

Arizona Supreme Court
Administrative Office of the Courts



Fiduciary Certification

Compliance Audit

Lyndi Anderson

June, 2009

July 2, 2009

Lyndi Anderson
PO BOX 13986
Tucson, AZ 85732

RE: Fiduciary Compliance Audit

Dear Ms. Anderson:

Enclosed is the final compliance audit report for Lyndi Anderson #20358.

Thank you for the cooperation and assistance during the compliance audit process exhibited by you and your staff. Their hard work throughout the audit process has been appreciated. To the extent the fiduciary audit process will assist the court to ensure the safety, health and welfare of individuals and estates entrusted by the court to your management, we have benefited from our audit of Lyndi Anderson #20358. I hope you and your clients will equally benefit.

If you have any questions, please let me know at (602) 364-2378.

Sincerely,

Nancy Swetnam, Director
Certification and Licensing Division

Enclosures

c. Honorable Charles Harrington, Presiding Judge, Pima County

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Lyndi Anderson #20358

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Disclaimer

This final report represents the information and conditions encountered at the point in time of the audit and does not purport to represent conditions prior to or subsequent to the performed audit. The information presented does not represent an endorsement or denunciation of the audited fiduciary or business.

After this report is distributed to the audited fiduciary, presiding judge of the county and, if a public fiduciary, the county supervisors, it becomes public record.

EXECUTIVE SUMMARY

Executive Summary

Lyndi Anderson, #20358

Compliance Audit Report

The Arizona Supreme Court, Fiduciary Certification Program conducted a compliance audit of Lyndi Anderson, #20358, pursuant to Arizona Revised Statutes § 14-5651 and Arizona Supreme Court Administrative Order 2003-31. During the period of December 19, 2008 through February 2, 2009 the Compliance Unit audited the fiduciary activities of Lyndi Anderson #20358 and her uncertified employees. The following is a summary of the audit findings.

Finding # 1 – Certification Number

Lyndi Anderson submitted documents to the Superior Court in Santa Cruz County without the fiduciary's certification number.

Lyndi Anderson, #20358 did not agree or disagree with the finding.

Finding # 2 – Late Filings

Statutorily required report of a fiduciary client was submitted to the court after the due date.

Lyndi Anderson, #20358 did not agree or disagree with the finding.

Finding # 3 – Documentation

By AZ statute a fiduciary must keep suitable records of their administration and exhibit them upon request.

Lyndi Anderson, #20358, disagrees with the finding.

Finding # 4 – Accuracy

Inventory and Appraisements, Annual Accountings and Annual Reports of Guardian were inaccurately prepared and/or documented.

Lyndi Anderson, #20358, disagrees with the finding.

Executive Summary

Finding # 5 – Diligence

A fiduciary must exercise extreme care and diligence when making medical and financial decisions on behalf of a ward or protected person.

Lyndi Anderson, #20358 disagrees with the finding.

Finding # 6 – Conflict of Interest or Self-Dealing

A fiduciary must avoid self-dealing or the appearance of a conflict of interest.

Lyndi Anderson, #20358 did not agree or disagree with the finding.

Finding Dismissed.

FINAL REPORT

Lyndi Anderson #20358
Certified Fiduciary
Compliance Audit Report

Objective

A Compliance audit of Lyndi Anderson, #20358 was conducted pursuant to the Fiduciary Program's responsibilities as set forth in A.R.S. § 14-5651, Arizona Supreme Court Administrative Order No. 2003-31 and the Arizona Code of Judicial Administration (“ACJA”) §§ 7-201, 7-202.

The objective of the compliance audit was to determine compliance with applicable statutes, Arizona Supreme Court orders and rules and ACJA §§ 7-201, 7-202.

Methodology

In preparation for the compliance audit, preliminary survey questions were requested and responded to by Lyndi Anderson. The responses were reviewed and compiled to assist in the development of case file samples. In addition, information was requested from the Superior Court in Pima County to verify court appointment information.

In order to test for compliance, the program has developed and currently utilizes a set of fiduciary compliance attributes consisting of Arizona statutes, Arizona Supreme Court rules and ACJA §§ 7-201 and 7-202. Compliance with these requirements was tested by a staff interview, observation and reviewing samples of client case files.

The court appointed client case files review was designed to provide conclusions about the accuracy, validity and timeliness of transactions, internal controls and compliance with the fiduciary attributes.

Beginning January 26, 2009 and prior to beginning the onsite fieldwork, the auditors reviewed the client court files from the Superior Court in Pima County and conducted internal controls interview with Lyndi Anderson and staff.

During the period of January 26, 2009 through January 29, 2009 auditors from the Compliance Unit of the Certification and Licensing Division of the Administrative Office of the Courts, Arizona Supreme Court, conducted the onsite compliance portion of the audit of the Lyndi Anderson office. The onsite

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compliance audit consists primarily of fiduciary client case file review. The audit also included the fiduciary activities of the uncertified staff. An Exit Interview was conducted February 2, 2009.

Lyndi Anderson was the court appointed fiduciary on eleven (11) client cases at the time of fieldwork. The fiduciary has four power of attorney clients under contract and serves as trustee for four clients. Lyndi Anderson has approximately \$868,922 in court appointed client assets under management. Within Ms. Anderson's organization there is one certified fiduciary.

Scope

The compliance audit team reviewed a sample of five court appointed case files, focusing on the internal controls processes, timeliness, accuracy, statutory and code requirements of client case administration.

Summary

Lyndi Anderson is the owner of the uncertified business, Eldercare Research & Consulting, which employs one full time staff member and five part time employees. The fiduciary and staff extended professional courtesies and cooperation to the audit team during the course of the audit. Mrs. Anderson's case management skills demonstrate her attention to detail and concern for her clients.

The compliance audit found non-compliance in six (6) key areas. The non-compliance was found in the areas of accuracy, documentation and fiduciary responsibilities. These findings are discussed as follows:

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<p><i>Finding # 1</i></p> <p>➤ <i>Certification Number</i></p> <p><i>Related Attributes:</i></p> <p><i>Arizona Code of Judicial Administration § 7-202(F)(3)</i></p> <p><i>Requirement</i></p>	<p>Documents filed with the Superior Court must include the fiduciary’s certificate number on the documents submitted.</p> <ul style="list-style-type: none"> • Court documents filed for clients were missing the certification number (fiduciary’s certification number) – Clients #1, 2, 3 <p>Certified fiduciaries must include the required certification numbers on all documents submitted to the superior court.</p>
<p><i>Auditee's Response</i></p>	<p><i>“Auditee is aware of a few limited instances, where the fiduciary certification number was omitted by counsel (Client # 1). The fiduciary did not notice and correct the omission error. However, Auditee could not locate all the noted omissions (Client # 2 and #3), upon internal review of the files, and noticed that since the fiduciary number is often noted in the pleading caption, it may have been missed by the auditors due to location or placement of the number.”</i></p>
<p><i>Corrective Action</i></p>	<p><i>“For the last several years, all of the Auditee’s legal counsel have been given notice and instruction that the fiduciary number must be on <u>every</u> document submitted to the court by this fiduciary. Auditee has revisited this requirement with each of them, <u>in writing</u>, subsequent to this audit, and all will be even more carefully reviewing the documents for compliance.</i></p> <p><i>If it is a matter of the location of the fiduciary number within the document, the guidelines state it has to be anywhere on the document, and Auditee and respective counsel, believe that Auditee has been, and continues to be in compliance.”</i></p>

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<p><i>Finding # 2</i></p> <p>➤ <u>Late filings</u></p> <p><i>Related Attributes:</i></p> <p>ARS §§ 14-5315(A); 5418(A), 5419(A)</p> <p>Arizona Code of Judicial Administration § 7-202(J)(2)(e)</p> <p><i>Requirement</i></p>	<p>Required court filings were late.</p> <ul style="list-style-type: none"> • Late Inventory and Appraisement – Clients # 1, 5 <p>Ms. Anderson must submit the inventory and appraisement, on or before the statutorily required due date or court ordered due date for each client.</p>
<p><i>Auditee's Response</i></p>	<p><i>“In both instances the inventory was less than one month late. In both instances the Auditee was appointed by other parties and did not receive a minute entry. Consequently, the due date did not get calendared according to appointee’s prior internal practices.”</i></p>
<p><i>Corrective Action</i></p>	<p><i>“Due dates are now calendared by both fiduciary and counsel. Minute entries are now required by fiduciary for in house record keeping and scheduling.”</i></p>

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<p><i>Finding #3</i></p> <p>➤ <i>Documentation</i></p> <p><i>Related Attributes:</i></p> <p>A.R.S. § 14-5418(B)</p> <p><i>Requirement</i></p>	<p>By AZ statute a fiduciary must keep suitable records of their administration and exhibit them upon request.</p> <ul style="list-style-type: none"> • Inheritance from death of wife is not reflected in accounting schedules – Client # 5 <p>A fiduciary must develop a systematic process for marshalling, securing and documenting the administration of a client’s estate and/or care to include all assets, transactions, activities and decision-making for each court appointed client.</p>
<p><i>Auditee's Response</i></p>	<p><i>“The original inventory was split half to husband and half to wife. The court was noticed of her death and petition for instruction to combine the estate into one accounting. Counsel and Auditee complied with orders and instruction and followed the procedures approved granting authority to combine the accountings, and the accountings were subsequently approved as well. Auditee respectfully disagrees with finding #3 based on the court orders and approval of same.”</i></p>
<p><i>Corrective Action</i></p>	<p><i>“Auditee maintains that no corrective action is appropriate, as court was petitioned and orders were granted by the court confirming the acceptability of the procedures used.”</i></p> <hr/> <p>AUDITOR’S NOTE: Finding Stands. File did not indicate/document correct actions of fiduciary.</p>

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<p><i>Finding #4</i></p> <p>➤ <i>Accuracy</i></p> <p><i>Related Attributes:</i></p> <p><i>Arizona Code of Judicial Administration §§ 7-202 (J)(4)(j) & 7-202 (J)(5)(h)</i></p> <p><i>Requirement</i></p>	<p>Required court documents are not accurate.</p> <ul style="list-style-type: none"> • The balance of Annual Accounting Disbursements Schedule 5 is not correct. – Client # 1 • Bank of America interest not reflected on first annual accounting – Client # 3 • Inventory Balance differs from Beginning Accounting balance – Client # 5 • Inconsistent Mileage Charge on Eldercare Research & Consulting invoice dated 1/19/09– Client # 5 • Overpayment on 12/1/05 Attorney invoice – Client # 5 • Total of attorney fees reflected on the Attorney Fee Affidavit cover sheet are incorrect – Client # 5 • Reimbursement of employee is reflected in accounting as payment to Banking institution. <p>Ms. Lyndi Anderson must ensure every document filed with the Superior Court is complete, accurate and understandable.</p>
<p><i>Auditee's Response</i></p>	<ul style="list-style-type: none"> • <i>“Concern: <u>The balance of Disbursements Schedule 5 is not correct</u> for Client # 1 . Response: The totals were correct, but the line item detail of the accounting was off by \$2,407, which was included in the total, because two line items were omitted during typing (one was a check for \$2,400 which is referenced as an outstanding check on the final page of the accounting, and the other was a check to MVD \$7.00 for a new car title). There was a typing entry error in the accounting which went unchecked. The accounting preparer has subsequently gone to an excel working document which double checks the validity of the final document reconciling it to the transaction reports of Quickbooks.</i> • <i><u>Bank of America totals listed on inventory do not match Bank of America totals on first annual accounting – Client # 3.</u> Response: the inventory reflected individual holdings at Bank of America at the time of appointment and those figures are accurate. The annual accounting shows the receipt of a higher number which reflects the interest</i>

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earned between the date of appointment and the actual date the funds were received by the Auditee. Auditee had difficulty securing the assets due to the policies of the banking institution. The amounts in both cases were accurate. They could have been split to separate out the interest, but otherwise were accurately posted to the accounts as they were received, and caused no harm to the client.

- *Inventory Balance differs from Beginning Accounting balance – Client # 5. Response: Auditee has little information with which to evaluate this finding but believes it is related to the Finding #3 above, and has nothing further to add without clarification.*
- *Inconsistent mileage charge. Response: Auditee bills mileage at the stated rate recognized by the Internal Revenue Service and it does vary with the fluctuation in the economy. The rates are modified according to the press releases provided to me by both the IRS and my accountant. For the billing period noted above the billing rate changed from \$.585 in 2008 to \$.55 1/1/09. The mileage prior to 12/31/2008 was correctly invoiced with one exception, in one instance the mileage was billed for 12/02/2008 at the new reduced rate and resulted in a lesser charge to the ward.*
- *Overpayment on 12/1/05 Attorney invoice – Client # 5. Response: There was no overpayment of this invoice, there are two pages, one for \$225 on invoice 24106 and \$30, on invoice 24107. Apparently the auditor missed the second page. The two invoices were paid together in the total amount of \$255. Details of same can be provided on request.*

AUDITOR’S NOTE: Above example of the overpayment finding is dismissed.

- *Total of attorney fees reflected on the Attorney Fee Affidavit cover sheet are incorrect – Client # 5. Response: Auditee has reviewed the file and the affidavit of fees is correct, and reconciles to the penny. Attorney was, in fact, paid \$9,151.21 for services during that accounting period, and that matches both the Quickbooks detail (available in*

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	<p><i>file if needed) as well as the invoices in the file. Perhaps the packet attached to the Attorney's fee affidavit lost a page(s) during reproduction to the fiduciary, but fiduciary has copies of all detail. Auditee denies the finding, and can provide documentation that this finding is incorrect."</i></p> <hr/> <p>AUDITOR'S NOTE: Above example of the finding is dismissed.</p> <hr/>
<p><i>Corrective Action</i></p>	<p><i>"Ms. Anderson takes extensive care to review and monitor accountings for accuracy by having the accountings prepared by an outside accountant, has the attorney of record review, and Ms. Anderson reviews the documents as well. Several of the findings in Finding #4 are in error and the Auditee has provided explanation and offers the documentation that the findings simply missed some detail leading to the error in the finding. The errors that were noted were typographical in nature, and remedies are already in place to prevent any further occurrence."</i></p>

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<p><i>Finding #5</i></p> <p>➤ <i>Diligence</i></p> <p><u><i>Related Attributes:</i></u></p> <p><i>Arizona Code of Judicial Administration § 7-202 (J)(4) & (J)(5)(d)</i></p> <p><i>Requirement</i></p>	<p>The fiduciary must exercise extreme care and diligence when making medical and financial decisions on behalf of a ward or protected person.</p> <ul style="list-style-type: none"> • Bond was not timely amended to reflect inheritance and appraisal of jewelry – Client # 3 • Dish Network, 4/25/05 invoice payment, was not paid timely resulting in late charge to the client– Client #5 <p>Diligence equates to the competent management of the property and income of a client’s estate.</p>
<p><i>Auditee's Response</i></p>	<ul style="list-style-type: none"> • <i>“Auditee respectfully disagrees, the fiduciary requested the bond increase, and bond was in fact increased immediately upon order of the court, effective 7/9/2008 and proof of bond and filing of bond is available in the file. This finding is an error: the bond was increased from \$200,000 to \$465,000 at the time of unrestricting the accounts for Client #3. Auditee will be happy to forward copies of the documentation.</i> • <i>Dish network had a number of issues with billing and crediting prior service. The bill in question was paid once fiduciary could determine that the balance was finally corrected. It was received a few days late by vendor.”</i>
<p><i>Corrective Action</i></p>	<p><i>“In every case, Auditee has bonds in place and modified according to court order immediately upon court notice of bond increase or decrease.</i></p> <p><i>Auditee makes every effort to exercise extreme care and diligence in managing the protected resources. Bills that are approved for payment are now paid daily upon receipt.”</i></p> <hr/> <p>AUDITOR’S NOTE: Finding Stands. The bond was increased from \$200,000 to \$465,000 when the accounts were unrestricted. They were not increased to cover the appraised jewelry.</p>

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<p><i>Finding # 6</i></p> <p>➤ <i>Conflict of Interest or Self-Dealing</i></p> <p><u><i>Related Attributes:</i></u></p> <p><i>Arizona Code of Judicial Administration § 7-202, Code of Conduct, Standard 2(b)</i></p> <p><i>Requirement</i></p>	<p>By code the fiduciary must avoid self-dealing or the appearance of a conflict of interest.</p> <ul style="list-style-type: none"> • Principal wrote and signed a check to herself from a client account. Although the reimbursement was correct, it has the appearance of a conflict – Client # 5 <p>Ms. Anderson must avoid self-dealing and the appearance of a conflict of interest. Self-dealing or conflict of interest arises where the fiduciary has some personal or agency interest other individuals may perceive as self-serving or adverse to the position or best interest of the protected person.</p>
<p><i>Auditee's Response</i></p>	<p><i>“Auditee had to reimburse <u>an employee</u>, who paid to run advertisements to sell a vehicle in the Tucson Newspaper for the ward. The expense was not paid to the Auditee, or to her own credit card. Tucson Newspaper would not accept a check, the only way they would run the advertisements was with a credit card. The ward no longer had credit cards, and the Auditee authorized the expense, and reimbursed the employee, and properly documented the file with the appropriate paper trail. The wards do not generally have credit cards due to banking regulations for protected persons.”</i></p>
<p><i>Corrective Action</i></p>	<p><i>“The current practice is that when there is no alternative, purchases are made and documented, usually on the company credit card, and then invoiced on the company invoice as a reimbursement for purchases and then paid to the company as part of the fiduciary expense reimbursement and accounted for in the fiduciary’s statement of fees and cost submitted to the court with the annual accounting.”</i></p> <hr/> <p>AUDITOR’S NOTE: Finding Dismissed</p>

APPENDIX

RESPONSE TO FINAL REPORT

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Draft Compliance Audit Report

Objective

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The objective of the compliance audit was to determine compliance with applicable statutes, Arizona Supreme Court orders and rules and ACJA §§ 7-201, 7-202.

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Summary

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Draft Compliance Audit Report

<p><i>Finding # 1</i></p> <p>➤ <i>Certification Number</i></p> <p><i>Related Attributes:</i></p> <p><i>Arizona Code of Judicial Administration § 7-202(F)(3)</i></p> <p><i>Requirement</i></p>	<p>Documents filed with the Superior Court must include the fiduciary’s certificate number on the documents submitted.</p> <ul style="list-style-type: none"> • Court documents filed for clients were missing the certification number (fiduciary’s certification number) – Clients #1, 2, 3 <p>Certified fiduciaries must include the required certification numbers on all documents submitted to the superior court.</p>
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<p><i>Corrective Action</i></p>	<p><i>“For the last several years, all of the Auditee’s legal counsel have been given notice and instruction that the fiduciary number must be on every document submitted to the court by this fiduciary. Auditee has revisited this requirement with each of them, in writing, subsequent to this audit, and all will be even more carefully reviewing the documents for compliance.</i></p> <p><i>If it is a matter of the location of the fiduciary number within the document, the guidelines state it has to be anywhere on the document, and Auditee and respective counsel, believe that Auditee has been, and continues to be in compliance.”</i></p>

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<p><i>Finding # 2</i></p> <p>➤ <u>Late filings</u></p> <p><i>Related Attributes:</i></p> <p>ARS §§ 14-5315(A); 5418(A), 5419(A)</p> <p>Arizona Code of Judicial Administration § 7-202(J)(2)(e)</p> <p><i>Requirement</i></p>	<p>Required court filings were late.</p> <ul style="list-style-type: none"> • Late Inventory and Appraisalment – Clients # 1, 5 <p>Ms. Anderson must submit the inventory and appraisalment, on or before the statutorily required due date or court ordered due date for each client.</p>
<p><i>Auditee's Response</i></p>	<p><i>“In both instances the inventory was less than one month late. In both instances the Auditee was appointed by other parties and did not receive a minute entry. Consequently, the due date did not get calendared according to appointee’s prior internal practices.”</i></p>
<p><i>Corrective Action</i></p>	<p><i>“Due dates are now calendared by both fiduciary and counsel. Minute entries are now required by fiduciary for in house record keeping and scheduling.”</i></p>

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<p><i>Finding #3</i></p> <p>➤ <i>Documentation</i></p> <p><i>Related Attributes:</i></p> <p>A.R.S. § 14-5418(B)</p> <p><i>Requirement</i></p>	<p>By AZ statute a fiduciary must keep suitable records of their administration and exhibit them upon request.</p> <ul style="list-style-type: none"> • Inheritance from death of wife is not reflected in accounting schedules – Client # 5 <p>A fiduciary must develop a systematic process for marshalling, securing and documenting the administration of a client’s estate and/or care to include all assets, transactions, activities and decision-making for each court appointed client.</p>
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<p><i>Finding #4</i></p> <p>➤ <i>Accuracy</i></p> <p><i>Related Attributes:</i></p> <p><i>Arizona Code of Judicial Administration §§ 7-202 (J)(4)(j) & 7-202 (J)(5)(h)</i></p> <p><i>Requirement</i></p>	<p>Required court documents are not accurate.</p> <ul style="list-style-type: none"> • The balance of Disbursements Schedule 5 is not correct. – Client # 1 • Bank of America totals listed on inventory do not match Bank of America totals on first annual accounting – Client # 3 • Inventory Balance differs from Beginning Accounting balance – Client # 5 • Inconsistent Mileage Charge on Eldercare Research & Consulting invoice dated 1/19/09– Client # 5 • Overpayment on 12/1/05 Attorney invoice – Client # 5 • Total of attorney fees reflected on the Attorney Fee Affidavit cover sheet are incorrect – Client # 5 <p>Ms. Lyndi Anderson must ensure every document filed with the Superior Court is complete, accurate and understandable.</p>
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Corrective Action

“Ms. Anderson takes extensive care to review and monitor accountings for accuracy by having the accountings prepared by an outside accountant, has the attorney of record review, and Ms. Anderson reviews the documents as well. Several of the findings in Finding #4 are in error and the Auditee has provided explanation and offers the documentation that the findings simply missed some detail leading to the error in the finding. The errors that were noted were typographical in nature, and remedies are already in place to prevent any further occurrence.”

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<p><i>Finding #5</i></p> <p>➤ <i>Diligence</i></p> <p><u><i>Related Attributes:</i></u></p> <p><i>Arizona Code of Judicial Administration § 7-202 (J)(4) & (J)(5)(d)</i></p> <p><i>Requirement</i></p>	<p>The fiduciary must exercise extreme care and diligence when making medical and financial decisions on behalf of a ward or protected person.</p> <ul style="list-style-type: none"> • Bond was not adjusted when accounts were unrestricted – Client # 3 • Dish Network, 4/25/05 invoice payment, was not paid timely resulting in late charge to the client– Client #5 <p>Diligence equates to the competent management of the property and income of a client’s estate.</p>
<p><i>Auditee's Response</i></p>	<ul style="list-style-type: none"> • <i>“Auditee respectfully disagrees, the fiduciary requested the bond increase, and bond was in fact increased immediately upon order of the court, effective 7/9/2008 and proof of bond and filing of bond is available in the file. This finding is an error: the bond was increased from \$200,000 to \$465,000 at the time of unrestricting the accounts for Client #3. Auditee will be happy to forward copies of the documentation.</i> • <i>Dish network had a number of issues with billing and crediting prior service. The bill in question was paid once fiduciary could determine that the balance was finally corrected. It was received a few days late by vendor.”</i>
<p><i>Corrective Action</i></p>	<p><i>“In every case, Auditee has bonds in place and modified according to court order immediately upon court notice of bond increase or decrease.</i></p> <p><i>Auditee makes every effort to exercise extreme care and diligence in managing the protected resources. Bills that are approved for payment are now paid daily upon receipt.”</i></p>

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<p>Finding # 6</p> <p>➤ Conflict of Interest or Self-Dealing</p> <p><i>Related Attributes:</i></p> <p>Arizona Code of Judicial Administration § 7-202, Code of Conduct, Standard 2(b)</p> <p>Requirement</p>	<p>By code the fiduciary must avoid self-dealing or the appearance of a conflict of interest.</p> <ul style="list-style-type: none"> • Principal wrote and signed a check to herself from a client account. Although the reimbursement was correct, it has the appearance of a conflict – Client # 5 <p>Ms. Anderson must avoid self-dealing and the appearance of a conflict of interest. Self-dealing or conflict of interest arises where the fiduciary has some personal or agency interest other individuals may perceive as self-serving or adverse to the position or best interest of the protected person.</p>
<p>Auditee's Response</p>	<p><i>“Auditee had to reimburse <u>an employee</u>, who paid to run advertisements to sell a vehicle in the Tucson Newspaper for the ward. The expense was not paid to the Auditee, or to her own credit card. Tucson Newspaper would not accept a check, the only way they would run the advertisements was with a credit card. The ward no longer had credit cards, and the Auditee authorized the expense, and reimbursed the employee, and properly documented the file with the appropriate paper trail. The wards do not generally have credit cards due to banking regulations for protected persons.”</i></p>
<p>Corrective Action</p>	<p><i>“The current practice is that when there is no alternative, purchases are made and documented, usually on the company credit card, and then invoiced on the company invoice as a reimbursement for purchases and then paid to the company as part of the fiduciary expense reimbursement and accounted for in the fiduciary’s statement of fees and cost submitted to the court with the annual accounting.”</i></p>