

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 94099 / January 28, 2022

ACCOUNTING AND AUDITING ENFORCEMENT
Release No. 4279 / January 28, 2022

ADMINISTRATIVE PROCEEDING
File No. 3-18769

	ORDER GRANTING APPLICATION FOR
In the Matter of	: REINSTATEMENT TO APPEAR AND PRACTICE
Jennifer F. Wolf, CPA	: 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 April 1, 2019, the Commission issued an Order Imposing Remedial Sanctions Pursuant to Rule 102(e) of the Commission’s Rules of Practice (the “Suspension Order”) as to Respondent Jennifer F. Wolf, CPA (“Wolf”).¹ The Suspension Order suspended Wolf from appearing or practicing before the Commission as an accountant but permitted Wolf, after one year from the date of the Suspension Order and if certain conditions were met, to request that the Commission consider her 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 any public company’s financial statements that are 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 Securities Exchange Act of 1934 (“Exchange Act”); (2) a preparer or reviewer, or a person responsible for the preparation or review, of any public company’s financial statements that are 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 Wolf’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, as that term is defined in Section 3(a)(58) of the Exchange Act.

¹ See Accounting and Auditing Enforcement Release No. 4034 dated April 1, 2019.

The Commission found that Wolf had been permanently enjoined by the United States District Court for the Northern District of California from future violations of Section 17(a)(3) of the Securities Act of 1933 and Rule 13b2-1 under the Exchange Act. In its complaint filed in that District Court action, the Commission alleged, among other things, that Wolf, while serving as the Acting Controller of Logitech International, S.A (“Logitech”), engaged in conduct that resulted in Logitech’s filing a false and misleading Form 10-K for the fiscal year ended March 31, 2011. The Form 10-K was misleading due to Logitech’s failure to record an inventory reserve for its Revue product.

Wolf has met all of 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 of a public company to be filed with the Commission, other than as a member of an audit committee, and in this capacity has attested that she will undertake to have her work reviewed by the independent audit committee of any company for which she works, or in some other manner acceptable to the Commission, while practicing before the Commission in this capacity. Wolf is not, at this time, seeking to appear or practice before the Commission as a preparer or reviewer, or a person responsible for the preparation or review, of any public company’s financial statements that are filed with the Commission *as a member of an audit committee* or as an independent accountant. If, in the future, she should wish to resume appearing and practicing in such a capacity, she will be required to submit an application to the Commission showing, among other things, that she has complied and will comply with the terms of the Suspension Order.

Wolf is currently subject to probation under the California State Board of Accountancy. Failure to abide by the terms of her probation could result in the suspension of Wolf’s CPA license. Wolf has attested that she will notify the Commission if she is found to have violated the terms of the probation. She also has attested that she understands that the suspension of her CPA license could result in the revocation of the reinstatement of her privilege to appear or practice before the Commission as an accountant.

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 This “good cause” determination is necessarily highly fact specific.

On the basis of information supplied, representations made, and undertakings agreed to by Wolf it appears that she has complied with the terms of the Suspension Order suspending her from appearing or practicing before the Commission as an accountant. No information has come to the attention of the Commission relating to her character, integrity, professional conduct, or qualifications to practice before the Commission that would be a basis for adverse action against

² Rule 102(e)(5)(i) provides:

“An 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).

her pursuant to Rule 102(e) of the Commission's Rules of Practice. In addition, Wolf has undertaken to have her work reviewed by the independent audit committee of any company for which she works, or in some other manner acceptable to the Commission. As a result, Wolf has shown good cause for reinstatement. Therefore, it is accordingly,

ORDERED pursuant to Rule 102(e)(5)(i) of the Commission's Rules of Practice that Jennifer F. Wolf, 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 as that term is defined in Section 3(a)(58) of the Securities and Exchange Act of 1934.

By the Commission.

Vanessa A. Countryman
Secretary