value of future cash flows),[fn 5] individually and taken as a whole, need to be realistic and consistent with:<br><br>a. The general economic environment, the economic environment of the specific industry, and the entity's economic circumstances;<br>b. Existing market information;<br>c. The plans of the entity, including what management expects will be the outcome of specific objectives and strategies;<br>d. Assumptions made in prior periods, if appropriate;<br>e. Past experience of, or previous conditions experienced by, the entity to the extent currently applicable;<br>f. Other matters relating to the financial statements, for example, assumptions used by management in accounting estimates for financial statement accounts other than those relating to fair value measurements and disclosures; and<br>g. The risk associated with cash flows, if applicable, including the potential variability in the amount and timing of the cash flows and the related effect on the discount rate.<br><br>Where assumptions are reflective of management's intent | Issuer A |

| AU 328, ***Auditing Fair Value Measurements and Disclosures*** | | |
|---|---|---|
| | and ability to carry out specific courses of action, the auditor considers whether they are consistent with the entity's plans and past experience. | |

Footnote to AU 328.36

fn 5 The auditor also should consider requirements of GAAP that may influence the selection of assumptions (see FASB Concepts Statement No. 7).

| AU 336, ***Using the Work of a Specialist*** | | |
|---|---|---|
| **Relationship Of The Specialist To The Client** | | |
| AU 336.10 | The auditor should evaluate the relationship fn 6 of the specialist to the client, including circumstances that might impair the specialist's objectivity. Such circumstances include situations in which the client has the ability—through employment, ownership, contractual right, family relationship, or otherwise—to directly or indirectly control or significantly influence the specialist. | Issuer A |

Footnote to AU 336.10

fn 6 The term *relationship* includes, but is not limited to, those situations meeting the definition of "related parties" contained in the financial reporting framework applicable to the company under audit.

| | | |
|---|---|---|
| **Using The Findings Of The Specialist** | | |
| AU 336.12 | The appropriateness and reasonableness of methods and assumptions used and their application are the responsibility of the specialist. The auditor should (*a*) obtain an understanding of the methods and assumptions used by the specialist, (*b*) make appropriate tests of data provided to the specialist, taking into account the auditor's assessment of control risk, and (*c*) evaluate whether the specialist's findings support the related assertions in the financial statements. Ordinarily, the auditor would use the work of the specialist unless the auditor's procedures lead him or her to believe the findings are unreasonable in the circumstances. If the auditor believes the findings are unreasonable, he or she should apply additional procedures, which may include obtaining the opinion of another specialist. | Issuer A |