

2014 Fraud Update:

It Isn't Who You Think It Is... and It Isn't What You Think They're Doing

**Presented for the
Texas Association of County Auditors
“On The Road Area Training”
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Why Does Fraud Happen... So Much



Why Does Fraud Happen... So Much

Evil has not taken over our society...

FINANCIAL PRESSURE HAS!!!



FRAUD DISCOVERIES

An employee responsible for planning and reserving meeting rooms at local hotels for company meetings was able to embezzle more than \$190,000 from her company by utilizing the following method:

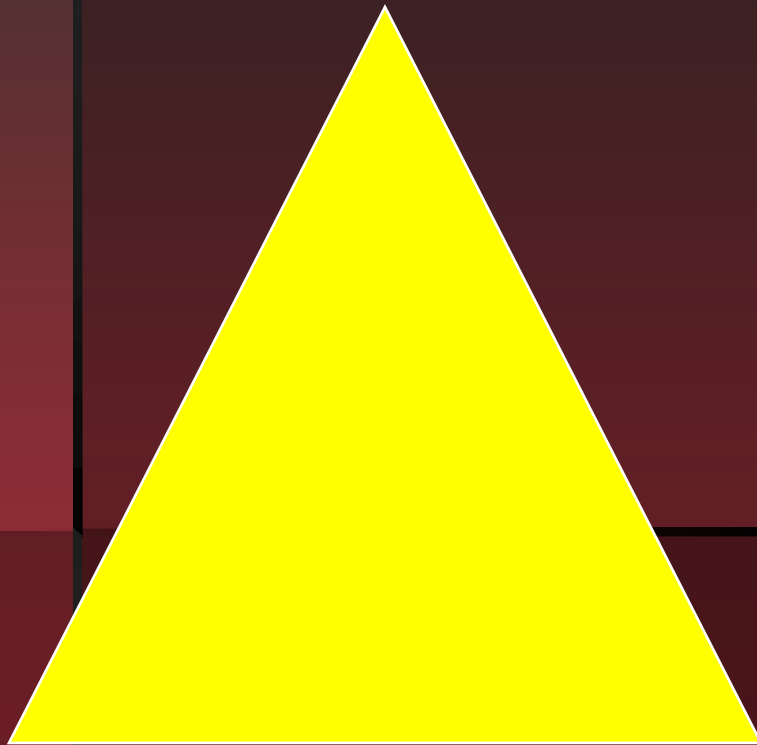
She would obtain a price quote (i.e. \$8,000) from a local hotel for an upcoming meeting claiming an anticipated attendance of approximately 200 people. The employee would then submit the faxed quote with her expense report, claiming that she had charged the \$8,000 on her personal credit card, and be reimbursed the cost. After the actual meeting took place, with only 100 participants, the actual, much lower bill (i.e. \$4,500) would arrive. She would then pay the bill with her personal credit card. The net personal profit from this one transaction amounted to \$3,500.

FRAUD DISCOVERIES

An employee embezzled funds from her company by increasing the tip amount on the customer's copy of restaurant credit card receipts by approximately \$2 to \$3 per meal. The actual restaurant copy of the receipt represented the actual lesser amount charged to the credit card. The employee would then attach the customer copy of the receipt to her expense report for reimbursement of charges to her personal credit card. The employee was caught when we noticed a \$4 tip written on a receipt for an \$8 purchase... for a book at a local book store.

THE FRAUD TRIANGLE

JOSEPH T. WELLS; *OCCUPATIONAL FRAUD AND ABUSE*; (OBSIDIAN PUBLISHING CO. - 1997); PG. 11



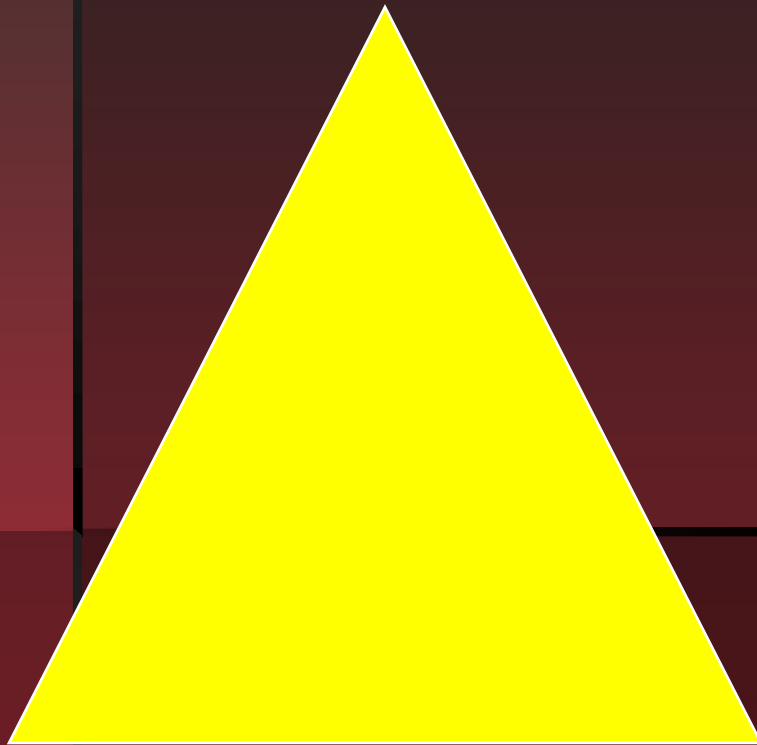
- Perceived Non-shareable Financial Need (Incentive/Pressure)
- Rationalization / Attitude
- Opportunity

Incentive / Pressure

- **A gambling or drug habit**
- **Personal debt or poor credit**
- **A significant financial loss or need**
- **Peer or family pressure to succeed**

THE FRAUD TRIANGLE

JOSEPH T. WELLS; *OCCUPATIONAL FRAUD AND ABUSE*; (OBSIDIAN PUBLISHING CO. - 1997); PG. 11



- Rationalization

Rationalization:

“I’m not a bad person... really!”

“I was just borrowing the money... I was going to pay it back”

“The company won’t even realize its gone; its not that much”

“I’ve been here 20 years; the company owes me”

“I deserve this after the way I’ve been treated”

“My boss does it all the time”

THE FRAUD TRIANGLE

JOSEPH T. WELLS; *OCCUPATIONAL FRAUD AND ABUSE*; (OBSIDIAN PUBLISHING CO. - 1997); PG. 11

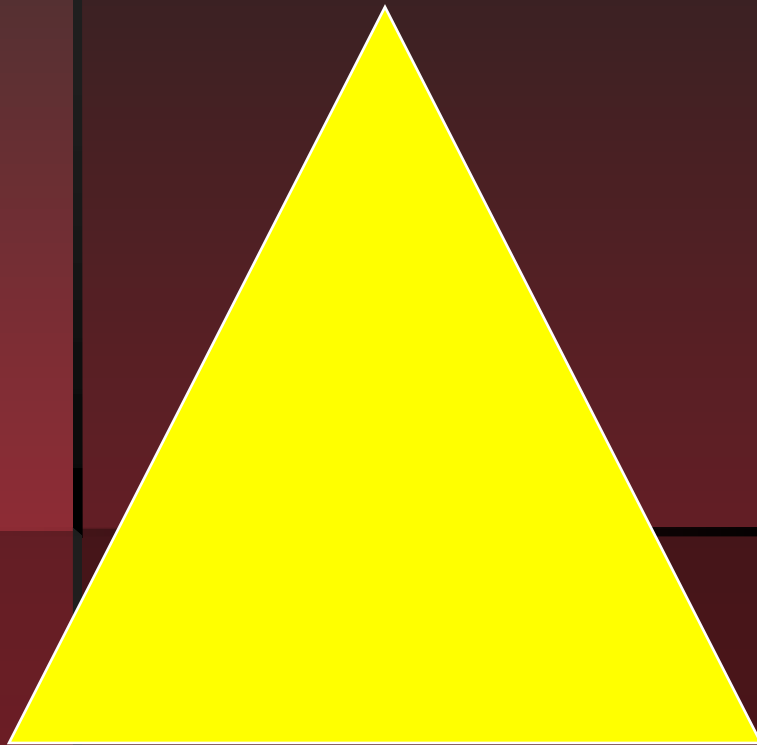
- 
- Opportunity

Opportunity

- **Poor Internal Controls**
- **Lack of Supervision**
- **Poor Accounting Records**
- **Extreme Trust in a Single Individual**
- **Lack of Disciplinary Action for Previous Frauds**

THE FRAUD TRIANGLE

JOSEPH T. WELLS; *OCCUPATIONAL FRAUD AND ABUSE*; (OBSIDIAN PUBLISHING CO. - 1997); PG. 11



- Perceived Non-shareable Financial Need (Incentive/Pressure)
- Rationalization
- Opportunity

Types of Fraud

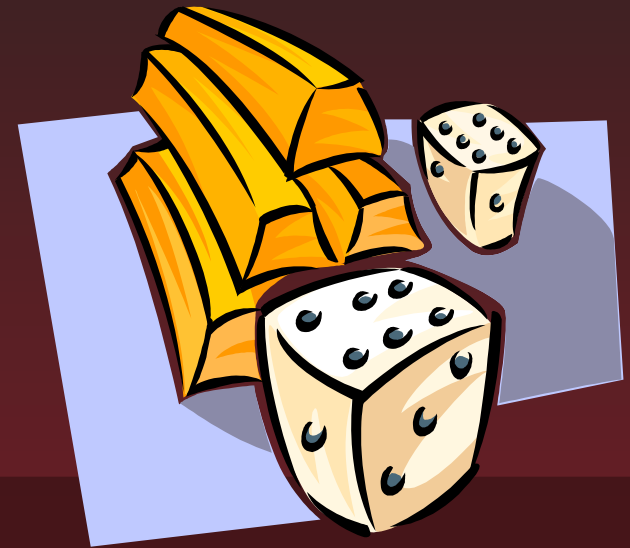
“Fraud and Stupid Look Exactly Alike”

Intent turns Stupid into Fraud

Misappropriation

Taking of company assets...

“I’ll just borrow this for a little while”



Corruption

“You scratch my back, I’ll scratch yours?”



BRIBERY – To Influence

KICKBACKS

BID-RIGGING

**ILLEGAL GRATUITIES –
For or Because of**

Fraudulent Statements

“Let’s make this number this and that number that... it will look better”



REPORT TO THE NATIONS

ON OCCUPATIONAL FRAUD AND ABUSE

2014 GLOBAL FRAUD STUDY



Together. Reducing
Fraud Worldwide

How Occupational Fraud is Committed

Occupational Frauds by Category — Frequency

Asset Misappropriation: 85.4%

Corruption: 36.8%

Financial Statement Fraud: 9.0%

Detection of Fraud Schemes

Initial Detection of Occupational Frauds

Tip	42.7%
Management Review	16.0%
Internal Audit	14.1%
By Accident	6.8%
Account Reconciliation	6.6%
Document Examination	4.2%
External Audit	3.0%

Victim Organizations

Frequency of Anti-Fraud Controls

External Audit	81.4%
Code of Conduct	77.4%
Internal Audit Dept.	70.6%
Management Cert. of F/S	70.0%
Hotline	54.1%
Fraud Policy	45.4%
Job Rotation / Mandatory Vacation	19.9%
Whistleblower Rewards	10.5%

Perpetrators

Behavioral Red Flags

Living Beyond Means	43.8%
Financial Difficulties	33.0%

The Mind... A Powerful Enemy: **Behavioral Analysis**



- Behaviorist Principles
- Fraud prevention relies on a thorough analysis of behavior
- Money exerts a powerful influence

Behavioral Analysis

Employment (the workplace) is a System of Behavior:

- **For both the crook and the dedicated worker, money exerts a powerful influence**
- **So we must establish a positive set of relations between employees and funds flowing through the company**

Behavioral Analysis

Punishment is the least effective method of changing behavior:

- **A temporary suppression of the behavior, but only with constant supervision and application**
- **Applying a negative stimulus or taking away a positive one only altered behavior while being applied**

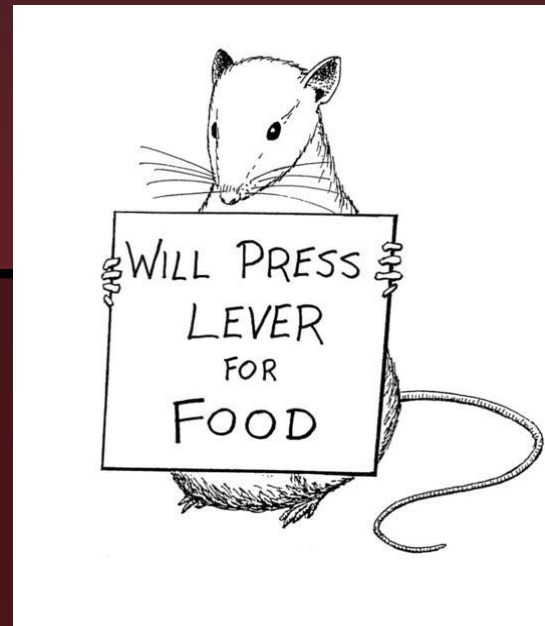
Behavioral Analysis

Reinforcement and Punishment are Distinguished by the way Positive and Negative Forces are Applied

Behavioral Analysis

Positive Reinforcement:

“You’ve cleaned your room... good... here’s the keys to the car”.



Behavioral Analysis

Negative Reinforcement:

“I’ll stop hassling you if you clean this room”

Withdrawing a Positive Reinforcement:

“Your room is still filthy, so you can’t use the car”.

Behavioral Analysis

Punishment Fights a Losing Battle:

The use of the car doesn't become less attractive... its power to stimulate is simply squelched

Behavioral Analysis

Behavior is most effectively modified by managing and modifying desires through reinforcement

Behavioral Analysis

Adequate compensation and recognition of accomplishments are great reinforcements

- ***Incentive programs***
- ***Task-related Bonuses***

Behavioral Analysis

Behaviorism is an alternative to punishment in that it points to an alternative... *modifying the circumstances* surrounding the act

Employee Experiencing Financial Problems

- Credit counseling
- Pay advances
- Low interest loans

Behavioral Analysis

Behaviorism is an alternative to punishment in that it points to an alternative... *modifying the circumstances* surrounding the act

Driving the Undesirable Behavior Into Extinction (Internal Controls)

- **Dual Signatures**
- **Perception of Controls in Place**

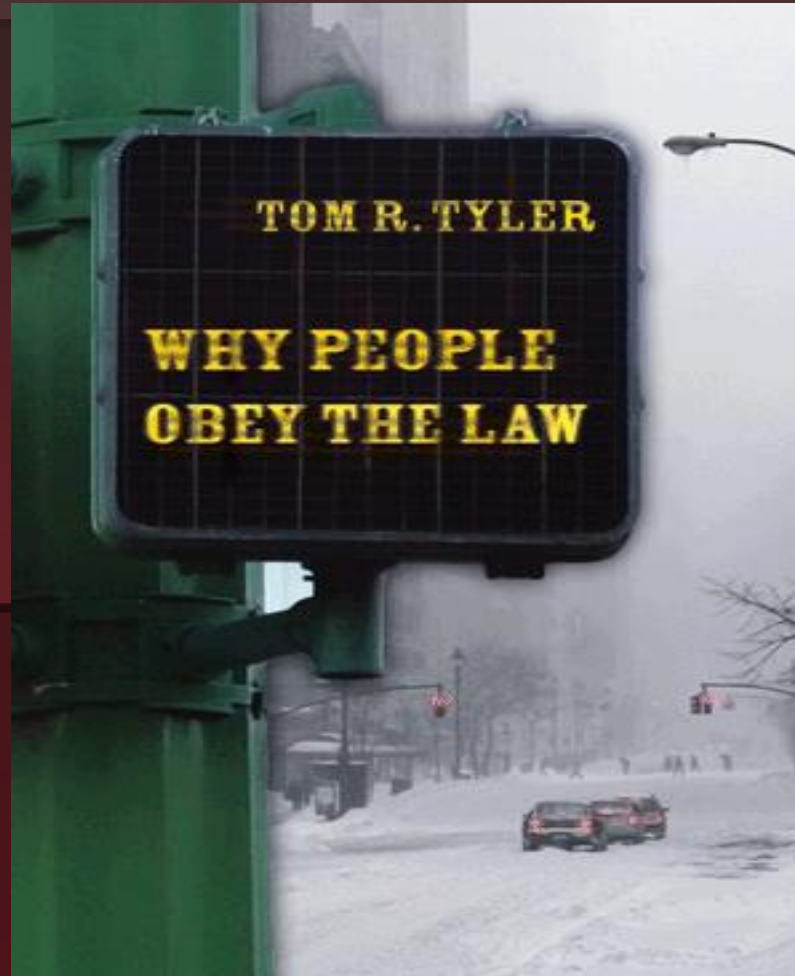
Behavioral Analysis

Behaviorism is an alternative to punishment in that it points to an alternative... *modifying the circumstances* surrounding the act

Encourage a Behavior's OPPOSITE Response

- Fraud involves dishonesty, secretiveness, and antagonism
- Find a way to reward honesty, openness, and cooperation

Why People Obey the Law



Why People Obey the Law

- **Instrumental Perspective:**

Because they fear punishment

**Weigh the pros and cons of compliance
and then act accordingly**

Why People Obey the Law

- **Normative Perspective:**

What a person believes is just and moral

Stealing is immoral, drug use is ok

Why People Obey the Law

- **Legitimacy:**

Leadership should produce compliance with a leader's decision

Crime Causation

CRIME

Crime Causation

Classical Criminology

- **We do things in order to avoid pain and produce pleasure**

We have free will

Criminals measure whether the gains are greater than the losses

Crime Causation

Routine Activities Theory

- **The motivation to commit crime and the supply of offenders is constant**

Availability of suitable targets (companies)

**The absence of capable guardians
(auditors/security)**

**Motivated offenders (unhappy or financially
challenged employees)**

An Environment of Behavioral Modification



Management Style & Orientation

HIGH FRAUD POTENTIAL

Autocratic

Low Trust

Power Driven

LOW FRAUD POTENTIAL

Participative

High Trust

Achievement Driven

Performance

HIGH FRAUD POTENTIAL

Measured Quantitatively

Short-term in Nature

LOW FRAUD POTENTIAL

Measured Quantitatively and
Qualitatively

Long-term in Nature

Policies and Rules

HIGH FRAUD POTENTIAL

Rigid

Inflexible

Strongly Policed

LOW FRAUD POTENTIAL

Reasonable

Fairly Enforced

Reward System

HIGH FRAUD POTENTIAL

Punitive

Politically Administered

LOW FRAUD POTENTIAL

Generous

Reinforcing

Fairly Administered

Performance Evaluation

HIGH FRAUD POTENTIAL

Critical

Negative

LOW FRAUD POTENTIAL

Positive

Stroking

Payoffs for Good Behavior

HIGH FRAUD POTENTIAL

Monetary

LOW FRAUD POTENTIAL

Monetary

Recognition

Promotion

Added Responsibility

Choice Assignments

Business Ethics

HIGH FRAUD POTENTIAL

Ambivalent

Rides the Tide

LOW FRAUD POTENTIAL

Clearly Defined

Regularly Followed

Internal Relationships

HIGH FRAUD POTENTIAL

Highly Competitive

Hostile

LOW FRAUD POTENTIAL

Competitive

Friendly and Supportive

Human Resources

HIGH FRAUD POTENTIAL

Burnout

High Turnover

Grievances

LOW FRAUD POTENTIAL

Running out of promotion
opportunities

Low Turnover

Job Satisfaction

CEO Characteristics

HIGH FRAUD POTENTIAL

Swinger
Braggart
Self-Interested
Insensitive
Feared
Insecure
Gambler
Impulsive

Vain

Highly Emotional
Pretend to Be More Than
They Are

LOW FRAUD POTENTIAL

Professional
Decisive
Respected
Secure Risk-taker
Thoughtful, Generous
Self-confident
Composed, Calm
Even Disposition

Fair

Know Who They Are
Know Where They Are Going

What Do We Habitually Cover Regarding Internal Controls?

Dual Signatures on Checks over \$500...

Reconcile the bank account monthly by someone who doesn't sign checks...

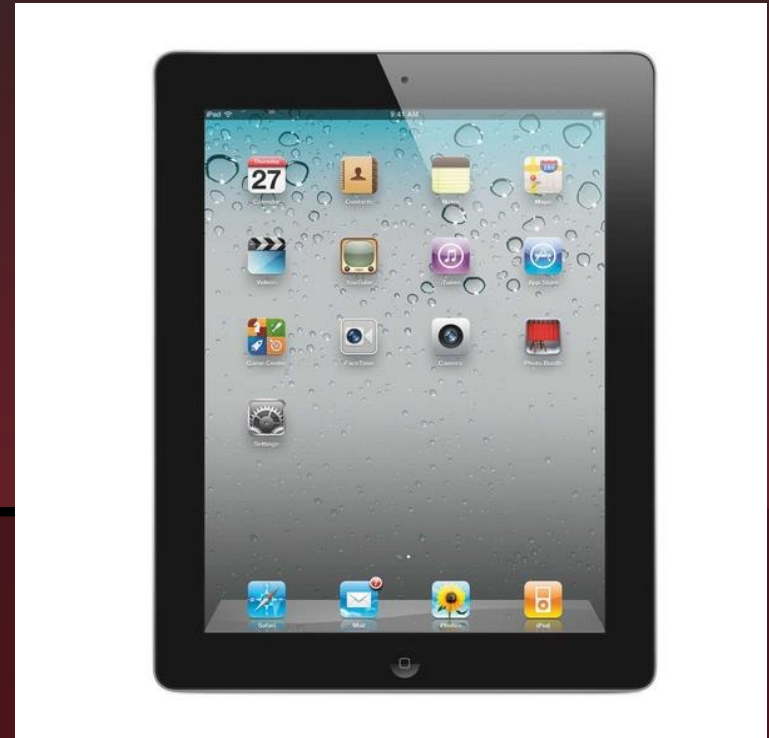
Lock the warehouse...

...But What Should We Be Covering Regarding Internal Controls?

It is a different world out there now!



It is a Different World Out There Now!

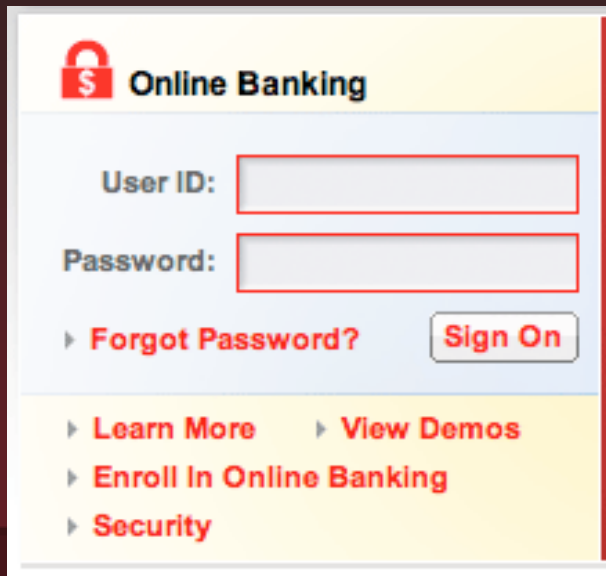


It is a Different World Out There Now!



**Unprecedented
Access**

It is a Different World Out There Now!



The image shows a screenshot of an online banking login interface. At the top left, there is a red padlock icon with a white dollar sign inside, followed by the text "Online Banking". Below this, there are two input fields: "User ID:" and "Password:". To the right of the "Password:" field is a "Sign On" button. Below the input fields, there is a link for "Forgot Password?". At the bottom of the form, there are four links: "Learn More", "View Demos", "Enroll In Online Banking", and "Security".

Online Banking

User ID:

Password:

[Forgot Password?](#)

[Learn More](#) [View Demos](#)
[Enroll In Online Banking](#)
[Security](#)

**Unprecedented
Access**

It is a Different World Out There Now!



**Online Bill Paying
Services**

It is a Different World Out There Now!



Debit Card Usage

It is Convenient

An employee cost his company, on average, over 3,000 per month for a three year period by charging personal expenses to the company credit card. (This isn't anything new)

The monthly payment of the credit card was accomplished by signing up for paperless statements and the new "convenient pay your bill online" system.

It is Convenient

Prevention/Detection Controls:

The individual responsible for reconciling the bank account should have no signature authority on the bank account... nor online bill payment authority

It is Convenient

Prevention/Detection Controls:

In the absence of an adequate staff size, the monthly bank statements HAVE to be reviewed by someone other than the person performing these tasks.

Everybody Needs This...

Have you been to an Office Depot lately?... Home Depot?... Staples... Etc, Etc

An employee cost her company \$200,000 over a 4 year period by charging personal items to these types of accounts.

Payments on these accounts were accomplished by both paper check and online bill payment.

Nobody Looks at These

An employee cost his company over \$1,000 per month by paying for personal items through the use of the company debit card.

The bank statements: Debit card transactions are a pain to read, hard to look at...

The supporting receipt or documentation is “easy” to lose or is not maintained adequately.

Nobody Looks at These

Prevention/Detection Controls:

Assign and control daily authorized limits on debit card usage

An individual with responsibility for coding and recording transactions should have no ability to use a debit card.

Nobody Looks at These

Prevention/Detection Controls:

Consider that the debit card usage portion of the bank statement is now an INVOICE.

In the absence of an adequate staff size, the monthly bank statements HAVE to be reviewed by someone other than the person performing these tasks.

It Takes Two

An employee cost his company \$25,000 over a one year period by colluding with an outside supplier in how return credits/rebates were being applied.

The employee had a personal account with the supplier... and credits were issued into his personal account rather than the company account.

Payment to the supplier was a 50% kickback.

It Takes Two

Prevention/Detection Controls:

Inventory must be tracked and accounted for...

- **Weekly, Monthly, Annually (volume determines)**
- **Supplier-based customer inventory tracking**

Easy Come, Easy Go: The Stroke of a Pen



The accountant for a company posted credit entries to her own accounts receivable account by debiting a different general ledger account called “Accounts Receivable – Other”.

She then recorded a journal entry to credit the “Accounts Receivable – Other” and debit the “Cash in Bank” account – recorded as a false deposit

Easy Come, Easy Go: **The Stroke of a Pen**

She then altered the monthly bank reconciliation to reflect a “balance per bank” that was inflated in an amount equal to the fictitious deposits

Easy Come, Easy Go: **The Stroke of a Pen**

Two people in accounting

One person had “all of the control”

No segregation of duties

Easy Come, Easy Go: The Stroke of a Pen

	Accounts Receivable				Accounts Receivable - Other				Checking Account	
(1)	1,000,000									
		450,000	(2)	(2)	450,000					
						450,000	(3)	(3)	450,000	
<p>(1) - Beginning Account Balance</p> <p>(2) - Entry from "Accounts Receivable" to "Accounts Receivable - Other" to clear a portion of the employee's receivable</p> <p>(3) - False deposit entry into "Checking Account" to clear the fictitious "Accounts Receivable - Other" account</p>										

Easy Come, Easy Go: The Stroke of a Pen

Alteration of the Bank Reconciliation

	5/31/2013	6/30/2013	7/31/2013	8/31/2013
Balance per Statement per Reconciliation	323,717.79	1,163,523.86	567,044.79	558,926.20
Actual Balance per Statement	323,717.79	813,523.86	217,044.79	108,926.20
Difference	0.00	(350,000.00)	(350,000.00)	(450,000.00)

Easy Come, Easy Go: The Stroke of a Pen

The Accounts Receivable Aging Report

TOTAL A/R	644,656.50	NET TOTALS	644,656.50	267,009.71	97,201.50	29,105.06	37,843.24	8,845.31
			100.00 %	41.42 %	15.08 %	4.51 %	5.87 %	1.37 %
					8,891.11	4,107.45	6,505.14	185,147.98
					1.30 %	.64 %	1.01 %	28.72 %
TOTAL # OF DEBIT CUSTOMERS	120 #		119 #		35 #	16 #	11 #	10 #
	0 #				8 #	8 #	8 #	8 #
PLUS CREDIT TOTALS			1,616.94-	1,616.94-				
			100.00 %	100.00 %				
TOTAL # OF CREDIT CUSTOMERS	8 #		8 #		0 #	0 #	0 #	0 #
	0 #				0 #	0 #	0 #	0 #
GRAND TOTALS			546,182.28	268,626.65	97,201.50	29,105.06	37,843.24	8,845.31
			100.00 %	41.57 %	15.04 %	4.50 %	5.86 %	1.37 %
					28,178.5	2,367.13	3,592.47	149,616.10
					8,891.11	4,107.45	6,505.14	185,147.98
					1.38 %	.64 %	1.01 %	28.65 %
GRAND TOTAL # OF CUSTOMERS	128 #		127 #		35 #	16 #	11 #	10 #
	0 #				8 #	8 #	8 #	8 #

The Phantom Company



CEO caused monthly “consulting service” payments to be made to a company wholly-owned by her

No invoices were ever received, or created for that matter

All of this came through a check request

This occurred over a 10 year period and amounted to over \$870,000

The Phantom Company

Other Facts

Domineering CEO that purposefully berated employees, instilled an atmosphere of fear, and failed to insure adequate training of employees for their assigned functions

Reasonably uneducated workforce

In a “relationship” with the current chairman of the board

The Phantom Company

Controls in Place

Checks were auto-signed

Check request with supporting invoice required

It Takes Some Guts...



The CFO of a company caused disbursements to be made to credit card companies related to his personal credit card accounts in the total amount of \$1,300,000 over a ten year period

Payments were made monthly, sometimes twice monthly, to VISA and Chase Mastercard, even though the company only had company accounts at American Express

It Takes Some Guts...

The disbursements were recorded to “travel expense”

The CFO caused journal entries to periodically be made to credit “travel expense” and debit various other expense accounts so as to conceal any budget verses actual comparison issues

It Takes Some Guts...

Supporting documentation included...

Credit card receipts for charges properly made to the company's American Express card

Gas pump receipts that had obviously been "left hanging" by the previous customer

Thick "card stock" junk mail flyers for educational conferences

It Takes Some Guts...

Supporting documentation included...

Hotel bills for hotel stays 5 – 10 years in the past

Airfare reservation confirmations for air travel never taken

Documentation stapled between two pages of 8 ½ by 11 inch copy paper, sometimes with up to 100 staples

It Takes Some Guts...

Controls in Place

Purchase requisition required

Description of the disbursement

GL Account to be charged

Individual requesting the disbursement

Signature of approval on requisition

It Takes Some Guts...

Controls in Place

Purchase requisition, along with supporting documentation to be included with the check when presented for authorized signature

Monthly comparison of budget to actual expenses

CFO had no ability to make a journal entry into the general ledger



Out of Sight, Out of Mind

A company changed the company credit card used for business purposes from VISA to Capital One

Old VISA cards were cancelled and destroyed...
except for one

An accounting clerk retained the use of one of the VISA cards and performed "cash advances" in \$300 amounts at a casino; advances totaled about \$80,000 annually over a 3 year period

Out of Sight, Out of Mind

No statements were ever received since the clerk registered the monthly statement for the “paperless” option

Payments on this card were made electronically each month by the accounting clerk

Out of Sight, Out of Mind

Controls in Place

Invoices received matched to POs

Checks not prepared without supporting invoice

Checks and invoices go to proper authority for approval

Checks not signed without all of this documentation

And so on, and so on...

Prevention: A Checklist Approach

A hand is shown adjusting a dial on a device, possibly a thermostat or a control panel. The dial has markings for 90 and 0. The text "Fraud Prevention" is overlaid in a green, serif font on the left side of the image.

*Fraud
Prevention*

COSO Report – Internal Control Elements

Control Environment

Risk Assessment

Control Activities

Communication

Monitoring

Prevention Effectiveness Checklist

2012 ACFE Report to the Nations on Occupational Fraud and Abuse

Is Ongoing Anti-Fraud Training Provided?

Do employees know what fraud is? (FRAUD POLICY)

Have fraud costs been made clear to employees?

Do employees know where to go to seek advice?

Prevention Effectiveness Checklist

2012 ACFE Report to the Nations on Occupational Fraud and Abuse

Is a Fraud Reporting Mechanism in Place?

Is it anonymous?

Do employees trust that they can report without fear of reprisal?

Do employees believe reports will be immediately investigated?

Prevention Effectiveness Checklist

2012 ACFE Report to the Nations on Occupational Fraud and Abuse

Do Hiring Practices Include the Following?

Past employment verification

Criminal and civil background checks

Credit checks / Drug screening

Education verification

References check

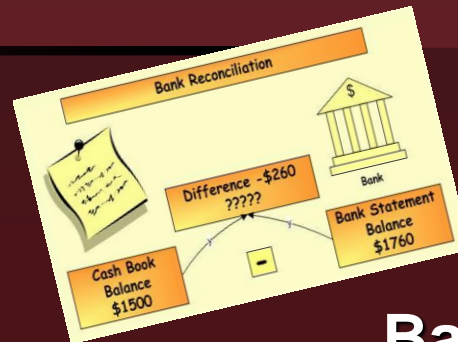
Relevant Control Activities for the Day

Journal Entry Controls



New Vendor Establishment Controls

Accounts Receivable



Bank Reconciliations

Control Activities – Journal Entries

Journal Entry Reduction of Account Receivable

This issue speaks to the controls surrounding the ability to record journal entries. While it will more than likely remain an ability of the new accountant, the following procedures can provide a review process over these types of transactions:

- Review Monthly Journal Entries (can be performed by management, board committee, or outside third party)
- Question those entries that do not make sense and determine that all journal entries have proper supporting documentation for the business purpose

Control Activities – Accounts Receivable

Manipulation of Accounts Receivable Aging Report

The Company should implement and adhere to the following processes regarding the monthly review of this report:

- Review the full report, not just the total page
- Accept no explanations for hand-written alterations to the report
- Require supporting documentation for non-cash “credits” to accounts receivable accounts and review for the existence of this documentation monthly (billing adjustment control)
- Compare delinquency notices mailed to the aging report and inquire as to “why” a delinquency notice was not mailed
- Formally establish that no accounts will be charged-off without formal Board of Directors approval
- Compare the Board-approved charge-off list to the accounts receivable charge-offs recorded in the general ledger

Control Activities – Bank Reconciliations

Manipulation of Bank Reconciliation

- Prove the bank reconciliation reconciling items

Compare the balance per the bank statement on the reconciliation to the actual balance per the bank statement

Trail deposits in transit listed on the reconciliation to the subsequent month's bank statement (any items clearing longer than two to three days into the future should be immediately investigated)

Trail the outstanding checks listed on the reconciliation to the clearing of the amounts in the subsequent month's bank statement (follow-up on checks that have remained outstanding for longer than 60 days)

- If possible, provide training to the secondary backup bookkeeper for the performance of the bank reconciliation and insure that this individual does not possess signature authority on the bank account

Control Activities - New Vendor Establishment

One of the most vulnerable areas of fraud in any business is the ability for a fictitious vendor or a “vendor not necessary to the business” to be created. The internal employee can then create invoices to the company and have the company pay the invoice. In these situations, the employee is the owner of the company or a beneficiary to the company that invoiced his/her employer for the charges.

Control Activities - New Vendor Establishment

These types of vendors include names that are similar to existing valid vendors or represent a variation of the names of existing valid vendors. Additionally, certain inefficiencies are present in a system that has numerous variations for the name of a valid vendor.

As an example, if a Company wanted to know the amounts disbursed to ABC Company, Inc. for a certain period, the process is made more difficult if this valid vendor is referred to in the master vendor file as ABC Company, Inc., ABC Company, ABC Co., Inc., etc. Additionally, as stated previously, ABC Co., Inc. may be a fictitious vendor established by the perpetrator of an internal fraud against the company.

Control Activities - New Vendor Establishment

In an effort to reduce the probabilities of this type of scenario occurring, proper vendor establishment procedures are placed in operation. These can and should include the following:

- Name: As shown on tax return
- Business Name: If different from above
- Name: As to be used as payee
- Phone Number:
- Address:
- Remittance address: If different from above
- Contact Person:
- Contact Email:
- W-9 Required: Taxpayer ID and Type of Business
- Disclosure of Owner Relationships to Company Personnel

Control Activities - New Vendor Establishment

This can be accomplished through the use of a form, questionnaire, etc. Once the information is obtained, processes need to be identified that provide validation of the information presented such as phone calls to the number provided, Google searches, State tax base searches, etc.

Control Activities - New Vendor Establishment

The policy and processes should include provisions for a vendor master file audit to determine that vendors listed in the vendor master file have been subjected to the provisions in the policy.

New Vendor Establishment Form Vendor Form.pdf

Your Company Name	
New Vendor Establishment	

Vendor Information		Validation Procedures					
		Documents or Procedures Performed					
Vendor Name:	ABC Company, Inc.	AOI	State Reg.	Googled			
Taxpayer ID#:	00-0000000	W-9					
Payee Name:	ABC Company						
Duplicate Name Search:	None noted						
Primary Phone:	000-000-0000	Called - Active Number					
Fax No.:	000-000-0001	Test Fax Successful					
Website:	www.abc.aaa	Active					
Physical Address:		Googled - Valid	Google Earth - Valid				
Address:	1412 1st Street						
City:	City						
State:	State						
Zip Code:	11111						
Mailing Address:		Googled - Valid	Google Earth - Valid				
Address:	P.O. Box 9999						
City:	City						
State:	State						
Zip Code:	11111						
Duplicate Address Search:	None Noted						
Contact Person:	Jane Doe						
Contact E-mail:	jane@abc.aaa	Email to and from - Successful					
Expected Transactions:							
Widget Purchases OR Monthly Statement Processing Services, etc.							
Vendor Relationships:							
Jane Doe is John Doe's sister - John works in our marketing department							

Monitoring

(VERIFY, VERIFICATION)

“Doveryai, No Proveryai”



Monitoring

(VERIFY, VERIFICATION)

“Trust, but Verify”



Spell the Word “SHOP”

SHOP



2014 Fraud Update:

It Isn't Who You Think It Is... and It Isn't What You Think They're Doing

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