Having retired from AG Edwards as an investment broker, I can say that not all fraud is based on cognitive disability. My client was vulnerable because she lost her husband, lived remotely and was very lonely. Started playing the lottery and a criminal group out of Canada reduced her estate from approximately three million to thirty-five thousand dollars. A CPA, myself, a bank and a doctor's office all risked disciplinary action for working together on confidential issues. Her only disability was loneliness for which there is no exam. Her co-trustee, her son, stated "It's her money." His tune changed when she died.

The bank told me she was making large checks out to people she couldn't explain and she also asked me to withdraw \$100,000.00 which was totally out of character. I insisted on hand delivering the check and also insisted we have a couple of strong drinks and under their influence did she admit what was going on, but was also very embarrassed. Gave me back the check and it was re-deposited to her account. I retired and the rest is history. FBI said she was on a "sucker" list.

There needs to be a whole assessment requirement, not just cognitive.