ORDER INSTITUTING DISCIPLINARY PROCEEDINGS, MAKING FINDINGS, AND IMPOSING SANCTIONS

In the Matter of Ömer Tanrıöver,

Respondent.

PCAOB Release No. 105-2018-007
May 9, 2018

By this Order, the Public Company Accounting Oversight Board ("Board" or "PCAOB") is: (1) censuring Ömer Tanrıöver ("Tanrıöver" or "Respondent"); and (2) barring Tanrıöver from being an associated person of a registered public accounting firm. The Board is imposing these sanctions on the basis of its findings that Tanrıöver failed to cooperate with a Board investigation by refusing to provide information in response to an Accounting Board Demand.

I.

The Board deems it necessary and appropriate, for the protection of investors and to further the public interest in the preparation of informative, accurate, and independent audit reports, that disciplinary proceedings be, and hereby are, instituted pursuant to Section 105(c) of the Sarbanes-Oxley Act of 2002, as amended (the "Act"), and PCAOB Rule 5200(a)(3) against Respondent.

II.

In anticipation of the institution of these proceedings, and pursuant to PCAOB Rule 5205, Respondent has submitted an Offer of Settlement ("Offer") that the Board has determined to accept. Solely for purposes of these proceedings and any other proceedings brought by or on behalf of the Board, or to which the Board is a party, and without admitting or denying the findings herein, except as to the Board's jurisdiction over him and the subject matter of these proceedings, which are admitted, Respondent consents to entry of this Order Instituting Disciplinary Proceedings, Making Findings, and Imposing Sanctions ("Order") as set forth below.¹

¹ The findings herein are made pursuant to Respondent's Offer and are not binding on any other person or entity in this or any other proceeding.
ORDER

III.

On the basis of Respondent's Offer, the Board finds that:

A. Respondent

1. Ömer Tanrıöver, age 53, is a former partner of DRT Bagimsiz Denetim ve Serbest Muhasebeci Mali Musavirlik A.Ş. ("Deloitte Turkey" or "Firm"). From 2004 through June 2007, and from April 2010 through May 2016, Tanrıöver served as Risk and Reputation Leader for Deloitte Turkey. In that capacity, Tanrıöver was a contact between the Firm and the PCAOB during the Board's 2014 inspection of Deloitte Turkey. On August 19, 2016, the Firm placed Tanrıöver on administrative leave, and he resigned from Deloitte Turkey as of January 1, 2017, in accordance with the Firm's partnership agreement. At all relevant times, Tanrıöver was an associated person of a registered public accounting firm as that term is defined in Section 2(a)(9) of the Act and PCAOB Rule 1001(p)(i).

B. Respondent Failed to Cooperate with a Board Investigation

Applicable PCAOB Rules

2. Section 105(b)(3)(A) of the Act authorizes the Board to sanction an associated person of a registered public accounting firm for "refus[ing] to...cooperate with the Board in connection with an investigation[.]

3. The Firm registered with the Board on September 15, 2004, pursuant to Section 102 of the Act and PCAOB Rules.


6. PCAOB Rule 5110(a)(1).
ORDER

Background

3. Beginning in July 2016, the PCAOB Division of Enforcement and Investigations (the "Division") conducted an informal inquiry and, beginning on December 20, 2016, a formal investigation of Deloitte Turkey concerning whether former members of Deloitte Turkey management devised and then implemented an improper audit document alteration plan in advance of the PCAOB's 2014 inspection, culminating in the Firm's making documentation available to PCAOB inspectors without revealing that improper alterations had been made ("Improper Alteration Plan").7

Respondent Refused to Provide Information in Response to an Accounting Board Demand

4. On February 14, 2017, the Division issued an ABD to Tanrıöver requiring him to provide information to the Division by February 28, 2017. The ABD sought, among other things, information concerning Tanrıöver's possible knowledge of, or possible involvement in, the Improper Alteration Plan.

5. On April 13, 2017, Tanrıöver informed the Division through his counsel that he would not provide responses to any of the demands for information included in the ABD. By not complying with the ABD, Tanrıöver failed to cooperate with a Board investigation.8

IV.

In view of the foregoing, and to protect the interests of investors and further the public interest in the preparation of informative, accurate, and independent audit reports, the Board determines it appropriate to impose the sanctions agreed to in Respondent's Offer. Accordingly, it is hereby ORDERED that:

A. Pursuant to Section 105(b)(3)(A)(iii) of the Act and PCAOB Rule 5300(b)(1), Ömer Tanrıöver is censured; and

B. Pursuant to Section 105(b)(3)(A)(i) of the Act and PCAOB Rule 5300(b)(1), Ömer Tanrıöver is barred from being an associated person of


8 See PCAOB Rule 5110(a).
ORDER

a registered public accounting firm, as that term is defined in Section 2(a)(9) of the Act and PCAOB Rule 1001(p)(i).9

ISSUED BY THE BOARD.

/s/ Phoebe W. Brown

Phoebe W. Brown
Secretary

May 9, 2018

9 As a consequence of the bar imposed in this Order, the provisions of Section 105(c)(7)(B) of the Act will apply with respect to Ömer Tanrıöver. Section 105(c)(7)(B) provides: "It shall be unlawful for any person that is suspended or barred from being associated with a registered public accounting firm under this subsection willfully to become or remain associated with any issuer, broker, or dealer in an accountancy or a financial management capacity, and for any issuer, broker, or dealer that knew, or in the exercise of reasonable care should have known, of such suspension or bar, to permit such an association, without the consent of the Board or the Commission."