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PROCEEDINGS BEFORE THE
WASHINGTON STATE BOARD OF ACCOUNTANCY

In the Matter of the Certified Public
Accountant (CPA) Certificate and/or
Licenses to Practice Public Accounting of:

Rahuldev Gandhi, CPA
License No. 27804

Respondent.

No. ACB-1482

CONSENT AGREEMENT

The Washington State Board of Accountancy (Board) and Rahuldev Gandhi
(Respondent), stipulate and agree as follows:

Section 1: Procedural Stipulations

- 1.1 Respondent understands that the Board may issue a statement of charges in this matter and proceed to a hearing before the Board upon the merits of said charges. The Board has not done so in order to facilitate resolution of this matter in accordance with the legislative intent endorsed in RCW 34.05.060 and the provisions of WAC 4-30-140.
- 1.2 Respondent understands that should the Board prevail at hearing based on a statement of charges that the Board has the power and authority to deny, suspend, revoke, or refuse to renew the Respondent's CPA certificate or any individual or firm licenses to practice public accounting as a CPA or CPA firm in Washington and may impose a fine plus the Board's investigative and legal costs in bringing charges or impose conditions precedent to renewal of the certificate or license, or impose full restitution to injured parties.

- 1.3 Respondent has the right to defend against a statement of charges by demanding a hearing and presenting evidence on the Respondent's behalf. Respondent voluntarily waives the right to a hearing and all other rights that may be accorded the Respondent by the Administrative Procedures Act, chapter 34.05 RCW, and the laws of Washington, including the right to petition the courts for judicial review.
- 1.4 Respondent wishes to expedite the resolution of this matter by means of this Consent Agreement and does not desire to proceed to a formal hearing based on the issuance of a statement of charges.
- 1.5 Respondent understands that the terms of this Consent Agreement are not binding unless approved by the Board and fully executed.
- 1.6 Should this Consent Agreement be rejected by the Board and the Board proceeds to issue a statement of charges, the Respondent waives any objection to the participation of any members of the Board at a hearing on this matter, other than the consulting Board member in this proceeding.

The parties further stipulate to the following Stipulated Facts, Conclusions of Law, and Agreed Order:

Section 2: Stipulated Facts

- 2.1 Respondent holds a valid Certified Public Accountant (CPA) license to practice public accounting (License No. 27804, issued on 7/23/2009) in Washington State.

- 2.2 On December 4, 2017, the Securities and Exchange Commission (SEC) issued “Order Instituting Public Administrative and Cease-and-Desist Proceedings Pursuant to Sections 4C and 21C of the Securities Exchange Act of 1934 and Rule 102 (c) of the Commission’s Rules of Practice, Making Findings, and Imposing Remedial Sanctions and Cease-and-Desist Order.”
- 2.3 As a result of the Order, the Respondent was denied the privilege of appearing or practicing before the SEC as an accountant. After three years, Respondent may request that the SEC consider his reinstatement.

Section 3: Conclusions of Law

- 3.1 The Board has jurisdiction over the Respondent and the subject matter of this proceeding.
- 3.2 The conduct described in Stipulated Facts 2.1 through 2.3 constitute cause for Board discipline under RCW 18.04.215 and RCW 18.04.295, for violation of WAC 4-30-142.

Section 4: Agreed Order

- 4.1 Respondent consents to the entry of this Agreement and has waived any right to a hearing.
- 4.2 Pursuant to RCW 18.04.295, the Board has the power to impose discipline. Based on the preceding Stipulated Facts and Conclusions of Law, the Board and Respondent agree that:
- 4.2.1 The Respondent’s individual CPA license is suspended for three (3) years which shall be stayed.
- 4.2.2 The stay shall be vacated and the original suspension imposed if the respondent fails to comply with the following terms:

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4.2.2.1 Pay the Board a fine in the amount of five thousand dollars (\$5000) within 90 days of the service of this Agreement. Such fine shall be made payable to the Washington State Board of Accountancy and remitted to the Washington State Board of Accountancy at PO Box 41465, Olympia, WA 98504.

4.2.2.2 Pay the Board the amount of two hundred fifty dollars (\$250) to reimburse the Board's investigative and legal costs within 90 days of the service of this Agreement. Such reimbursement shall be made payable to the Washington State Board of Accountancy and remitted to the Washington State Board of Accountancy at PO Box 41465, Olympia, WA 98504.

4.2.3 Complete 20 hours of CPE within 90 days of the service of this Agreement, and certificates submitted to the Board within 30 days following the due date. The prescribed CPE is to include:

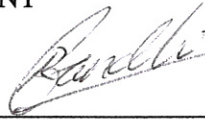
4.2.3.1 Completion of the 8-hour AICPA ethics course covering the Code of Professional Conduct.

4.2.3.2 Completion of 12 hours of CPE in PCAOB and SEC standards as they apply to audits of public companies.

I, Rahuldev Gandhi, certify that I have read this Consent Agreement in its entirety, and that I fully understand and agree to all of it and that it may be presented to the Board without my appearance. If the Board accepts the Consent Agreement, I understand that I will receive a signed copy.

DATED this 26th day of June, 2018.

RESPONDENT



Rahuldev Gandhi
CPA

The Board accepts and enters this Consent Agreement.

DATED this 19th day of July, 2018.

WASHINGTON STATE
BOARD OF ACCOUNTANCY



Karen R. Saunders, CPA
Chair