



# Philadelphia Area Chapter Association of Certified Fraud Examiners

## 2004 Directors

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## *The Philadelphia Examiner*

Fall 2003

### *Message from the President*

Kathleen M. Walter

Have something to sell? Not in that business? Sure you are! You should be selling you and your credentials. Now let's clarify that! Let's change "selling" to "promoting." My dictionary defines the word, **promote**, as an action that means to advance (oneself) in station, rank or honor, and/or to contribute to the growth or prosperity. Make self-promotion a cognitive goal, not a latent one. If boldly going where no man or woman has gone before is too much for you then start smaller but **just start!**

Welcome back to school! This is Marketing and Networking 201, an advanced course in getting to know you better through your self-promotion. There will be homework! With the Internet, the world is at your fingertips! Throughout this year as Chapter President, I have on occasion brought my marketing background to the forefront, to share with you my 15 years of experience in "promoting". As you know, we live in a highly competitive world. The competition, increasing, even as you read this note. However, the competition does create **opportunity** (an event causing a favorable juncture of circumstances and/or a good chance for advancement or progress). What truly matters is what we DO with the opportunities as they present themselves to avoid being "lost in the press of competition". I propose the following steps:

**Step One** – Attend as many of our Chapter (and other similar) meetings and conferences possible. Extra knowledge, new ideas and fresh faces can go a long way. **Be prepared** before you go. What is your goal in attending? Meet 10 new people? Have 10 people know you and your business? Find a new job? Get noticed by the decision makers within the Association? What is your personal "30-second commercial" of who you are and what you want others to know about you?

**Step Two** – Purchase a professional name badge with large clear print, or in lieu of this, carry a name badge from a prior event. Also, consider writing your name and/or company affiliation on a badge that is provided to you at the event. These kinds of identifiers can be conversation starters. When your name is visible, you are more likely to be spoken to and your message remembered. Wear your name badge high on your right shoulder as this is the most visible spot when shaking hands and exchanging introductions.

**Step Three** – Select your meeting attire to include two available pockets. One pocket to keep your business cards for distribution. The other (pocket) to keep the cards that you will receive. Keep a pen handy to write on the back of the received cards the questions or topics pertinent to your contact. After the event record the date, event, and place of the meeting on each card. If you make contact at a later time do, refer to the event in your opening remarks. Immediately add the new cards to your card file or address portfolio. Don't wait! Cards are lost and memories fade with busy schedules.

**Step Four** - Bring a supply of your cards wherever you go. You never know when an opportunity will jump up and stare you in the face. The Chapter's new Business Card Board, located at all luncheon/training meetings, has proven to be very popular.

Do you know Rumpelstiltskin's first name? Of course not, since he never said it loudly or clearly enough for anyone to hear, or remember. He didn't wear a badge and he didn't give out his cards. Don't be like old Rumpel! Create your presence in a room and in all of your networking conversations. Shake hands with confidence. Display and distribute your cards.

Smile. Relax. Enjoy. See you at our October 14 luncheon training meeting and the December 1 All-Day Conference.

# CORPORATE RESPONSIBILITY AND CORPORATE COMPLIANCE

(Part 2 of 2)

The Newsletter Committee would like to thank Edward Quinn of Quinn & Associates for suggesting this article for our newsletter.

## DIRECTOR RESPONSIBILITIES AND THE DEVELOPMENT OF COMPLIANCE PROGRAMS

This educational resource, co-sponsored by the Office of Inspector General (OIG) of the U.S. Department of Health and Human Services and the American Health Lawyers Association, the leading health law educational organization, seeks to assist directors of health care organizations in carrying out their important oversight responsibilities. A recent survey by the Health Care Compliance Association found that in just three years, health care organizations with active compliance programs have grown from 55 percent in 1999 to 87 percent in 2002. While recent court opinions (see *Caremark*) established a Board's duty to oversee a compliance program, it did not enumerate a specific methodology for doing so. This educational resource is designed to assist health care organization directors in exercising that responsibility.

## V. SUGGESTED QUESTIONS FOR DIRECTORS

The following structural questions explore the Board's understanding of the scope of the organization's compliance program. The operational questions are directed to the operations of the compliance program and may facilitate the Board's understanding of the vitality of its compliance program.

### STRUCTURAL QUESTIONS

**1. How is the compliance program structured and who are the key employees responsible for its implementation and operation? How is the Board structured to oversee compliance?**

The success of a compliance program relies upon assigning high-level personnel to oversee its implementation and operations. The Board may wish as well to establish a committee or other subset of the Board to monitor compliance program operations and regularly report to the Board.

**3. What are the goals and inherent limitations of the organization's compliance program? How does the organization address these limitations?**

The adoption of a corporate compliance program by an organization creates standards and processes that it should be able to rely upon and against which it may be held accountable. A solid understanding of the rationale and objectives of the compliance program, as well as its goals and inherent limitations, is essential if the Board is to evaluate the reasonableness of its design and the effectiveness of its operation. If the Board has unrealistic expectations of its compliance program, it may place undue reliance on its ability to detect vulnerabilities. Furthermore, compliance programs will not prevent all wrongful conduct and the Board should be satisfied that there are mechanisms to ensure timely reporting of suspected violations and to evaluate and implement remedial measures.

**4. Does the compliance program address the significant risks of the organization?**

Health care organizations operate in a highly regulated industry and must address various standards, government program conditions of participation and reimbursement, and other standards applicable to corporate citizens irrespective of industry. A comprehensive ongoing process of compliance risk assessment is important to the Board's awareness of new challenges to the organization and its evaluation of management's priorities and program resource allocation.

**5. What will be the level of resources necessary to implement the compliance program as envisioned by the Board?**

From the outset, it is important to have a realistic understanding of the significant resources necessary to implement and sustain the compliance program including the initial investment in establishing a compliance infrastructure and training the organization's employees. With the adoption of a compliance program, the organization is making a long-term commitment of resources because effective compliance systems are not static programs but instead embrace continuous improvement. Quantifying the organization's investment in compliance efforts gives the Board the ability to consider the feasibility of implementation plans against compliance program goals. Such investment may include annual budgetary commitments as well as direct and indirect human resources dedicated to compliance. The Board also should consider how management intends to measure the effectiveness of its compliance program.

## OPERATIONAL QUESTIONS

The following questions address the effectiveness of compliance programs and the sufficiency of reporting systems.

### A. Code of Conduct

**How has the Code of Conduct or its equivalent been incorporated into corporate policies across the organization? How do we know that the Code is understood and accepted across the organization? Has management taken affirmative steps to publicize the importance of the Code to all of its employees?**

Regardless of its title, a Code of Conduct is fundamental to a successful compliance program because it articulates the organization's commitment to ethical behavior. The Code should function in the same way as a constitution, *i.e.*, as a document that details the fundamental principles, values, and framework for action within the organization. The Code of Conduct helps define the organization's culture; all relevant operating policies are derivative of its principles. As such, codes are of real benefit only if meaningfully communicated and accepted throughout the organization.

### B. Policies and Procedures

**Has the organization implemented policies and procedures that address compliance risk areas and established internal controls to counter those vulnerabilities?**

If the Code of Conduct reflects the organization's ethical philosophy, then its policies and procedures represent the organization's response to the day-to-day risks that it confronts while operating in the current health care system. These policies and procedures help reduce the prospect of erroneous claims, as well as fraudulent activity by identifying and responding to risk areas. Because compliance risk areas evolve with the changing reimbursement rules and enforcement climate, the organization's policies and procedures also need periodic review and, where appropriate, revision. Regular consultation with counsel, including reports to the Board, can assist the Board in its oversight responsibilities.

### C. Compliance Infrastructure

**1. Does the Compliance Officer have sufficient authority to implement the compliance program? Has management provided the Compliance Officer with the autonomy and sufficient resources necessary to perform assessments and respond appropriately to misconduct?**

Designating and delegating appropriate authority to a compliance officer is essential to the success of the organization's compliance program. For example, the Compliance Officer must have the authority to review all documents and other information that are relevant to compliance activities. Boards should ensure that lines of reporting within management and to the Board, and from the Compliance Officer and consultants, are sufficient to ensure timely and candid reports for those responsible for the compliance program. In addition, the Compliance Officer must have sufficient personnel and financial resources to implement fully all aspects of the compliance program.

**2. Have compliance-related responsibilities been assigned across the appropriate levels of the organization? Are employees held accountable for meeting these compliance-related objectives during performance reviews?**

The successful implementation of a compliance program requires the distribution throughout the organization of compliance-related responsibilities. The Board should satisfy itself that management has developed a system that establishes accountability for proper implementation of the compliance program. Program implementation lags where there is poor distribution of responsibility, authority and accountability beyond the Compliance Officer.

### D. Measures to Prevent Violations

**1. What is the scope of compliance-related education and training across the organization? Has the effectiveness of such training been assessed? What policies/measures have been developed to enforce training requirements and to provide remedial training as warranted?**

A critical element of an effective compliance program is a system of effective organization-wide training on compliance standards and procedures. In addition, there should be specific training on identified risk areas, such as claims development and submission, and marketing practices.

**2. How is the Board kept apprised of significant regulatory and industry developments affecting the organization's risk? How is the compliance program structured to address such risks?**

Compliance programs of health care organizations must consider significant regulatory and industry developments. The Board requires current information to assess the steps being taken by management to mitigate the inherent risks.

**3. How are "at risk" operations assessed from a compliance perspective? Does the organization periodically evaluate the effectiveness of (i.e. conformance with) the compliance program?**

Compliance risk is further mitigated through internal review processes. Monitoring and auditing provide early identification of program or operational weaknesses and may substantially reduce exposure to government or whistleblower claims. One effective tool is the performance of regular, periodic compliance audits by internal or external auditors. In addition to evaluating the organization's conformance with reimbursement or other regulatory rules, or the legality of its business arrangements, an effective compliance program periodically reviews whether the compliance program's elements have been satisfied.

**4. What processes are in place to ensure that appropriate remedial measures are applied to identified weaknesses?**

Responding appropriately to deficiencies or suspected non-compliance is essential. Failure to comply with the organization's compliance program, or violation of applicable laws and other types of misconduct, can threaten the organization's status as a reliable and trustworthy provider of health care. Moreover, failure to respond to a known deficiency may be considered an aggravating circumstance in evaluating the organization's potential liability for the underlying problem.

**E. Measures to Respond to Violations**

**1. What processes are undertaken to evaluate and respond to suspected compliance violations? How are reporting systems, such as the compliance hotline, monitored to verify appropriate resolution of reported matters?**

Compliance issues may range from simple overpayments to be returned to the payor to possible criminal violations. The Board's duty of care requires that it explore whether procedures are in place to respond to credible allegations of misconduct and whether management promptly initiates corrective measures. Many organizations take disciplinary actions when a responsible employee's conduct violates the organization's Code of Conduct and policies. Disciplinary measures should be enforced consistently.

**2. Does the organization have policies to appropriately protect "whistleblowers" and those accused of misconduct? —**

For an effective compliance program, employees must be able to ask questions and report problems. To fulfill its duty of care, the Board should ensure that the organization has a process in place to encourage such constructive communication.

**3. What is the process by which the organization evaluates and responds to suspected compliance violations? What policies address the protection of employees and the preservation of relevant documents and information?**

Legal risk may exist based not only on the conduct under scrutiny, but also on the actions taken by the organization in response to the investigation. In addition to a potential obstruction of a government investigation, the organization may face charges by employees that it has unlawfully retaliated or otherwise violated employee rights. It is important, therefore, that organizations respond appropriately to a suspected compliance violation and, more critically, to a government investigation without damaging the corporation or the individuals involved. The Board should confirm that processes and policies for such responses have been developed in consultation with legal counsel and are well communicated and understood across the organization.

**4. What guidelines have been established for reporting compliance violations to the Board? What policies govern the reporting to government authorities of probable violations of law?**

As discussed, the Board should fully understand management's process for evaluating and responding to identified violations of the organization's policies, as well as applicable federal and state laws. In addition, the Board should receive sufficient information to evaluate the appropriateness of the organization's response. Federal law encourages organizations to self-disclose wrongdoing to the federal government. Health care organizations and their counsel have taken varied approaches to making such disclosures. Boards may want to inquire as to whether the organization has developed a policy on when to consider such disclosures.

**VI. Conclusion**

The perspectives shared in this educational resource are intended to assist the health care director in performing the important and necessary service of oversight of the corporate compliance program. In so doing, it is hoped that fiduciary service will appear less daunting, and provide a greater opportunity to "make a difference" in the delivery of health care.

REPORT FROM 14<sup>TH</sup> ANNUAL ACFE FRAUD CONFERENCE / EXHIBITION CHAPTER REPRESENTATIVE MEETING  
By CAROL A. CAGNO

I was honored to represent and wore my delegation name/chapter affiliation badge with pride throughout a stay that was crammed with training sessions, exhibition vendor demonstrations, and social events. My fellow participants expressed their respect for Philadelphia Chapter members, accomplishments, as well as our promotion and support of the national association.

**CHAPTER MEETING AGENDA AND DISCUSSION**

About 70 representatives of USA and international chapters attended the Chapter meeting. Jeff Kubiszyn, Chapter Liaison, was the meeting facilitator and the stated author of the meeting agenda.

**Representative Report** – the participants discussed the challenges of receiving (local) presenters' BIO(s) and topic outlines in sufficient advance of training day to meet National's standards and event advertisement. Our usually successful tactic is a one-on-one approach taken by the requestor to give periodic and persuasive reminders to the scheduled presenter.

o **ACFE Plans for the Future to Enhance Promotion of Chapter Membership**

Improvements to the ACFE Chapter Web Page – Provide more links to local websites PowerPoint Presentation about the ACFE & Chapters – for chapter use Business Cards for Chapter Officers

**Representative Report** – Our Chapter is one of few with an established Chapter Business Card. I made sure to announce and distribute our card at various points, especially during my presentation on our Chapter's recruiting activities.

o **Chapter Awards**

Two awards were pre-announced during the Chapter meeting, Chapter of the Year and Best Newsletter.

Jeff K. advised the representatives that the award process is one of self-nomination, and open to all Chapters, large or small. Jeff noted that in 2003, though well announced by National, he received few responses from the Chapters at large.

o **Jim Ratley**

Jim Ratley, CFE, ACFE Program Director made a pre-announcement to the group re the ACFE initiative to promote education on fraud detection issues at the college level. The ACFE will be offering course materials for free to any college or university.

**Representative Report** - The offer will be promoted through ACFE members who market to the institutions their training credentials/services as course leaders. Rately assured the group that the initiative was for education purposes, and that students, upon completion of the course, would not be considered eligible for designation as CFE.

Ratley – pre-announced the intent of the ACFE to take the association to a non-profit status, however is still a year or two away. Joe Wells was slated to make a general announcement and another about his, and Mrs. Wells, actions that named the ACFE as beneficiary for the bulk of their estate upon their deaths.

**Carol Cagno – Philadelphia Area Chapter**

Reviewed Chapter recruiting activities (active and passive) as follows:

Location of Chapter – Philadelphia as a hub of institutions with compliance drivers, i.e. Teaching, Utilities, Insurance, Brokerage Houses, law firms, etc.

Meeting Location – Centralized and convenient to main arteries of transportation. Attractive Hotel meeting room setting, affordable hot/tasty/lunch (subsidized by the Chapter), free meeting room, parking validation.

Enthusiasm of the Current Members – Word of Mouth publicity of membership and events. Consistent emphasis on the importance of the Chapter and National Association. Encourage members to achieve CFE status.

Bi-Monthly Training/Luncheon – Most of the officers and BOD staff are on hand to greet guests/members. Meetings announced well in advance via web-site and by mail. Future chapter and national meetings are announced at each meeting. Bulletin Board at the meeting site for a business card exchange, also for networking and enhancing our mailing lists. Chapter membership enrollment forms available at all meetings, and prominently displayed.

Community Outreach w/Colleges & Universities – Discuss of chapter benefits w/schools that w/primarily business related courses. Offer Scholarships.

Chapter Website – Links to ACFE and other business sites to post our training events, as well as the training events of organizations w/reciprocal agreements.

Chapter Newsletter – Distributed on-line and in hard copy.

Chapter Gifts – High quality items displaying the Chapter logo, and distributed during our all-day training in December.

Business Cards – Carried and distributed by the Officers and BOD

Speakers – Offering important training on basic and "hot" fraud related topics.

Board Members – Totally supportive individuals that are carefully selected because of their dedication to the organization and their involvement with Chapter activities, particularly training.

Mailing Lists – Provided by Malcolm Mills. Shows the pool of potential CFEs within a multi-state area.

The Board of Directors at their September 12th Meeting approved the establishment of a **Job Board for CFE Members** and potential employers. This will facilitate Membership access to potential employers with a need for their expertise. Additional information to be provided as the project develops. Board contacts are:

William M. Crowley  
(856) 845-5568  
wmcrowleycfeciamba@yahoo.com

Kathleen M. Walter  
Chapter President  
kwalter@attorneygeneral.gov

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### **Philadelphia Chapter and Association of CFE - Scholarship Opportunity**

The Philadelphia Chapter will be offering one \$1000 scholarship next spring in conjunction with the Association's \$1000 scholarship program. There is a potential scholarship award of up to \$2000 for full-time undergraduate or graduate students with a declared major in accounting or criminal justice.

For the eleventh year, the Association will award a number of scholarships through its Continuing Education Committee. Fifteen scholarships of \$1,000 each will be awarded through the Ritchie-Jennings Memorial Scholarship Program in honor of Tracy Ritchie, CFE, and Larry Jennings, CFE, who both died in a terrorist attack in Pakistan on November 12, 1997. The Philadelphia Chapter is using the same criteria as the Association in judging. Scholarships will be awarded on the basis of overall academic achievement, letters of recommendation, and an original 250-500 word essay discussing how fraud awareness will influence their professional career development.

If you have sons, daughters, other relatives or friends, please make them aware of this scholarship opportunity. There will be additional information at upcoming meetings, newsletters and our website in January. If you have any questions, please call Dave Naser at 610-738-0100 x104 or Cathy Minns at 215-640-1682.

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#### **Take Advantage of the Chapter Website!**

Obtain information on Chapter events, volunteer to serve on a committee, download an electronic version of the Chapter newsletter, browse our collection of frequently asked questions (FAQs), utilize the "Resource Links" area, and network with other professionals who share your interests.

The most popular area is the "Events" page, where members can find information about upcoming meetings and seminars sponsored by the Chapter as well as the national ACFE, and link to online registration forms. Another popular area is the newsletter, The Philadelphia Examiner, is also a popular area, containing articles about topics of interest to fraud professionals, accountants, and others in the field. As is The Philadelphia Chapter's interactive Membership Directory is a comprehensive, searchable database of information, and is intended to serve as a useful resource for the Chapter membership as both a networking and marketing tool.

In the past year, the Chapter website has been visited over 19,500 times. It's a resource well worth the trip!

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#### **JULY 2003 JOINT TWO-DAY CONFERENCE REPORT: ADVANCED COMPUTER-AIDED FRAUD EXAMINATION & DETECTION TECHNIQUES**

By Fred Cantz, CPA, CFE

The Association of Certified Fraud Examiners Advanced Computer-Aided Fraud Examination and Detection Techniques Training Conference, was held at the Doubletree Hotel on July 17 and 18. The conference was attended by eighty-five persons including numerous members of our local chapter. The conference was facilitated by two distinguished instructors, W. Michael Kramer, J.D., CFE, a member of the Board of Regents of the ACFE, and Conan C. Albrecht, Ph.D, a professor of Information Systems at Brigham Young University. Mr. Kramer, a practicing attorney who specializes in fraud-related issues and a former federal prosecutor and Dr. Albrecht, who is an expert in computerized fraud detection techniques provided an excellent overview on the basic principles of fraud examination, and the application of computer aided detection techniques.

The conference agenda included presentations relating to conducting "proactive" fraud detection programs, data manipulation and analysis, the use of online database queries to detect fraud, computer-aided data analysis programs and the use of specific computer-aided fraud tests for fraud indicators and fraud schemes. The central theme of this training was that we, as fraud examiners, must recognize the role that computers play in assisting us in performing analysis of information in an efficient, economical and effective manner. Attendees obtained a better understanding and awareness of the enormous benefit to be gained versus that with traditional fraud examination methods.

## David R. Hoffman; Tuesday, October 14, 2003 – "Elder Care"

An Assistant U.S. Attorney in the Eastern District of PA. He prosecutes health care fraud matters, both civilly and criminally. He brought the first balance billing action against a physician, the first health care RICO prosecution in the district and has been successful in prosecuting physicians, nurses, pharmacists, drug manufacturers, educational institutions, nursing homes and personal care specialists. These resulted in Consent Orders mandating corporate compliance programs, diabetes monitoring and nutrition and wound care standards monitored by U.S. Attorney's Office. He received the Director's Award from U.S. Dept of Justice Executive Office for U.S. Attorneys in 1996 and 2001 for his work in protecting the elderly from abuse and neglect. Also awarded the 1999 Dept of Health and Human Services Inspector General's Integrity Award. He served as Chief Counsel for PA Dept of Aging, an Assistant District Attorney in Philadelphia and also served as judicial law clerk to the Honorable Anthony J. Scirica in state and federal court. He lectures for Temple, UofP & Villanova's Law Schools. He graduated from University of Pittsburgh and their School of Law. See you there.

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### WELCOME NEW MEMBERS !!!

Bonawitz, Dennis	Brown, William J.	Calabretta, Joseph M.	Carroll, James P.
Cohen, Gabrielle	Creveling, Tracey	Donaldson, Walter B.	Geckle, Steven E.
Martin, Richard	Mastronardi, John J.	Pearlman, Don	Prate, Rocco V.
Sacchetti, Mary G.	Simser, Edward V.	Stavros, James V.	Stuller, Jr., Ken F.

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### WELCOME NEW BOARD MEMBERS !!!

#### WILLIAM J. NEWS

Over ten years of diverse experience in civil fraud and criminal investigations using classic investigative tools as well as database research. Skilled at locating and analyzing legal and financial documents, identifying civil and criminal violations and report writing. Experienced formal presenter and consultant. Experience gained at companies such as LEXIS/NEXIS as Risk Management Consultant; NATIONAL FRAUD CENTER as Investigation Analyst; FDIC/RTC as Investigator & Investigation Technician; and PHILADELPHIA STOCK EXCHANGE (PHLX) as Senior Investigator - Surveillance Department, Analyst - Department of Securities and Securities and PACE Clerk - Department of Securities. His education earned at the University of Pennsylvania, The Wharton School, Evening Division 1983 - 1989, where a BBA was received and at LaSalle University - Evening Division - 1978 - 1982.

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#### FRANCIS P. THOMAS, III

Mr. Thomas is First Vice President and General Auditor of The Glenmede Trust Company, N. A., where he has been employed since April 1985. He has served as a national director of the Fiduciary and Investment Risk Management Association, Inc. He was the voting representative for Glenmede's membership in the former Philadelphia Chapter of the Bank Administration Institute. He is a management member of the Institute of Internal Auditors, and participates in their Chief Audit Executives program.

Fran received a Bachelor of Science degree in Business Admin / Finance from the Philadelphia University in 1979 on a scholarship. He was awarded a MBA degree in MIS from Drexel University in 1985. He completed the Trust Audit and Compliance School of Cannon Financial Institute at the University of North Carolina in 1987. He was granted the following designations: Certified Trust Auditor (CTA) in June 1987; Certified Fraud Examiner (CFE) in March 1989 (Life-member); Certified Financial Services Auditor (CFSA) in August 1996, and Certified Fiduciary Audit Professional (CFAP) in May 1992.

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#### LLOYD DOLETSKI

Experience gained as Internal Revenue Service: Field Group Manager, Special Enforcement Program and Training and General Prog. Exam and as Philadelphia College of Pharmacy and Science Business Admin Teacher and Cheltenham Senior High Chemistry Teacher. He received his 1983 MBA from Drexel, 1973 MA-Chemistry from Villanova and 1968 BS-Education from Bloomsburg.

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SEE NEXT ISSUE FOR PROFILES OF OTHER NEW DIRECTORS: WILLIAM CROWLEY & VINCENT TROISI

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MEETINGS and CONFERENCES - Mark your calendar for these important dates!

Tuesday, October 14, 2003 – David Hoffman, Assistant U.S. Attorney, Topic: Elder Justice

**December 1 All-Day Conference at Doubletree Hotel, Broad & Locust Sts. Phila.**

Keynote Speaker:

Speaker: Patrick L. Meehan, US Attorney for the Eastern District

Special Guests:

Toby Bishop, Pres & CEO, Assoc. of Certified Fraud Examiners

Speaker: Alan Fishbein, Manager-In-Charge & Daniel Devine, Director, RGL Forensic Accountants and Consultants,  
Topic: Forensic Accounting & Fraud Investigations

Speaker: Peter F. Schenck, Assistant US Attorney & Speaker: John J. Pease, Assistant US Attorney  
Topic: Corporate Fraud Prosecutions Including an Overview of the Sarbanes – Oxley Act

Speaker: Andrea Rhinehart, Project Director, Delaware Medicare Fraud Alert  
Topic: Medicare and Volunteers

**Philadelphia Area Chapter Training Meetings, Doubletree Hotel, 11:30 AM – 1:30 PM**  
**2004 Meetings - Feb 2, April 19, June 7, August 2, October 4,**

Two Day Joint Conference with national in MAY 2004 NOT JULY

National's Annual Conference will be in July 2004 in Las Vegas.

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Philadelphia Area Chapter Of the  
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