

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 106633 / October 8, 2026

ACCOUNTING AND AUDITING ENFORCEMENT
Release No. 4605 / October 8, 2026

ADMINISTRATIVE PROCEEDING
File No. 3-18967

In the Matter of	:	ORDER GRANTING APPLICATION FOR
CARLOS LOPEZ, CPA	:	REINSTATEMENT TO APPEAR AND PRACTICE
	:	BEFORE THE COMMISSION AS AN
	:	ACCOUNTANT RESPONSIBLE FOR THE
	:	PREPARATION OR REVIEW OF FINANCIAL
	:	STATEMENTS REQUIRED TO BE FILED WITH
	:	THE COMMISSION OTHER THAN AS A MEMBER
	:	OF AN AUDIT COMMITTEE

On February 6, 2020, the Commission issued a settled Order Making Findings and Imposing Remedial Sanctions Pursuant to Section 4C of the Securities Exchange Act of 1934 and Rule 102(e) of the Commission's Rules of Practice against Respondent Carlos Lopez.¹ The Suspension Order denied Lopez the privilege of appearing or practicing before the Commission as an accountant but permitted him, after two years from the date of the Suspension Order and if certain conditions were met, to request that the Commission consider his reinstatement to resume appearing or practicing before the Commission as (1) a preparer or reviewer, or a person responsible for the preparation or review, of financial statements that are required to be filed with the Commission other than as a member of an audit committee, as that term is defined in Section 3(a)(58) of the Exchange Act; (2) a preparer or reviewer, or a person responsible for the preparation or review, of financial statements that are required to be filed with the Commission as a member of an audit committee, as that term is defined in Section 3(a)(58) of the Exchange Act; or (3) an independent accountant.

This order is issued in response to Lopez's application for reinstatement to appear and practice before the Commission as an accountant responsible for the preparation or review of financial statements required to be filed with the Commission, other than as a member of an audit committee.

¹ *In the Matter of LBB & Associates Ltd., LLP and Carlos Lopez, CPA*, Exchange Act Release No. 88140 (Feb. 6, 2020).

In the Suspension Order, the Commission found that Lopez engaged in improper professional conduct with respect to LBB and Associates Ltd., LLP's 2012, 2013, and 2014 audits of Behavioral Recognition Systems, Inc. Specifically, when serving as the engagement partner during the 2012 audit, Lopez failed to comply with PCAOB standards regarding (i) the identification of related party transactions or (ii) the audit procedures required when examining known related party transactions. In addition, when serving as the engagement quality reviewer ("EQR") on the 2013 and 2014 audits, Lopez failed to comply with PCAOB standards which prohibit an individual who served as the engagement partner on either of the two preceding audits from serving as the EQR.

Rule 102(e)(5) of the Commission's Rules of Practice governs applications for reinstatement and provides that the Commission may reinstate the privilege to appear and practice before the Commission "for good cause shown,"² which determination is necessarily highly fact specific.

Lopez has shown good cause for reinstatement and has met the conditions set forth in the Suspension Order to be reinstated to appear and practice before the Commission as a person responsible for the preparation or review of financial statements required to be filed with the Commission, other than as a member of an audit committee. In his capacity as a person responsible for the preparation or review of financial statements required to be filed with the Commission, other than as a member of an audit committee, Lopez attests that he will have his work reviewed by the independent audit committee of any company for which he works, or in some other manner acceptable to the Commission, while practicing before the Commission in this capacity.

Lopez is not, at this time, seeking to appear or practice before the Commission as a person responsible for the preparation or review of financial statements required to be filed with the Commission *as a member of an audit committee* or as an independent accountant. If, in the future, Lopez should wish to resume appearing and practicing before the Commission in such a capacity, he will be required to submit an application to the Commission showing, among other things, that he has complied and will comply with the terms of the Suspension Order.

On the basis of information supplied, representations made, and undertakings agreed to by Lopez, and for the reasons stated immediately above, it appears that he has complied with the terms of the Suspension Order denying him the privilege of appearing or practicing before the Commission as an accountant. No information has come to the attention of the Commission relating to his character, integrity, professional conduct, or qualifications to practice before the Commission that would be a basis for adverse action against him pursuant to Rule 102(e) of the Commission's Rules of Practice. As a result, Lopez has shown good cause for reinstatement. Therefore, it is accordingly,

² Rule 102(e)(5)(i) provides:

"[a]n application for reinstatement of a person permanently suspended or disqualified under paragraph (e)(1) or (e)(3) of this rule may be made at any time, and the applicant may, in the Commission's discretion, be afforded a hearing; however, the suspension or disqualification shall continue unless and until the applicant has been reinstated by the Commission for good cause shown." 17 C.F.R. § 201.102(e)(5)(i).

ORDERED pursuant to Rule 102(e)(5)(i) of the Commission's Rules of Practice that Carlos Lopez, CPA is hereby reinstated to appear and practice before the Commission as an accountant responsible for the preparation or review of financial statements required to be filed with the Commission, other than as a member of an audit committee.

By the Commission.

Vanessa A. Countryman
Secretary