



1666 K Street NW
Washington, DC 20006

Office: 202-207-9100
Fax: 202-862-8430

www.pcaobus.org

Order Instituting Disciplinary Proceedings, Making Findings, and Imposing Sanctions

In the Matter of Slack & Company LLC,

Respondent.

PCAOB Release No. 105-2021-017

December 14, 2021

By this Order Instituting Disciplinary Proceedings, Making Findings, and Imposing Sanctions (“Order”), the Public Company Accounting Oversight Board (the “Board” or “PCAOB”) is imposing sanctions upon Slack & Company LLC (the “Firm” or “Respondent”), a registered public accounting firm. The Board is:

- (1) censuring the Firm; and
- (2) imposing a civil money penalty in the amount of \$15,000 upon the Firm.

The Board is imposing these sanctions on the basis of its findings that the Firm failed to timely file required Form APs, in violation of PCAOB Rule 3211, *Auditor Reporting of Certain Audit Participants*.

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)(1) against Respondent.

II.

In anticipation of 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 Respondent and the subject matter of

these proceedings, which are admitted, Respondent consents to entry of this Order as set forth below.¹

III.

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

A. Respondent

1. **Slack and Company LLC** is a limited liability corporation located in South Carolina. At all relevant times, the Firm was registered with the Board pursuant to Section 102 of the Act and PCAOB rules.

B. Respondent Failed to Timely File Form APs in Violation of PCAOB Rule 3211

2. PCAOB Rule 3211, which took effect for issuer audit reports issued on or after January 31, 2017, provides that each registered public accounting firm must provide information about engagement partners and other accounting firms that participate in audits of issuers by filing a Form AP, *Auditor Reporting of Certain Audit Participants*, for each audit report issued by the firm for an issuer. Form APs are due by the 35th day after the date the audit report is first included in a document filed with the U.S. Securities and Exchange Commission (SEC),² subject to a shorter filing deadline that applies when the audit report is first included in a registration statement filed under the Securities Act of 1933, as amended.³

3. The Firm audited the financial statements of Alfi, Inc. as of and for the year ended December 31, 2019. The Firm issued an audit report dated February 9, 2021, which was included in Alfi, Inc.'s Form S-1/A filed with the SEC on February 10, 2021.

4. The Firm audited the financial statements of Green Stream Holdings, Inc. as of and for the fiscal year ended April 30, 2020. The Firm issued an audit report dated August 16, 2020, which was included in Green Stream Holdings, Inc.'s Form 10-K filed with the SEC on August 19, 2020.

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

² See Rule 3211(b)(1).

³ In that instance, a firm is required to file the Form AP by the tenth day after the date the audit report is first included in a document filed with the Commission. See Rule 3211(b)(2).

5. The Firm audited the financial statements of ABCO Energy, Inc. as of and for the years ended December 31, 2019 and December 31, 2020. The Firm issued audit reports dated August 6, 2020 and April 15, 2021, which were included in ABCO Energy, Inc.'s Form 10-K/A filed with the SEC on September 16, 2020, and Form 10-K filed with the SEC on April 15, 2021, respectively.

6. The Firm audited the financial statements of GEX Management, Inc. as of and for the years ended December 31, 2018, December 31, 2019 and December 31, 2020. The Firm issued audit reports dated August 26, 2019, May 14, 2020, and April 15, 2021, which were included in GEX Management's Form 10-K/A filed with the SEC on August 26, 2019, and Forms 10-K filed with the SEC on May 14, 2020, and April 15, 2021, respectively.

7. The Firm audited the financial statements for Quad M Solutions, Inc. as of and for the fiscal years ended September 30, 2019 and September 30, 2020. The Firm issued audit reports dated January 15, 2020 and January 8, 2021, which were included in Quad M Solutions, Inc.'s Form 10-K/A filed with the SEC on January 16, 2020, and Form 10-K filed with the SEC on January 12, 2021, respectively.

8. The Firm failed to file the required Form APs for the above filings by the 35th day after the date the audit reports were first included with the filings made with the SEC, in violation of PCAOB Rule 3211.

9. The Firm belatedly filed the aforementioned Form APs on August 5, 2021.

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 determined it appropriate to impose the sanctions agreed to in Respondent's Offer. Accordingly, it is hereby ORDERED that:

- A. Pursuant to Section 105(c)(4)(E) of the Act and PCAOB Rule 5300(a)(5), the Firm is hereby censured; and
- B. Pursuant to Section 105(c)(4)(D) of the Act and PCAOB Rule 5300(a)(4), a civil money penalty in the amount of \$15,000 is imposed upon the Firm. All funds collected by the Board as a result of the assessment of this civil money penalty will be used in accordance with Section 109(c)(2) of the Act. The Firm shall pay this civil money penalty within ten (10) days of the issuance of this Order by: (1) wire transfer pursuant to instructions provided by Board staff; or (2) United States Postal Service money order, bank money order, certified check, or bank

cashier's check (a) made payable to the Public Company Accounting Oversight Board, (b) delivered to the Office of Finance, Public Company Accounting Oversight Board, 1666 K Street, N.W., Washington D.C. 20006, and (c) submitted under a cover letter, which identifies the Firm as a respondent in these proceedings, sets forth the title and PCAOB release number of these proceedings, and states that payment is made pursuant to this Order, a copy of which cover letter and money order or check shall be sent to Office of the Secretary, Attention: Phoebe W. Brown, Secretary, Public Company Accounting Oversight Board, 1666 K Street, N.W., Washington D.C. 20006.

ISSUED BY THE BOARD.

/s/ Phoebe W. Brown

Phoebe W. Brown
Secretary

December 14, 2021