

purpose of these proceedings and any other proceedings brought by or on behalf of the Commission, or to which the Commission is a party, and without admitting or denying the findings herein, except as to the Commission's jurisdiction over her and the subject matter of these proceedings, and the findings contained in Section III.3 below, which are admitted, Respondent consents to the entry of this Order Instituting Administrative Proceedings Pursuant to Rule 102(e) of the Commission's Rules of Practice, Making Findings, and Imposing Remedial Sanctions ("Order"), as set forth below.

III.

On the basis of this Order and Respondent's Offer, the Commission finds that:

1. Symmetry Medical, Inc. ("Symmetry"), is a Delaware corporation headquartered in Warsaw, Indiana. A manufacturer of medical implants and instruments as well as aerospace industry products, Symmetry's subsidiaries include Symmetry Medical Sheffield LTD, f/k/a Thornton Precision Components, Limited ("TPC"). Since 2003, TPC's financial data has been consolidated into Symmetry's financial statements filed with the Commission. Since December 2004, Symmetry's common stock has been registered with the Commission pursuant to Section 12(b) of the Exchange act and listed on the New York Stock Exchange.

2. Norman, age 50 and a citizen of the United Kingdom, was employed as TPC's controller from approximately 1989 to 2008. Norman holds a B.A. in business studies from Sheffield University, but is not a UK Chartered Accountant and holds no other accounting licenses or certifications. She was allowed to resign by Symmetry after disclosing her role in TPC's accounting irregularities and assisting the company with its restatement of prior year financials.

3. On February 1, 2012, a final judgment was entered by consent against Norman, permanently enjoining her from future violations of Sections 10(b) and 13(b)(5) of the Securities Exchange Act of 1934 ("Exchange Act") and Rules 10b-5, 13b2-1 and 13b2-2 thereunder, and from aiding and abetting violations of Sections 13(a), 13(b)(2)(A) and 13(b)(2)(B) of the Exchange Act and Rules 12b-20, 13a-1 and 13a-13, in the civil action styled, Securities and Exchange Commission v. Lynne Norman, et al. ("SEC v. Norman") (Civil Action No. 3:12cv60), in the United States District Court for the Northern District of Indiana.

4. The Commission's complaint in SEC v. Norman alleged, among other things, that as the controller of TPC, Norman bore responsibility for ensuring the accuracy of TPC's financial accounts on a monthly and quarterly basis and assisting TPC's Finance Director in reporting TPC's financial accounts to Symmetry for inclusion in Symmetry's consolidated financial statements; that, between at least 2003 and September 2007, Norman knowingly participated in TPC's manipulation of its financial accounts; that these manipulations included pre-booking sales revenues, booking fictitious sales revenues, engaging in sales-buyback arrangements, understating cost of revenues and creating fictitious work-in-process inventories, and overstating amounts for capitalized tool and die; that Norman knew (i) that the foregoing manipulations did not conform to US Generally Accepted Accounting Principles, (i) that the foregoing manipulations materially impacted TPC's financial statements, (iii) that TPC's

financial statements were consolidated into Symmetry's financial statements and (iv) that Symmetry was a US publicly traded company; that Norman made serial misrepresentations to Symmetry's internal and external auditors concerning the foregoing manipulations; and that, notwithstanding all of the foregoing, Norman falsely attested in writing to the accuracy of TPC's financial statements in 2007 after the departure of TPC's Financial Director.

IV.

In view of the foregoing, the Commission deems it appropriate and in the public interest to impose the sanction agreed to in Respondent Norman's Offer.

Accordingly, it is hereby ORDERED, effective immediately, that Norman is suspended from appearing or practicing before the Commission as an accountant.

By the Commission.

Elizabeth M. Murphy
Secretary