

From: Nathan Hartgraves <nhartgraves@sanvilleco.com>
Sent: Monday, June 22, 2026 8:24 AM
To: Comments
Cc: Nicholas Storbakken; Matthew Wyder
Subject: [EXT]: Comment on PCAOB Strategic Priorities and Permanent Broker-Dealer Inspection Program (PCAOB No. 2026-001)

Dear Board Member Calabria and PCAOB Staff,

I am writing in response to the March 31, 2026 Request for Comment on Strategic Priorities and Board Member Calabria's April 21, 2026 remarks at the Chicago forum regarding the permanent broker-dealer audit inspection program.

I strongly support a more risk-based, tailored approach. Broker-dealers that do not hold customer assets or custody present meaningfully lower risk and should face lighter scrutiny than those that do. Differentiating oversight between exempt and non-exempt filers makes sense and would reduce unnecessary regulatory burden on smaller firms.

At the same time, the PCAOB's oversight has meaningfully improved audit quality at our firm. Earlier inspections drove real progress, and I credit that oversight with raising standards industry-wide. The concern is not returning to the pre-PCAOB era where some firms performed minimal work at very low fees. Any reduction in inspection intensity for lower-risk broker-dealers must be paired with clear expectations around technology use, substantive testing, and quality control so that audit rigor does not decline. We commonly find issues when taking on new clients and generally take a year or two to enhance the overall quality of the financial reporting of our newly minted clients.

Our firm is actively leveraging AI agents to perform our work more effectively and efficiently, which is assisting in our strategy as being a market price correction for our services while maintaining a high degree of audit quality. I would welcome the opportunity to share our experience if helpful to the Board's work.

Thank you for soliciting stakeholder input on these important issues.

Regards,
Nathan



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Schedule a Meeting