ORDER GRANTING PETITION TO TERMINATE BAR AND CONSENTING TO ASSOCIATION WITH A REGISTERED PUBLIC ACCOUNTING FIRM

In the Matter of Joao Rafael Belo de Araujo Filho

PCAOB Release No. 105-2020-005

June 5, 2020

On December 5, 2016, the Public Company Accounting Oversight Board (“Board” or “PCAOB”) issued an order instituting disciplinary proceedings, making findings and imposing sanctions that barred Joao Rafael Belo de Araujo Filho (“Araujo”) from being an associated person of a registered public accounting firm. Araujo was permitted, pursuant to the order, to petition for Board consent to associate with a registered public accounting firm after one year from the date of the order.1 Araujo has filed a petition to terminate the bar and for Board consent to associate with Grant Thornton Auditores Independentes, a public accounting firm registered with the Board pursuant to Section 102 of the Sarbanes-Oxley Act of 2002, as amended, and PCAOB Rules. By this Order, the Board is granting Araujo’s petition.

In the order imposing sanctions against Araujo, the Board found that Araujo, while an associated person of Deloitte Touche Tohmatsu Auditores Independientes (“Deloitte Brazil”), violated PCAOB rules and standards in connection with a Board inspection by participating in the improper alteration of work papers in advance of the Board’s 2012 inspection of Deloitte Brazil. Araujo consented to the entry of the order without admitting or denying the findings in it, except as to the Board’s jurisdiction over him and the subject matter of the proceedings, which he admitted.

PCAOB Rule 5302(b) governs petitions to terminate a bar from being an associated person of a registered public accounting firm. Such petitions must be supported by an affidavit addressing certain factors and include certain exhibits as specified in PCAOB Rule 5302(b)(2). PCAOB Rule 5302(b)(3) requires the petitioner to make a showing satisfactory for the Board to be able to determine that the proposed association would be consistent with the public interest. Such a determination depends on the petitioner’s specific facts and circumstances.

On the basis of the information supplied and representations made relating to factors identified in PCAOB Rule 5302(b)(4), it appears that Araujo has met the

1 In the Matter of Joao Rafael Belo de Araujo Filho, PCAOB Rel. No. 105-2016-037 (December 5, 2016).
requirements of PCAOB Rule 5302(b) and that he has complied with the December 5, 2016 order barring him from being an associated person of a registered public accounting firm. Moreover, nothing has come to the Board’s attention that would be a basis for an adverse decision on Araujo’s petition.

In view of the foregoing, the Board determines that the proposed association would be consistent with the public interest. Accordingly, it is hereby ORDERED that:

A. The Board consents to Joao Rafael Belo de Araujo Filho, CPA’s association with Grant Thornton Auditores Independentes, a registered public accounting firm;

B. The bar against Joao Rafael Belo de Araujo Filho, CPA from being an associated person of a registered public accounting firm is hereby terminated; and

C. Joao Rafael Belo de Araujo Filho, CPA agrees that, for a period of one year from the date the Board grants the petition to terminate his bar, he undertakes:

i. To be supervised for all work performed that is subject to the Board’s jurisdiction, as set forth in Title I of the Sarbanes-Oxley Act of 2002, as amended;

ii. that his supervisors will be Nelson Barreto, Audit Leader and Risk and Reputation Leader of Grant Thornton Auditores Independentes, and Daniel Maranhao, Managing Partner of Grant Thornton Auditores Independentes;

iii. that he will provide his supervisors with a copy of the Board order granting the petition to terminate his bar; and

iv. that he will certify in writing to the Director of the Division of Enforcement and Investigations, Public Company Accounting Oversight Board, 1666 K Street, N.W., Washington D.C. 20006, his compliance with the above undertakings. The certification shall identify the undertakings, provide written evidence of compliance in the form of a narrative, and be supported by exhibits sufficient to demonstrate compliance. Araujo shall submit such certification within thirty (30) days of the close of the one year period from the date the Board grants his petition to terminate his bar. During and after such one year period, Araujo shall also submit such additional evidence of and information
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concerning his compliance as the staff of the Division of Enforcement and Investigations may reasonably request.

ISSUED BY THE BOARD.

Phoebe W. Brown
Secretary

June 5, 2020