

# Missing Form APs?

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In May of 2024, I [posted on LinkedIn](#) a brief note about working with data from Form APs filed with the PCAOB. In a comment on my LinkedIn posting, [Olga Usvyatsky](#) suggested that “the variation is not limited to firms’ names - for instance, I find errors in reporting CIK codes of the clients intriguing.” I thought it would be interesting to investigate the issue raised by Olga, but doing so would be greatly facilitated by an alternative source for data on auditor-client relationships.

Recently, I discovered that it is relatively straightforward to process XBRL data filed using SEC EDGAR using data sets prepared by the SEC and posted on its website. There are two data sets: the *Financial Statements* and *Financial Statement and Notes* data sets, with the latter being roughly ten times as large as the former. For the task we consider here, we need to use the *Financial Statement and Notes* data set.<sup>1</sup>

In essence, I compare the auditors listed in firms’ 10-K filings with data on Form APs, with a focus on my success rate in matching the two. In Table 5, we can see that the auditor with the greatest number of non-matches is B F Borgers CPA PC, an auditor featured in a tongue-in-cheek *Financial Times* [article by George Steer](#) that showed that the auditor Ben Borgers had used 14 different names—including the name “Ben F orgers”—on Form AP filings.<sup>2</sup> While more research would be needed to investigate the reasons for “missing” data, having Borgers emerge as the “winner” yet again suggests that missing Form AP filings might be another red flag worth pursuing.

This note was written using [Quarto](#) and compiled with [RStudio](#), an integrated development environment (IDE) for working with R. The source code for this note is available [here](#) and the latest version of this PDF is [here](#).

## 1 XBRL tags

A key concept in XBRL is the **tag**. Each value will be associated with, *inter alia*, a tag that indicates what the value represents. For example, a value might be tagged as `AssetsCurrent` to indicate that the value represents the total of current assets.<sup>3</sup>

To understand tags related to auditors, I begin by examining the tags that begin with the text `Auditor`. From Table 1, it can be seen that there are three such tags in common use: `AuditorName`, `AuditorLocation`, and `AuditorFirmId`.<sup>4</sup>

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<sup>1</sup>Run `source("https://raw.githubusercontent.com/iangow/notes/refs/heads/main/get_dera_notes.R")` to get these data.

<sup>2</sup>The analysis of the Form AP data in the FT article had been conducted by independent researcher [Stephen Walker](#) and I showed how to reproduce Stephen’s analysis in [an earlier note](#).

<sup>3</sup>The *inter alia* refers to other things use to narrow down what the value relates to, such as the filing (`adsh`, also known as the **accession number**), the period (`ddate`), and the applicable XBRL version (`version`).

<sup>4</sup>In Table 1, we do see `AuditorFirmId1` and `AuditorFirmId2`, but given how rare these tags are, we can ignore these for present purposes.

From Table 1, it appears that not every filing with non-missing AuditorName has non-missing AuditorFirmId. Table 2 provides more data on the distribution of missing values for these two fields, where has\_name and has\_id indicate non-missing values of AuditorName and AuditorFirmId, respectively.

Table 3 provides some information on some cases where AuditorName is present, but AuditorFirmId is not. While there's no clear pattern to these data, they do suggest that firms are not always diligent in including AuditorFirmId in XBRL filings.

From Table 4, it can be seen that most filings containing information in AuditorFirmId are on variants of Form 10-K. So I focus on Form 10-K filings (and variants) in the analysis in this note.<sup>5</sup>

From the Form APs, I collect data on audit firm IDs, the CIKs of issuers and fiscal period-end dates.

I then merge data from these 10-K filings with data on Form APs using **accession numbers** and period-end dates. Table 5 shows that roughly 1-2% of filings on Form 10-Ks involving Big Four auditors (firm\_id values of 34, 42, 238, and 185), Grant Thornton (248) or BDO (243) appear not to have corresponding matches in the Form APs data.

While there might be a perfectly innocent explanation, it might be worth digging deeper to understand why (say) Gries & Associates, Yusufali & Associates, and Heaton & Company have such high rates of unmatched filings.

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<sup>5</sup>Specifically, I consider 10-K, 10-K/A, 10-KT, and 10-KT/A filings.

Table 1: Tags beginning with Auditor on txt

tag	n
AuditorName	45,525
AuditorLocation	45,237
AuditorFirmId	45,130
AuditorOpinionTextBlock	2,345
AuditorsRemunerationTableTextBlock	25
AuditorsRemunerationTextBlock	16
AuditorsRemunerationScheduleTableTextBlock	10
AuditorRemunerationTableTextBlock	10
AuditorSRemunerationTableTextBlock	7
AuditorsRemunerationDisclosureTextBlock	6
AuditorReplacementProcessPolicyTextBlock	6
AuditorInformationTextBlock	4
AuditorNetIncome	3
AuditorAttestationFlag	2
AuditorLocation2	2
AuditorFirmId1	2
AuditorLocation1	2
AuditorFirmId2	2
AuditorName2	2
AuditorName1	2

Table 2: Distribution of missingness of AuditorName and AuditorFirmId

has_name	has_id	n
FALSE	TRUE	22
TRUE	FALSE	74
TRUE	TRUE	35,117

Table 3: Sample of auditor names with missing IDs

AuditorName	n
PricewaterhouseCoopers LLP	7
Ernst & Young LLP	4
Pinnacle Accountancy Group of Utah	4
Gries & Associates, LLC	3
KPMG LLP	3

Table 4: Forms with information on AuditorFirmId

form	n
10-K	31,636
20-F	4,926
10-K/A	3,198
40-F	763
20-F/A	533
10-KT	72
40-F/A	54
10-KT/A	9
6-K	8
10-Q	5
8-K	2
6-K/A	1

Table 5: Number of cases without Form AP filings by auditor

firm_id	firm_name	unmatched	total	% unmatched
34	Deloitte & Touche LLP	1,526	5,358	28.48
42	Ernst & Young LLP	1,445	6,034	23.95
238	PricewaterhouseCoopers LLP	1,261	4,653	27.10
185	KPMG LLP	1,062	4,175	25.44
248	Grant Thornton LLP	426	1,599	26.64
688	Marcum LLP	247	1,929	12.80
243	BDO USA, P.C.	233	1,175	19.83
49	RSM US LLP	155	783	19.80
100	WithumSmith+Brown, PC	152	919	16.54
173	Crowe LLP	142	604	23.51
2738	M&K CPAS, PLLC	109	393	27.74
686	Forvis Mazars, LLP	108	438	24.66
5525	Fruci & Associates II, PLLC	99	278	35.61
23	Baker Tilly US, LLP	91	351	25.93
5041	B F Borgers CPA PC	88	571	15.41
659	Moss Adams LLP	78	424	18.40
206	MaloneBailey, LLP	70	347	20.17
274	EisnerAmper LLP	63	253	24.90
587	RBSM LLP	61	192	31.77
6993	Boladale Lawal & Co ( Chartered Accountants)	52	65	80.00

## **Bibliography**