

Center For Combating Elder Financial Abuse



CENTER FOR COMBATING ELDER FINANCIAL ABUSE

John Schwartz

Founder and President

CENTER FOR COMBATING ELDER FINANCIAL ABUSE

Lesson One:

Introduction On Predators Who Conduct Elder Financial Abuse

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**For some individuals, this is their first training class in
Elder Financial Abuse.**

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Goals for today's training:

- **Provide an introduction on what elder financial abuse REALLY looks like in the United States today.**
- **Discuss actions you can take NOW to prevent elder financial abuse.**

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Training Agenda

1. First two cases - set the tone of the presentation
2. Background on myself and the Center
3. Mission and goals
4. Predator Fundamental Principles: Detection and Control
5. Examples of three convicted financial predators
6. A “tech support” scheme from Arlington, VA
7. Virginia General Assembly passes law on February 23rd
8. Steps to protect seniors & review of the Center’s website

CENTER FOR COMBATING ELDER FINANCIAL ABUSE

In this training, you will see videos from:

- **Victims**
- **Convicted predators**

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In this training, we go beyond a list of "red flags".



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▼ About Elder Abuse

Physical Abuse

Psychological Abuse

Financial
Exploitation

Neglect &
Abandonment

Sexual Abuse

Red Flags of Elder
Abuse

State Elder Abuse
Flyers

Find Help Near You

► Financial Exploitation

► Prosecutors

Law Enforcement

► Victim Specialists

► Multidisciplinary
Teams

Guardianship

FINANCIAL EXPLOITATION

Stories

Did This Happen to You?

Warning Signs

WARNING SIGNS

Warning signs of financial exploitation include:

- Sudden changes in bank accounts or banking practices, including an unexplained withdrawal of large sums of money by a person accompanying the elder
- The inclusion of additional names on an elder's bank signature card
- Unauthorized withdrawal of the elder's funds using the elder's ATM card
- Abrupt changes in a will or other financial documents
- Unexplained disappearance of funds or valuable possessions
- Substandard care being provided or bills left unpaid despite the availability of adequate financial resources
- Discovery of an elder's signature being forged for financial transactions or for the titles of his/her possessions
- Sudden appearance of previously uninvolved relatives claiming their rights to an elder's property or possessions
- Unexplained sudden transfer of assets to a family member or someone outside the family
- The provision of services that are not necessary
- An elder's report of financial exploitation.

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**Next, let's look at our first two cases to "set the tone"
of the presentation.**

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**Our first case: John McKendrick, US Naval Academy Class of 1966, victim
of a “tech support” scheme.**

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Be Warned! How Navy Veteran Lost \$92,000 to This Online Scam

A cautionary tale about the sophistication of criminals who target the vulnerable

By Katherine Gustafson,

Published September 14, 2023

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Scammers [prey on veterans](#), exploiting their trust and goodwill, often striking when they are most vulnerable.

That's what happened to John McKendrick, 80, of West Palm Beach, Florida, a retired Navy lieutenant commander and veteran of 20 years who lost his life savings. Now, he wants to warn other veterans.

Navy veteran warns of online security scammers that robbed him of his life savings

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Updated: 7:05 AM EDT Apr 28, 2023

Infinite Scroll Enabled



Tara Jakeway



VETERAN SCAMMED OUT OF LIFE SAVINGS
WEST PALM BEACH

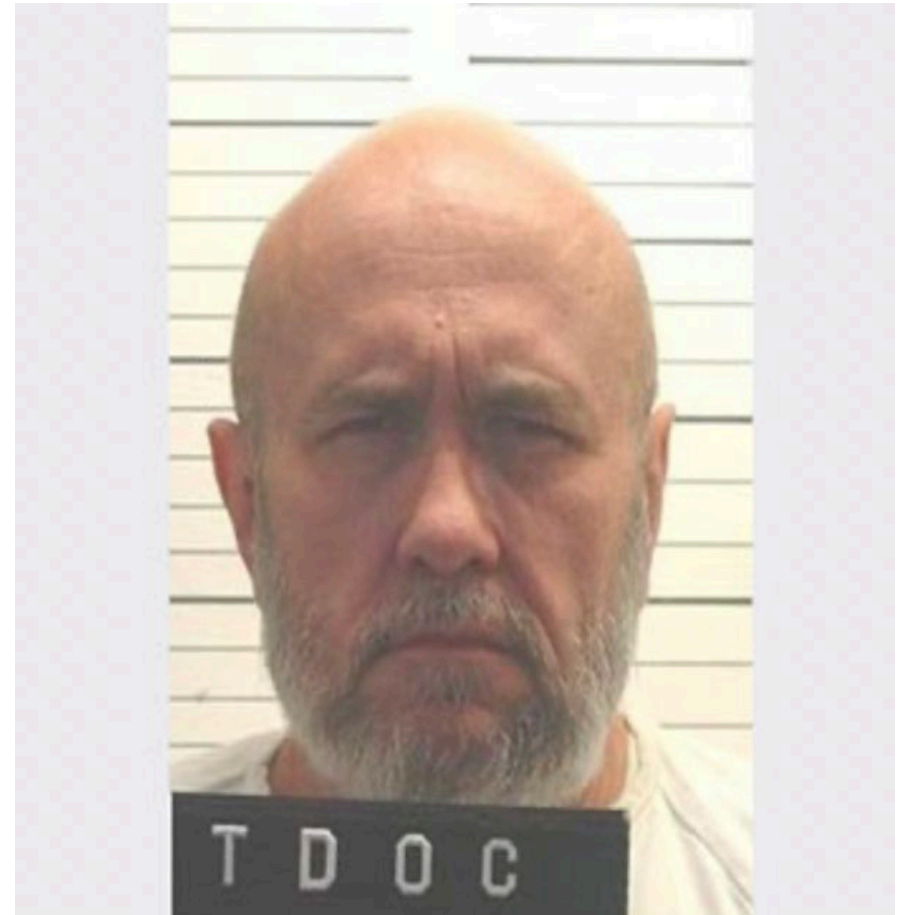
ONLY ON



CENTER FOR COMBATING ELDER FINANCIAL ABUSE

Our second case: Roger Dale Williams, church pastor, convicted predator

Convicted Predator: Roger Williams – Church Pastor



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Eastern District of Tennessee

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FOR IMMEDIATE RELEASE

Thursday, September 13, 2018

Roger Dale Williams Sentenced To 63 Months in Prison for Phony Investment Scheme

KNOXVILLE, Tenn.- On September 13, 2018, the Honorable Pamela L. Reeves, U.S. District Judge, sentenced Roger Dale Williams, 52, of Shelbyville, Kentucky, to serve 63 months in prison for conducting a scheme to defraud investors and obstructing the administration of federal tax laws. Williams was also ordered to pay \$1,373,361.96 in restitution to victims that lost money as a result of the scheme.

Williams pleaded guilty in May 2018 to federal mail fraud and tax charges stemming from his scheme to defraud victims who believed that they were investing money in an “investment club” and, later, in church bonds. He began offering bogus investment opportunities in 2001 as part of membership in an “investment club,” which included opportunities to invest in stock purchases, business start-ups, and bonds. Many of his victims were elderly. In order to perpetuate the scheme, he also provided victims with false IRS forms pertaining to their purported investments.

More recently, Williams extended his fraud scheme to members of the King Branch Road Church of Christ in Pigeon Forge, Tennessee, where he had become a pastor. He solicited funds for the purchase of

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My Background

- Retired FBI Agent with 24 years of experience
- Served as an active-duty Army officer for 9 years (Field Artillery)
- Researched our nation's efforts to combat elder financial abuse since 2012
- Our Center is a veteran operated, 501c3 nonprofit organization

AMERICAN SOCIETY OF CRIMINOLOGY

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78TH ANNUAL MEETING OF THE ASC



CENTER FOR COMBATING ELDER FINANCIAL ABUSE

Mission and Goals

- Mission of the Center: ***Lead the way*** in protecting the elderly and their families from predators who commit elder financial abuse.
- Goals of the Center:
 - 1) Increase awareness of the **scale and scope of the threat posed by financial predators.**
 - 2) Provide innovative detection and prevention solutions.
- Note: Currently, there are 58 million elders in the United States. There will be 70 million by 2030.

The Scope of Elder Financial Exploitation: What It Costs Victims

Jilenne Gunther, MSW, JD

National Director of BankSafe, AARP



Introduction

Every year, millions of older Americans lose significant portions of their life savings to elder financial exploitation, and the problem is only growing. During the pandemic, the rate of exploitation doubled, and some pandemic-related forms of exploitation are here to stay.¹

Elder financial exploitation (EFE) is “the illegal or improper use of an older adult’s funds, property, or assets.”² Perpetrators range from family members and other people a victim knows (sometimes referred to in this report as “known others”) to professional criminals. Through this kind of exploitation, many victims are stripped of a significant part of their retirement savings.^{3,4} Getting restitution⁵ is nearly impossible, and re-earning that money takes time, when time is not on an older victim’s side. Victims often lose not only key resources that can jeopardize their current and future financial security but also a degree of their own dignity.⁶

Getting at the true financial scope of this immense problem has been elusive. To start, many victims never report EFE because of shame and embarrassment.⁷ In fact, the tendency to not report an incident may be greatest when the perpetrator is related to the victim.⁸ Victims may not want to publicly cast shame on their family; they may rely on the perpetrator for needed care and not want to jeopardize that care, or they may simply not want the family member to be prosecuted.

The impact also reaches other parts of society. With a victim’s funds depleted, family caregivers are even more likely to incur costs to provide care.⁹ The financial industry, unsurprisingly, loses billions of dollars each year to EFE,¹⁰ while taxpayers bear an increased burden in the form of the public programs and other resources needed to assist those victims who are financially devastated.^{11, 12}

Moreover, the cost of EFE extends well beyond financial losses.¹³ Victims of these crimes suffer declines in mental health that coincide with the emotional distress of feeling tricked and misled.^{14, 15} Physical health of victims is also at stake; evidence links EFE to cardiovascular problems¹⁶ and possibly even earlier death.¹⁷

Accurately quantifying the amount of total financial losses can be a start toward understanding the scope of the problem, even in terms of beginning to understand the breadth of nonfinancial impacts. In this paper, using a first-of-its-kind methodology to measure the annual financial cost of EFE in the United States, we find that victims over age 60 lost \$28.3 billion.

\$28.3 Billion

Victims of EFE lose \$28.3 billion annually.

Annual Cost of Elder Financial Abuse

What if our Center can reduce the annual cost of elder financial abuse by only .1% (we don't touch 99.9%)?

.1% of \$28.3 Billion = \$28.3 Million

I am confident that we can do this!

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HOW does the Center accomplish its mission?

- We go beyond the “red flags” and look at this crime through the eyes of the predator
- We study predators and learn their **fundamental** principles

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Predator Fundamental Principles: Control and Detection

- Main goal for *any* predator: **GAIN CONTROL**
- How does a predator gain control: **AVOID DETECTION**
- Result: A predator that avoids **DETECTION** is in **CONTROL** of his prey
- This is what I meant by going beyond the “red flags”
- Time element: Predator crimes can happen “**IN THE BLINK OF AN EYE**”

Predator Fundamentals: Control and Detection

The late Mickey Rooney, age 90, before the Senate Aging Committee on March 2, 2011:

“You can be in **CONTROL** of your life one minute and in the next minute, you have absolutely no **CONTROL**. Sometimes this happens quickly, but other times it is very gradual.”



Mickey Rooney testifies before the Senate Aging Committee about elder abuse in 2011 (AP Photo)

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Ponzi Schemes: One of the most effective “attack vectors”

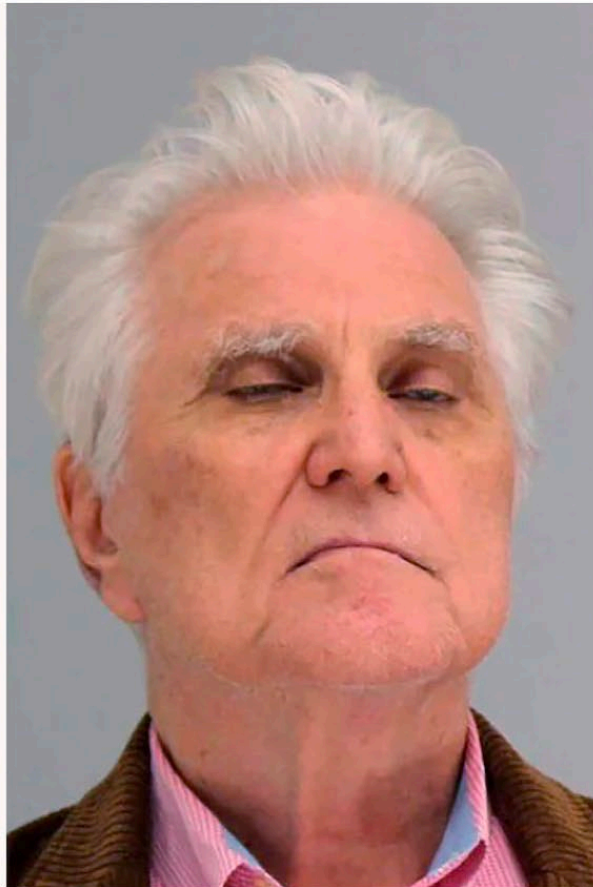
- William Neil “Doc” Gallagher: Christian talk show host
- Scott Kohn: The “Bernie Madoff” of elder financial abuse

A Christian talk show host promised to enrich clients. His Ponzi scheme bilked them out of millions.



By [Brittany Shammass](#)

November 2, 2021 at 9:28 p.m. EDT





Sharen Wilson Criminal District Attorney



For Immediate Release

Contact: Anna Tinsley Williams, Communications Officer
atwilliams@tarrantcountytexas.gov
(817) 884-3120(w); (682) 299-8079 (cell)

Monday, November 1, 2021

"Doc" Gallagher Sentenced to Three Life Terms for Ponzi Scheme

(Fort Worth, TX) – William Neil "Doc" Gallagher, the self-styled "Money Doctor," was sentenced to three life sentences in prison -- plus another 30 years behind bars -- Monday by Judge Elizabeth Beach.

The sentences were a result of his guilty plea on August 31, 2021, to charges stemming from a Ponzi scheme he ran in Hurst that bilked senior citizens out of millions of dollars.

Judge Beach sentenced Gallagher to life terms on three charges -- securing the execution of a document by deception for an amount greater than \$200,000, theft of property more than \$300,000 and misapplication of fiduciary property or property of financial institution of more than \$300,000. He was sentenced to another 10 years each on three charges: One charge of forgery against the elderly and two charges of exploitation of the elderly.

"Doc' Gallagher is one of the worst offenders I have seen," said Lori Varnell, chief of the Tarrant County Criminal District Attorney's Elder Financial Fraud team. "He ruthlessly stole from his clients who trusted him for almost a decade.

"He amassed \$32 million in loss to all of his clients and exploited many elder individuals. He worked his way around churches preying on people who believed he was a Christian."

Gallagher, 80, ran the "Gallagher Financial Group" that advertised on Christian radio with the tag line "See you in church on Sunday." In 2020, he pleaded guilty to similar charges in Dallas County and was sentenced to 25 years in prison.

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Doc Gallagher hid in “plain sight” on Christian radio and avoided detection.

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What's it like to turn on the TV and learn you lost your life savings to an alleged swindler?

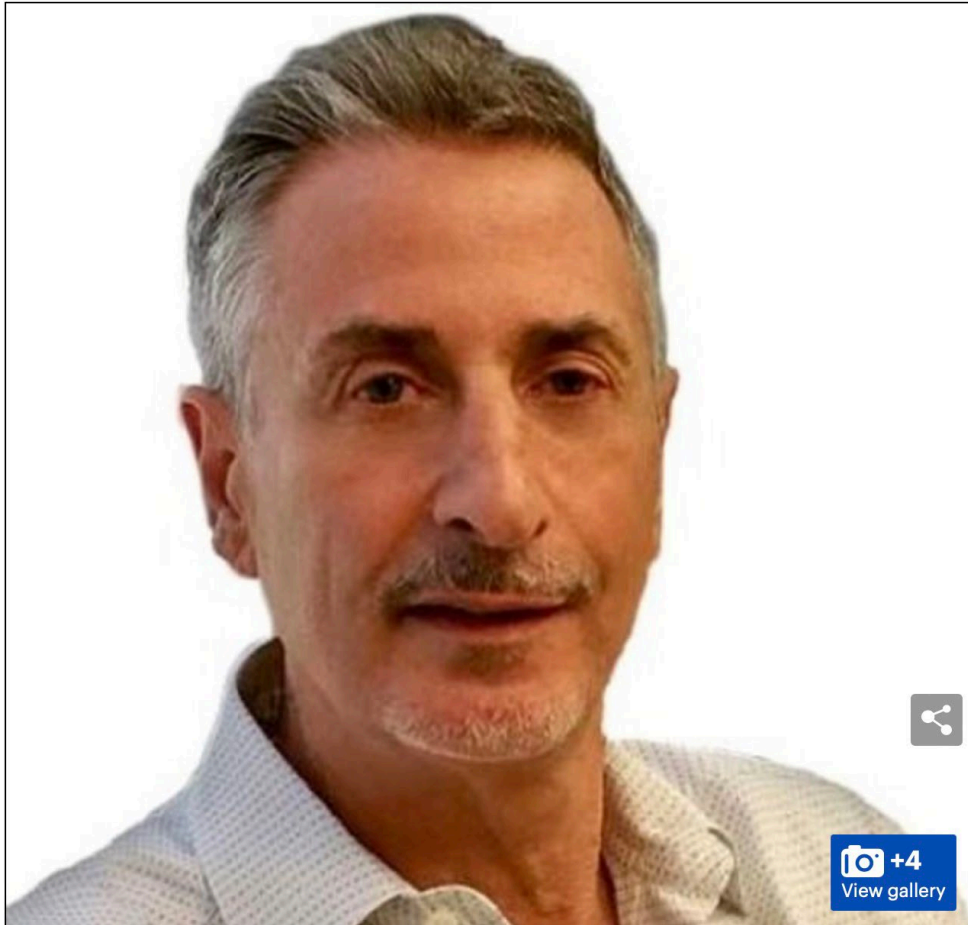
One of "Doc" Gallagher's investors in an alleged Ponzi scheme speaks out: Susan Pippi says, "We trusted him. ... He fooled us."



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Our next case: Scott Kohn, the “Bernie Madoff” of elder financial abuse

Scott Kohn: The “Bernie Madoff” of EFA



Scott Kohn, 68, of Newport, California, was indicted in 2019 for the fraudulent scheme which he used to fund an opulent lifestyle from a \$4.8million mansion boasting sweeping views of the Pacific Ocean



Scott Kohn leaves the courthouse Wednesday, Nov. 20, 2019. SABRINA SCHAEFFER/Staff

Department of Justice

Office of Public Affairs

FOR IMMEDIATE RELEASE

Thursday, August 18, 2022

California Man Receives 10 Year Sentence Following Guilty Plea in South Carolina to Fraud Conspiracy

Masterminded \$300 Million Ponzi Scheme Targeting Retirees and Military Pension Holders

Judge Bruce Hendricks of the U.S. District Court for the District of South Carolina sentenced a California man today to 10 years in prison for his role as the ringleader of a nationwide Ponzi scheme that exploited military veterans in desperate financial straits and targeted elderly investors seeking a safe retirement investment.

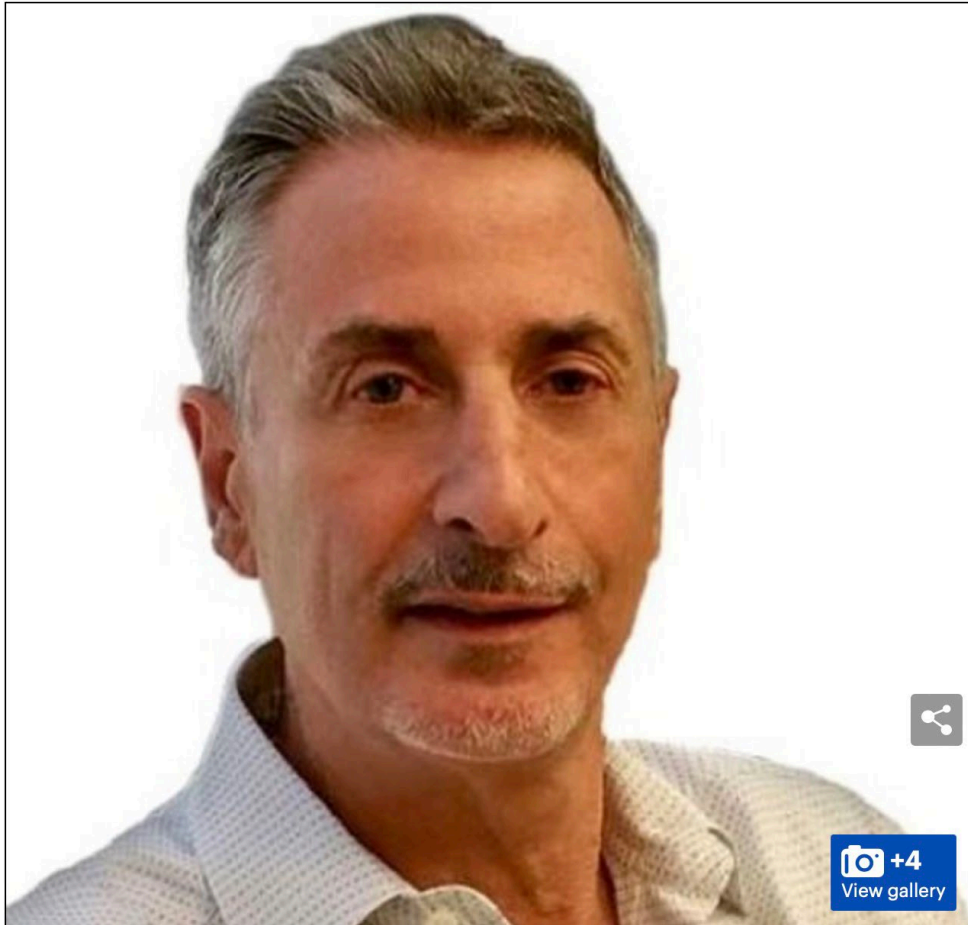
Scott Kohn, 68, of Newport, California, ran a corporation called Future Income Payments LLC (FIP), formerly known as Pensions, Annuities, and Settlements LLC. From April 2011 until April 2018, Kohn and his co-conspirators used FIP as a vehicle for a nationwide Ponzi scheme.

Kohn and his co-conspirators solicited pensioners experiencing financial distress, most of whom were military veterans, by offering an upfront lump-sum payment in exchange for an assignment of the rights to their monthly pensions and disability payments. Even though the assignment transactions were characterized as “sales,” they were, in fact, usurious loans with annual interest rates of as much as 240%.

Kohn and his co-conspirators – working through a network of hundreds of financial advisors and insurance agents nationwide – then solicited thousands of seniors to purchase FIP’s “structured cash flows,” which were the pensioners’ monthly pension payments. Kohn and his co-conspirators induced these seniors to invest their retirement savings with FIP by making false assurances of a significant rate of return on their investment, concealing the usurious nature of FIP’s transactions with the pensioners and lying about the financial health of the corporation.

During the seven years the scheme operated, Kohn drew upon FIP funds to live a lavish lifestyle. When the Ponzi scheme ultimately collapsed, Kohn and his co-conspirators had caused more than \$310 million in losses to more than 2,500 retirees and had placed more than 13,000 veterans into exploitative loans.

Scott Kohn: The “Bernie Madoff” of EFA



Scott Kohn, 68, of Newport, California, was indicted in 2019 for the fraudulent scheme which he used to fund an opulent lifestyle from a \$4.8million mansion boasting sweeping views of the Pacific Ocean



Scott Kohn leaves the courthouse Wednesday, Nov. 20, 2019. SABRINA SCHAEFFER/Staff

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Our next case: Rusty Rahm also stole \$300 million from the elderly.

Kansas City Man Pleads Guilty for His Part in a Nationwide Telemarketing Fraud Scheme

Thursday, December 8, 2022

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For Immediate Release

U.S. Attorney's Office, District of Minnesota

MINNEAPOLIS- A Kansas City man has pleaded guilty to conspiracy to commit mail fraud in connection to a \$300 million nationwide telemarketing fraud scheme that targeted elderly and vulnerable victims announced, U.S. Attorney Andrew M. Luger.

According to court documents, from 2000 through February 2020, Russell Jason Rahm, 52, participated in a telemarketing fraud scheme involving fraudulent magazine subscription sales. Rahm was the owner and Chief Executive Officer of several Kansas-based companies involved in the fraudulent scheme, including Subscription Ink Co. and Millennium Marketing. As part of the scheme, Rahm's companies, along with other companies, used fraudulent sales scripts to defraud victim-consumers, many of whom were elderly or otherwise vulnerable, out of hundreds or even thousands of dollars. The fraudulent sales scripts were designed to induce consumers, through a series of lies and misrepresentations, into making large or repeat payments. Rahm's companies also handled collections for those victim-consumers who did not pay or who challenged the resulting charges as fraudulent. Rahm's companies received, reviewed, and responded to complaints from victim-consumers to state Attorney General's offices and the Better Business Bureau.

According to court documents, Rahm and his companies also provided sales leads and handled order management, billing, and collections for other companies involved in fraudulent magazine sales in exchange for a percentage of the revenue received from victim-consumers.

Powerboat Racer Rusty Rahm Pleads Guilty In \$300M Magazine Fraud Scheme

by Nathan Bechtold Dec 14, 2022 Updated Dec 14, 2022



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**Rusty Rahm avoided detection from 2000 through 2020 – approximately
20 years!**

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Understand the scale and scope of the threat posed by financial predators.

Two predators successfully stole \$300 million.

- Scott Kohn sentenced on August 18, 2022
- Rusty Rahm pleads guilty on December 8, 2022

These cases happened less than two years ago!

These cases are approximately four months apart!

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Our last case: Rich Brune, age 75

Arlington, VA

Lost \$800,000 through a "tech support" scheme

Date: October 6, 2023

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FBI warns of rising elder fraud crime rates as scammers steal billions in savings each year


CBS
EVENING
NEWS
WITH NORAH O'DONNELL

BY ROBERT LEGARE, JEFF PEGUES, ANDRES TRIAY

OCTOBER 6, 2023 / 8:05 PM EDT / CBS NEWS



CBS News: Rich Brune

Rich Brune – a 75-year-old retiree living in Virginia – told CBS News he fell for an online scam last year that cost him nearly \$800,000. Sophisticated criminals posing as Microsoft workers contacted him online and told Brune his computer had been hacked, his financial accounts were compromised, and he needed to take urgent remedial action.

Over a five-month period, the Navy veteran said he was instructed to transfer much of his life savings into a cryptocurrency account that the scammers told him was safe from the purported hackers. Instead, they were robbing him of his nest egg.

After his money vanished, according to Brune, the Internal Revenue Service informed him that he owed approximately \$200,000 in taxes because the money stolen from him had been withdrawn from his retirement accounts.

A former White House scientist was scammed out of \$655,000. Then came the IRS.

The government that Frances Sharples served for more than four decades considers the money to be income, compounding her pain



By Michael Laris

December 14, 2023 at 6:00 a.m. EST



Virginia General Assembly

4 WASHINGTON

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THE SCENE

INVESTIGATIONS

SPORTS

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LIVE TV

 Peak bloom prediction

 Forecast

Discover Black Heritage

 Virginia early voting

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Our news standards

14 WEATHER ALERTS

NEWS4 I-TEAM

Virginia General Assembly passes law to strengthen reporting of elder financial exploitation

Bill would create statewide training guide by January 2026

By **Susan Hogan, News4 Consumer Investigative Reporter** and **Katie Leslie** •

Published March 1, 2024 • Updated on March 1, 2024 at 8:07 pm



NEWS4 I-TEAM

Virginia General Assembly passes law to strengthen reporting of elder financial exploitation

Bill would create statewide training guide by January 2026

By Susan Hogan, News4 Consumer Investigative Reporter and Katie Leslie •

Published March 1, 2024 • Updated on March 1, 2024 at 8:07 pm



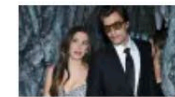
NEWS 4 I-TEAM

VA LAWMAKERS PASS BILL TO PREVENT ELDER EXPLOITATION

THROUGH HIS PAPERWORK AND



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CELEBRITY NEWS

See Millie Bobby Brown in Jon Bon Jovi's new family photo with fiancé Jake



KING CHARLES III

King Charles' wife Queen Camilla taking a break from royal duties



RESTAURANTS

41 locations of Outback, Carrabba's and Bonefish Grill have closed



UNIVERSITY OF MARYLAND (UMD)

University of Maryland suspends fraternities and sororities pending investigation

Virginia General Assembly passes law to strengthen reporting of elder financial exploitation

Bill would create statewide training guide by January 2026

By **Susan Hogan, News4 Consumer Investigative Reporter** and **Katie Leslie** •

Published March 1, 2024 • Updated on March 1, 2024 at 8:07 pm



PASSAGE OF "LARRY'S LAW"

- NEW VIRGINIA TRAINING GUIDELINES BY JAN. 2026
- ENCOURAGE BANKS TO CONTACT TRUSTED PERSON, AUTHORITIES WITH CONCERNS
- BANKS THAT UNDERGO TRAINING WON'T BE HELD LIABLE FOR DISCLOSURES

A BILL PASSED UNANIMOUSLY
EARLIER THIS WEEK THROUGH THE

Trending Stories



FALLS CHURCH

Teen driver charged with DUI manslaughter after Falls Church crash that killed 1, hurt 4



RESTAURANTS

41 locations of Outback, Carrabba's and Bonefish Grill have closed



UNIVERSITY OF MARYLAND (UMD)

University of Maryland suspends fraternities and sororities pending investigation



KING CHARLES III

King Charles' wife Queen Camilla taking a break from royal duties

Virginia General Assembly



Virginia General Assembly passes law to strengthen reporting of elder financial exploitation

Del. Michelle Maldonado, D-Manassas, sponsored the Virginia Senior Safe Act, though she calls the bill “Larry’s Law” in honor of a local Navy veteran whose family says lost more than \$3 million in an alleged wire fraud scheme.

The News4 I-Team first reported Larry Cook’s story last year after, his family says, his credit union should have done more to stop him from wiring millions overseas.

His family said they discovered the apparent scam after his death when paperwork showed he had made nearly 75 wire transfers overseas in 2022. The family believes he was vulnerable to fraud after suffering a stroke that left him cognitively impaired.

Bank was denied.



Family Sues Banks After Veteran Allegedly Loses \$3.6 Million in Wire Fraud Scheme

Satterfield, who is serving as the administrator of her uncle's estate, told the I-Team Cook was a decorated Navy commander and nuclear submarine officer who was known in the family as a meticulous record keeper. In the complaint, she said that began to change when he suffered a stroke in 2019 that left him cognitively impaired.

When he died two years later at age 76, Satterfield had a chance to review his once meticulous records and said she discovered "mind-boggling amounts of wires, mostly to Thailand."

She believes her uncle was duped into an elaborate wire fraud scheme that may have begun with a phishing email from a scammer pretending to be Amazon, alerting her uncle to a purchase he never made. The complaint indicates that, soon after receiving that email, Cook began sending wires worth nearly \$50,000 each overseas. They were earmarked as "loan repayment."

Actions to take NOW to protect an elderly from financial predators

1. Conduct a vulnerability assessment. Why? Because this is what the predators do! Look at the following factors:
 1. Your age?
 2. Is your partner still alive?
 3. Are you active in the community, or are you isolated?
 4. Do you have trusted and responsible family members living close by, or far away?
 5. Are you healthy, or do you have an illness?
 6. Are you high risk for dementia?
 7. Are you susceptible to an investment scheme? Depends on if you are confident that you have adequate life savings.
 8. Are you susceptible to a romance scheme?
2. Begin conducting this assessment at age 65, and conduct it annually with a trusted and responsible family member. The earlier in life you begin this process, the better!
3. If your assessment identifies “vulnerabilities”, then work with a trusted and responsible person to reduce these vulnerabilities.

Actions to take NOW to protect an elderly from financial predators

1. Slow down new relationships. Predators speed up relationships in order to create confusion. This tactic is found in the following schemes: Romance, Grandchild, Investment, and Tech Support.
2. Romance schemes - ask the individual to conduct a video call. Have a friend present.
3. Get additional telephone number.
4. Do not click on links in texts or emails.
5. Don't put your driver's license or credit card up to the camera.
6. Consider freezing your credit.
7. Have trusted and responsible family members visit more often. Even one more visit per year may make a difference.

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What to do if you spot elder financial abuse?

1. Report allegation to local law enforcement
2. If it is an internet-based crime, report to the FBI Internet Crime Complaint Center: ic3.gov
3. Report allegation to trusted family member
4. Consider measures to reduce predator's control of victim

CENTER FOR COMBATING ELDER FINANCIAL ABUSE

- Please visit our website, www.ENDEFA.org for more educational material.




CENTER FOR COMBATING ELDER FINANCIAL ABUSE

We conduct extensive research and provide comprehensive training to individuals and organizations to help prevent and stop elder financial abuse.

3,000 goal for the month of February - thank you!


We're celebrating our 2nd anniversary on February 8th! Please contact us if we can provide you with



Featured Content

William "Doc" Gallagher, Christian radio host, stole approximately \$32 million from elderly victims.

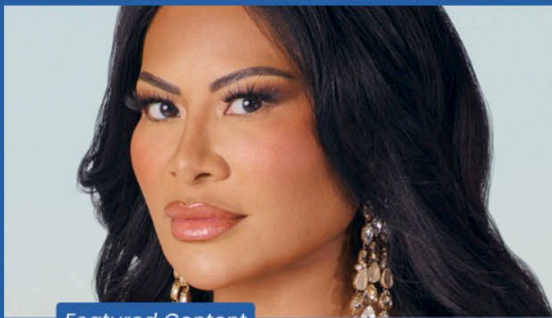
[Click here to read more](#)



Featured Content

Scott Kohn stole approximately \$300 million from elderly victims, including approximately 13,000 veterans.

[Click here to read more](#)

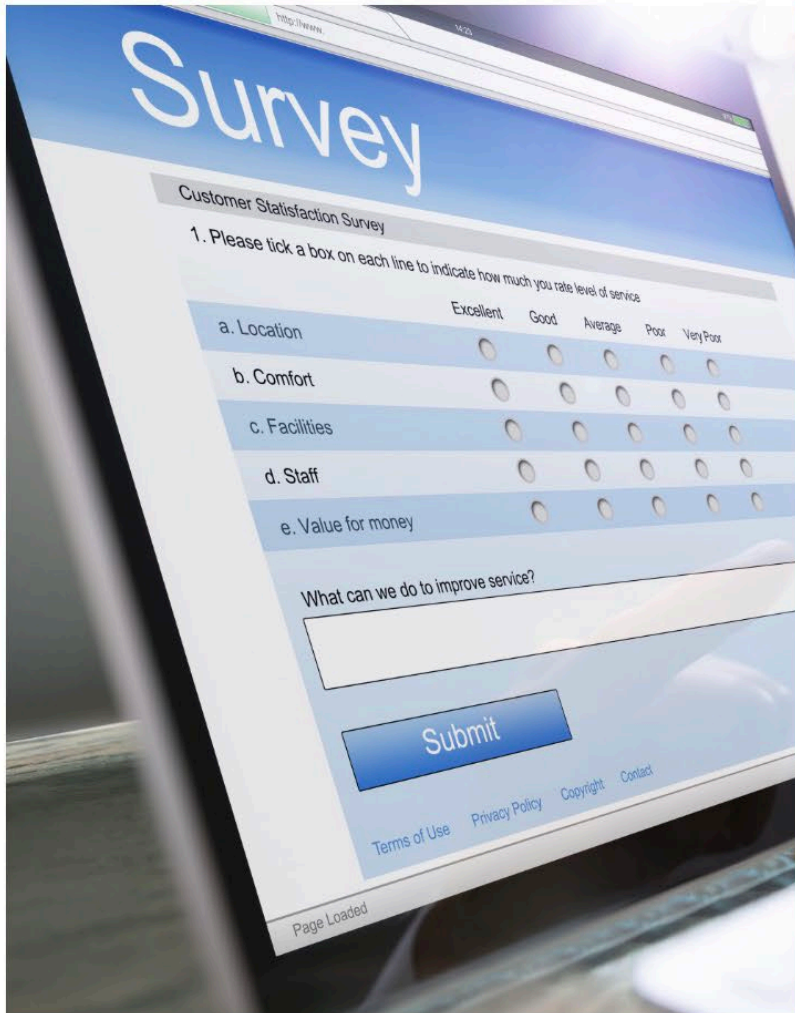


Featured Content

Jennifer Shah was a cast member of a reality show while she operated a nationwide telemarketing scheme.

[Click here to read more](#)

Financial Vulnerability Survey



Our Center is very happy to share the Financial Vulnerability Survey which was developed by the Wayne State University Institute of Gerontology. The survey consists of 17 questions and it provides older adults an assessment of how vulnerable they may, or may not, be to elder financial abuse.

Dr. Peter Lichtenberg is the Director of the Institute of Gerontology and he is also a national expert in financial capacity assessment and financial exploitation of older adults. Our Center thanks Dr. Lichtenberg for his efforts to develop the Financial Vulnerability Survey! To take the survey, please click the button below!

[Take the Survey](#)

High Exploitation Risk

Your responses show significant stress in key areas that impact financial decision making. They indicate that you have a greatly increased vulnerability to financial exploitation.

Exploitation Risk Rating: 16

Anyone can be vulnerable to financial exploitation, but some older adults are at increased risk. These questions measure the main stressors that can affect financial vulnerability and risk: daily finances, psychological aspects of finances and financial decision-making, and relationship pressures around finances.

RATING REFERENCE



Final Thought: Mickey Rooney

The late Mickey Rooney, age 90, before the Senate Aging Committee on March 2, 2011:

“I’m asking you to stop this elderly abuse. I mean stop it now. Not tomorrow, not next month, but now.”



Mickey Rooney testifies before the Senate Aging Committee about elder abuse in 2011 (AP Photo)

Center For Combating Elder Financial Abuse

