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Accounting Firm Advisory and Defense Practice Group

December 2025

Accounting Firm Quarterly Update

Q3 2025

Our Clients and Friends –

We are pleased to provide you with Gibson Dunn's Accounting Firm Quarterly Update for Q3 2025. The Update is available in .pdf format at the below link, and addresses news on the following topics that we hope are of interest to you:

- SEC Returns to Simultaneous Consideration of Settlement and Waiver Requests
- Ninth Circuit Rejects Challenge to SEC No-Admit/No-Deny Rule
- Accounting Firm Settles Lawsuit Challenging Constitutionality of PCAOB
- Ninth Circuit Holds Companies May Be Required to Disclose Interim Financial Results
- SEC Allows Companies to IPO with Mandatory Arbitration Provisions
- SEC Allows Retail Voters to Give Standing Proxy Instructions

- Sixth Circuit Confirms Privilege Standard for Internal Investigations
- SEC Announces Cross-Border Fraud Task Force
- UK Entities Update Guidance on Failure to Prevent Fraud
- DOJ Reaches Settlement in Two FCA Cybersecurity Cases
- FTC Changes Strategy on Non-Compete Agreements

Please let us know if there are topics that you would be interested in seeing covered in future editions of the Update.

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Warmest regards,
Jim Farrell
Michael Scanlon

Chairs, [Accounting Firm Advisory and Defense Practice Group](#), Gibson, Dunn & Crutcher LLP

In addition to the practice group chairs, this update was prepared by David Ware, Monica Limeng Woolley, Bryan Clegg, Hayden McGovern, Ty Shockley, Garrick R. Donnelly, and Jimmy Scoville.

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