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# FINANCIAL EXPLOITATION INVESTIGATION SUITE OF TOOLS (FEIST) MANUAL

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Texas Adult Protective Services Edition

SEPTEMBER 2021

# Financial Exploitation Investigation Suite of Tools (FEIST) Texas Edition

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# Financial Exploitation Investigation Suite of Tools (FEIST)

## Texas Edition

### Introduction

The Financial Exploitation Investigation Suite of Tools (“FEIST”) was developed by Webber CPA, PLLC in conjunction with a federal grant to Enhance Adult Protective Services awarded by the Administration for Community Living (ACL) to the New York State Office of Children & Family Services Bureau of Adult Services (OCFS BAS). The FEIST was then modified for use by Texas Adult Protective Services. The purpose of these tools is to guide APS specialists’ investigations of financial exploitation, a fast-growing and complex form of abuse against vulnerable adults of all ages.

For purposes of the FEIST, a financial exploitation investigation is divided into two phases. Phase I, Initial Inquiry & Observation, is composed of two steps intended to guide the user to a decision point - can financial exploitation be ruled out or not? If financial exploitation cannot be ruled out, the APS specialist moves to Phase II, Additional Investigation & Documentation, which is composed of three steps intended to guide the user through a thorough and well-documented investigation of alleged financial exploitation. The FEIST steps, when assembled together with supporting documentation, comprise a complete package to assist with making a successful referral to a forensic accountant. It is important to note that these steps are not meant to be rigidly applied. They are simply a helpful structure for conducting investigations and making referrals to forensic accountants.

When investigating alleged financial exploitation, it is important to maintain objectivity, understand the facts of the situation, identify key players, and look for characteristics or “red flags” that will assist the APS specialist or supervisor with distinguishing between financial exploitation and inability to manage finances. Various remedies exist for clients who have been financially exploited or who have fallen victim to poor money management, so this distinction is necessary to efficiently and effectively assign APS resources.

Notification to law enforcement must be made when financial exploitation is a suspected criminal offense. Some evidence of a suspected crime may be readily apparent to APS, such as theft or large cash withdrawals initiated by a suspect; however, other, more complex cases with large and/or multiple accounts, properties, and so on may be more difficult to analyze and summarize the evidence. In these cases, APS may elect to make a referral to forensic accountants for a thorough analysis.

APS policy [10600 Financial Exploitation and Service Delivery](#) and its sub-items include examples of remedies available to clients who have been financially exploited, such as representative payee, powers of attorney, and trusts. Making a guardianship referral is also an available remedy as outlined in [7300 Referrals to HHSC Office of Guardianship Services \(OGS\)](#).

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## Summary Referral Form

Client data is always collected and stored by APS, but other parties involved in a case investigation, like forensic accountants, do not have access to IMPACT. The *Summary Referral Form* summarizes client information to facilitate the clear and concise communication of important data to other parties involved in an investigation. Not only should the form contain demographic information, it should also contain a summary of the alleged financial exploitation as communicated by the reporter or observed by the APS specialist in the space provided. The APS specialist completes the referral form as fully as possible.

## Phase I: Initial Inquiry & Observation

### Step 1: Client Questions/APS Specialist Observations

The first tool in the Financial Exploitation Investigation Suite of Tools (FEIST) is *Step 1: Client Questions/APS Specialist Observations*. The key to any good investigation is asking the right questions, and the key to making a good referral is presenting the results of that investigation in a concise, organized format. This step provides a structure for asking probing questions and documenting the client's responses. For each question, indicate yes, no, unknown, or not applicable, and describe any additional details noted. Space is provided for specialists to document any observations made during their visits that could be indicators of financial exploitation.

*Step 1* also assists the specialist with recognizing when further investigation may not be necessary. Questions 1 through 24 are intended to identify whether financial exploitation may be occurring or has occurred; if so, Questions 25 through 44 are intended to help the specialist dig deeper and recognize the full scope of the financial exploitation.

APS specialists complete *Step 1* as fully as possible with the understanding that while it is required for a forensic accountant referral, it is simply a tool, and not a required procedure for case investigations. These questions are not intended to replace standard interview procedures, but to supplement those procedures. Rapport must be built with the client before broaching these questions, and it may take repeated visits to build this rapport. Even then, the client may be unwilling or unable to answer certain questions.

### Step 2: Red Flags Checklist – Initial Inquiry & Observation

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The second tool in the Financial Exploitation Investigation Suite of Tools (FEIST) is *Step 2: Red Flags Checklist – Initial Inquiry & Observation*, which serves as a summary of all “Red Flags” of financial exploitation noted during the specialist’s assessment of the client. Space exists within the tool for the specialist to reference the indicator or specific example of financial exploitation so that, when submitted as part of the complete referral package, the forensic accountant may efficiently assess the case, review the relevant evidence, and provide an accurate analysis.

*Step 2* also contains a decision point, which requires the specialist to assess whether, based on the available evidence, there is reason to believe financial exploitation may be occurring or has occurred. If the specialist answers “yes” to any of the questions asked, the specialist continues to FEIST Phase II, and takes the additional action noted within *Step 2*. If not, the specialist may cease use of the FEIST because financial exploitation has been ruled out.

## Phase II: Additional Investigation & Documentation

### Step 3: Client Income & Expenses

*Step 3: Client Income & Expenses* creates a detailed summary of the client’s income and expenses. For each income source, indicate the approximate amount of each payment, and the frequency of payment (monthly, quarterly, annually, etc.). For each regular expense item, list the payee, amount, and frequency of payment. Sections for “other” income and expenses are provided to accommodate items not already listed. Based on what is known about the client’s income and expenses, the specialist can use this step to determine whether the client’s income is sufficient to cover his or her expenses, which may be an indicator of either mismanagement of funds or financial exploitation.

At this time, the specialist may want to complete *Appendix A: Client Account Log* to assist with preparing a list of all the client’s known accounts and tracking whether statements and supporting records for those accounts have been requested and obtained from financial institutions. Once FEIST Steps 1 through 3 are complete, the specialist should have an understanding of the alleged financial exploitation, the client’s normal income and expense patterns, and the accounts that may be affected. With this information, APS specialists should be able to identify transactions that do or do not fit within normal patterns as they start reviewing records in FEIST Steps 4 and 5.

### Step 4: Bank Statement Summary

*Step 4: Bank Statement Summary* assists specialists in performing an initial analysis of deposit and withdrawal trends in the client’s bank accounts (checking, savings, money

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market accounts, certificates of deposit). Beginning balances, ending balances, deposits, and withdrawals are usually summarized on the first page of each bank statement, and should be entered in the appropriate fields in *Step 4: Bank Statement Summary*. If observed deposit or withdrawal patterns deviate from what the APS specialist knows about the client's normal income and spending patterns, a more detailed review of bank statements is necessary to determine the cause of these changes.

When completed electronically, ending balances, totals, and net activity fields will automatically calculate. This step is completed for each account and year reviewed.

***Step 4 is optional when making a referral to a forensic accountant.***

### Step 5: Red Flags Checklist – Statement Review

*Step 5: Red Flags Checklist – Statement Review* serves as a summary of all “Red Flags” of financial exploitation noted during the APS specialist's review of the statements and records received from financial institutions, and acts as a guide for APS specialists to use as they review financial records in detail. Space exists within the tool for the APS specialist to reference specific examples of financial exploitation noted during their review so that, when submitted as part of the complete referral package, the forensic accountant may efficiently assess the case, review the relevant evidence, and begin intervention.

### Making the Best Referral

Employing additional resources for intervention in financial exploitation cases may require APS specialists to make a referral, such as for guardianship, law enforcement, or forensic accountants. The best referrals are supported by records that clearly describe the client's situation and provide specific examples of abuse. The FEIST provides a detailed framework for gathering records, conducting a thorough investigation, and ultimately, if necessary, presenting these records in an organized manner to a forensic accountant or other third party for assistance with investigation and intervention.

Referral packages should be assembled as follows:

- Completed *Summary Referral Form*
- Completed form for *Step 1: Client Questions/Caseworker Observations*
- Completed form for *Step 2: Red Flags Checklist – Initial Inquiry & Observation*
- Completed form for *Step 3: Client Income & Expenses*
- Completed form for *Step 4: Bank Statement Summary*

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- Completed form for *Step 5: Red Flags Checklist – Statement Review*
- Completed form for *Appendix A: Client Account Log* (if applicable)
- Completed form for *Appendix B: Document Review Guide* (if applicable)
- Completed form for *Appendix C: Forensic Accountant Referral Checklist* (if applicable)
- All statements and supporting records obtained from financial institutions
- List of other parties involved with the case and their contact information
- Any other relevant documents obtained during the investigation

When making a case referral to a forensic accountant or other third party, be sure to communicate any deadlines associated with your proposed intervention.

To refer a case to a forensic accountant, or to determine whether a case may be appropriate for a forensic accountant, APS specialists may complete *Appendix D: Forensic Accountant Referral Checklist*.

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#### FEIST Version 2.0 Supplemental Appendices

Appendix A: Client Account Log

Appendix B: Document Review Guide

Appendix C: Forensic Accountant Referral Checklist

#### Appendix A: Client Account Log

*Appendix A: Client Account Log* assists APS specialists with creating a list of accounts held by the client, and tracking the related documents requested and received. Information captured in *Appendix A: Client Account Log* includes financial institution name, account type and number, ownership information (individual, joint, POA listed, etc.), dates when the accounts were opened and closed, time periods for which statements or related documents were requested, and dates those documents were received. If statements and related documents are forwarded to a forensic accountant or other third party, either alone or as part of a complete referral package, *Appendix A: Client Account Log* acts as a “Table of Contents” for the documents so that they are presented in an organized format.

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### Appendix B: Document Review Guide

*Appendix B: Document Review Guide* provides a list of other types of documents that APS specialists may want to request as part of their investigations. To assist specialists in reviewing these records, *Appendix B: Document Review Guide* provides some “Considerations for Review”, which are questions designed to point specialists to specific pieces of information within certain documents that may be relevant to their investigation. Any relevant information noted while reviewing these documents should be described in the “Notes” section of *Appendix B: Document Review Guide*. It is important to note that specialists do not have to request all of these documents to conduct an investigation. Action items from *Step 1: Client Questions/APS Specialist Observations* and “Considerations for Review” from *Appendix B: Document Review Guide* help specialists narrow down specific documents that may be relevant to a case.

### Appendix C: Forensic Accountant Referral Checklist

*Appendix C: Forensic Accountant Referral Checklist* assists APS specialists with determining whether a case may be appropriate to refer to a forensic accountant. *Appendix C: Forensic Accountant Referral Checklist* also contains a list of documents to send to the forensic accountant, which includes any and all FEIST steps completed by the APS specialist as part of the investigation.

Case characteristics that may merit the use of forensic accountants include:

- **Complex account structure:** Client has multiple bank and/or investment accounts, multiple institutions, and frequent funds transfers
- **Duration:** The period of financial exploitation is unknown or suspected to have occurred over many years
- **Comingling of funds:** Client and alleged perpetrator share resources
- **Unknown spending habits:** Client spending patterns are unknown and not easily observable based on initial review of records
- **Multiple perpetrators are suspected:** Missing funds must be appropriately attributed to respective perpetrators in order to move forward with the investigation
- **Guardianship is desired:** Petition may be enhanced by forensic accounting report



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## Summary Referral Form

District & Region:

Referral Date:

APS SME:

SME Email:

Client Information	
Client Name:	DOB:
Address:	City, State, Zip:
Phone:	Marital Status:
Alleged Perpetrator Name:	AP's Relationship to the Client:
<b>Case Summary: Provide a summary that includes a description of the alleged incident (EXPL), contacts already made and with whom, records collected, and any other relevant information.</b>	

### ***Case characteristics prompting the forensic accounting referral (check all that apply):***

- ☐ Complex account structure: The client has multiple bank and/or investment accounts, multiple institutions, and frequent funds transfers
- ☐ Duration: The period of financial exploitation is unknown or suspected to have occurred over many years
- ☐ Comingling of funds: Client and alleged perpetrator share resources
- ☐ Unknown spending habits: Client spending patterns are unknown or inconsistent and not easily observable based on initial review of records
- ☐ Multiple perpetrators are suspected: Missing funds must be appropriately attributed to respective perpetrators in order to move forward with the investigation
- ☐ Guardianship is desired: Petition may be enhanced by forensic accounting report

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## Phase I: Initial Inquiry & Observations Step 1: Client Questions/APSS Observations

District & Region:

APS SME:

Case ID:

SME's Email:

	Client Questions/APSS Observations	Response (Yes, No, Unknown, or N/A)	Notes
N/A	Have you talked to the CL about the EXPL allegation?		
1.	Is the client concerned he/she is being taken advantage of financially? If yes, please explain in Notes.		
2.	Is the client experiencing problems or concerns related to his/her care or finances? If yes, explain in Notes.		
3.	Does the client's income cover regular expenses, including monthly bills?		
4.	Is the client able to manage his/her own finances?		
5.	Have any of the client's utilities been disconnected in the last 3-6 months?		
6.	Is the client's rent or mortgage up-to-date? If no, state how far behind in Notes.		

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	Client Questions/APSS Observations	Response (Yes, No, Unknown, or N/A)	Notes
7.	Is the client at risk of eviction or foreclosure? If yes, state how soon in Notes.		
8.	Does anyone else live with the client? If yes, answer the questions below.		
	Does that person or persons contribute to household expenses?		
	Does that person or persons depend on the client financially? If yes, answer the question below.		
	Does the client want to support that person or persons financially?		
9.	Has anyone prevented the client from getting necessary food, clothing, medical supplies or care, or receiving outside communications, including mail and phone calls?		
10.	What are the client's sources of income (retirement, SSI, SSDI, RSDI, VA, pension, investment securities, other)? List the amount from each source in Notes.		
11.	Does the client have a POA, representative payee, or other fiduciary? If yes, answer the question below.		
	Does that person charge a fee for those services?		
	Has the client recently changed his/her POA, representative payee, or other fiduciary? If yes, answer the question below.		

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	Client Questions/APSS Observations	Response (Yes, No, Unknown, or N/A)	Notes
	Did anyone ask or pressure the client to make that change?		
12.	Does anyone help the client pay his/her bills? If yes, answer the questions below.		
	Does that person manage their own money well?		
	Does that person have problems with debt, gambling, drugs, alcohol, or other costly habits?		
13.	Is the client comfortable with how his/her finances are being handled?		
14.	Does the client have a checking and/or savings account? If yes, answer the questions below.		
	What financial institution is the account(s) at?		
	Is anyone else on the account(s)?		
	Has the client received notice of insufficient funds in the last 3-6 months?		
	Does anyone have the client's debit card, checkbook, or PIN#?		
15.	Does the client have credit cards? If yes, answer the questions below.		
	How many credit cards does the client have?		
	Which companies are the credit cards with?		
	Is there a balance? If yes, list the balance for each card in Notes.		

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	Client Questions/APSS Observations	Response (Yes, No, Unknown, or N/A)	Notes
	Has the client ever noted any unauthorized charges?		
16.	Has anyone recently asked the client to sign or co-sign papers? If yes, list what kind in Notes.		
17.	Has anyone recently asked the client to give or lend them money?		
18.	Has the client applied for a bank or car loan recently?		
19.	Has the client recently received a call or letter from a debt collection agency?		
20.	Has the client's identity ever been stolen?		
21.	Has the client ever been the victim of a scam?		
22.	Does the client have any other important assets like jewelry, land, other property? If yes, answer the question below.		
	Is the client missing any money, valuables, or property?		
23.	<b>APSS Observation:</b> Did you <b>observe</b> collection invoices; disconnected utilities or disconnection notices; eviction or foreclosure notices; unopened mail; lack of food; lack of meds or compliance issues with meds; missing valuables; missing financial records; missing funds?		

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	Client Questions/APSS Observations	Response (Yes, No, Unknown, or N/A)	Notes
24.	<b>APSS Observation:</b> Did you <b>observe</b> concern or confusion about finances or housing; no memory of recent financial or legal transactions; concerns about threats related to financial or legal transactions; large monetary gifts; fear of, deference to, or reliance on a caretaker for response; or a new caretaker or trusted relationship?		
<b>If answered 'no' to all indicators of financial exploitation (EXPL), STOP. Proceed to questions in Step 2. If answered 'yes' to one or more indicators of EXPL, continue with questions 25-44.</b>			
25.	Has the client had to go to the hospital recently? If yes, state why and when/what dates in Notes.		
26.	Does the client have health insurance? If yes, list what kind in Notes.		
27.	What are the client's regular expenses (rent, electric, gas, phone, etc.)?		
28.	Does the client have any "pay day" loans or other debt not addressed above?		
29.	Has the client made any large, monetary gifts recently?		
30.	Does the client own his/her home? If yes, answer the questions below.		
	Is anyone else listed on the deed?		
	Does the client have a reverse mortgage on his/her home?		

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	Client Questions/APSS Observations	Response (Yes, No, Unknown, or N/A)	Notes
	Has the client ever applied for a reverse mortgage?		
31.	Does the client own, lease, or use a car? If yes, answer the questions below.		
	Does anyone else use the car?		
	If yes, does that person pay for gas or repairs with their own money or the client's money?		
32.	Does the client have any insurance policies? If yes, list the beneficiaries, amounts, and companies (if known) in Notes.		
33.	Does the client have a will? If yes, answer the questions below.		
	Who are the beneficiaries?		
	Has the client made changes to his/her will, including beneficiaries recently?		
	If changes have been made recently, did anyone ask or pressure the client to do this?		
34.	Does the client have an investment account (stocks, bonds, etc.)? If yes, list where in Notes.		
35.	Does the client have any other accounts at banks or brokerage firms? If yes, list the type of account(s) and which financial institution(s) in Notes.		
36.	Does the client receive dividends or investment income?		
37.	Is the client the beneficiary or principal of a trust?		
38.	Has the client recently sold or inherited property?		



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	Client Questions/APSS Observations	Response (Yes, No, Unknown, or N/A)	Notes
39.	Has anyone sold the client's property without his/her consent?		
40.	Does the client file a tax return every year?		
41.	Has the client had to file for bankruptcy in the last 5 years?		
42.	<b>APSS Observation:</b> Did you <b>observe</b> isolation from family/loved ones; poor eye contact; withdrawn nature; malnourishment; hygiene issues; cuts or bruises; or inappropriate clothing? Any legal invoices or recently signed legal documents (POA, Health Care Proxy, Will, etc.)?		
43.	<b>APSS Observation:</b> Do/Does the individual(s) identified by the client under Step 1 above have any apparent issues with or known history of domestic violence?		
44.	<b>APSS Observation:</b> Do/Does the individual(s) identified by the client as caretaker or other responsible party appear capable of providing the necessary assistance to the client?		
<b>Other Comments/Observations:</b>			

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## Phase I: Initial Inquiry & Observation Step 2: Red Flags Checklist - Observations

District & Region:

APS SME:

Case ID:

SME's Email:

✓	Red Flag	Source of Information (client, collateral, previous case ID, etc.)
	Multiple individuals (reporters, collaterals, etc.) allege EXPL	
	Case history of financial exploitation allegations	
	Responses suggest lack of capacity, dementia, or severe disorientation	
	Client relies on others for ADLs/IADLs	
	Others speak for the client, or client defers to others for response	
	Client is evasive, hostile, or dismissive about finances	
	Client is isolated from resources/other individuals	
	Client reports feeling threatened or ashamed	
	Client is unable to pay bills	
	Client is uncomfortable with the way finances are handled	
	Individual handling finances or care charges excessive fees	
	Client is uncomfortable with decisions made by POA or Health Care Proxy (HCP)	
	Others live in the home and do not contribute to the household	
	Others use client's car or other assets	
	Client believes income does not cover regular expenses	
	Client has unexplained debt	
	Client has unexplained balances on credit card(s)	
	Client believes he/she has been financially exploited, scammed, or had identity stolen	

After you have completed and reviewed Step 2: Red Flags Checklist, ask yourself the following additional questions based on what you know so far:

- Is there a reason to believe the client may be a victim of financial exploitation? Is this something you cannot rule out?

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- Is there a reason to believe someone may be taking the client's funds or property without the client's consent or knowledge?
- Is there a reason to believe that someone is using the client's funds or property in their own interest rather than the interest of the client?
- Does the client indicate he/she is being exploited, and this cannot be ruled out?

If the answer to any of these questions is yes, **proceed with FEIST Phase II and take other needed action to gather additional information.**

- This includes making a prompt request for financial records not already gathered from the financial institutions where the client is believed to have accounts.
- If the client is believed to have given a power of attorney to an agent, contact the agent, and request a copy of the power of attorney document.
- Consider requesting a credit report for the client (if capable of giving consent).

If, on the other hand, it appears that the client is knowingly giving their funds or property away to another person, with the client's informed consent AND without coercion or intimidation, then it is unlikely to be financial exploitation. **If you can rule out financial exploitation, stop use of the FEIST.**

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## Phase II: Additional Investigation & Documentation Step 3: Client Income & Expenses

District & Region:

APS SME:

Case ID:

SME's Email:

Income Source	Amount	Frequency	Notes
Social Security Retirement			
Disability Benefits (SSI, SSDI, VA, etc.)			
Food stamps, TANF, housing assistance, or other monetary government benefits			
Pension(s)			
Investment Income or Distributions			
Trust Income or Distributions			
Wages			
Rental Income			
Inheritance			
Insurance Proceeds			
Other:			

Expenses	Amount	Frequency	Notes
Mortgage/Rent			
Facility Rent (skilled nursing, assisted living, etc.)			
Home Equity Loan or Other Line of Credit			
Utilities (gas, electric, water, landline)			
Cell Phone			
Cable			
Car Loan			
Gas (car)			

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Expenses	Amount	Frequency	Notes
Bus, Uber, Taxi, or Other Transportation			
Food			
Property Taxes			
Insurance (auto, health, etc.)			
Medical			
Loan Payment(s)			
Credit Card Payment(s)			
Magazine(s)/Newspaper(s)			
Charitable Donations			
Cash Withdrawals			
Clothing			
Pooled Trust/Medicaid Spenddown			
Other			
<b>Does income appear to cover regular expenses? (check one)</b> Yes <input type="checkbox"/> No <input type="checkbox"/>			
<b>Other Comments:</b> <div style="height: 40px; border: 1px solid black;"></div>			

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## Phase II: Additional Investigation & Documentation Step 4: Bank Statement Summary

District & Region:

APS SME:

Case ID:

SME's Email:

Financial Institution:

Account Number:

Account Type:

Year:

**This step is optional when making a referral to a forensic accountant.**

Instructions: Based on the information given on the bank statements, complete the chart below to summarize and analyze financial activity over time. See FEIST manual for more information.

Statement Month	Income Deposits	Other Deposits	Check Withdrawals	ATM Withdrawals	Transfers to Other Accounts	Fees	Other Withdrawals	Ending Balance
January								-
February								-
March								-
April								-
May								-
June								-
July								-
August								-
September								-
October								-
November								-
December								-
Totals	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
						-		Net Activity

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## Phase II: Additional Investigation & Documentation Step 5: Red Flags Checklist – Statement Review

District & Region:

APS SME:

Case ID:

SME's Email:

✓	Red Flag	Source of Information (client, collateral, previous case ID, etc.)
	Client denies transactions	
	Negative net activity (cash flow) in one or more accounts	
	Increasing monthly/annual withdrawals over time	
	Increasing monthly/annual deposits over time	
	Decreasing monthly/annual deposits over time	
	Large, unknown withdrawals	
	Large, unknown deposits	
	Accounts being consolidated	
	Utilities being paid while client resides in facility	
	Multiple payments to utility company in the same month	
	Payments for gas/auto when client does not have/use car	
	Round dollar amounts paid to credit card companies	
	Transfers to/from other accounts	
	Frequent account changes (ex: new account numbers or new banks)	
	Account ownership changes during period (ex: POA added)	
	Statement mailing address changes during period	
	AP was receiving/keeping bank statements	
	Withdrawals from previously unused accounts	
	Debit card purchases inconsistent with observed lifestyle	
	Increase in ATM withdrawals	
	ATM/debit card held by AP	
	Checks written to cash or to AP(s)	
	Inconsistent or suspicious handwriting or signatures on checks or withdrawal slips	
	Insufficient funds fees, returned checks, or rejected transactions	
	Deposits from real estate transactions, or lack thereof	

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✓	Red Flag	Source of Information (client, collateral, previous case ID, etc.)
	Growing credit card debt, or new credit accounts opened	
	Decline or change in credit score	
	New loans	
	Recent large purchases (cars, furniture)	
	Transactions incurred while client was in hospital or other facility	
	Spending in client's account consistent with spending in AP's account	
	Change in banking activity observed when suspect became involved	



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**Supplemental Appendices**

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## Appendix A: Client Account Log

District & Region:

APS SME:

Case ID:

SME's Email:

Financial Institution Name	Account Number	Ownership or Type	Open Date	Close Date	Time Period Requested	Date Received
<i>Checking Accounts</i>						
<i>Savings Accounts/Money Market Accounts</i>						
<i>Certificates of Deposit</i>						
<i>Investment Accounts</i>						
<i>Real Property and Other Assets</i>						
<i>Loans, Credit, and Other Debt</i>						

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## Appendix B: Document Review Guide

District & Region:

APS SME:

Case ID:

SME's Email:

Document	Considerations for Review	Notes
Power of Attorney documents	When was it executed? Did the Client have capacity at that time? Who is authorized as agent for the Client? What are his/her powers? Are they exercised appropriately, if at all? Is agent receiving compensation? Is there a gift rider? Does the bank have a copy of a valid POA to allow the person to act on the account? Should an accounting be requested from the agent under POA (15-day letter)?	
Health Care Proxy documents	What are the Client's wishes for medical care? Who is authorized to make decisions on Client's behalf? Have past decisions aligned with Client directives?	
Wills	Are beneficiaries appropriately designated? Who is the Executor? When was it signed?	
Deeds	Do County Clerk records reflect property ownership as described by Victim? Any recent transfers?	
Mortgage applications, agreements, repayment records	Does the Client have a mortgage? On what property? When was it signed? Who signed it? When is it expected to be paid off?	
Reverse mortgage applications, agreements, and draw requests	Does the Client have a reverse mortgage? On what property? When was it signed? By whom? How much has been withdrawn?	

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Document	Considerations for Review	Notes
Line of credit applications, agreements, disbursement and repayment records	Does the Client have a home equity line of credit? When was it signed? Who signed for it? When is it expected to be paid off?	
HUD statements and real estate closing documents	Where is the property? How much money did the Client spend or receive for the purchase or sale of real property? Are these figures reflected in bank documents?	
Lease agreements	Does the Client lease any property or vehicles? What type of property or vehicle? Was the lease entered into for the direct benefit of the Client? How long is the Client obligated under the lease? What are the payment terms?	
Vehicle title	Does the Client own the vehicle? What kind? Are liens attached? Has it been transferred to another party? Did the other party give appropriate consideration?	
Property appraisals (real estate, auto, jewelry)	What additional property does the Client own? Are these assets accounted for?	
Collateral agreements	Has the Client assigned any property as collateral for debt? What property? What is the assigned value? What are the payment terms?	
Insurance policy documents	Who purchased the insurance, when, and for what purposes? Are beneficiaries appropriately designated? Were beneficiaries recently changed? What is the cash value, if any? Are any loans outstanding? What is the	

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Document	Considerations for Review	Notes
	premium and how often is it paid?	
Bank statements and records for all accounts and safe deposit boxes, such as: signature cards and account opening records, canceled checks (front and back), deposit items, withdrawal slips, wire transfer details, Currency Transaction Reports (CTRs), and Suspicious Activity Reports (SARs)	Who is listed on the accounts? How long have accounts been open? What are expected patterns of spending? Do observed patterns deviate from expectations? Did you note inconsistent or suspicious handwriting/signatures? Large transactions? Transfers between accounts and/or account consolidations? Unauthorized charges?	
Investment account documents, such as: statements, deposit forms, withdrawal requests, beneficiary designations	Who is listed on the accounts? How long have accounts been open? What are expected patterns of income and distributions? Did you note inconsistent or suspicious handwriting/signatures? Large withdrawals? Other linked bank/investment accounts?	
Credit card statements	Are bills being paid regularly, in full, and on time? How much debt is outstanding?	
Trust documents	Is the Client a trustee or beneficiary of a Trust? What is the approximate value of the Trust and related income? What are implications for the case?	

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Document	Considerations for Review	Notes
Federal and state income tax returns	Did the Client file a tax return, if required? From where does the Client draw income? Does the Client have investments? A mortgage? Has APS requested financial records from all institutions listed on Schedules B and D?	
Medicaid application and decision	Is the Client covered by Medicaid? When was the application submitted, signed, and approved? Will alleged exploitation affect eligibility?	
Medical/Insurance records	What kind of medical conditions does the Client have? What services were provided recently, and which services are covered by insurance? Did the Client have large medical bills in the past or upcoming?	
Hospital records	Was the Client recently hospitalized? What kind financial activity took place while the Client was hospitalized? Does that activity appear reasonable given the Client's situation?	
Resident facility records	Who is the primary contact for the Client? What information does the Client's account history and notes reveal?	
Capacity/psychiatric evaluation	Has a provider determined Client's capacity? Was determination effective before or during abuse? Were/are suspected perpetrators aware of determination?	

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Document	Considerations for Review	Notes
Past APS records	What allegations were investigated in client's past and what plans were put in place following any case closings?	
Guardianship records	Who makes decisions on behalf of the Client? Does the guardianship cover person, property, or both?	
Probate court records	What assets were left to the Client as a result of another's death? Are those assets in the Client's possession?	
Bankruptcy court records	What was the reason and outcome of the bankruptcy proceedings? What is the status of any debt repayment?	
Other judgment records	What was the reason for judgment? What debt is owed by the Client as a result? What is the status of repayment?	

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Document	Considerations for Review	Notes
Other Documents Reviewed/Notes:		



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## Appendix C: Forensic Accountant Referral Checklist

District & Region:

APS SME:

Case ID:

SME's Email:

### ***Case documents to send to a forensic accountant:***

- ☐ Summary Referral Form
- ☐ Step 1: Client Questions/APS Specialist Observations
- ☐ Step 2: Red Flags Checklist – Initial Inquiry & Observation
- ☐ Step 3: Client Income & Expenses
- ☐ Step 4: Bank Statement Summary
- ☐ Step 5: Red Flags Checklist – Statement Review
- ☐ Appendix A: Client Account Log
- ☐ Appendix B: Document Review Guide
- ☐ Appendix C: Forensic Accountant Referral Checklist
- ☐ All statements and supporting records requested and obtained from financial institutions.
- ☐ List of other parties involved with case and contact information.
- ☐ Any other relevant documents obtained during the investigation.

Deadline for report from forensic accountants: