2019 Inspection KCCW Accountancy Corp.

(Headquartered in Diamond Bar, California)

May 19, 2021

PCAOB
Public Company Accounting Oversight Board

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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2019 Inspection

During the Public Company Accounting Oversight Board ("PCAOB")'s 2019 inspection of KCCW Accountancy Corp., we assessed the firm's compliance with laws, rules, and professional standards applicable to the audits of public companies.

We selected for review three audits of issuers with fiscal years ending in 2018. For each issuer audit selected, we reviewed a portion of the audit. We also evaluated elements of the firm's system of quality control.

2019 Inspection Approach

In selecting issuer audits for review, we use a risk-based method of selection. We make selections based on (1) our internal evaluation of audits we believe have a heightened risk of material misstatement, including those with challenging audit areas, and (2) other risk-based characteristics, including issuer and firm considerations. In certain situations we may select all of the firm's issuer audits for review.

When we review an audit, we do not review every aspect of the audit. Rather, we generally focus our attention on audit areas we believe to be of greater complexity, areas of greater significance or with a heightened risk of material misstatement to the issuer's financial statements, and areas of recurring deficiencies. We may also select some audit areas for review in a manner designed to incorporate unpredictability.

Our selection of audits for review does not constitute a representative sample of the firm's total population of issuer audits. Additionally, our inspection findings are specific to the particular portions of the issuer audits reviewed. They are not an assessment of all of the firm's audit work nor of all of the audit procedures performed for the audits reviewed.

View the details on the scope of our inspections and our inspections procedures.

Overview of the 2019 Inspection and Historical Data by Inspection Year

The following information provides an overview of our inspection in 2019 of the firm's issuer audits as well as data from the previous inspection. We use a risk-based method to select audits for review and to identify areas on which we focus our review. Because our inspection process evolves over time, it can, and often does, focus on a different mix of audits and audit areas from inspection to inspection and firm to firm. Further, a firm's business, the applicable auditing standards, or other factors can change from the time of one inspection to the next. As a result of these variations, we caution that our inspection results are not necessarily comparable over time or among firms.

Firm Data and Audits Reviewed

	2019	2016
Firm Data		
Total issuer audit clients for which the firm was the principal auditor at the outset of the inspection procedures	30	32
Total engagement partners on issuer audit work[1]	3	3
Audits Reviewed		
Total audits reviewed[2]	3	3
Audits in which the firm was the principal auditor	3	3
Integrated audits of financial statements and internal control over financial reporting ("ICFR")	0	0
Audits with Part I.A deficiencies	1	0

If a deficiency is included in Part I.A of our report, it does not necessarily mean that the firm has not addressed the deficiency. In many cases, the firm has performed remedial actions after the issue was identified. Depending on the circumstances, remedial actions may include performing additional audit procedures, informing management of the issuer of the need for changes to the financial statements or reporting on ICFR, or taking steps to prevent reliance on prior audit reports. Our inspection may include a

[1] The number of engagement partners on issuer audit work represents the total number of firm personnel (not necessarily limited to personnel with an ownership interest) who had primary responsibility for an issuer audit (as defined in AS 1201) during the twelve-month period preceding the outset of the inspection.

[2] The population of issuer audits from which audits are selected for review may differ from the issuer audits at the outset of the inspection procedures due to variations such as new issuer audit clients for which the firm has not yet issued an opinion or issuer audit clients lost prior to the outset of the inspection.

review, on a sample basis, of the adequacy of a firm's remedial actions, either with respect to previously identified deficiencies or deficiencies identified during the current inspection. If a firm does not take appropriate actions to address deficiencies, we may criticize its system of quality control or pursue a disciplinary action.

The fact that we have included a deficiency in our report — other than those deficiencies for audits with incorrect opinions on the financial statements and/or ICFR — does not necessarily mean that the issuer's financial statements are materially misstated or that undisclosed material weaknesses in ICFR exist. It is often not possible for us to reach a conclusion on those points based on our inspection procedures and related findings because, for example, we have only the information that the auditor retained and the issuer's public disclosures. We do not have direct access to the issuer's management, underlying books and records, and other information.

Audit Areas Most Frequently Reviewed

This table reflects the audit areas we have selected most frequently for review in the 2019 inspection and the previous inspection. For the issuer audits selected for review, we selected these areas because they were generally significant to the issuer's financial statements, may have included complex issues for auditors, and/or involved complex judgments in (1) estimating and auditing the reported value of related accounts and disclosures and (2) implementing and auditing the related controls.

2019		2016	
Audit area	**Audits reviewed**	**Audit area**	**Audits reviewed**
Cash and cash equivalents	3	**Income statement accounts**	3
Accruals and other liabilities	2	**Cash and cash equivalents**	2
Revenue and related accounts	2	**Equity and equity-related transactions**	2
Expenses	1	**Accruals and other liabilities**	1
Certain assets	1	**Certain assets**	1

Part I: Inspection Observations

Part I.A of our report discusses deficiencies, if any, that were of such significance that we believe the firm, at the time it issued its audit report(s), had not obtained sufficient appropriate audit evidence to support its opinion on the issuer's financial statements and/or ICFR. Part I.B discusses deficiencies, if any, that do not relate directly to the sufficiency or appropriateness of evidence the firm obtained to support its opinion(s) but nevertheless relate to instances of non-compliance with PCAOB standards or rules. Consistent with the Sarbanes-Oxley Act ("the Act"), it is the Board's assessment that nothing in Part I of this report deals with a criticism of or potential defect in the firm's quality control system. Any such criticisms or potential defects are discussed in Part II. Further, you should not infer from any Part I deficiency or combination of deficiencies that a quality control finding is identified in Part II. Section 104(g)(2) of the Act restricts us from publicly disclosing Part II deficiencies unless the firm does not address the criticisms or potential defects to the Board's satisfaction no later than 12 months after the issuance of this report.

Classification of Audits with Part I.A Deficiencies

Within Part I.A of this report, we classify each issuer audit in one of the categories discussed below based on the Part I.A deficiency or deficiencies identified in our review.

The sole purpose of this classification system is to group and present issuer audits by the number of Part I.A deficiencies we identified within the audit as well as to highlight audits with an incorrect opinion on the financial statements and/or ICFR.

Audits with an Incorrect Opinion on the Financial Statements and/or ICFR

This classification includes instances where a deficiency was identified in connection with our inspection and, as a result, an issuer's financial statements were determined to be materially misstated, and the issuer restated its financial statements. It also includes instances where a deficiency was identified in connection with our inspection and, as a result, an issuer's ICFR was determined to be ineffective, or there were additional material weaknesses that the firm did not identify, and the firm withdrew its opinion, or modified its report, on ICFR. This classification does not include instances where, unrelated to our review, an issuer restated its financial statements and/or an issuer's ICFR was determined to be ineffective. Any deficiencies identified in connection with our reviews of these audits would be included in the audits with multiple deficiencies or audits with a single deficiency classification below.

Audits with Multiple Deficiencies

This classification includes instances where multiple deficiencies were identified that related to a combination of one or more financial statement accounts, disclosures, and/or important controls in an ICFR audit.

Audits with a Single Deficiency

This classification includes instances where a single deficiency was identified that related to a financial statement account or disclosure or to an important control in an ICFR audit.

Part I.A: Audits with Unsupported Opinions

This section of our report discusses the deficiencies identified, by specific issuer audit reviewed, in the audit work supporting the firm's opinion on the issuer's financial statements.

We identify each issuer by a letter (e.g., Issuer A). Each deficiency could relate to several auditing standards, but we reference the PCAOB standard(s) that most directly relates to the requirement with which the firm did not comply.

Issuer audits are presented below within their respective deficiency classifications (as discussed previously). Within the classifications, we generally present the audits based on our assessment as to the relative significance of the identified deficiencies taking into account the significance of the financial statement accounts and/or disclosures affected, and/or the nature or extent of the deficiencies.

Audits with an Incorrect Opinion on the Financial Statements and/or ICFR

None

Audits with Multiple Deficiencies

None

Audits with a Single Deficiency

Issuer A

Type of audit and related area affected

In our review, we identified a deficiency in the financial statement audit related to a **Certain Asset**.

Description of the deficiency identified

The firm did not test the valuation of a certain asset, including whether the write off of that asset at year end was appropriate. (AS 2502.15)

Part I.B: Other Instances of Non-Compliance with PCAOB Standards or Rules

This section of our report discusses any deficiencies we identified that do not relate directly to the sufficiency or appropriateness of evidence the firm obtained to support its opinion(s) but nevertheless relate to instances of non-compliance with PCAOB standards or rules. When we review an audit, we do not review every aspect of the audit. As a result, the area below was not necessarily reviewed on every audit. In some cases, we assess the firm's compliance with specific PCAOB standards or rules on other audits that were not otherwise selected for review and may include instances of non-compliance below.

We identified the following deficiencies:

In one of three audits reviewed and in three other audits, the firm did not file its report on Form AP by the relevant deadline. In these instances, the firm was non-compliant with PCAOB Rule 3211, *Auditor Reporting of Certain Audit Participants*.

Part II: Observations Related To Quality Control

Part II of our report discusses criticisms of, and potential defects in, the firm's system of quality control.

Deficiencies are included in Part II if an analysis of the inspection results, including the results of the reviews of individual audits, indicates that the firm's system of quality control does not provide reasonable assurance that firm personnel will comply with applicable professional standards and requirements. Generally, the report's description of quality control criticisms is based on observations from our inspection procedures.

Any changes or improvements to its system of quality control that the firm may have brought to the Board's attention may not be reflected in this report, but are taken into account during the Board's assessment of whether the firm has satisfactorily addressed the quality control criticisms or defects no later than 12 months after the issuance of this report.

Criticisms of, and potential defects in, the firm's system of quality control, to the extent any are identified, are nonpublic when the reports are issued. If a firm does not address to the Board's satisfaction any criticism of, or potential defect in, the firm's system of quality control within 12 months after the issuance of our report, any such deficiency will be made public.

Appendix A: Firm's Response to the 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, excluding any portion granted confidential treatment, is attached hereto and made part of this final inspection report.

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. 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.

KCCW
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Registered with Public Company Accounting Oversight Board (PCAOB)

January 4, 2021

Via Electronic Mail

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Dear Mr. Botic,

We are writing to submit a respond and to demonstrate the effort made by KCCW (or the "Firm") to address the criticisms and potential defects pursuant to the Draft Inspection Report dated December 7, 2020 as issued by the PCAOB (or the "Inspection Report").

We have evaluated **Part 1.A: Audits with Unsupported Opinions of the Inspection Report**. PCAOB commented the following:

Issuer A
Deficiency identified by PCAOB in the financial statement audit related to a Certain Asset
The Firm did not test the valuation of a certain asset, including whether the write off of that asset at year end was appropriate.

Our Response
We performed remedial actions in regard to the valuation of the long-term investment by obtaining updated valuation reports prepared by an outside consulting firm (the "specialists") and performing the following procedures to test the valuation of investment:

(1) We considered the relevance of the valuation reports. We obtained valuation reports as of September 1, 2017. On December 24, 2018, the common shares of the investee were received by the issuer. Considering the relevance of the valuation reports using assumptions from over a year ago to support the valuation of the investment balance, we obtained updated reports as of December 31, 2018 prepared by the consulting firm.

(2) We obtained an understanding of and assessed the professional qualifications of the specialists. We also assessed the relationship to the issuer of the specialists. During our interview with the specialists at fieldwork, the specialists represented to us that they are independent from the issuer, and that they took responsibility on all assumptions made by them and the completeness and accuracy of the data used in the valuation. We also obtained such assertion in written statements Redacted pursuant to Section 104(f) and/or (g)(2) of the Sarbanes-Oxley Act.

(3) We obtained an understanding of the valuation method used by the specialists, evaluated the method.

(4) We obtained an understanding of the underlying assumptions and parameters used in the valuation model and performed substantive testing on those assumptions and parameters. We also verified the completeness and accuracy of the data used in the valuation model.

Based on our procedures performed, it appears that the valuation of investment was appropriate.

Redacted pursuant to Section 104(f) and/or (g)(2) of the Sarbanes-Oxley Act.

Subsequent to the recognition of the investment value, the issuer performed qualitative and quantitative analysis of the operating performance of the investee, considered the adverse changes in market conditions and the regulatory and economic environment and the changes in its operating structure, and assessed the investee's ability to remain in business and its additional funding requirements. Based on the aforementioned assessments, the issuer determined that there is an other-than-temporary impairment of such investment, and fully wrote off the investment balance at the balance sheet date.

We have evaluated **Part 1.B: Other Instances of Non-Compliance with PCAOB Standards or Rules.** PCAOB commented the following:

In one of three audits revised and in three other audits, the Firm did not file its report on Form AP by the relevant deadline. In these instances, the Firm was non-compliant with PCAOB Rule 3211, Auditor Reporting of Certain Audit Participants.

<u>Our Response</u>
We have thrived to maintain the quality of our firm's system quality control and we appreciate that the inspection team pointed out such issue for these issuers selected. We will take immediate actions and the following procedures:

(1) To ensure proper monitoring of the Form AP to be timely filed, we will utilize PPC Form: PCA-CX-16.5: Form AP Auditor Documentation Checklist (the "Checklist"). Engagement partners will fill out the Checklist when issuers' audit reports are issued. The engagement partner will file the Form AP by the relevant deadline.

(2) The concurring partner will confirm Form AP is timely filed by logging-in to PCAOB website and sign off on the Checklist by the relevant deadline.

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Redacted pursuant to Section 104(f) and/or (g)(2) of the Sarbanes-Oxley Act.

We highly appreciate the thorough process and rigorous standards applied by the inspection team as well as the comments provided to us. We remain dedicated to evaluating our system of quality control, monitoring of audit quality, and updating our quality control policies and procedures. We are mindful of our responsibility to the capital markets and are committed to continually improving our firm and working constructively with the PCAOB to improve audit quality.

Sincerely,

Edward Wu

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Managing Partner
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