

FRAUD TALK – EPISODE 111

The \$200,000 Car: When Fraudsters Use Audit Guidelines to Steal

In this episode, the president and co-founder of Verracy, Mary Breslin, CFE, discusses a case she investigated where an employee stole \$1.8 million after being overly interested in auditing processes. After being tipped off when she saw he purchased an expensive sports car, she shares lessons she learned from the case.

Transcript

Sarah Thompson: Hello, and welcome to *Fraud Talk*, the ACFE's monthly podcast. I'm Sarah Thompson, public information officer for the ACFE. Today I am joined by Mary Breslin, a certified fraud examiner and certified internal auditor who is president and co-founder of Verracy. Thank you for joining us today, Mary.

Mary Breslin: Thank you for having me, Sarah. Pleasure to be here.

Sarah: Now I've been fortunate enough to have attended a number of your sessions at ACFE conferences, and you always have really interesting case studies to share from your years of investigating fraud in a lot of different industries. Our listeners today are lucky enough to get to hear one of those stories. Why don't you start by setting the scene for us?

Mary: Okay. This story I chose to tell today, a case because it's got a little bit of everything. [laughs] It's got a little bit of everything for everyone. I was a chief audit executive at a company that offered mining services, they actually called them drilling services on one half of the business and they manufactured mine equipment for drilling on the other side of the business. There was two major divisions. The company is very old, was about 130 years old when I was there, and audit was still fairly new to them. We had a lot of interesting work that we worked on.

My boss had come to me and said, "Hey, we're having a lot of conversations about our rolling assets, and we think you need to do an audit around rolling assets." There's been a lot of concern, I think the CEO had been at a mine site where somebody had spent \$200,000 on a truck, [laughs] which you don't do that because trucks last about three months-- or three years, excuse me, at any given mine site because they just get beat up very quickly. [00:02:00] This individual had purchased the King Ranch edition inside and outside. It was roughly a \$200,000 Ford-350.

That this triggered the CEO, he was just like, "Okay, we don't have explicit rules around this, so we obviously can't just trust people to do what they want." They came to my team and said, "Can you do a global audit on this? What we're going to do is we're going to hire an individual to come in and manage our global fleet, and part of that will be a project to "rightsize" the fleet. We're going to get rid of a bunch of trucks and vehicles that need to be replaced and some that have already been replaced but not gotten rid of," and so we went out and we did this audit.

While we were doing the audit, they went into a hiring process of trying to find somebody who had experience to do a massive project of rightsizing the fleet on a global basis and then also manage the fleet going forward. Right around the same time that we finished the audit, they found their candidate and they brought this gentleman on, I'll just call him Charlie for the remainder of the story. He was a really nice guy. Right away, we sat down together upon his being hiring and we went through what we had done in the audit.

What we had found was there was just no standardization. There was just-- it was a lot of blah, blah. Every location-- and we operated in like 70 countries around the world. We had 70 official sites. We were probably on mines in a hundred countries around the world. Every one of those 70 locations was do whatever they wanted. There was just no controls around anything, no global program process methodology. [00:04:00] Our audit basically went through and outlined all of the different challenges and opportunities for problems that this could create.

Upon Charlie being hired, we had finished this audit, we sat down with him, we went through the entire audit. He was definitely what I would refer to as audit-friendly. He was like, "Oh, this is great, it's a roadmap for what I need to do, what I need to fix, this is fantastic." We told him, "Okay, we know that the project that you're doing is going to take roughly a year and a half."

Here, ding, ding, ding, lesson number one, we told him, "We'll come back in roughly a year and a half and we'll revisit the items on the audit. We'll come back, we'll look at the action plan," because there was a lot of work that needed to be done in order to standardize this. We told him his timeframe. [laughs] We told him, "[unintelligible 00:04:55] year and a half before audit's going to look at anything." [laughs] That's lesson number one if you're keeping track of all the lessons I'm going to tell you during this because there's a lot of them in this story. We go on our merry way.

Roughly about a year and three quarters later, I guess, a year and a half later, maybe a little bit longer than that, I pull into the parking lot after being on a trip overseas. I had been gone about three weeks, and I pull into the lot and there is a brand new Audi, an Audi R8, it's a \$200,000 car. It's all the way in the back of the lot and it's parked diagonally across four spots. The only reason I knew anything about this car was because it was the lust car of my husband.

This was the car he always wanted. He still talks about it. We saw one on the road the [00:06:00] other day and he was like, "There's my car." I didn't know what he's talking about until we got up to it. He is in love with this car. He would send me articles on it, texts me stuff about it. It's the only reason that I knew anything about this car to begin with. I'm not a big car person.

I see this car and I immediately recognize it because my husband has taken 10 years to educate me on it. I'm like, "Wow, that's an expensive car." I instantly knew it did not belong to any of the executives because, roughly six months earlier, the executives had all gone through this new car-buying frenzy. They all bought a new car. They have this competition amongst themselves not to see who could buy the most expensive, the parking lot wasn't filled with Lamborghinis and Maseratis or anything. No, their competition was to see who could get the best deal, so they were all trying to out-deal each other.

The most expensive car that anybody had bought was actually my boss, and he had purchased an Audi A6, not an Audi R8, which is this high-end sports car, but he had bought a regular sedan, definitely on the nicer end. The other thing I knew was the group of executives I worked for there were really honest, ethical, a hard-working group of individuals. They didn't really give themselves a whole lot of perks. One little perk that was a practice, not a rule, was there was this little cutout parking area that was close to the front entrance and that's where the executives parked primarily because they got there before everybody else.

Also, it was an unspoken rule, other employees just didn't park there, everybody let the executives park there and everybody else parked 30 feet back and from that point back. I knew where they parked, and I knew this was one of their cars, which made me think, "Well, whose car is this?" No matter if you're a seasoned fraud examiner or not, your brain starts to fill in the blanks and tries [00:08:00] to make sense of what it's seeing and it tries to make sense of it in a way that's not fraud. It's not a bad thing.

I'm thinking, "Oh, maybe it's some high-end salesperson, something," right? Remember, I've been gone for several weeks, so I have not seen this car in the parking lot day after day or any day, but I go into the office. If you ever want to know what's going on, there's one person you always want to go to, and that is the receptionist because everything that's happening in an organization, that receptionist is probably in one way form or another privy to seeing part of letting people in and out of the building, they know.

I spoke to her and I asked her, "Hey, I just passed this gorgeous Audi R8 in the parking lot, still has dealer tags on it, whose car is that?" She's like, "Oh, yes. Oh, everybody's been about that, that's Charlie's." I'm like, "Okay," and so I'm walking to my office. I'm the chief audit executive, so I know how much money everybody makes. We do payroll audits, we do executive compensation audits. I knew how much everybody makes.

I walking to my office and I'm doing the mental math, I'm calculating in my head. All I can think about is, "If Charlie just bought a \$200,000 car, he's either in debt up to his eyeballs or he's living in a van down by the river. That's the only way. Or, option three is somebody, maybe us, paying for it," right?

Sarah: Yes.

Mary: I go to my office and I start thinking about Charlie. One of the things that I am thinking about is how audit-friendly Charlie was. Not only with Charlie's, "This is great, it's a roadmap," but Charlie probably came back to myself and my team and he-- in hindsight, I realized something, he would not just [00:10:00] come to me, which would normally be what a senior manager would do, would come to somebody who's on their level.

He would often just go to my employees, to my team and ask, "Hey, I read this in the audit report, I read this. Right here it said like, 'This could lead to fraud,' so I was really curious about that. How can it lead to fraud?" Multiple times he came back over and over again, overly interested and, "What about this? What about that?" with the audit report. He was clearly literally using that report as a pathway, a road to success; not in the way we thought, unfortunately.

Now, just because Charlie had bought an expensive car didn't mean I could start a fraud investigation on that. I didn't have predications. I decided we were going to start looking at some of the follow-up action items and a few things started to pop. Again, I wasn't sure I really had a case to start a fraud investigation, but I thought, "You know what? Let me just talk to him to tell him I want to follow up on some of the items and stuff." It had been about two, three weeks since I had seen the car in the parking lot. The car was there every day at this point.

We had started poking at a few follow-up items with action items that come off of that global audit. I went and I talked to my boss and I said, "I think we should start this follow-up," and I really wasn't sure I wanted to use the fraud. My boss frequently yelled at me about finding fraud. As a matter of fact, in more than one occasion he had said, "Do you have to find fraud everywhere you go, Mary? Does there have to be fraud everywhere?" To which I, of course, responded, "It doesn't have to be but there appears to be. Yes, be glad I'm finding it."

[00:12:00] There's a lot of fraud and corruption in the mining industry, unfortunately, so it wasn't like it was that difficult to find. Something came up that week, we were having cake day, which I don't know for you listeners if you ever worked in an organization that does cake day, it's where the company will order various number of birthday cakes and send them to all the break rooms and they will send out an announcement saying, "It's cake day, we're celebrating everybody's birthday, anniversary," whatever. They have a list of everybody's birthday, anniversary that occurred that month. This week was cake day.

I knew Charlie didn't ever miss cake day. I've seen him stalk out cake day in more than one occasion myself. I decided to casually run into Charlie at cake day. Casually being I basically hung out there and stalked and waited for him to show up for about 45 minutes then casually bump into him. I waited till Charlie had a big old mouth full of cake and then I did this.

I walked over to him and I said, "Hey, Charlie, I heard that that beautiful Audi R8 in the parking lot is yours. Oh my goodness, that is my husband's favorite car. I want you to come out and take a picture with me with the car. Oh, can I drive the car? Oh, how about I just sit in the car and you take a picture of me in the car. I'll show it to my husband, it'll make him so jealous.

Oh, wait, how about if I drive the car just a couple little-- you can be in the car with me but then I could send a video to my husband. My God, that car is so spectacular. I bet it corners like it's on rails, it must be amazing. What on Earth made you decide to buy that car? This is an incredible-- It's expensive, isn't it? Now, let me-- My husband is trying to convince me to justify that. How did you convince your wife?" I can see Charlie, who is a ruddy-complexioned individual, all of the color is now draining from his face.

His mouth has apparently gone dry because he gives me that like, "Give me a second," like motion with his finger and he reaches over and he [00:14:00] grabs a bottle of water and he starts drinking a bunch of water I'm sure to wash down the now very dry cake in his mouth. He says to me this, "You're

never going to believe this." I think, "I bet I'm not." [laughs] He says, "It's a really funny story." I think, "I bet it is." He proceeds to tell me, "Look, my wife inherited \$250,000 from a relative she didn't even know she had."

Two things immediately went through my mind, the first was, "Nonsense," because that doesn't even happen in the movies and nobody would write that in the movies because nobody would ever believe it. Two was this, "Your wife inherited \$250,000 and she let you spend \$200,000 on a car?" For the ladies that are listening, how many of you believe that? [laughs] We have this moment where I'm looking at him and he is looking at me and he knows I don't believe him and he knows I suspect him of something. I can see that he knows that, and I know that he sees that I know that. I see and he sees and we both see, and then we both move to our respective corners. I know he knows, he knows I know, right?

Sarah: Yes.

Mary: I go immediately to my boss's office, and I happened to work for general counsel in this particular organization because we did so many fraud investigations, so many audits actually turned into fraud investigations. I go to him and I say, "I think I have a problem," and he says, "Okay, start an investigation." I pull my report out, the audit report out, and we start going through it and we look at what could possibly be abused. Well, there's a lot of things.

One of the things that stood out to all of us was the **[00:16:00]** rightsizing of the fleet. In order to "rightsize" the fleet, an estimation had been made that we were going to sell roughly 50% of our rolling fleet. We had at that time probably 60,000 or 70,000 rolling vehicles. We were going to sell roughly half of those, auction them off, and we would replace roughly half of them with new vehicles.

There was going to be a lot of movement, buying and selling, and how we were getting rid of the vehicle that we needed to get rid of because they were old, they weren't safe anymore, whatever, whatever the reason was, was we had engaged two auction houses, two big auction houses. One was headquartered in New York State, one was headquartered in California, and both of them had auction facilities all over North America. We had started the project with North America. There were other ways of dealing with it in other parts of the world, but the big first movement was in North America.

I went down to accounting and I asked them, "How does this work with the auction?" They're like, "Well, each of the locations does an assessment, based on what we know--" they're relying what Charlie had told them. Charlie then gives approval to dispose of certain number of cars or vehicles and approval to replace them and then he approves what's going to be purchased. Once all of that is done, then the auction facilities will come pick up the vehicles. They'll bring like car, vehicle, trucks where you can load 7, 8, 10 vehicles on it and they'll take them to auction. I didn't know what happens.

They're like, "Well, then he brings **[00:18:00]** us the reports from everything that's been auctioned off, and we put the information in the system. Whatever the cars were sold at, the fee that we paid the auction house, and we remove the asset from the register," if it's even in the register. That was one of the big problems we had was a lot of the assets weren't even recorded at a global level. They may be recorded on a spreadsheet somewhere at a local level, but corporate did not really have its hands around everything that we owned, so that was part of the problem.

I'm like, "So the report comes to Charlie?" She's like, "Yes, he brings it down." She's like, "It's in the envelope from the company it comes from," and stuff. I'm like, "Okay," and I go back to my office and I pull my team in and I go, "Okay, we got to reach out to these auction houses and get copies of everything that has been sold. We reached out and they were able to get us stuff by the end of the day, so it was very quick. I had a great data analyst that worked for me, and he was able to pull down all the records of everything that had been recorded in our accounting and all the records of everything that these two companies had sent to us.

We thought we had this great process in place, right? Every sale, every purchase, every auction was being approved in advance. Accounting was recording everything, they were updating all the asset registers as everything was happening. Here was the one segregation of duties that was the massive

lesson learned that we missed, the reports and the checks were going to Charlie. We pulled the contracts and it very explicitly said in the contracts. We got on the phone with these auction houses, and [00:20:00] they were very quick to give us the electronic data associated with every single sale.

What the blue book value was, what the car actually sold for, what their fees were; everything was beautifully broken down and they got it to us within hours, both auction house. We compared it to what was in our books, and Charlie was getting \$2,000 to \$3,000 on every single car that came through. How he had done this was this, he had gone to our local bank, the bank that we did a lot of business with, and he had opened up three look-alike bank accounts. One that looked like our organization and one that looked like each, so two more, one that looked like each of the auction houses.

When the check would come in, he had social engineered his way into the hearts of all of the bank tellers at the bank and he would go deposit it and then he would move the money over to the account for the look-alike of whichever organization had done that round of auctions. Using Adobe Pro, because Adobe Pro is the arch-nemesis of every fraud examiner out there, he would change all of the reports that were sent to him electronically, because he asked for copies electronically in addition to a copy being sent into the mail, and he would alter them to reduce the amount that was received.

He would print out a new check on the look-alike account. To make it extra special and make it look really valid, he would put it all back in the envelope that everything was mailed to him. A couple of things that came out was, one, nobody had ever thought about this new process that he was building was in reaction to the needs seen by the executives and this audit report that we had [00:22:00] issued. Nobody seemed to realize that we probably should have vetted the processes he was putting in before we went back and actually followed up on the action items and so he would bring it in.

In about 18 months, he stole \$1.8 million from us very quickly. In 36 hours, we were done, the investigation was fast, fast, fast. I had to go to my boss essentially with my tail between my legs and say, "So Charlie stole \$1.8 million from us that we can prove, and I'm pretty sure I taught him how to commit fraud." [chuckles]

Sarah: Not something you want to tell your boss of the--

Mary: Not exactly my proudest moment. He was over-involved in the process. I had shown the gaps in the process. He had come back and he had looked for gaps and asked for explanations of how these gaps could lead to fraud over and over again with my team. I'm pretty sure that we might have helped this along. Not my best moment. He was also highly over-involved in everything, which experienced fraud examiners know, somebody being over-involved in an area or in a process where they don't necessarily belong don't need to be, that's a massive red flag and we missed it.

The other massive red flag that was missed, that was a big lesson learned, was when we look for fraud, we're looking for red flags, but red flags fall into multiple different categories. It's a red flag of the actual fraud, it's the transaction related to the fraud, or it's a [00:24:00] red flag of how it's concealed, or it's a red flag of conversion, how the fraudster converts the money to something that they have control over that they can then use personally. A red flag of how it's controlled, like how the fraud is managed, and sometimes we look for what's missing which is also really just a red flag of the actual transaction itself.

Here, the red flag that was glaring, the minute we saw it, we couldn't see it, was the bank accounts, the conversion. Both auction houses had apparently banks that were headquartered in Salt Lake City even though they were headquartered in New York and California. In hindsight, obviously, that should have been an indicator. A company that's headquartered in New York and a company that's headquartered in California is not very likely to be issuing checks off of the bank down the street from our headquarters. That is in fact what was happening, and we missed that.

Of course, afterwards, we had fraud training for everybody around things like this, to be on the lookout for that type of thing, but we hadn't up to that point had that type of training for our accounting team. I'm now proud that we have caught this guy, we've caught him so quickly. My boss who's general counsel for the company, he reaches out to the authorities. The authorities come in, they have him arrested, but I'm at the same time, I'm like a little upset with myself that I feel like I contributed. He

learned a lot from the audit and that's like an auditor's worst fear, is that we tell them too much and we actually give them the keys to the kingdom instead of helping them secure the kingdom, right?

Sarah: [00:26:00] Yes.

Mary: I felt that I had done that. I was a little bit vindicated when this happened. Two days after, he was taken out in handcuffs and my boss was a big advocate of fraud alerts and making it known. Having people taken out in handcuffs was definitely his preferred-- if that was an option if somebody committed a large fraud crime against us. He wanted everybody to know that we were actively looking and that we were doing things to not only prevent and detect but then there were consequences and such.

After Charlie was taken out in handcuffs, two days later, I had a chance to be slightly validated, indicated to feel better; it's really what it came down to. He calls me into his office and he says, "You're never going to believe this." I'm like, "Oh, I feel like this is how this whole thing started; when somebody saying to me, 'You're never going to believe this.'" He goes, "No, you're never going to believe this." He goes, "I just got off the phone with the assistant district attorney in New York." I think it was like out of Buffalo or wherever.

I'm like, "Okay, why?" He goes, "They have a search warrant. They have an arrest warrant for Charlie." I'm like, "What?" He's like, "Yes, he committed almost the exact same crime at his prior company. It just took them two years to figure out what had happened." Charlie actually ended up getting five years for the crime against us. He pled, so we didn't have to go to trial. Upon his release, he was arrested and was brought to New York and had to go through the same process again for the prior company. He ended up right back in jail in New York after he got in jail in Utah. [laughs]

I felt a little bit better knowing that [00:28:00] he was in fact that rare 3%, 5% of people who take a job with the intention of committing the crime, not just an opportunistic fraudster. I may have expedited the problem, but I definitely didn't necessarily lead to it with that particular individual.

Sarah: Also the difference in length of time it took the New York investigation, you said it took almost two years or so for them to figure out what had happened versus your 36 hours.

Mary: Yes, since he had left, it had been two years since he had left them. I was not privy to the details of that case, so I don't know how long it had been going on there. It had been going on with us, I think it was roughly about 15 months. He got away with it for 15 months and he stole 1.8 million that we could prove in that time. My guess is that there were other things he was doing as well that we did not expose because that's what happens very frequently is there's more than one scam that's going on with these guys, especially somebody who's a repeat offender.

Sarah: Absolutely. I wanted to go back just a little bit to you talking about how it's an auditor's worst nightmare or a fraud examiner's worst nightmare, that it's thinking that you laid out step by step how someone might commit fraud. I know that some of our members that I talk to, they say that that's one of the reasons that their organization might be leery about giving anti-fraud training to employees, saying like, "Are we giving too much away? Are we giving too many details?"

Do you have any advice for how and-- someone in your position or even just a fraud examiner who wants to do fraud training, how to find that right balance? That you're giving enough information that it will take your average employee and make them be able to recognize red flags that might lead them to giving a tip that exposes fraud, [00:30:00] giving them that information but not giving away so much or too much that would lead them to then think, "Oh, I could commit fraud now that I know all this."

Mary: Sure. I know folks like myself who worry about stuff like that, most have not experienced it. I have, so it actually happened to me, but I will tell you, it is extremely rare. One is you can-- you don't have to create a roadmap to how to commit the fraud. I teach professionals anti-fraud all the time in the audit world, fraud examiners. I have been saying for many, many years that I expect that the fraudsters will start taking those classes. I don't doubt that for a second.

Here's the thing, here's the most important thing, it's not about what information you provide when you're doing fraud awareness training, it's about who you're training. The average person is not going

to become a fraudster. The average person just wants to do their job and get paid for it. There's only a limited number of people who actually see that opportunity, have that pressure, and then can rationalize it. The vast majority of employees in every organization are good honest people, turn all of them into fraud fighters.

If you train all of them to know what to look for, then who cares if you taught one or two bad guys some tricks because now you've got 95% of your employee base who are the good guys trained to see the problem. I would much rather risk having taught somebody what to do so they could commit a fraud than one or two rare instances. I've done hundreds of fraud cases, it's happened to me one time. I've been providing audit reports for 30-some odd years, it's happened one time. That's why it makes for a good story, right?

I would much rather turn **[00:32:00]** everybody else in the organization into a fraud fighter because we've given them good fraud awareness training and they understand what fraud is when they see it. The average person doesn't raise their hand and say, "I think this is fraud," unless they've had fraud awareness training because their brain is rationalizing, they think more to waste and abuse. They think somebody else should be seeing it.

Without the training, you're not going to turn all the good guys into fraud fighters. I would much rather risk teaching one or two bad guys a trick or two and then have thousands of other people who are fraud fighters that are likely to spot those bad behaviors than worry about not teaching one or two people and not turn those thousands into fraud fighters. Is there a true risk there? Sure, but it's easy to balance the scale by teaching everybody what to look for, defining the line is between waste and abuse and fraud in each organization so employees know where it is.

One of the stories that I talk about all the time is defining fraud. I talk about my experiences in all these different industries that I've had the fortune of working in. I've worked on Wall Street with Barclays Capital for years. I started my career at Price Club, which is now Costco Wholesale, right? I've been in mining, I've been in manufacturing, I've been in retail banking.

I've been in all these different industries, and I can tell you that when I was on Wall Street, dropping \$5,000 at dinner was not unusual for traders and wealth managers, so it happened all the time. Somebody at Price Club or any manufacturing company I ever worked for who dropped \$5,000 a dinner, they would be fired and the police would probably be waiting for them to show up for work the next day, two dramatically different reactions to the same exact event.

[00:34:00] You can't expect employees to know where that line is drawn unless you teach them. Only then when they're comfortable with calling a potential of fraud in real-time are you going to get people to raise their hand, and the only way to do that is to teach them, is to provide the training. That's my opinion. That's my advice, is it's worth the risk.

Sarah: Yes, that makes perfect sense because even just boiling it down to a numbers game, like you were saying, if 95%-- I think that I optimistically would like to think that that number's even low, 95% of good guys. If we say 98% of good guys and that 2% of bad seeds that they're more likely-- you have now-- if it was a company of a hundred, you have 98 extra pairs of eyes and ears watching and keeping an eye out, so even if that two bad person takes a risk and decides to try and start, at the very least it probably would be caught a lot quicker. It would be flagged.

Mary: Yes. I'll tell you, I'll add a quick little caveat to the end here. Another industry I worked in was oil and gas, I worked for ConocoPhillips for a number of years, but I was in accounting while I was there; I wasn't in audit. I was at ConocoPhillips, I was a manager in accounting when Enron collapsed and Conoco and Phillips had just merged, and so we were actually in hiring mode. I ended up hiring a number of accountants from Enron. Now, Enron had just collapsed. Now we look back and we're like, "We understand the bigger picture of everything that's going on."

In that particular moment in Houston, there was rumors and there was headlines, but we didn't fully understand everything just yet. You can judge me on this later, but I hired a couple of those accountants. As things started coming out, more and more news articles, the books, everything, the information **[00:36:00]** started being released to the general public. I would sit down with those

employees and I would be like, "Hey, I just saw this," or, "I saw that. Were you aware of fraud on a massive scale?" They'd all be like, "Absolutely not. No, no, no. I'm not sure I believe all this stuff."

If I changed my question and I said, "Were you guys aware of repetitive really bad business practices or waste, abuse?" They'd be like, "Oh, yes, ther than that." We now know in hindsight that those things that they were labeling mentally; bad business practices, repetitive bad business practices, waste, abuse were really fraud, but it was acceptable in that culture and they had not been trained, they didn't know where the line was or where it should be.

Therefore, they didn't even see, even though they were in the midst of one of the biggest fraud cases in history, the accountants didn't see it. Without the training, I think that we put ourselves at way more risk than we ever would by training everyone.

[music]

Sarah: Thank you so much for sharing your story with us today. I'm sure that all of our listeners will find it fascinating and pointing out all those lessons and advice learned from it is really, really useful as well. Thank you for being here with us.

Mary: Thank you for having me.

Sarah: Thank you for listening. You can find this podcast and all other episodes of *Fraud Talk* on Spotify, iTunes, or wherever you get your podcasts. This has been Sarah Thompson signing off.